# COUNTY OF RIVERSIDE ENVIRONMENTAL ASSESSMENT FORM: INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Environmental Assessment (CEQ / EA) Number: 43045 Project Case Type (s) and Number(s): Conditional Use Permit No. 3776 Lead Agency Name: County of Riverside Planning Department Address: 4080 Lemon Street 12<sup>th</sup> Floor, Riverside, CA 92501 Contact Person: Jose Merlan Telephone Number: 951-955-0314 Applicant's Name: John Rowland Prime Development Applicant's Address: 412 Olive Ave #475 Huntington Beach, CA 92648 Final Date Adented by Hearing Bedry

# Final – Date Adopted by Hearing Body:

#### I. PROJECT INFORMATION

**Project Description:** The proposed Project, Conditional Use Permit No. 3776, consists of the proposal to build a luxury mobile "Modular" home park with 71-units each with 2 bedrooms and 2 bathrooms and associated two-car garages, a clubhouse, dog park, swimming pool, spa, and numerous walking trails. The proposed Project also includes associated driveways, access roads, and related appurtenances. The proposed Project site is approximately 10.02 gross acres (9.07 net acres). Much of the site is currently vacant with an existing drainage facility located on the northern most corner of the Project site. Main access into the gated community is from Union Street and emergency access is provided along Corydon Street. A concrete drainage channel will be located on the southwestern area portion of the Project site. A 15' access road for Flood Control Maintenance will be located along the Project's western boundary. There are four (4) floor plan varieties that will be offered to Aged-qualified (55+) residents. Each unit will be energy efficient and powered by Graphene solar panels as well as back up batteries in case of a power outage. The lot size ranges from 2,500 square feet to 3,603 square feet and the unit's living area will include four optional floor plans including 853 square-feet, 904 square-feet, 958 square-feet, and 988 square-feet. All units will include a 400 square-foot two car garage.

The units will range in size from 958 SF to 1,086 SF. The Project site will be landscaped with a waterwise plant palette approved by County Department of Transportation – Landscape Division. All common areas will be maintained under a maintenance and amenities agreement and included in the monthly space rent.

The following Project exhibits are provided as Attachment A and includes Exhibit A: Site Plan, Exhibit B: Modular Floor Plans and Elevation Renderings, Exhibit C: Club House Elevation, Exhibit D: Grading Plans, and Exhibit E: Landscape Plans

**Project Location:** The Project is located on the southwest corner of the Corydon Road and Union Street intersection within the Lakeland Village Community of unincorporated Riverside County (Figure 1: Project Location). The Project site is located south of City of Lake Elsinore and north of City of Wildomar. More specifically, the Project site includes two lots that are identified as Assessor's Parcel Number 370-310-012 and 370-310-002.



Figure 1- Project Site



	T			o :	
А.	Type of Project:	Site Specific $\boxtimes$ ;	Countywide $\square$ ;	Community $\square$ ;	Policy 📋.

B. Total Project Area:

Residential Acres: 10.02	Lots: 2	Units: 71	Projected No. of Residents: 144
Commercial Acres: N/A	Lots: N/A	Sq. Ft. of Bldg. Area: N/A	Est. No. of Employees: N/A
Industrial Acres: N/A	Lots: N/A	Sq. Ft. of Bldg. Area: N/A	Est. No. of Employees: N/A
Other: N/A			

C. Assessor's Parcel No(s): 370-310-002 and 370-310-012

Street References: South of Union Street, west of Corydon Road, north of Grand Avenue

- **D. Section, Township & Range Description or reference/attach a Legal Description:** Township 6 South, Range 4 West, Section 28.
- E. Brief description of the existing environmental setting of the Project site and its surroundings: The site consists of vacant land located in Riverside County, California. It is bordered by a mix of vacant lands and residential development in all directions. Vacant, maintained lots exist to the west, south, and east. The vacant lots are located adjacent to existing residential developments. The Project site is relatively flat and appears to be routinely maintained. The elevation on the Project site is approximately 1,300 feet above mean sea-level (AMSL).

# II. APPLICABLE GENERAL PLAN AND ZONING REGULATIONS

#### A. General Plan Elements/Policies:

- 1. Land Use: The proposed Project will meet all applicable countywide and Area Plan policies (LU 1.1 to LU 37.5) located in the Land Use Element chapter of the Riverside County General Plan and Elsinore Area Plan. The proposed Project is located within a Mixed-Use Area (MUA) and adheres to the policies for the Community Development: Mixed-Use Area land use designation. MUA developments include "more affordable housing, life-cycle housing" which is consistent with this residential Project. LU 33.1 states that MUA designation may be developed pursuant to any zoning classification that meets the intent of a communitylevel policy area, as described in each area plan. The Project area falls within the Lakeland Village Policy Area (LVPA) of the Elsinore Area Plan (ELAP) and furthers and does not conflict with applicable policies ELAP 6.1 to ELAP 6.30. The Project site is within Neighborhood 8 which is described as predominantly vacant with existing development in the southeast corner of the neighborhood. The existing development includes an existing commercial center, as well as single family residences located in the southwest portion of the site, adjacent to the commercial center and along Gill Lane. The Project would not conflict with the LVPA or the ELAP policies, including ELAP 6.1 to ELAP 6.30, or the General Plan policies.
- **2. Circulation:** The proposed Project would not conflict with Circulation Element policies C 1.1 to C 25.2, as set forth in the General Plan. The Project includes two-car garages for each unit and may slightly increase overall circulation in this area. It does not interfere with any transportation programs/plans.
- 3. Multipurpose Open Space: No natural open space land is required to be preserved within the boundaries of the Project site. The proposed Project includes the development of recreational areas including, a park, a clubhouse, dog park, swimming pool, gym, spa, and walking trails. The proposed Project would be consistent with or otherwise would not conflict

with the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). The proposed Project site is within Criteria Cell No. 5342 of the MSHCP, as such a Habitat Assessment & Negotiation Strategy (HANS) was prepared and determined that the project is consistent with the MSHCP. Pollutant discharges will be minimized and aimed away from drainages during construction. There are no agricultural or forest resources within the Project area. All applicable Multipurpose Open Space Element conservation and preservation policies (OS 1.1 to OS 22.5) within the General Plan are met for this Project.

- 4. Safety: The proposed Project allows for sufficient provision of emergency response services to the future users of the Project through the Project's design features (fire access lanes, vertical and horizontal clearances). The Project will comply with all applicable policies (S 1.1 to S 7.15) and issues within the Safety Element chapter of the General Plan. The proposed Project site is located within a FEMA Flood Zone X, Other Areas, determined to be outside the 0.2% annual chance of floodplain. Further, the Project site is not located within any other special hazard zone, including liquefaction hazard, fault zone, high fire hazard, dam inundation zone, etc.
- 5. Noise: Sufficient mitigation against any foreseeable noise impacts have been incorporated into the design of the Project. The proposed Project meets all applicable Noise Element policies and would not exceed Riverside County noise standards as concluded by the analysis contained herein. The Project's construction and operational activities are required to comply with the Riverside County Noise Ordinance found in County Code Section 9.52.020.
- **6. Housing:** The proposed Project will meet all applicable housing element goals, policies (H 1.1 to H 5.6), and actions (H-1 to H-32) set forth in the General Plan. The Project is expected to have a direct increase in population by providing 71 two-bedroom housing units in a 55+ community.
- **7. Air Quality:** The proposed Project will help advance all applicable Air Quality Element policies (AQ 1.1 to AQ 29.4) within the General Plan. The proposed Project has been conditioned to control any fugitive dust during grading and construction activities in compliance with Policy AQ 4.9. The proposed Project advances all other applicable Air Quality element policies.
- 8. **Healthy Communities:** The proposed Project will meet all applicable Health Community Policies (HC 1.1 to HC 14.3) within the General Plan.
- **9. Environmental Justice:**The proposed Project is not within an Environment Justice Community.
- B. General Plan Area Plan(s): Elsinore Area Plan
- C. Foundation Component(s): Community Development
- **D. Land Use Designation(s):** Mixed-Use Area (MUA)
- E. Overlay(s), if any: N/A
- F. Policy Area(s), if any: Lakeland Village Policy Area
- G. Adjacent and Surrounding:

- 1. General Plan Area Plan(s): Southwest Area Plan to the south, Sun City/Menifee Valley to the east, County of Orange to the west and Mead Valley and Lake Mathews Area Plans to the north.
- 2. Foundation Component(s): Community Development, Open Space, Rural Community, and Rural
- 3. Land Use Designation(s):

North: Low Density Residential and City of Lake Elsinore South: Commercial Retail and City of Lake Elsinore East: City of Lake Elsinore West: Low Density and Medium Density Residential

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

#### H. Adopted Specific Plan Information

- 1. Name and Number of Specific Plan, if any: N/A
- 2. Specific Plan Planning Area, and Policies, if any: N/A
- I. Existing Zoning: General Residential (R-3), General Commercial (C-1/C-P), Watercourse, Watershed and Conservation Areas (W-1), and Rural Residential (R-R)
- J. Proposed Zoning, if any: N/A

#### K. Adjacent and Surrounding Zoning:

North: City of Lake Elsinore South: General Commercial (C-1/C-P)/City of Wildomar East: City of Wildomar/City of Lake Elsinore West: Rural Residential (R-R)

# III. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

# IV. DETERMINATION

On the basis of this initial evaluation:

A PREVIOUS ENVIRONMENTAL IMPACT REPORT/NEGATIVE DECLARATION WAS NOT PREPARED

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

 $\square$  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

For: John Hildebrand *Planning Director* 

Printed Name

# V. ENVIRONMENTAL ISSUES ASSESSMENT

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

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

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

a) According to the Department of Transportation, CA Scenic Highway Mapping System, the Project site is not located within or adjacent to a Scenic Highway. Highway 74 is located approximately 4 miles northwest of the site and the Interstate 15 freeway is located approximately 1.8 miles northeast of the site. Both highways are designated as State Eligible scenic highways. However, the Project site is not within view of either of these highways and is surrounded by existing commercial and residential uses which are consistent with the proposed Project. The establishment of the proposed mobile home residential complex would not obstruct the viewshed from either Highway 74 or the Interstate 15 freeway. The Project would not affect scenic highway corridors. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

Findings of Fact: No Impact

Mitigation: No mitigation is required.

b) The Project site consists of vacant land. Land uses within the vicinity of the site consist of an existing commercial center, as well as single family residences located to the southwest, single-family residences to the north, and vacant lands and single family residences to the east and west. The proposed Project would alter the existing visual character of the Project site from undeveloped vacant land to construct a mobile "modular" home residential complex with a total of 71 mobile "Modular" home units. Although the proposed Project would change the visual characteristics of the Project site by developing the site, the design of the Project would be consistent with the visual character within the Project area. The Project site does not contain scenic resources or unique features such as mature trees or rock outcroppings.

Although the surrounding project area is generally urbanized, the Santa Ana Mountains located to the west of the site provide scenic vistas to surrounding residents. As stated above, the design of the Project would be consistent with the visual character within the Project area. The proposed Project would be subject to a Design Review to ensure that project plans are consistent with established County design guidelines for residential uses. The character of the proposed Project would be compatible with the surrounding uses in the Project vicinity. As such, the proposed Project would not substantially degrade the existing visual character or quality of public views of the Project site and its surroundings or the Santa Ana Mountains to the west. Therefore, the proposed Project would not damage scenic resources, or degrade the existing visual quality of public views surrounding the site. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

#### Findings of Fact: No Impact

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

c) See Response to 1c above. The Project site is not located within a non-urbanized area and would not degrade the existing visual character or quality of public views of the site and its surroundings. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

#### Findings of Fact: No Impact

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

<ul><li><b>Mt. Palomar Observatory</b></li><li>a) Interfere with the nighttime use of the Mt. Palomar</li></ul>		$\boxtimes$	
Observatory, as protected through Riverside County Ordinance No. 655?			

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

a) County of Riverside Ordinance No. 655 regulates light pollution and establishes standards to limit light leakage in order to reduce interference with nighttime astrological observation and research conducted at the Mount Palomar Observatory. Ordinance No. 655 established two zones based on radial distance from the Mount Palomar Observatory, which is located in northern San Diego County. The two zones are comprised of two concentric circles, the larger outer circle is 45-mile radius, and the smaller inner circle is 15-mile radius with the Palomar Observatory at the center. L The Project site is

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

located within Zone B of the Mt. Palomar Special Lighting Areas, and, therefore, is subject to the special lighting policies and procedures designed to address impacts on the Mt. Palomar Observatory. Therefore, because the Project would be required to comply with Ordinance No. 655, the Project's potential to interfere with the nighttime use of the Mt. Palomar observatory would be less than significant, and no mitigation measures are required.

Findings of Fact: Less Than Significant

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

<b>3. Other Lighting Issues</b> a) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			
b) Expose residential property to unacceptable light levels?		$\boxtimes$	

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

a) The Project site is located in an urbanized area, which is subject to preexisting exterior lighting from surrounding development and existing street lighting.

Construction of the proposed Project would include temporary light and glare resulting from construction activities that could adversely affect day or nighttime views. Sources of construction-related light and glare include usage of construction vehicles and equipment; however, construction activities are anticipated to occur primarily during daylight hours in compliance with the County's Noise Ordinance No. 847 and once construction is completed, light and glare from these activities would cease to occur.

The main sources of daytime glare are generally sunlight reflecting from structures and other reflective surfaces and windows. Implementation of the proposed Project would introduce new sources of daytime glare through the construction of new structures and use of automobiles traveling to and from the project site. Building materials (i.e., reflective glass and polished surfaces) are the most substantial sources of glare. The proposed buildings would incorporate a variety of building materials, which would primarily be non-reflective materials; therefore, these materials would not have the potential to produce a substantial degree of glare. In addition, the proposed Project would include exterior lighting on the Project site for safety and building identification purposes. As such, the proposed Project would introduce new sources of light and glare to the area in the form of exterior lighting. As identified above, nearby parcels consist of single family residential and commercial uses; as such, the project area contains many existing sources of nighttime illumination. These include street and parking area lights, landscape lighting, security lighting, and exterior lighting on existing buildings. Therefore, new sources of light and glare associated with the project would not be substantial in the context of existing lighting sources. In addition, all lighting would comply with applicable standards from the County of Riverside Ordinance No. 655, Riverside County Ordinance No. 915 (Outdoor Lighting), and California Building Code standards, which would ensure that light and glare impacts from the proposed Project would be less than significant. Furthermore, as a project feature, an exterior lighting plan shall be submitted to

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Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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the County for review and approval prior to construction of the project. As such, a less than significant impact would occur directly, indirectly and cumulatively related to new sources of substantial light and glare which would adversely affect day or nighttime views. No mitigation would be required.

Finding of Fact: Less than Significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

b) The nearest sensitive receptors to the Project site are single family residences to the north and east, which are separated from the Project site by Union Street and Corydon Road. The Project would be required to comply with Riverside County Ordinance No. 915 (Outdoor Lighting), which generally would preclude significant lighting impacts to surrounding properties, including existing single family homes. Mandatory compliance with the County's lighting requirements would ensure that the Project would not expose residents or residential properties to unacceptable light levels, and a less-than-significant impact would occur.

Finding of Fact: Less than Significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

AGRICULTURE & FOREST RESOURCES Would the Project:		
<b>4. Agriculture</b> a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?		
b) Conflict with existing agricultural zoning, agricultural use or with land subject to a Williamson Act contract or land within a Riverside County Agricultural Preserve?		$\boxtimes$
c) Cause development of non-agricultural uses within 300 feet of agriculturally zoned property (Ordinance No. 625 "Right-to-Farm")?		
d) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?		

**Source(s)**: Riverside County General Plan Figure OS-2 "Agricultural Resources," GIS database, Farmland Mapping & Monitoring Program California Important Farmland Finder, Project Application Materials

a) According to the Farmland Mapping & Monitoring Program (FMMP) California Important Farmland Finder and as reported by Riverside County GIS database and the Riverside County General Plan, the Project site contains lands defined by the FMMP as "Urban Built-Up Land" (Riverside County, 2015a,

Figure OS-2). There are no portions of the Project site that contain Prime Farmland, Farmland of Statewide Importance, Farmland of Local Importance, or Unique Farmland ("Farmland"). Therefore, the Project does not propose to convert farmland to non-agricultural use. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

Finding of Fact: No Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

b) The Project site is zoned as General Residential (R-3), General Commercial (C-1/C-P), Watercourse, Watershed and Conservation Areas (W-1), and Rural Residential (R-R). The Project site is not zoned for agricultural use or subject to a Williamson Act contract. Further, the Project site is not located within the Riverside County Agricultural Preserve. The Project would not conflict with existing agricultural zoning, agricultural use or with land subject to a Williamson Act contract or land within a Riverside County Agricultural Preserve.

Finding of Fact: No Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

c) The Project site is currently vacant and is not zoned for agricultural use. The Project would not cause development of non-agricultural land within agricultural zoned property.

Finding of Fact: No Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

d) The Project site is vacant and not utilized as farmland. The Project would not result in the conversion of farmland to non-agricultural use.

Finding of Fact: No Impact.

Mitigation: No mitigation is required.

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

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

a) The Project site is not zoned as forest land and there are no lands within the Project site's vicinity that are zoned for forest land (as defined in Public Resources Code § 12220(g)), timberland (as defined by Public Resources Code § 4526), or Timberland Production (as defined by Government Code § 51104(g)). Due to the lack of forest land in the Project area, the Project does not conflict with zoning for forest land or cause rezoning of forest land, timberland, or timberland zoned for Timberland Production. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

Finding of Fact: No Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

b) The Project site is vacant and does not contain forest land. Further, there are no lands within the Project site's vicinity that are zoned for forest land. The Project would not result in the loss of forest land, or involve any changes that could result in the conversion of forest land to non-forest use.

Finding of Fact: No Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

c), The Project site is vacant and does not contain forest land. Further, there are no lands within the Project site's vicinity that are zoned for forest land. The Project would not involve other changes in the existing environment which, due to their location or nature, could result in con-version of forest land to non-forest use.

Finding of Fact: No Impact.

Mitigation: No mitigation is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
AIR QUALITY Would the Project:				
<b>6. Air Quality Impacts</b> a) Conflict with or obstruct implementation of the applicable air quality plan?			$\boxtimes$	
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non- attainment under an applicable federal or state ambient air quality standard?				
c) Expose sensitive receptors, which are located within one (1) mile of the Project site, to substantial pollutant concentrations?			$\square$	
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			$\boxtimes$	

**Source(s)**: Riverside County General Plan, Riverside County Climate Action Plan ("CAP"), SCAQMD CEQA Air Quality Handbook

a) The Project site is located within the South Coast Air Basin (SCAB) under the jurisdiction of South Coast Air Quality Management District (SCAQMD). SCAQMD and the Southern California Association of Governments (SCAG) are responsible for formulating and implementing the Air Quality Management Plan (AQMP) for the SCAB. The AQMP is a series of plans adopted for the purpose of reaching short-and long-term goals for those pollutants the SCAB has designated as a 'nonattainment' area because the SCAQMD does not meet federal and/or state Ambient Air Quality Standards (AAQS) for certain pollutants. The land use and transportation control portions of the AQMP are based on the regional growth forecasts included in SCAG's Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS), which is a long-range transportation plan that uses growth forecasts to Project trends over a 20-year period to identify regional transportation strategies to address mobility needs. Both the RTP/SCS and AQMP are based, in part, on projections originating with County and City General Plans. The two principal criteria for conformance to the AQMP are discussed below.

Criteria No. 1: The Project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.

The growth forecasts used in the AQMP to calculate future emissions levels are based in part on land use planning data provided by lead agencies via their general plan documents. Projects that increase the intensity of use on a subject property may result in increased stationary area source emissions and/or vehicle source emissions when compared to the AQMP assumptions. However, if a project does not exceed the growth projections in the applicable local general plan, then the project is considered to be consistent with the growth assumptions in the AQMP. The Project site has a land use designation of Mixed-Use Area (MUA). The Project follows the policies for this land use designation. Accordingly, the Project would not exceed the growth projections in the County of Riverside General Plan, and the Project is considered to be

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consistent with the growth assumptions used in the AQMP. Therefore, the Project is consistent with Criteria No. 1. The proposed Project is consistent with the land use and growth intensities reflected in the adopted General Plan. Furthermore, the Project would not exceed any applicable regional or local thresholds. As such, the Project would not result in or cause AAQS violations. The Project is considered to be consistent with the AQMP. Impacts would be less than significant for Criteria No. 1.

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

The Project site has General Plan land use designation of MUA. MUA does not have an intensity range. Assuming a worst-case scenario by using the Highest Density Residential (HHDR) at 10-40 dwelling units per acre (10 gross acres at 40 du/acre), 400 du would be possible and would represent the growth assumptions for the GPA. The proposed Project would only build 71 units under the current land use designation (MUA), as such it would be 329 units under the worst case scenario under the growth assumptions of the GPA.7171As a result, the development density of the proposed Project would not exceed the assumptions in the AQMP and would not conflict with SCAQMD's attainment plans. Therefore, the Project is consistent with Criteria No. 2. Impacts would be less than significant.

Finding of Fact: Less than Significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

b) The Basin is currently designated nonattainment for the federal and State standards for ozone, particulate matter less than 10 microns in size (PM10), and particulate matter less than 2.5 microns in size (PM2.5). The Basin's nonattainment status is attributed to the region's development history. Past, present, and future development Projects contribute to the region's adverse air quality impacts on a cumulative basis. By its very nature, air pollution is largely a cumulative impact. No single Project is sufficient in size to, by itself, result in nonattainment of an ambient air quality standard. Instead, a Project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a Project's contribute to the cumulative impact is considerable, then its impact on air quality would be considered significant. In developing thresholds of significance for air pollutants, the SCAQMD considerable. If a Project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions. The California Emissions Estimator Model (CalEEMod) was used to calculate expected Project-related air pollutant emissions. The following analysis assesses the potential Project-level air quality impacts associated with construction and operation of the proposed Project.

# **Construction Emissions**

During construction, short-term degradation of air quality may occur due to the release of particulate matter emissions (i.e., fugitive dust) generated by grading, building construction, paving, and other activities. Emissions from construction equipment are also anticipated and would include carbon monoxide (CO), nitrogen oxides (NOx), volatile organic compounds (VOC), directly emitted PM2.5 or PM10, and toxic air contaminants such as diesel exhaust particulate matter.

Project construction activities would include grading, site preparation, and paving activities. Construction-related effects on air quality from the proposed Project would be greatest during the site preparation phase due to the disturbance of soils. If not properly controlled, these activities would

43045.

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CEQ / EA No

temporarily generate particulate emissions. Sources of fugitive dust would include disturbed soils at the construction site. Unless properly controlled, vehicles leaving the site would deposit dirt and mud on local streets, which could be an additional source of airborne dust after it dries. PM10 emissions would vary from day to day, depending on the nature and magnitude of construction activity and local weather conditions. PM10 emissions would depend on soil moisture, silt content of soil, wind speed, and amount of operating equipment. Larger dust particles would settle near the source, whereas fine particles would be dispersed over greater distances from the construction site.

The SCAQMD has established Rule 403: Fugitive Dust, which would require the construction contractor retained by the Project applicant to implement measures that would reduce the amount of particulate matter generated during the construction period, including the following:

- Water active sites at least three times daily (locations where grading is to occur shall be thoroughly watered prior to earthmoving).
- Cover all trucks hauling dirt, sand, soil, or other loose materials, or maintain at least 2 feet (0.6 meter) of freeboard (vertical space between the top of the load and the top of the trailer) in accordance with the requirements of California Vehicle Code Section 23114.
- Reduce traffic speeds on all unpaved roads to 15 miles per hour or less.

In addition to dust-related PM10 emissions, heavy trucks and construction equipment powered by gasoline and diesel engines would generate CO, sulfur oxides (SO2), NOx, VOCs and some soot particulate (PM2.5 and PM10) in exhaust emissions. These emissions would be temporary in nature and limited to the immediate area surrounding the construction site.

The calculated maximum daily emissions associated with Project construction are presented in Table 6-1, Peak Daily Construction Emissions (without Mitigation). As shown in Table 6-1, emissions resulting from the Project construction will not exceed criteria pollutant thresholds established by the SCAQMD for emissions of any criteria pollutant. Accordingly, the Project would not emit substantial concentrations of these pollutants during construction and would not contribute to an existing or projected air quality violation, on a direct or cumulatively-considerable basis. Impacts associated with construction-related emissions of VOCs, NOX, CO, SOX, PM10 and PM2.5 would be less than significant and mitigation is not required.

Table 6-1. Peak Daily Construction Emissions (without Mitigation)						
Project Construction		Maxi	mum Pollutant	Emissions (Ibs	/day)	
	VOCs	NOX	со	SO2	PM10	PM2.5
Site Preparation	3	28	19	<1	21	11
Grading	2	18	15	<1	8	4
Building Construction (Year 1)	2	15	18	<1	1	<1
Building Construction (Year 2)	2	14	18	<1	1	<1
Paving	1	10	15	<1	<1	<1
Architectural Coating	27	1	2	<1	<1	<1
Peak Daily Total	27	28	20	<1	21	11
Maximum	27	28	20		21	11
SCAQMD Threshold	75	100	550	150	150	55

Exceed Significance?	No	No	No	No	No	No			
Source: CalEEMod (June 2023). CO = carbon monoxide lbs/day = pounds per day NOX = nitrogen oxides PM2.5 = particulate matter less than 2.5 microns in size PM10 = particulate matter less than 10 microns in size SCAQMD = South Coast Air Quality Management District SO2 = sulfur oxides VOCs = volatile organic compounds									

#### **Operational Emissions**

Long-term air pollutant emissions associated with operation of the proposed Project include emissions from area, energy, and mobile sources. Area-source emissions include architectural coatings, consumer products, and landscaping. Energy-source emissions result from activities in buildings that use electricity and natural gas. Mobile-source emissions are from vehicle trips associated with operation of the Project. As summarized in Table 6-2, Project operation-source emissions would not exceed the SCAQMD regional thresholds of significance for any criteria pollutants. Therefore, the Project would not emit substantial concentrations of any criteria pollutants during long-term operation and would not contribute to an existing or projected air quality violation. Impacts would be less than significant.

SCAQMD considers air pollutant emissions that exceed the SCAQMD's project-level thresholds to also be cumulatively considerable. Conversely, if a project does not exceed the SCAQMD project-level thresholds then SCAQMD considers the project's air pollutant emissions to be less than cumulatively considerable. The evaluation of Project-specific air pollutant emissions demonstrates that the Project would not exceed any applicable thresholds that are designed to assist the region in attaining the applicable national air quality standards. Therefore, the Project's air pollutant emissions would be less than cumulatively considerable and would not contribute to the non-attainment of applicable State and federal standards.

Table 6-2. Peak Daily Operational Emissions								
Source		Pollutant Emissions (Ibs/day)						
	VOCs	NOX	со	SO2	PM10	PM2.5		
Project Area	21	2	43	<1	6	6		
Project Energy	<1	<1	<1	<1	<1	<1		
Project Mobile	1	1	10	<1	3	<1		
Peak Daily Total	22	3	53	<1	9	6		
SCAQMD Threshold	55	55	550	150	150	55		
Exceed Significance?	No	No	No	No	No	No		
Source: CalEEMod (June 202 CO = carbon monoxide lbs/d PM10 = particulate matter les VOCs = volatile organic com	23). ay = pounds per c ss than 10 micron pounds	lay NOX = nitrogen s in size SCAQMD	n oxides PM2.5 = pa = South Coast Air	articulate matter les Quality Manageme	ss than 2.5 microns ent District SO2 = se	in size ulfur oxides		

The proposed Project would include emission reduction features including the following:

- Use of low VOC paints.
- Neighborhood electric vehicle (NEV) charging stations; and
- The Project would comply with the CalRecycle initiative of reducing landfill waste by 75 percent.

With the emission reduction features, operation of the Project is not anticipated to result in a cumulatively considerable net increase of any criteria pollutant impacts, and operational impacts would be less than significant.

Findings of Fact: Less Than Significant

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

c) The SCAQMD's Governing Board adopted a methodology for calculating localized air quality impacts through localized significance thresholds (also referred to as a LST analysis). Localized significance thresholds represent the maximum emissions from a project that would not cause or contribute to an exceedance of the most stringent applicable state or federal ambient air quality standard. Localized significance thresholds were developed in recognition of the fact that criteria pollutants such as CO, NOx, and PM10 and PM2.5 in particular, can have local impacts at nearby sensitive receptors as well as regional impacts. The localized significance thresholds are developed for each source receptor area and are applicable to NOx, CO, PM10, and PM2.5.

The project site is located in Source Receptor Area 25 (SRA 25). The SCAQMD states that receptor locations are onsite locations where persons may be exposed to the emissions from project activities. Receptor locations include residential, commercial and industrial land use areas; and any other areas where persons can be situated for an hour or longer at a time. The closest sensitive receptors are the single family residential uses located along Union Street, approximately 25 meters north of the Project site.

The onsite emissions during construction were compared with the localized significance thresholds for SRA 25, 5-acre site, with a receptor at 25 meters for NOX and CO, and 200 meters for PM10 and PM2.5. The CalEEMod program was used to estimate air pollutant emissions from project construction. Compliance with the dust control BMP requirements in Rule 403 is mandatory; as such, the project is required to implement the BMPs by law. These measures are accounted for in the CalEEMod program as "mitigation" because of how the model is constructed, even though compliance with Rule 403 requirements is neither voluntary nor considered mitigation under CEQA. The results of the localized significance analysis are provided in Table 6-3. Onsite construction emissions are from fugitive dust during grading and off-road diesel emissions.

Table 6-3. Peak Daily Operational Emissions								
Source		Pollutant Emissions (Ibs/day)						
	NOX	со	PM10	PM2.5				
Project Area	2	43	6	6				
Project Energy	<1	<1	<1	<1				
Project Mobile	1	10	3	<1				
Peak Daily Total	3	53	9	6				
Localized Significance Threshold	371	1,965	96	8				
Exceed Significance?	No	No	No	No				
Source: CalEEMod (June 2023).								

CO = carbon monoxide lbs/day = pounds per day NOX = nitrogen oxides PM2.5 = particulate matter less than 2.5 microns in size PM10 = particulate matter less than 10 microns in size SCAQMD = South Coast Air Quality Management District SO2 = sulfur oxides VOCs = volatile organic compounds

The localized construction analysis demonstrates that the proposed project would not exceed the localized significance thresholds for NOx, CO, PM10 and PM2.5. Construction of the residential development would be of relatively short duration with typical construction equipment and materials, which would not be anticipated to expose sensitive receptors to substantial pollutant concentrations. Further, long-term operational pollutant emissions would be reduced by the emission reduction features identified above such that operational impacts would not be anticipated to expose sensitive receptors to substantial pollutant concentrations.

Findings of Fact: Less Than Significant

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

d) Construction equipment exhaust, the application of architectural coatings, and the installation of asphalt surfaces may create odors in the Project vicinity during construction. These construction activities are of a temporary duration and would not occur after completion of construction. The Project would be required to comply with SCAQMD Rule 1113 standards for paint applications and Rule 1108 standards regarding application of asphalt as a matter of regulatory policy. Land uses generally associated with long-term (i.e., operational) objectionable odors include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting operations, refineries, landfills, dairies, and/or various heavy industrial uses. The proposed Project does not propose any such uses or activities that would result in a potentially significant operational source odor impact. Potential sources of Project-generated operational odors include disposal of domestic refuse. Consistent with County requirements, all Project-generated refuse would be stored in covered containers and removed at regular intervals in accordance with solid waste regulations, thereby precluding substantial generation of odors that could result from temporary holding of refuse on site. Additionally, the proposed Project would be required to comply with SCAQMD Rule 402, which regulates nuisance odors. Through compliance with SCAQMD Rule 1108, 1113, and 402, the Project would not involve any substantial short-term or long-term sources of odors. Impacts would be less than significant and no mitigation measures are required.

Findings of Fact: Less Than Significant

Mitigation: No mitigation is required.

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

**Source(s):** GIS database, WRCMSHCP, General Biological Assessment and Western Riverside County MSHCP Consistency Analysis for Assessor's Parcel Numbers 370-310-002 and 370-310-012 (October 2018, revised August 2019 and February 2020) prepared by Hernandez Environmental Services, Jurisdictional Delineation for Tentative Tract Map 30846 with Assessor Parcel Numbers of 370-310-002 and 370-310-012 Located in Riverside County, California (February 15, 2021) prepared by Hernandez Environmental Services, and a Determination of Biologically Equivalent or Superior Preservation for Assessor's Parcel Numbers 370-310-002 and 370-310-012 (March 2020, revised February 2021) prepared by Hernandez Environmental Services.

a) The Project site is located in WRMSHCP Criteria Cells 5342 and 5240. The Project site is located within the Elsinore Area Plan, in the Elsinore Subunit (SU3), in Criteria Cells 5240 and 5342. Conservation within these Cells will contribute to assembly of Proposed Extension of Existing Core 3.

Further, the Project site is located within a plan-defined narrow endemic plant species survey area (NEPSSA), criteria area species survey area (CASSA) for plant species, and burrowing owl (Athene cunicularia) survey area.

A burrowing owl habitat assessment determined that the Project site provides potentially suitable habitat for burrowing owl. Focused burrowing owl surveys conducted on the Project site found that burrowing owls are not currently present on the Project site. However, since the Project site contains suitable habitat for burrowing owl and burrowing owl could occupy the site prior to construction, a preconstruction burrowing owl survey will be required within 30 days prior to ground disturbance.

Focused botanical surveys were conducted for pursuant to Section 6.1.3 (NEPSSA) of the WRMSHCP for Munz's onion, San Diego ambrosia, many-stemmed dudleya, spreading navarretia, California Orcutt grass, Hammitt's clav-cress, and Wright's trichocoronis. These species were found to be absent from the Project site. In addition, focused botanical surveys were conducted pursuant to Section 6.3.2 (CASSA) of the WRCMSHCP for San Jacinto Valley crownscale, Parish's brittlescale, Davidson's saltscale, Thread-leaved brodiaea, Round-leaved filaree, Smooth tarplant, Coulter's goldfields, Little mousetail, which found that smooth tarplant (*Centromadia pungens*), a CNPS rank 1B.1 rare plant, occurs on the Project site.

In addition, the Jurisdictional Delineation prepared for the Project found that the Project site contains approximately 0.31 acres of man-made earthen channel that drains to a man-made cement storm drainage outlet which eventually drains to the back basin of Lake Elsinore. Approximately 0.67-acre of smooth tarplant dominant ruderal habitat surrounds the man-made earthen channel. The onsite manmade drainage feature and adjacent smooth tarplant ruderal dominant habitat are considered WRMSHCP riparian/riverine resources associated with Lake Elsinore.

The Project is subject to compliance with the avoidance and/or compensation requirements identified for riparian/riverine areas pursuant to Section 6.1.2 Species Associated with Riparian/Riverine Habitat and Vernal Pools and Section 6.3.2 CAPSSA of the WRMSHCP. Since the Project will impact 0.31 acres of man-made earthen, unvegetated channel and over 200 individual smooth tarplant within an approximate 0.67-acre area of the western portion of the site, a Western Riverside County Determination of Biologically Equivalent or Superior Preservation (DBESP) analysis was prepared pursuant to the WRMSHCP. To mitigate for permanent impacts to the 0.31 acre of man-made drainage feature, the Project shall provide offsite mitigation through the purchase of 0.31-acre of re-establishment credits and 0.31-acre of rehabilitation credits at the Riverpark Mitigation Bank. In addition, the Project will mitigate for direct impacts to 0.67 acre of onsite smooth tarplant habitat (consisting of over 200 individual plants) through offsite restoration at a 3:1 ratio. Offsite planting of approximately 2.01 acre of smooth tarplant will occur on suitable existing WRMSHCP conservation lands located along the San Jacinto River within the KB Homes Coastal Donation area. A Habitat Mitigation and Monitoring Plan (HMMP) will be prepared by the applicant and must be reviewed and approved by the Western Riverside County Regional Conservation Authority (RCA) and Wildlife Agencies. Further, the Urban/Wildlands Interface Guidelines (Section 6.14 of the WRCMSHCP) are required to be applied to the Project, including the following:

- Drainage Water Quality Best Management Practices (BMPs) shall be incorporated, including the National Pollutant Discharge Elimination Systems (NPDES) and erosion control requirements from the Regional Water Quality Control Board to ensure that the quantity and quality of surface water runoff discharged into the onsite drainage is not altered in an adverse way when compared with existing conditions. These BMPs will be implemented as part of the Storm Water Pollution Prevention Plan (SWPPP) in order to ensure that water quality is not degraded.
- Toxics Measures such as those employed to address drainage issues will be implemented for toxics. Land uses proposed in proximity to the onsite drainage that use chemicals or generate CEQ / EA No

bioproducts that are potentially toxic or may adversely affect wildlife species, habitat or water quality must incorporate measures to ensure that application of such chemicals does not result in discharge to the drainage.

 Invasives - Invasive, non-native plant species must not be used as landscaping materials for development that is proposed adjacent to the onsite drainage area. Table 6-2 of Volume 1 of the MSHCP lists the plants that should be avoided.

Based on the findings of the General Biological Assessment and Western Riverside County MSHCP Consistency Analysis and implementation of the mitigation identified within the DBESP prepared for the Project, the Project would not conflict with provisions of the WRMSHCP. The Project required review and consultation with the RCA as part of the Habitat Assessment & Negotiation Strategy (HANS) process and Joint Project Review (JPR). It was concluded that the Project would not conflict with WRMSHCP Reserve Assembly goals with respect to providing a connection from Proposed Extension of Existing Core 3 to Cleveland National Forest. The RCA criteria consistency review concluded that the Project is consistent with both the Cell Criteria and Other Plan Requirements. Therefore, the Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state conservation plan. Impacts are considered less than significant.

# Findings of Fact: Less than Significant with Mitigation

# Mitigation:

MM BIO-1: Due to the fact that the Project site is located within the Western Riverside County MSHCP burrowing owl survey area, a 30-day preconstruction survey is required prior to the commencement of Project activities (e.g. vegetation clearing, clearing and grubbing, tree removal, site watering) to ensure that no owls have colonized the site in the days or weeks preceding Project activities. If BUOW are found to have colonized the Project site prior to the initiation of construction, the Project proponent will immediately inform RCA and the Wildlife Agencies and will need to prepare a Burrowing Owl Protection and Relocation Plan for approval by RCA and the Wildlife Agencies prior to initiating ground disturbance. If ground-disturbing activities occur but the site is left undisturbed for more than 30 days, a preconstruction survey will again be necessary to ensure burrowing owl has not colonized the site since it was last disturbed. If burrow owl is found, the same coordination described above will be necessary.

MM BIO-2: The Project will mitigate for permanent impacts to the 0.31 acre of man-made drainage feature, the Project shall provide offsite mitigation through the purchase of 0.31-acre of re-establishment credits and 0.31-acre of rehabilitation credits at the Riverpark Mitigation Bank.

MM BIO-3: The Project will mitigate for direct impacts to 0.67 acre of onsite smooth tarplant habitat (consisting of over 200 individual plants) through offsite restoration at a 3:1 ratio. Offsite planting of approximately 2.01 acre of smooth tarplant will occur on suitable existing WRMSHCP conservation lands located along the San Jacinto River within the KB Homes Coastal Donation area. A Habitat Mitigation and Monitoring Plan (HMMP) will be prepared by the applicant and must be reviewed and approved by the Western Riverside County Regional Conservation Authority (RCA) and Wildlife Agencies.

MM BIO-4: The Project will mitigate for potential impacts to WRMSHCP covered species (Cooper's hawk and San Diego black-tailed jackrabbit) through the payment of the appropriate development mitigation fees.

MM BIO-5: The Project will mitigate for potential impacts to candidate, sensitive, special status or any Migratory Bird Treaty Act covered bird species during the migratory bird nesting season between February 1 and September 15, the Project will implement the following measures:

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- It is recommended that vegetation removal be conducted during the non-nesting season for migratory birds to avoid direct impacts. The non-nesting season is between February 1 and September 15.
- If vegetation removal will occur during the migratory bird nesting season, between February 1 and September 15, pre-construction nesting bird surveys will be performed within three days prior to vegetation removal.
- If active nests are found during nesting bird surveys, they shall be flagged and a 300-foot buffer for songbirds and a 500-fot buffer for raptors shall be fenced around the nests.
- A biological monitor shall visit the site once a week during ground disturbing activities to ensure all fencing is in place and no sensitive species are being impacted.

<u>Monitoring</u>: Prior to the issuance of any grading permits, the results of the preconstruction surveys shall be reviewed by the County Environmental Programs Department (EPD). No grading permits shall be issued by the Riverside County Building & Safety Department until EPD and/or the County Biologist verifies that the pre-construction surveys were satisfactorily completed.

Prior to the issuance of any grading permit for areas identified with jurisdictional features, the Project applicant shall obtain regulatory permits from CDFW and RWQCB. Through the permitting and subject to approval by the regulatory agencies, the applicant shall compensate for Project-specific impacts through the purchase of 0.31-acre of re-establishment credits and 0.31-acre of rehabilitation credits at the Riverpark Mitigation Bank and offsite planting of approximately 2.01 acre of smooth tarplant to be located on suitable existing WRCMSHCP conservation lands located along the San Jacinto River within the KB Homes Coastal Donation area. An HMMP shall be prepared for the offsite planting and must be reviewed and approved by the RCA and Wildlife Agencies.

b) The construction of the Project will result in impacts to the entire 10.02-acre site, including 8.89 acres of ruderal habitat, 0.15 acre of non-vegetated disturbed areas, 0.67 acre of smooth tarplant disturbed habitat, and 0.31 acres of non-jurisdictional man-made unvegetated drainage channel. In addition, the proposed offsite drainage improvements will impact approximately 0.21 acre of ruderal habitat located within APN 370-310-014 to the south. Further, the proposed road improvements, including new sidewalk, curb, and gutter, will result in impacts to approximately 0.20 acre of developed areas and 0.04 acre of ruderal habitat along Corydon Road. The General Biological Assessment and Western Riverside County MSHCP Consistency Analysis prepared for the Project found that the Project site does not contain suitable potential habitat for endangered or threatened species. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

Findings of Fact: No Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

c) The General Biological Assessment and Western Riverside County MSHCP Consistency Analysis prepared for the Project found that the Project has the potential to impact Cooper's hawk (*Accipiter cooperii*), a CDFW watch list wildlife species and San Diego black-tailed jackrabbit (*Lepus californicus bennettii*), a CDFW Species of Special Concern. These species are adequately covered under the WRMSHCP. Payment of the appropriate development mitigation fees will mitigate any impacts to these species.

Further, to mitigate for potential impacts to candidate, sensitive, or special status bird species during the migratory bird nesting season between February 1 and September 15, the Project will implement the following measures:

- It is recommended that vegetation removal be conducted during the non-nesting season for migratory birds to avoid direct impacts. The non-nesting season is between February 1 and September 15.
- If vegetation removal will occur during the migratory bird nesting season, between February 1 and September 15, pre-construction nesting bird surveys will be performed within three days prior to vegetation removal.
- If active nests are found during nesting bird surveys, they shall be flagged and a 300-foot buffer for songbirds and a 500-fot buffer for raptors shall be fenced around the nests ...
- A biological monitor shall visit the site once a week during ground disturbing activities to ensure all fencing is in place and no sensitive species are being impacted.

In addition, the Project will result in impacts to 0.67 acre of onsite smooth tarplant habitat (consisting of over 200 individual plants). Impacts to this species will be mitigated through offsite restoration at a 3:1 ratio, as described in 7.a), above.

# Findings of Fact: Less than Significant with Mitigation

# Mitigation:

MM BIO-3: The Project will mitigate for direct impacts to 0.67 acre of onsite smooth tarplant habitat (consisting of over 200 individual plants) through offsite restoration at a 3:1 ratio. Offsite planting of approximately 2.01 acre of smooth tarplant will occur on suitable existing WRMSHCP conservation lands located along the San Jacinto River within the KB Homes Coastal Donation area. A Habitat Mitigation and Monitoring Plan (HMMP) will be prepared by the applicant and must be reviewed and approved by the Western Riverside County Regional Conservation Authority (RCA) and Wildlife Agencies.

MM BIO-4: The Project will mitigate for potential impacts to WRMSHCP covered species (Cooper's hawk and San Diego black-tailed jackrabbit) through the payment of the appropriate development mitigation fees.

MM BIO-5: The Project will mitigate for potential impacts to candidate, sensitive, special status or any Migratory Bird Treaty Act covered bird species during the migratory bird nesting season between February 1 and September 15, the Project will implement the following measures:

- It is recommended that vegetation removal be conducted during the non-nesting season for migratory birds to avoid direct impacts. The non-nesting season is between February 1 and September 15.
- If vegetation removal will occur during the migratory bird nesting season, between February 1 and September 15, pre-construction nesting bird surveys will be performed within three days prior to vegetation removal.
- If active nests are found during nesting bird surveys, they shall be flagged and a 300-foot buffer for songbirds and a 500-fot buffer for raptors shall be fenced around the nests.
- A biological monitor shall visit the site once a week during ground disturbing activities to ensure all fencing is in place and no sensitive species are being impacted.

<u>Monitoring</u>: Prior to the issuance of any grading permits, the results of the preconstruction surveys shall be reviewed by the County Environmental Programs Department (EPD). No grading permits shall

be issued by the Riverside County Building & Safety Department until EPD and/or the County Biologist verifies that the pre-construction surveys were satisfactorily completed.

Prior to the issuance of any grading permit for areas identified with jurisdictional features, the Project applicant shall obtain regulatory permits from CDFW and RWQCB. Through the permitting and subject to approval by the regulatory agencies, the applicant shall compensate for Project-specific impacts through the purchase of 0.31-acre of re-establishment credits and 0.31-acre of rehabilitation credits at the Riverpark Mitigation Bank and offsite planting of approximately 2.01 acre of smooth tarplant to be located on suitable existing WRCMSHCP conservation lands located along the San Jacinto River within the KB Homes Coastal Donation area. An HMMP shall be prepared for the offsite planting and must be reviewed and approved by the RCA and Wildlife Agencies.

d) Wildlife movement corridors link together areas of suitable habitat that are otherwise separated by rugged terrain, changes in vegetation, or human disturbances. The Project area was evaluated for its function as a wildlife corridor that species use to move between wildlife habitat zones. Usually, mountain canyons or riparian corridors are used by wildlife as corridors. The Project site is relatively flat and disturbed. It is surrounded by residential development in all directions. No wildlife movement corridors were found to be present on the Project site. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

#### Findings of Fact: No Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

e) The Jurisdictional Delineation prepared for the Project found that the Project site contains approximately 0.31 acres of man-made earthen channel that drains to a man-made cement storm drainage outlet which eventually drains to the back basin of Lake Elsinore. Approximately 0.67-acre of smooth tarplant dominant ruderal habitat surrounds the man-made earthen channel. The onsite man-made drainage feature and adjacent smooth tarplant ruderal dominant habitat are considered California Department of Fish and Wildlife (CDFW) jurisdictional under Section 1602 of the Fish and Game Code. Further, the 0.31-acre of man-made drainage feature would be regulated by the State Water Resources Control Board (State Water Board) and the Regional Water Quality Control Boards (RWQCB) (collectively Water Boards) under the Porter-Cologne Water Quality Control Act (Porter-Cologne). Implementation of the Project will impact approximately 0.98-acre of CDFW jurisdictional drainage and associated habitat under Section 1602 of the Fish and Game Code and 0.31-acre of waters of the State regulated by the RWQCB under Porter-Cologne. The Project will require a 1602 Streambed Alteration Agreement from the CDFW and Waste Discharge Requirements (WDR) under Porter-Cologne from the RWQCB.

As identified in 7.a), above, the Project will mitigate for permanent impacts to the 0.31 acre of manmade drainage feature through the purchase of 0.31-acre of re-establishment credits and 0.31-acre of rehabilitation credits at the Riverpark Mitigation Bank. In addition, the Project will mitigate for direct impacts to 0.67 acre of onsite smooth tarplant habitat (consisting of over 200 individual plants) through offsite restoration at a 3:1 ratio.

# Findings of Fact: Less than Significant with Mitigation

Mitigation:

MM BIO-2: The Project will mitigate for permanent impacts to the 0.31 acre of man-made drainage feature, the Project shall provide offsite mitigation through the purchase of 0.31-acre of re-establishment credits and 0.31-acre of rehabilitation credits at the Riverpark Mitigation Bank.

MM BIO-3: The Project will mitigate for direct impacts to 0.67 acre of onsite smooth tarplant habitat (consisting of over 200 individual plants) through offsite restoration at a 3:1 ratio. Offsite planting of approximately 2.01 acre of smooth tarplant will occur on suitable existing WRMSHCP conservation lands located along the San Jacinto River within the KB Homes Coastal Donation area. A Habitat Mitigation and Monitoring Plan (HMMP) will be prepared by the applicant and must be reviewed and approved by the Western Riverside County Regional Conservation Authority (RCA) and Wildlife Agencies.

<u>Monitoring</u>: Prior to the issuance of any grading permits, the results of the preconstruction surveys shall be reviewed by the County Environmental Programs Department (EPD). No grading permits shall be issued by the Riverside County Building & Safety Department until EPD and/or the County Biologist verifies that the pre-construction surveys were satisfactorily completed.

Prior to the issuance of any grading permit for areas identified with jurisdictional features, the Project applicant shall obtain regulatory permits from CDFW and RWQCB. Through the permitting and subject to approval by the regulatory agencies, the applicant shall compensate for Project-specific impacts through the purchase of 0.31-acre of re-establishment credits and 0.31-acre of rehabilitation credits at the Riverpark Mitigation Bank and offsite planting of approximately 2.01 acre of smooth tarplant to be located on suitable existing WRCMSHCP conservation lands located along the San Jacinto River within the KB Homes Coastal Donation area. An HMMP shall be prepared for the offsite planting and must be reviewed and approved by the RCA and Wildlife Agencies.

f) The Project site does not contain any State or federally protected wetlands. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

Findings of Fact: No Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

g) Other than the WRMSHCP, which is addressed above, the only local policies or ordinances protecting biological resources within the Project area are Riverside County Ordinance No. 559 (Regulating the Removal of Trees) and the County's Oak Tree Management Guidelines. The Project site does not contain oak trees. Therefore, the Riverside County Oak Tree Management Guidelines are not applicable to the Project. Ordinance No. 559 pertains to parcels or property located above 5,000 feet in elevation. Because the Project site does not reach an elevation of 5,000 feet, Ordinance No. 559 is also not applicable to the Project site. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

Findings of Fact: No Impact.

Mitigation: No mitigation is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
CILL TURAL RESOLIRCES Would the Project				
8 Historic Resources				
a) Alter or destroy a historic site?				$\boxtimes$
b) Cause a substantial adverse change in the significance of a historical resource, pursuant to California Code of Regulations. Section 15064.5?				

**Source(s):** On-site Inspection, Project Application Materials, Cultural Resources Records Search for the CUP03776 Project (November 20, 2018)

a) The Riverside County Planning Department conducted a records search at the Eastern Information Center (EIC) at the University of California, Riverside (UCR), for the Project site and an area of onemile surrounding the Project site. The cultural resources records search conducted for the Project found that no historic sites or resources are recorded within the boundaries of the Project site. Therefore, the Project will not alter or destroy a historic site. No impacts are identified or anticipated, and no mitigation measures are required.

Findings of Fact: No Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

b) The cultural resources records search conducted for the Project found that no historic sites or resources are recorded within the boundaries of the Project site. Therefore, the Project will not cause a substantial adverse change in the significance of a historical resource, pursuant to California Code of Regulations, Section 15064.5. No impacts are identified or anticipated, and no mitigation measures are required.

Findings of Fact: No Impact.

Mitigation: No mitigation is required.

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

**Source(s):** On-Site Inspection, Project Application Materials, Cultural Resources Records Search for the CUP03776 Project (November 20, 2018)

a) The Project site has been previously disturbed in the past by agriculture, previous development, and removal of the onsite residence between 1989 and 1994. The Riverside County Planning Department conducted a records search at the EIC for the Project site and an area of one-mile surrounding the Project site. The EIC records search identified eight previously recorded cultural resources within one mile of the Project site, and no recorded resources on the Project site. The project will not alter or destroy an archaeological site. No impacts are identified or anticipated, and no mitigation measures are required.

Findings of Fact: No Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

b) As previously stated, the EIC records search identified eight previously recorded cultural resources within one mile of the Project site, and no recorded resources on the Project site. Therefore, the Project will not cause a substantial adverse change in the significance of an archaeological resource, pursuant to California Code of Regulations, Section 15064.5. No impacts are identified or anticipated, and no mitigation measures are required.

Findings of Fact: No Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

c) Based on an analysis of past aerial photographs of the property, it has been determined that the Project site does not include a formal cemetery or any archaeological resources that might contain interred human remains. Nonetheless, the Project will be required to adhere to State Health and Safety Code Section 7050.5 if in the event that human remains are encountered and by ensuring that no further disturbance occur until the County Coroner has made the necessary findings as to origin of the remains. Furthermore, pursuant to Public Resources Code Section 5097.98 (b), remains shall be left in place and free from disturbance until a final decision as to the treatment and their disposition has been made. This is a mandatory state law requirement. This is also considered a standard Condition of Approval and is not considered as mitigation pursuant to CEQA. Therefore, compliance with state law would reduce impacts to less than significant levels.

Findings of Fact: Less than Significant Impact.

Mitigation: No mitigation is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ENERGY Would the Project:				
<b>10.</b> Energy Impacts a) Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?				
b) Conflict with or obstruct a State or Local plan for renewable energy or energy efficiency?			$\boxtimes$	

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

a) The Southern California Gas Company provides natural gas to the Project vicinity and gas lines are currently located within Corydon Road and Union Street, adjacent to the site. Southern California Edison currently provides electricity services to the Project area. The Project would install onsite electrical and connect to existing infrastructure. This is a Natural-Gas-free project. This project will also use solar and battery power to supply power to each unit.

During construction of the proposed Project, energy would be consumed in three general forms:

- 1. Petroleum-based fuels used to power off-road construction vehicles and equipment on the Project site, construction worker travel to and from the Project site, as well as delivery truck trips;
- 2. Electricity associated with providing temporary power for lighting and electric equipment; and
- 3. Energy used in the production of construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

Based on these uses of energy during construction activities, the proposed mobile home residences and the associated infrastructure would not be expected to result in demand for fuel greater on a perunit-of-development basis than other development Projects in Southern California. Construction does not involve any unusual or increased need for energy and would not be wasteful, inefficient, or unnecessary. Once operational, the Project would generate demand for electricity, natural gas, as well as gasoline for motor vehicle trips. Operational use of energy includes the heating, cooling, and lighting of the mobile home residences, water heating, operation of electrical systems and plug-in appliances, and outdoor lighting, and the transport of electricity, natural gas, and water to the residences where they would be consumed. This use of energy is typical for residential development, no additional energy infrastructure would be required to be built to operate the Project, and no operational activities would occur that would result in extraordinary energy consumption.

Findings of Fact: Less than Significant Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

b) The Project would be required to comply with any County ordinances or regulations pertaining to renewable energy and/or energy efficiency. Further, the Project would be required to comply with all Title 24 and CALGreen standards. Compliance with Title 24 and CALGreen standards would ensure the Project incorporates energy efficient windows, insulation, lighting, ventilation systems, as well as water efficient fixtures and electric vehicles charging infrastructure (if required). Additionally, the Project would be required to construct solar panels at all mobile home residences that are built post-2020 to comply with the 2019 Title 24 standards, which mandate photovoltaic systems in newly constructed residential buildings (resulting in approximately 53 percent less energy usage than residential buildings constructed under the 2016 standards). Adherence to the Title 24 energy requirements will ensure conformance with the State's and County's goal of promoting energy and lighting efficiency. Therefore, the Project would result in less than significant impacts associated with renewable energy or energy efficiency plans.

Findings of Fact: Less than Significant Impact.

Mitigation: No mitigation is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
GEOLOGY AND SOILS Would the Project directly or indirect	stly:			
11. Alquist-Priolo Earthquake Fault Zone or County Fault Hazard Zones			$\boxtimes$	
a) Be subject to rupture of a known earthquake fault,				
as delineated on the most recent Alquist-Priolo Earthquake				
Fault Zoning Map issued by the State Geologist for the area				
or based on other substantial evidence of a known fault?				
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**Source(s)**: Riverside County General Plan Figure S-2 "Earthquake Fault Study Zones," GIS database, County Geologic Report GEO190026, " Updated Geotechnical Investigation and Percolation Testing" dated October 30, 2017 prepared by Geocon West, Inc.

a)The site is not within a currently established Alquist-Priolo Earthquake Fault Zone or Riverside County Earthquake Fault Zone for surface fault rupture hazards. Based on the Riverside County Geologist review of published geologic maps and reports, the site is not located on any known active, potentially active, or inactive fault traces. As such, impacts are considered less than significant.

Findings of Fact: Less than Significant Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

# 12. Liquefaction Potential Zone Image: Second S

**Source(s)**: Riverside County General Plan Figure S-3 "Generalized Liquefaction," County Geologic Report GEO190026, "Updated Geotechnical Investigation and Percolation Testing", dated October 30, 2017 prepared by Geocon West, Inc. and County Geologic Report GE)1501, "Geotechnical Investigation, Proposed Condominium Development, APN's 370-310-001 and –002, Corydon Road, Wildomar Area, Riverside County, California", dated June 9, 2005.

a) According to Riverside County GIS, the potential for earthquake induced liquefaction is considered very high. Portions of the soils at the site are potentially susceptible to liquefaction during the design earthquake. Analysis indicates that total settlements of up to 2.6 inches are anticipated with differential settlement on the order of 1.3 inches over a horizontal distance of 40 feet. A less than significant impact with mitigation is anticipated.

Findings of Fact: Less than Significant Impact. Mitigation:

GEO-1 – Prior to grading permit issuance, the grading plans shall include a note documenting MM GEO-1. "Undocumented fill and the upper portion of the young alluvium within the limits of grading should be removed to expose competent alluvium with a relative density of at least 85 percent based on ASTM D1557." <u>Monitoring</u>: No monitoring is required.

13. Ground-shaking Zone		$\square$	
a) Be subject to strong seismic ground shaking?			

**Source(s):** Riverside County General Plan Figure S-4 "Earthquake-Induced Slope Instability Map," and Figures S-13 through S-21 (showing General Ground Shaking Risk), County Geologic Report GEO190026, "Updated Geotechnical Investigation and Percolation Testing", dated October 30, 2017 prepared by Geocon West, Inc.

a) The Project is located in a seismically active region. The San Andreas Fault system dominates the geologic structure of the southern California area. Known active faults within the San Andreas Fault system include the Newport-Inglewood, Whittier-Elsinore, San Jacinto and San Andreas Faults. No active faults are known to exist within the Project site. The site is not located within an Alquist-Priolo Earthquake Fault Zone. The site is not within a currently established State of California Alquist-Priolo Earthquake Fault Zone (CA DC, 2017; RCIT, 2017) or a Riverside County Fault Hazard Zone for surface fault rupture hazards. The margin of the nearest Riverside County Fault Hazard Zone (RCFHZ) is located approximately 650 feet north-northeast of the site. No active or potentially active faults with the potential for surface fault rupture are known to pass directly beneath the site, and no faults are geologically mapped within or Projecting toward the site.

As a mandatory condition of Project approval, the Project's building would be required to be constructed in accordance with currently adopted California Building Standards Code, Riverside County Ordinances, and California Title 24 regulations in effect at the time of building plan submittal. Furthermore, the Project would be required to comply with the site-specific grading and construction recommendations contained within the Project's geotechnical report, which the County would impose as conditions of Project approval, to further reduce the risk of adverse effects related to strong seismic ground shaking. With the Project's mandatory compliance with these standard and site specific design and construction measures, potential impacts related to seismic ground shaking would be less than significant.

Findings of Fact: Less Than Significant Impact Is Identified

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

#### 14. Landslide Risk

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

**Source(s)**: On-site Inspection, Riverside County General Plan Figure S-5 "Regions Underlain by Steep Slope,"County Geologic Report GEO190026, "Updated Geotechnical Investigation and Percolation Testing" dated October 30, 2017 prepared by Geocon West, Inc..

a) The Project site as well as surrounding properties is relatively flat and no substantial topographic features exist on the site that could potentially result in landslides or rockfalls. Hilly terrain is approximately 1.4 of a mile south of the site and according to the Geotechnical Investigation and Percolation Testing report, there are no steep slopes on or adjacent to the site. As such, landslides are not a design consideration for the site. A less than significant impact would occur. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

Findings of Fact: No Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

 $\square$ 

 $\square$ 

 $\boxtimes$ 

15. Ground Subsidence		$\square$	
a) Be located on a geologic unit or soil that is			
unstable, or that would become unstable as a result of the			
Project, and potentially result in ground subsidence?			

**Source(s):** Riverside County General Plan Figure S-7 "Documented Subsidence Areas Map, County Geologic Report GEO190026, "Updated Geotechnical Investigation and Percolation Testing", dated October 30, 2017 prepared by Geocon West, Inc.

a) According to the Geotechnical Investigation and Percolation Testing, the geologic units on the Project site generally consist of sands, silts, and clays. Laboratory testing indicated that a sample of the near surface soils exhibits "low" expansion potential with an expansion index of 40. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

Findings of Fact: Less than Significant Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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

**Source(s):** On-site Inspection, Riverside County General Plan Figure S-5 "Regions Underlain by Steep Slope", Figure S-9, Special Flood Hazard Areas", Figure S-10," Dam Failure Inundation Zone (Riverside County, 2015a), County Geologic Report GEO190026, "Updated Geotechnical Investigation and Percolation Testing", dated October 30, 2017 prepared by Geocon West, Inc.

a) No steep hillsides subject to mudflow and no volcanoes are located on or near the Project site. With respect to seiches, the Project site is located approximately ½ mile southwest of the dry lake bed and 1.5 miles southwest of Lake Elsinore; the risk of a seiche is considered low. Therefore, there is no potential for the Project to be subject to hazards associated with seiches, mudflows, and/or volcanic hazards. No significant impacts are identified or anticipated, and no mitigation measures are required.

Findings of Fact: No Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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

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**Source(s):** Riv. Co. 800-Scale Slope Maps, Project Application Materials, County Geologic Report GEO190026, "Updated Geotechnical Investigation and Percolation Testing", dated October 30, 2017 prepared by Geocon West, Inc.

a) The Project site is relatively level with topography descending gradually from north to southeast at elevations of  $\pm 1286$  feet AMSL to  $\pm 1296$  feet AMSL. Grading would occur over the entire Project site and after grading, elevations would vary across the site between  $\pm 1280$  through  $\pm 1312$  AMSL. Impacts resulting in topographic changes would be less than significant.

Findings of Fact: Less than Significant Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

b) Grading at the Project site will not include significant cut or fill slopes. According to the Geotechnical Investigation and Percolation Testing, permanent, graded fill slopes constructed of on-site soils with gradients of 2:1 (horizontal to vertical) or flatter and vertical heights of 10 feet or less will possess factors of safety of 1.5 or greater. Planned cuts into the existing fill or alluvial materials will be over-excavated and reconstructed with compacted fill. Grading of cut and fill slopes will be designed in accordance with the requirements of the local building codes of the County of Riverside and the 2016 California Building Code. Therefore, no significant impacts are identified or anticipated.

Findings of Fact: Less than Significant Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

c) The Project site does not contain any operational subsurface sewage disposal systems under existing conditions. The Project site does not serve as a leach field for any off-site properties and has no potential to affect or negate operating subsurface sewage disposal systems. No impact would occur.

Findings of Fact: No Impact.

Mitigation: No mitigation is required.

		Potentially Significant Impact	Less than Significant with	Less Than	No Impact
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	Mitigation Incorporated	Significant Impact	
<ul><li>18. Soils <ul><li>a) Result in substantial soil erosion or the loss of topsoil?</li></ul></li></ul>			
b) Be located on expansive soil, as defined in Section 1803.5.3 of the California Building Code (2022), creating substantial direct or indirect risks to life or property?			
c) Have soils incapable of adequately supporting use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?			

**Source(s):** U.S.D.A. Soil Conservation Service Soil Surveys, Project Application Materials, On-site Inspection, Updated Geotechnical Investigation and Percolation Testing (October 30, 2017) prepared by Geocon West, Inc.

a) Erosion has the potential to occur from Project-related construction activities and through naturally occurring wind and water erosion. Construction of the Project would involve grading, paving, utility installation, building construction, and landscape installation that has the potential to temporarily expose on-site soils that would be subject to erosion during rainfall events or high winds. Pursuant to State Water Resources Control Board requirements, the Project is required to obtain a National Pollutant Discharge Elimination System (NPDES) permit for construction activities, including proposed grading. The NPDES permit is required for all projects that include construction activities, such as clearing, grading, and/or excavation that disturb at least one (1) acre of total land area. Further, the County's Municipal Separate Storm Sewer System (MS4) NPDES Permit requires the Project to prepare a Project-specific Storm Water Pollution Prevention Plan (SWPPP) and submit it to the County of Riverside for approval. During site construction, construction activities shall be designed and constructed to minimize runoff of sediment and all other pollutants. The SWPPP would identify a combination of erosion control and sediment control measures (i.e., Best Management Practices) to reduce or eliminate sediment discharge to surface water from storm water and non-storm water discharges during construction. In addition, the Project would be required to comply with SCAQMD Rule 403, which would reduce the amount of particulate matter in the air and minimize the potential for wind erosion. Compliance with the requirements identified in the Project's SWPPP, as well as applicable regulatory requirements, would ensure that the potential for water and/or wind erosion impacts during Project construction would be less than significant. Impacts resulting from soil erosion or loss of topsoil are considered less than significant.

Following construction, wind and water erosion on the Project site would be less than existing conditions because the Project site would be landscaped and covered with impervious surfaces and surface runoff would be captured and treated by an on-site storm drain system. Therefore, implementation of the Project would result in less long-term erosion and loss of topsoil than under the site's existing conditions. Further, the County's MS4 NPDES Permit requires the Project to prepare and submit a Water Quality Management Plan (WQMP) to the County for approval. The Project-specific WQMP will include a combination of erosion control and sediment control measures (i.e., Best Management Practices) to reduce or eliminate sediment discharge to surface water from storm water and non-stormwater discharges. Compliance with the requirements identified in the Project's WQMP would ensure that the potential for water and/or wind erosion impacts during Project operation would be less than significant. Impacts resulting from soil erosion or loss of topsoil are considered less than significant.

Findings of Fact: Less than Significant Impact.

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Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

b) Development of the Project site is required to comply with federal, state and County regulations regarding soil loss or erosion as well as the California Building Code requirements to reduce risks due to expansive soils. According to the Geotechnical Investigation and Percolation Testing, onsite soils generally possess a low expansion potential. Impacts resulting from expansive soils are considered less than significant.

Findings of Fact: Less than Significant Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

c) The design of the Project would not include the use of septic tanks or alternative wastewater disposal systems. No impact would occur.

Findings of Fact: No Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

19. Wind Erosion and Blowsand from Project either on or off site.		$\boxtimes$	
a) Be impacted by or result in an increase in wind			

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

a) As shown in Figure S-8 of the County's General Plan Safety Element, soils that occur at the Project Site are rated "moderate" for wind erodibility. As with any movement of soil, development of the Project site would have the potential to loosen surface soils, thereby making soils susceptible to wind and/or water erosion. Development would be considered a minimal surface disturbance and Best Management Practices would be required to minimize soil erosion due to wind. Further, Riverside County's Building and Safety Department would review and approve any future development plans, which would have the applicant comply with comments and/or conditions to reduce soil erosion impacts. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required. Impacts would be less than significant.

Findings of Fact: No Impact.

Mitigation: No mitigation is required.
	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
GREENHOUSE GAS EMISSIONS Would the Project				
20. Greenhouse Gas Emissions a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?				
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?				

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

a) Construction activities produce GHG emissions from various sources, such as site excavation, grading, utility engines, heavy-duty construction vehicles onsite, equipment hauling materials to and from the site, asphalt paving, building construction, and motor vehicles transporting the construction crew. In addition, operation of the proposed mobile home residences would result in area and indirect sources of operational GHG emissions that would primarily result from vehicle trips, electricity and natural gas consumption, water transport (the energy used to pump water), and solid waste generation. GHG emissions from electricity consumed by the residences would be generated off-site by fuel combustion at the electricity provider. GHG emissions from water transport are also indirect emissions resulting from the energy required to transport water from its source.

The SCAQMD does not have an adopted threshold of significance for construction-related GHG emissions. However, lead agencies are required to quantify and disclose GHG emissions that would occur during construction. SCAQMD recommends amortizing GHG emissions over the life of the project based on the total GHG emissions for construction activities divided by the project life (i.e., 30 years) then adding that number to the annual operational phase GHG emissions. CalEEMod was used to calculate emissions from on-site construction equipment and emissions from worker and vehicle trips to the site. Construction of the proposed Project is anticipated to begin in 2023 and be completed in 2024. During construction, approximately 6,134 cubic yards of soil would be cut and 9,652 cubic yards would be filled, for a net 3,518 cubic yards of soil to be imported. This analysis utilizes CalEEMod defaults for construction worker, vendor, haul trips, and construction equipment. Table 20-1 presents the estimated GHG emissions by each calendar year and amortized emissions for the proposed project.

Table 20-1. Project Construction Greenhouse Gas Emissions				
Construction Phase GHG Activity	CO2e			
Year	MT/yr			
2023	183			
2024	258			
Total	441			
Amortized over 30 Years	15			

Source: CalEEMod. Note: Numbers may appear to not sum correctly due to rounding. GHG = greenhouse gas MT CO2e = metric tons of carbon dioxide equivalent	
Source: CalEEMod. Note: Numbers may appear to not sum correctly due to rounding. GHG = greenhouse gas MT CO2e = metric tons of carbon dioxide equivalent	
Note: Numbers may appear to not sum correctly due to rounding. GHG = greenhouse gas MT CO2e = metric tons of carbon dioxide equivalent	Source: CalEEMod.
GHG = greenhouse gas MT CO2e = metric tons of carbon dioxide equivalent	Note: Numbers may appear to not sum correctly due to rounding.
MT CO2e = metric tons of carbon dioxide equivalent	GHG = greenhouse gas
	MT CO2e = metric tons of carbon dioxide equivalent

As indicated in Table 20-1, project construction would result in total emissions of 441 MT CO2e, which would be amortized to an annual rate of 15 MT CO2e over 30 years. Since there is no separate GHG significance threshold for construction emissions, project-level and cumulative GHG emissions during construction activities alone would be less than significant directly, indirectly, and cumulatively. No mitigation is required.

Long-term operation of the proposed Project would generate GHG emissions from area, mobile, waste, and water sources as well as indirect emissions from sources associated with energy consumption. Mobile source GHG emissions would include project-generated vehicle trips associated with trips to the proposed Project. Area-source emissions would be associated with activities such as landscaping and maintenance on the project site, and other sources. Waste source emissions generated by the proposed project include energy generated by landfilling and other methods of disposal related to transporting and managing project-generated waste. In addition, water source emissions associated with the proposed Project are generated by water supply and conveyance, water treatment, water distribution, and wastewater treatment. CalEEMod was used to calculate the long-term operational emissions associated with the proposed project. Table 20-2 shows the calculated GHG emissions for the proposed project.

Table 20-2. Project Operational Greenhouse Gas Emissions							
Operational GHG Activity	CO2	CH4	N2O	CO2e			
MT/yr							
Total	576	<1	<1	598			
SCAQMD Significance Threshold	-	-	-	3,000			
Exceed Significance?	-	-	-	No			
Source: CalEEMod. Note: values may appear incorrect due to rounding. CH4 = methane CO2 = carbon dioxide CO2e = carbon dioxide equivalent GHG = greenhouse Gas MT/yr = metric tons per year N2O = nitrous oxide							

As shown in Table 20-2, the project would result in approximately 598 MT CO2e/yr. This is less than SCAQMD's threshold of 3,000 MT CO2e/yr. Therefore, the proposed Project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. Impacts would be less than significant directly, indirectly and cumulatively. No mitigation is required.

Findings of Fact: Less than Significant Impact.

Mitigation: No mitigation is required.

b) The Project would develop the site with mobile home residences that would comply with state programs that are designed to be energy efficient. The Project would comply with all mandatory measures under the County's Climate Action Plan. Per the County's Climate Action Plan (CAP) 2019 Update, the goals and supporting measures within the County's CAP Update are proposed to reflect and ensure compliance with changes in the local and State policies and regulations such as SB 32 and California's 2017 Climate Change Scoping Plan. Therefore, compliance with the County's CAP in turn reflects consistency with the goals of the CARB Scoping Plan, Assembly Bill (AB) 32 and Senate Bill (SB) 32. Therefore, the proposed Project would not conflict with CARB plans, policies, and regulations adopted for the purpose of reducing the greenhouse gas emissions.

Findings of Fact: No Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
HAZARDS AND HAZARDOUS MATERIALS Would the Pro	ject:			
<ul><li>21. Hazards and Hazardous Materials</li><li>a) Create a significant hazard to the public or the</li></ul>			$\boxtimes$	
environment through the routine transport, use, or disposal of bazardous materials?				
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?				
c) Impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan?			$\boxtimes$	
d) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter (1/4) mile of an existing or proposed school?			$\square$	
e) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				

**Source(s):** GeoTracker, EnviroStor, Project Application Materials

#### Findings of Fact:

a-b) Development of the site may involve the handling of incidental amounts of hazardous substances, such as solvents, fuels, and oil. To avoid public exposure to hazardous materials, any future development would be required to comply with local, state, and federal laws and regulations regarding the handling and storage of hazardous materials. Long-term use of the site is not anticipated to pose a health or safety hazard to the public because normal household materials would be utilized for cleaning, paints, pesticides, etc. Compliance with local, state and federal hazardous material laws and regulations and implementation of BMPs, potential hazardous impacts to the public would be less than significant.

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CEQ / EA No

## Findings of Fact: Less than Significant Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

c) The construction and operation of the proposed Project would not cause any road closure or create detours that would interfere with adopted regional emergency response plans or regional emergency evacuation plans. At a local level, the Riverside County Fire Department provides emergency response services. The fire department provides 24-hour fire protection and emergency medical services to the Project area. The operation of the proposed Project would not hinder the ability of the fire department to respond to emergencies within the Project area because the site would be utilized as a residential use. The site design would be reviewed by the Riverside County Fire Department to ensure compliance with Project-specific emergency access, water pressure and similar requirements. With compliance with County of Riverside Fire Department design requirements, potential emergency response impacts would be less than significant.

## Findings of Fact: Less than Significant Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

d) The closest school to the Project site would be William Collier Elementary School located approximately 0.15 miles to the east. The transport of hazardous substances or materials to and from the Project site during construction would be required to comply with applicable federal, State, and local regulations to preclude substantial public safety hazards. Accordingly, there would be no potential for existing or proposed schools to be exposed to substantial safety hazards associated with the routine transport of hazardous substances or materials to and from the Project site. Further, most of the Project's traffic will use Corydon Road, and have no reason to travel on local roads near William Collier Elementary School. Thus, impacts would be less than significant.

#### Findings of Fact: Less than Significant Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

e) GeoTracker and EnviroStor databases were consulted to determine no hazardous materials sites occur onsite. No impact would occur.

Findings of Fact: No Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

# 22. Airports

a)	Result in an inconsistency with an Airport Master		$\bowtie$
Plan?			

b) Require review by the Airport Land Use		$\square$
Commission?		
c) For a Project located within an airport land use plan		$\square$
or, where such a plan has not been adopted, within two (2)		$\square$
miles of a public airport or public use airport, would the		
Project result in a safety hazard for people residing or		
working in the Project area?		
d) For a Project within the vicinity of a private airstrip,		
or heliport, would the Project result in a safety hazard for		$\square$
people residing or working in the Project area?		

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

a-d) According to Riverside County GIS, the Project is not located in an Airport Influence Area or Airport Compatibility Area. The Project is not located within the jurisdiction of any airport that would review/approve Project plans. The closest airport is the Skylark Field located approximately ½ mile north of the Project site. As such, the Project would not be exposed to hazards related to airport operations, and no impacts would occur.

Findings of Fact: No Impact.

Mitigation: No mitigation is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
HYDROLOCY AND WATER OUALITY Would the Dreight				
23 Water Quality Impacts				
a) Violate any water quality standards or waste			$\boxtimes$	
discharge requirements or otherwise substantially degrade				
surface or ground water quality?				
b) Substantially decrease groundwater supplies or			$\square$	
interfere substantially with groundwater recharge such that				
the Project may impede sustainable groundwater				
management of the basin?				
c) Substantially alter the existing drainage pattern of			$\boxtimes$	
the site or area, including through the addition of the course				
of a stream or river or through the addition of impervious				
d) Result in substantial erosion or siltation on-site or				
off-site?			$\boxtimes$	
e) Substantially increase the rate or amount of				
surface runoff in a manner which would result in flooding on-			$\bowtie$	
site or off-site?				
f) Create or contribute runoff water which would			$\square$	
exceed the capacity of existing or planned stormwater				
drainage systems or provide substantial additional sources				
of polluted runoff?				<u> </u>
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g) Impede or redirect flood flows?			$\boxtimes$
h) In flood hazard, tsunami, or seiche zones, risk the release of pollutants due to Project inundation?			$\boxtimes$
i) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?		$\boxtimes$	

**Source(s)**: Riverside County General Plan Figure S-9 "Special Flood Hazard Areas," Figure S-10 "Dam Failure Inundation Zone," Riverside County Flood Control District Flood Hazard Report/ Condition, Project Specific Water Quality Management Plan (January 7, 2019) prepared by Sake Engineers, Inc., GIS database

a) Implementation of the proposed Project includes grading, site preparation, construction of new buildings, and infrastructure improvements. Grading, stockpiling of materials, excavation, construction of new structures, and landscaping activities would expose and loosen sediment and building materials, which would have the potential to mix with stormwater and urban runoff and degrade surface and receiving water quality.

Additionally, construction generally requires the use of heavy equipment and construction-related materials and chemicals, such as concrete, cement, asphalt, fuels, oils, antifreeze, transmission fluid, grease, solvents, and paints. In the absence of proper controls, these potentially harmful materials could be accidentally spilled or improperly disposed of during construction activities and could wash into and pollute surface waters or groundwater, resulting in a significant impact to water quality.

Pollutants of concern during construction activities generally include sediments, trash, petroleum products, concrete waste (dry and wet), sanitary waste, and chemicals. Each of these pollutants on its own or in combination with other pollutants can have a detrimental effect on water quality. In addition, chemicals, liquid products, petroleum products (such as paints, solvents, and fuels), and concrete-related waste may be spilled or leaked during construction, which would have the potential to be transported via storm runoff into nearby receiving waters and eventually may affect surface or groundwater quality. During construction activities, excavated soil would be exposed, thereby increasing the potential for soil erosion and sedimentation to occur compared to existing conditions. In addition, during construction, vehicles and equipment are prone to tracking soil and/or spoil from work areas to paved roadways, which is another form of erosion that could affect water quality. However, the use of BMPs during construction implemented as part of a SWPPP as required by the NPDES General Construction Permit (and Municipal Code Section 14.08) would serve to ensure that Project impacts related to construction activities resulting in a degradation of water quality would be less than significant.

The Project includes operation of residential and recreation/open space uses. Potential pollutants associated with the proposed uses include various chemicals from cleaners, pathogens from pet wastes, nutrients from fertilizer, pesticides and sediment from landscaping, trash and debris, and oil and grease from vehicles. If these pollutants discharge into surface waters, it could result in degradation of water quality. However, operation of the Project would be required to comply with the requirements of the Santa Ana Regional MS4 Permit and has prepared a Project-specific WQMP that describes the low-impact development (LID) infrastructure and non-structural, structural, and source control and treatment control BMPs that are included in the Project's design to protect surface water quality.

The Santa Ana Regional MS4 Permit requires that new development and significant redevelopment Projects (or priority Projects), such as the Project, develop and implement a WQMP that includes BMPs and LID design features that would provide onsite treatment of stormwater to prevent pollutants from onsite uses from leaving the site. A WQMP has been developed for the Project and is required to be approved prior to the issuance of a building or grading permit. As described previously, the WQMP is

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required to be approved prior to the issuance of a building or grading permit. The Project's WQMP would be reviewed and approved by the County to ensure it complies with the Santa Ana RWQCB MS4 Permit regulations. In addition, the County's permitting process would ensure that all BMPs in the WQMP would be implemented with the Project. Overall, implementation of the WQMP pursuant to the existing regulations would ensure that operation of the Project would not violate any water quality standards, waste discharge requirements, or otherwise degrade water quality; and impacts would be less than significant.

Findings of Fact: Less than Significant Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

b) The Elsinore Valley Municipal Water District (EVMWD) provides water services to the Project area. The EVMWD's 2020 Urban Water Management Plan describes that the EVMWD obtains water from local groundwater wells, surface water from Canyon Lake Reservoir and treated at the Canyon Lake Water Treatment Plant, and imported water purchased from the Metropolitan Water District. EVMWD pumps water from the Elsinore Valley Subbasin and the Bedford-Coldwater Subbasin. EVMWD actively manages the groundwater subbasins and serves as the Groundwater Sustainability Agency (GSA) for the Elsinore Valley Subbasin and is a member of the Bedford-Coldwater Groundwater Sustainability Authority (BCGSA), which serves as the GSA for the Bedford-Coldwater Subbasin. The EVMWD 2020 Urban Water Management Plan (UWMP) shows that the anticipated production of groundwater would remain the same through 2045 and the supply would exceed demand in both normal years and multiple dry year conditions. The Project would not result in changes to the Projected groundwater pumping that would decrease groundwater supplies, and the Project would not otherwise impede the sustainable aroundwater management of the basin. The Project would convey stormwater drainage into landscaping areas and the water quality basin, which would infiltrate into soils and groundwater and lake. From the water quality basin, runoff would flow to the existing storm drain and flood control facilities within the Project area and then to Lake Elsinore. Therefore, impacts related to interference with groundwater recharge would be less than significant.

Findings of Fact: Less than Significant Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

c) A man-made earthen channel extends through the western portion of the Project site. Surface flows sheet flow across the site to a storm drain located on the northwest corner of the site, which eventually drains to the back basin of Lake Elsinore. The surface flows onsite originate from Grand Avenue to the southeast. Runoff from Grand Avenue flows north through a concrete flood control channel to a man-made earthen channel located on the adjacent property to the south of the Project site. Flows enter the Project site at the southwestern corner of the Project site. The man-made channel will be filled and replaced by a concrete flood control channel, which will extend from the existing concrete flood control channel south of the Project site to the existing storm drain located within the northwest corner of the Project site. The Project site. The Project area would be collected by roof drains, surface flow designed pavement, curbs, and area drains and conveyed to either landscaping areas or to the proposed water quality basin. Overall, the proposed drainage system and adherence to the existing regulations would ensure that Project impacts related

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to alteration of a drainage pattern and erosion/siltation from operational activities would be less than significant.

Findings of Fact: Less than Significant Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

d) Grading and construction activities on the Project site would expose underlying soils and disturb surficial soils on the Project site. Exposed soils would be subject to erosion during rainfall events or high winds due to the removal of stabilizing vegetation and exposure of these erodible materials to wind and water. Pursuant to the County's MS4 Permit, the Project must to prepare and submit to the County for approval a Project-specific SWPPP. The SWPPP will identify a combination of erosion control and sediment control measures (i.e., BMPs) to reduce or eliminate sediment discharge to surface water from stormwater and non-storm water discharges during construction. With mandatory compliance to the requirements noted in the Project's SWPPP, , the potential for water and/or wind erosion impacts during Project construction would be less than significant and mitigation is not required.

Following construction, wind and water erosion on the Project site would be minimal because the areas disturbed during construction would be landscaped or covered with impervious surfaces and drainage would be controlled through a storm drain system. Further, the project is located within the Lakeland Village Master Drainage Plan. The project will construct the portion of Line O-10 from the existing inlet structure at Union Steet to the western border of the project site to protect the development from offsite flood hazard and related erosion. Therefore, because the Project would not result in substantial erosion or siltation on-site or off-site, impacts would be less than significant.

Findings of Fact: Less than Significant Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

e-g) The Project's onsite drainage design will provide flood protection to the proposed development, the proposed water quality basin will adequately treat onsite flows, and the detention basins will mitigate for increased runoff. Therefore, because the Project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-site or off-site, impacts would be less than significant.

Findings of Fact: Less than Significant Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

h) According to the Federal Emergency Management Administration (FEMA) Flood Insurance Rate Map (FIRM) Panel 06065C2681G, the Project site is located in Zone X Area of Minimal Flood Hazard area.

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A tsunami is a series of long period waves generated in the ocean by a sudden displacement of large volumes of water. Causes of tsunamis include underwater earthquakes, volcanic eruptions, or offshore slope failures. The first order driving force for locally generated tsunamis offshore southern California is expected to be tectonic deformation from large earthquakes (Legg, *et al.*, 2003). The site is located approximately 23 miles from the nearest coastline; therefore, the negligible risk associated with tsunamis is not a design consideration. A seiche is a run-up of water within a lake or embayment triggered by fault- or landslide-induced ground displacement. The site is located approximately ½ mile southwest of the dry lake bed and 1.5 miles southwest of Lake Elsinore. Therefore, the risk of a seiche is considered low and no impact would occur.

#### Findings of Fact: No Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

i) As described previously, use of BMPs during construction implemented as part of a SWPPP as required by the NPDES Construction General Permit would serve to ensure that Project impacts related to construction activities resulting in a degradation of water quality would be less than significant. Thus, construction of the Project would not conflict or obstruct implementation of a water quality control plan. All new development Projects are required to implement a WQMP that would comply with the MS4 permit requirements. The WQMP and applicable BMPs are verified as part of the County's permitting approval process, and construction plans would be required to demonstrate compliance with these regulations. Therefore, operation of the proposed Project would not conflict with or obstruct implementation of a water quality control plan.

Water production from groundwater basins is managed by EVMWD, who is the Groundwater Sustainability Agency (GSA) for the Elsinore Valley Subbasin, and by the Bedford-Coldwater Groundwater Sustainability Authority for the Bedford-Coldwater Subbasin. The 2020 Urban Water Management Plan details that the anticipated production of groundwater would remain steady through 2045. The EMWD's supply of water would be sufficient during both normal years and multiple dry year conditions between 2025 and 2045 to meet all of the estimated needs, including the Project. Therefore, the Project would be consistent with the groundwater management plan and would not conflict with or obstruct its implementation. Thus, impacts related to water quality control plan or sustainable groundwater management plan would be less than significant.

Findings of Fact: Less than Significant Impact.

Mitigation: No mitigation is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
LAND USE/PLANNING Would the Project:				
<ul> <li>24. Land Use</li> <li>a) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted</li> </ul>				
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for the purpose of avoiding or mitigating an environmental effect?		 
b) Disrupt or divide the physical arrangement of an established community (including a low-income or minority community)?		

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

a) The Project site is currently vacant. The site's land use designation Mixed Use Area allows for flexibility in land usage than conventionally designated and zoned area that limit land uses to a singular theme. Flexibility in land use and design provides an incentive for landowners and developers to make efficient use of land and to propose different land uses *or* mixes of uses unique to each section of their proposed project.

Therefore, impacts related to General Plan land uses would be less than significant. The zoning designations for the Project site are General Residential (R-3), General Commercial (C-1/C-P), Watercourse, Watershed and Conservation Areas (W-1), and Rural Residential (R-R). The proposed Project includes 71 mobile home residences within a 10.02 gross acre site. The proposed Project only includes development within the portions of the site zoned as R-3 and W-1; the Project does not propose development of the portions of the site zoned C-1/C-P or R-R.

According to the General Plan, MUA does not identify a particular mixture or intensity of land uses, but to designate areas where a mixture of residential, commercial, office, entertainment, educational, and/or recreational uses, or other uses is planned. On a net acre basis, the 71 mobile home residences would be developed on 9.07 net acres, which would result in 7.83 units per net acre. Thus, the residential Project would not conflict with the existing residential General Plan land use and zoning designations for the site.

The Project site is located within the WRMSHCP boundaries. The County of Riverside, acting as the lead agency for the proposed project, is a permittee under the WRMSHCP and, therefore, is afforded coverage under the state or federal ESAs for impacts to listed species covered by the plan. The County is required to document consistency with the WRMSHCP in conjunction with any discretionary approvals for the project. Through the Habitat Acquisition and Negotiation Strategy (HANS) process, the Project was found to be consistent with both the WRMSHCP Criteria and Other Plan requirements.

The proposed Project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. As such, no impact would occur.

Findings of Fact: No Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

b) The Project site is adjacent to existing residential and commercial development. Therefore, the change of the Project site from a vacant site to a residential neighborhood would not physically divide an established community. Conversely, it would add to the existing neighborhoods surrounding the site. In addition, the proposed roadway/sidewalk system provides for circulation through the site and does not result in any physical division. Thus, the proposed Project would not result in impacts related to physical division of an established community.

Findings of Fact: No Impact.

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Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
MINERAL RESOURCES Would the Project				
25 Minoral Resources				
a) Result in the loss of availability of a known mineral				$\boxtimes$
resource that would be of value to the region or the residents				
of the State?				
b) Result in the loss of availability of a locally-				
important mineral resource recovery site delineated on a				
local general plan, specific plan or other land use plan?				
c) Potentially expose people or property to hazards				$\square$
from proposed, existing, or abandoned quarries or mines?				

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

a) Riverside County General Plan Figure OS-6 shows that the Project site and surrounding area is located within Mineral Resource Zone 3 (MRZ-3), meaning the significance of mineral deposits is undetermined and the site is not located within an area designated by the State Mining and Geology Board as being of regional or Statewide significance (Riverside County, 2015a, Figure OS-6). Because the site is not located within an area known for mineral resources that are of value to the region and the residents of the State, no impact would occur.

Findings of Fact: No Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

b) The Project does not propose mining operations and is not located in an identified locally important mineral resource recovery site. Therefore, the Project will not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

Findings of Fact: No Impact.

Mitigation: No mitigation is required.

c) There are no proposed, existing, or abandoned mines within the vicinity of the Project site. Therefore, the Project does not have the potential to expose people or property to hazards from proposed, existing, or abandoned quarries or mines. As such no impact would occur.

Findings of Fact: No Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
NOISE Would the Project result in:				
<ul> <li>26. Airport Noise <ul> <li>a) For a Project located within an airport land use plan</li> <li>or, where such a plan has not been adopted, within two (2)</li> <li>miles of a public airport or public use airport would the</li> <li>Project expose people residing or working in the Project area</li> <li>to excessive noise levels?</li> </ul> </li> </ul>				
b) For a Project located within the vicinity of a private airstrip, would the Project expose people residing or working in the Project area to excessive noise levels?				

**Source(s):** Riverside County General Plan Figure S-20 "Airport Locations," County of Riverside Airport Facilities Map, Noise Impact Analysis (December 7, 2018) prepared by Eilar Associates, Inc.

a-b) The Project site is not located within an airport land use plan. The closest airport is the Skylark Field located approximately ½ mile north of the Project site. The Project's distance from an airstrip is not forecast to have the potential to expose people to excessive noise levels. No impact would occur.

Findings of Fact: No Impact.

Mitigation: No mitigation is required.

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

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

**Source(s):** Riverside County General Plan, Table N-1 ("Land Use Compatibility for Community Noise Exposure"), Noise Impact Analysis (December 7, 2018) prepared by Eilar Associates, Inc., Ordinance No. 847 Regulating Noise

a) A Noise Impact Study was prepared for the project by Eilar Associates, Inc. on December 7, 2018. The analysis of this study is quoted here.

# Methodology

#### Field Measurement

Typically, a "one-hour" equivalent sound level measurement ( $L_{EQ}$ , A-Weighted) is recorded for at least one noise-sensitive location on the site. During the on-site noise measurement, start and end times are recorded, vehicle counts are made for cars, medium trucks (double-tires/two axles), and heavy trucks (three or more axles) for the corresponding road segment(s). Supplemental sound measurements of one hour or less in duration are often made to further describe the noise environment of the site.

For measurements of less than one hour in duration, the measurement time is long enough for a representative traffic volume to occur and the noise level ( $L_{EQ}$ ) to stabilize. The vehicle counts are then converted to one-hour equivalent volumes by applying an appropriate factor. Other field data gathered include measuring or estimating distances, angles-of-view, slopes, elevations, roadway grades, and vehicle speeds. This information is subsequently verified using available maps and records.

#### **Roadway Noise Calculation**

The Traffic Noise Model (TNM) calculation protocol in Cadna Version 2019 (based on the methodology used in TNM Version 2.5, released in February 2004 by the U.S. Department of Transportation) was used for all traffic modeling in the preparation of this report. Using the TNM protocol, the CNEL is calculated as 0.092 times the ADT for surrounding roadways, based on the studies made by Wyle Laboratories (see reference). Future CNEL is calculated for desired receptor locations using future road alignment, elevations, lane configurations, projected traffic volumes, estimated truck mixes, and vehicle speeds. Noise attenuation methods may be analyzed, tested, and planned with TNM, as required.

#### Cadna Noise Modeling

Modeling of the outdoor noise environment to determine temporary construction noise impacts is accomplished using Cadna Version 2019, which is a model-based computer program developed by

DataKustik for predicting noise impacts in a wide variety of conditions. Cadna (Computer Aided Noise Abatement) assists in the calculation, presentation, assessment, and mitigation of noise exposure. It allows for the input of project information such as noise source data, barriers, structures, and topography to create a detailed model and uses the most up-to-date calculation standards to predict outdoor noise impacts. Noise standards used by Cadna that are particularly relevant to this analysis include ISO 9613 (Attenuation of sound during propagation outdoors). Cadna provides results that are in line with basic acoustical calculations for distance attenuation and barrier insertion loss.

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Further explanation may be provided upon request.

## Project-Generated Traffic Noise impacts

Changes in traffic noise levels can be predicted by inputting the ratio of the two scenarios into the following logarithmic equation:

$$4 \Delta = 10\log(V2)$$
/V1)

where:  $\Delta$ = Change in sound energy, V1 = original or existing traffic volume, and V2 = future or cumulative traffic volume.

# Measurement Equipment

Some or all of the following equipment was used at the site to measure existing ambient noise levels:

- Larson Davis Model 824 Type 1 Sound Level Meter, Serial #A3043
- Larson Davis Model CA250 Type 1 Calibrator, Serial #1081
- Tripod

The sound level meter was field-calibrated immediately prior to the noise measurement and checked afterwards, to ensure accuracy. All sound level measurements conducted and presented in this report, in accordance with the regulations, were made with sound level meters that conform to the American National Standards Institute specifications for sound level meters (ANSI S1.4). All instruments are maintained with National Bureau of Standards traceable calibration, per the manufacturers' standards.

## Applicable Noise Standards

The proposed project must meet the acoustical requirements of the County of Riverside Noise Element to the General Plan, State of California Building Code, and Riverside County Code of Ordinances (Ordinance No. 847) in order to obtain approval. The County of Riverside Noise Element to the General Plan requires exterior noise levels in outdoor use areas or residential properties to be shielded from noise levels over 70 CNEL in order to be considered conditionally compatible. Additionally, the Noise Element to the General Plan and the California Building Code require interior noise of 45 CNEL or less in habitable space within

residential spaces.

The Riverside County Code of Ordinances gives noise limits for stationary noise sources (Ordinance No. 847). According to Section 9.52.020 (L) of the Code or Ordinances, heating and air conditioning equipment is exempt from this requirement. As heating and air conditioning equipment is the only significant stationary noise source expected on site, the noise limits for stationary noise sources do not apply to this project.

Chapter 9.52.020 of the Riverside County Code of Ordinances states that construction noise may be treated as an exception to the noise standards of the Code of Ordinances, provided projects located within one quarter mile of inhabited dwellings prohibit construction between the hours of 6 p.m. and 6 a.m. during the months of June through September, and between the hours of 6 p.m. and 7 a.m. during the months of October through May.

## Existing Noise Environment

The primary noise sources in the vicinity of the project site include automobile and truck traffic noise from Corydon Road and Union Street. Current traffic volumes were obtained from the County of Riverside Transportation Department Traffic Counts and professional experience. No additional noise sources are considered to be significant.

Corydon Road is a two-way Arterial running generally north-south along the east boundary of the project site. Corydon Road has three lanes north of Union Street and two lanes south of Union Street. The posted speed limit is 45 mph. According to the County of Riverside Transportation Department Traffic Counts, Corydon Road currently carries a traffic volume of approximately 19,281 Average Daily Trips (ADT).

Union Street is a two-lane, two-way roadway running generally east-west along the north boundary of the project site. Union Street is not classified in the County of Riverside Circulation Plan; however, it is assumed to be a Collector. The speed limit was not observed to be posted, but based on professional experience and observations on site, the speed limit is assumed to be 35 mph. The County of Riverside Transportation Department Traffic Counts do not give traffic volumes for Union Street; however, based on professional experience and observations on site, it is estimated that Union Street currently carries a traffic volume of approximately 8,000 ADT.

Traffic mix information for roadways was taken from the County of Riverside Department of Public Health Memo "Requirements for determining and mitigating traffic noise impacts to residential structures." The vehicle mix for Corydon Road was modeled as 3.0% medium trucks and 5.0% heavy trucks, based on its classification as an Arterial. As Union Street has been evaluated as a Collector, the vehicle mix was modeled as 1.84% medium trucks and 0.74% heavy trucks. Current and future traffic volumes for the roadway sections near the project site are shown below in Table 27-1.

Table 27-1. Overall Traffic Information						
Roadway Name	Speed Limit	Vehicle Mix (%)		Current ADT Future A	) Current ADT Futu	Future ADT
	(mpn)	Medium	Heavy	(Year)	(Buildout)	
Corydon Road	45	3.0	5.0	19,281 (2013)	20,700	
Union Street	35 (assumed)	1.84	0.74	8,000 (2018, assumed)	10,400	

Noise contours were calculated for the project site using Cadna Noise Modeling Software without considering topography or project structures in the current noise environment. The site is currently exposed to noise levels ranging from approximately 57 CNEL at the southwest corner of the project site to 75 CNEL at the northeast corner of the site. For a graphical representation of contours, please refer to Figure 3: Site Plan Showing Current Traffic CNEL Contours and Noise Measurement Location.



Figure 3- Site Plan Showing Current Traffic CNEL Contours and Noise Measurement Location

# Measured Noise Level

An on-site inspection was conducted at 12:10 p.m. on Tuesday, December 4, 2018. The weather conditions were as follows: winds at 5 to 7 mph, low humidity, and temperatures in the upper 60s. A noise measurement was taken at the northeast corner of the project site, approximately 42 feet west of the Corydon Road centerline and approximately 32 feet south of the Union Street centerline. The microphone position was approximately five feet above the existing grade. The dominant source of noise during the measurement was traffic noise from Corydon Road and Union Street. The measured noise level can be seen in Table 27-2, and the measurement location is shown graphically on Figures 3 and 4.

Table 27-2. On-Site Noise Measurement Conditions and Results			
Date	Tuesday, December 4, 2018		
Time	12:10 p.m. – 12:22 p.m.		
Conditions	Clear skies, winds at 5-7 mph, temperature in the upper 60s with low humidity		
Measured Noise Level	70.9 dBA LEQ		





# Calculated Noise Level

Noise levels were calculated for the site using the methodology described above for the location, conditions, and traffic volumes counted during the noise measurements. The calculated noise levels ( $L_{EQ}$ ) were compared with the measured on-site noise level to determine if adjustments or corrections (calibration) should be applied to the traffic noise prediction model. Adjustments are intended to account for site-specific differences, such as reflection and absorption, which may be greater or lesser than accounted for in the model.

The measured noise level of 70.9 dBA  $L_{EQ}$  was compared to the calculated (modeled) noise level of 68.2 dBA  $L_{EQ}$ , for the same conditions and traffic flow. According to the Federal Highway Administration's Highway Traffic Noise: Analysis and Abatement Guide (see reference), a traffic noise model is considered validated if the measured and calculated noise impacts differ by three decibels or less. No adjustment was deemed necessary to model future noise levels for this noise model as the difference between the measured and calculated levels was found to be less than three decibels. The Traffic Noise Model is assumed to be representative of actual traffic noise that is experienced on site. This information is presented in Table 27-3.

Table 27-3. Calculated versus Measured Traffic Noise Data				
Location	Calculated	Measured	Difference	Correction
42' west of Corydon Road centerline and 32' south of the Union Street centerline	68.2 dBA LEQ	70.9 dBA LEQ	2.7 dB	None Applied

## Future Noise Environment

The future noise environment in the vicinity of the project site will be primarily a result of the same ambient noise sources, as well as minor noise generated by the proposed uses at the project site.

## Future Traffic Volumes and Project-Generated Traffic

Future traffic volumes of Corydon Road and Union Street have been determined based on the future buildout daily traffic volumes provided by the County of Riverside. County of Riverside traffic noise modeling requirements state that future traffic volumes shall be modeled as the Level of Service C (LOS C) design capacity based on the roadway classification. Corydon Road is classified as two-lane Arterial in the vicinity of the project site. The County of Riverside LOS C design capacity of a two-lane Arterial is 14,400. As this volume is less than the current volume, the LOS C volume of a Secondary roadway was used for Corydon Road for a worst-case analysis. Therefore, the future traffic volume of Corydon Road was modeled as 20,700 ADT. Union Street is not classified in the County of Riverside Circulation Plan; however, it is assumed to be a Collector. Therefore, Union Street was modeled as 10,400 ADT.

The same truck percentages from the current traffic volumes were used for future traffic volume modeling.

Future noise contours were calculated for the project site using Cadna without considering topography or project structures. In the future noise environment, the site is expected to be exposed to noise levels ranging from approximately 58 CNEL at the southwest corner of the project site to 76 CNEL at the northeast corner of the site. For a graphical representation of contours, please refer to Figure 4: Site Plan Showing Future Traffic CNEL Contours and Noise Measurement Location.

Project-generated traffic noise was evaluated to determine whether the project will have a significant noise impact on the adjacent properties. As a traffic study for this project was unavailable at the time the noise study was prepared, project-generated peak hour volumes from a similar project were used to determine potential project-generated traffic noise impacts near affected intersections.

## Mechanical Equipment

Air conditioning units will be located on site at each residence. However, according to Section 9.52.020 (L) of the County of Riverside Code or Ordinances, heating and air conditioning equipment is exempt from noise limits. No other mechanical equipment on site is expected to generate a significant amount of noise.

## Temporary Construction Equipment

Construction information was not available at the time that the noise study was prepared; however, typical construction phasing and equipment has been selected for analysis based on the work expected to be performed. Noise levels and typical duty cycles for proposed equipment are detailed in Table 27-4. Unless otherwise noted, all noise levels have been provided by the DEFRA Construction Equipment Noise Database and all duty cycles have been provided by the Federal Highway Administration (see references).

Table 27-4. Typical Construction Equipment Noise Levels			
Equipment Description	Duty Cycle (%)	Noise Level at 50 feet (dBA)	
Dump Truck	40	77	
Dozer	40	77	
Water Truck	40	77 <sup>1</sup>	
Backhoe	40	65	
Scraper	40	84 <sup>2</sup>	
Excavator	40	77	
Concrete Mixer Truck	40	76	
Concrete Pump Truck	20	74	
Paver	50	73	

<sup>1</sup>Source: Noise measurements made by Eilar Associates on March 25, 2010 for Brutoco Engineering & Construction, Inc. for the Orange Line Extension Project, Metro Contract #C0943, City of Los Angeles, California.

<sup>2</sup>Source: Federal Highway Administration Construction Noise Handbook, Construction Equipment Noise Levels and Ranges.

#### **Traffic Noise Impacts**

#### Exterior Traffic Noise Impacts

The County of Riverside Noise Element to the General Plan requires exterior noise levels in outdoor use areas of residential properties to be shielded from noise levels over 70 CNEL in order to be considered conditionally compatible. Receivers have been placed in the traffic noise model at the anticipated outdoor use areas (backyards) for the worst-case lots on site, in addition to receivers placed at the common outdoor use areas on site. All other outdoor use receivers are located at a greater distance from roadway noise sources and are expected to have lower noise levels. Please refer to Table 5 for future traffic noise levels at these outdoor use areas. These calculated noise levels consider shielding that would be provided by the proposed residences on site. For a graphical representation of the receiver locations, please refer to Figure 5.

Table 27-5: Future Traffic Noise Impacts at Outdoor Use Areas			
Receiver	Location	Exterior Noise Level (CNEL)	
R1	Lot 1	68.3	
R2	Lot 2	68.2	
R3	Lot 3	68.5	
R4	Lot 4	68.7	
R5	Lot 5	69.0	
R6	Lot 6	69.5	
R7	Lot 7	71.3	
R8	Lot 8	71.4	
R9	Lot 9	71.2	

R10	Lot 10	71.2
R11	Lot 11	71.1
R12	Lot 12	71.0
R13	Lot 13	71.0
R14	Lot 14	70.9
R15	Lot 15	70.8
R16	Lot 16	67.8
R17	Lot 17	64.2
R18	Lot 18	63.0
R19	Lot 19	62.0
R20	Lot 20	61.2
R21	Lot 21	60.7
R22	Pool	59.7
R23	Dog Park	58.8



Figure 5- Site Plan Showing Outdoor Use Receiver and Barrier Locations

As shown above, calculations of future noise levels at outdoor use receivers are expected to exceed County noise limits at lots 7 through 16. Therefore, the utilization of perimeter sound walls can be

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Table 27-6: Futu	Table 27-6: Future Traffic Noise Levels at Outdoor Use Areas – with Barrier Mitigation		
Receiver	Location	Barrier Height (ft)	Exterior Noise Level (CNEL)
R7	Lot 7	6	66.9
R8	Lot 8	6	66.5
R9	Lot 9	6	66.4
R10	Lot 10	6	66.3
R11	Lot 11	6	66.3
R12	Lot 12	6	66.2
R13	Lot 13	6	66.2
R14	Lot 14	6	66.2
R15	Lot 15	6	66.8

expected to reduce noise impacts. The Project proposes a 6-foot wall around the perimeter of the proposed residential areas. All other receivers are expected to comply with the 70 CNEL noise limit.

With the incorporation of the sound attenuation barriers shown in Table 27-6, all outdoor use areas are expected to comply with the County of Riverside Noise Element to the General Plan. Please refer to Figure 6 for a graphical representation of the barrier location.

A sound wall should be solid and constructed of masonry, wood, plastic, fiberglass, steel, or a combination of those materials, with no cracks or gaps, through or below the wall. Any seams or cracks must be filled or caulked. If wood is used, it can be tongue and groove and must be at least 7/8-inch thick or have a surface density of at least 3½ pounds per square foot. Where architectural or aesthetic factors allow, glass or clear plastic may be used on the upper portion, if it is desirable to preserve a view.



Figure 6- Satellite Aerial Photograph Showing Construction Noise Source and Receiver Locations

## Interior Traffic Noise Impacts

The State of California and the County of Riverside require buildings to be designed in order to attenuate, control, and maintain interior noise levels to below 45 CNEL in habitable space. According to the U.S. EPA, current exterior building construction is generally expected to achieve at least 15 decibels of exterior-to-interior noise attenuation, with windows opened. Therefore, proposed Project building structures exposed to exterior noise levels greater than 60 CNEL could be subject to interior noise levels exceeding the 45 CNEL noise limit for residential habitable space.

Calculations show that future noise levels on site are expected to exceed 60 CNEL at several lots on site, and therefore interior noise levels may exceed 45 CNEL with windows open without appropriate attention to detail. Due to high noise levels on site, an exterior-to-interior noise analysis should be performed when building plans become available, prior to the issuance of building permits. However, the required interior noise levels are feasible and can be achieved with readily available building materials and construction methods.

It is likely that either insulated glazing units or laminated glass will be required at exterior windows to reduce noise levels to below 45 CNEL inside units. Additionally, it is anticipated that mechanical ventilation will be required at some lots in order to provide the appropriate fresh air exchange rates while windows are closed to meet interior noise requirements. To reduce the onsite and residential interior noise from vehicular noise from the adjacent roadway, the Project includes development of a 6-foot-high wall along the Project site frontage of Corydon Road and Union Street and the noise abatement design features on Lots 7 through 15.

#### Temporary Construction Noise Impacts

Chapter 9.52.020 of the Riverside County Code of Ordinances (Ordinance No. 847) states that construction noise may be treated as an exception to the noise standards of the Code of Ordinances provided Projects located within one quarter mile of inhabited dwellings prohibit construction between the hours of 6 p.m. and 6 a.m. during the months of June through September, and between the hours of 6 p.m. and 7 a.m. during the months of October through May. The proposed Project would be eligible for such an exemption if construction were limited as stated above; however, noise levels have been evaluated regardless of this exemption to determine anticipated noise levels at the nearest surrounding occupied properties. Typical noise levels of construction equipment that may be used on site are listed in Table 27-7.

Table 27-7: Typical Construction Equipment Noise Levels			
Equipment Description	Duty Cycle (%)	Noise Level at 50 feet (dBA)	
Dump Truck	40	77	
Dozer	40	77	
Water Truck	40	77 <sup>1</sup>	
Backhoe	40	65	
Scraper	40	<sub>84</sub> <sup>2</sup>	
Excavator	40	77	
Concrete Mixer Truck	40	76	
Concrete Pump Truck	20	74	
Paver	50	73	

<sup>1</sup>Source: Noise measurements made by Eilar Associates on March 25, 2010 for Brutoco Engineering & Construction, Inc. for the Orange Line Extension Project, Metro Contract #C0943, City of Los Angeles, California.

<sup>2</sup>Source: Federal Highway Administration Construction Noise Handbook, Construction Equipment Noise Levels and Ranges.

The construction activity schedule was evaluated to determine potential temporary noise impacts to the surrounding noise sensitive receivers to the north, south, and east. Any other potentially noise sensitive receivers are located at a greater distance from construction activity and would be exposed to lesser noise impacts due to distance attenuation and shielding provided by intervening structures. Typical, anticipated construction activity is detailed in Table 27-8.

Table 27-8: Anticipated Construction Activity		
Phase	Anticipated Large Equipment	
1. Site Work (Grading, Utilities)	Dump Truck, Dozers (2), Water Truck, Backhoe, Scraper, Excavator	
2. Foundation	Concrete Mixer Trucks (2), Concrete Pump Trucks (2)	
3. Paving	Paver, Roller	

Noise levels were calculated at the nearest receivers to the north, south, and east. Noise sources were placed near the center of the property to evaluate typical impacts to the surrounding receivers as equipment moves around the property. Noise calculations consider typical duty cycles of equipment to account for periods of activity and inactivity on the site. Noise levels for each phase of construction are shown in Table 27-9.

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Table 27-9: T	emporary Construction Noise L	evels at Nearest C	Occupied Propertie	9S
Phase	Equipment Used	Receiver	Approximate Distance (ft)	Average Noise Level of Equipment (dBA)
1 Site Work (Grading Utilities)	Dump Truck, Dozers (2), Water	C1	357	66.5
	Truck, Backhoe, Scraper, Excavator	C2	389	66.0
		C3	328	67.3
	Concrete Mixer Trucks (2), Concrete	C1	357	59.8
2. Foundation Pump Trucks (2)	C2	389	59.3	
		C3	328	60.6
		C1	357	53.9
3. Paving	Paver, Roller	C2	389	53.4
		C3	328	54.7

Calculations show that construction noise levels on site are expected to range from 53.4 dBA at receiver C2 during paving activities, to 67.3 dBA at receiver C3 during the grading and utility phase of construction. Construction is prohibited between the hours of 6 p.m. and 6 a.m. during the months of June through September, and between the hours of 6 p.m. and 7 a.m. during the months of October through May.

The following measures shall be implemented at the Project site to reduce construction noise levels:

- Staging areas should be placed as far from occupied receivers as possible on the Project site to limit any additional unnecessary noise exposure at sensitive receivers.
- Place stationary equipment in locations that will have a lesser noise impact on nearby sensitive receivers.
- Turn off equipment when not in use.
- Limit the use of enunciators or public address systems, except for emergency notifications.
- Equipment used in construction should be maintained in proper operating condition, and all loads should be properly secured, to prevent rattling and banging.
- Schedule work to avoid simultaneous construction activities that both generate high noise levels.
- Use equipment with effective mufflers.
- Minimize the use of backup alarms.

With work limited to daytime hours and adherence to the general good practice construction noise control techniques and adherence to the above mitigation measures, temporary construction noise is not expected to have a significant impact on surrounding properties.

Finding of Fact: Less than Significant with Mitigation

#### Mitigation:

MM NOI-1: To reduce the onsite and residential interior noise from vehicular noise from the adjacent roadway, the Project includes development of a 6-foot-high wall along the Project site frontage of Corydon Road and Union Street and the noise abatement design features on Lots 7 through 16.

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MM NOI-2: To reduce construction noise levels, the following measures shall be implemented at the Project site.

- Staging areas should be placed as far from occupied receivers as possible on the Project site to limit any additional unnecessary noise exposure at sensitive receivers.
- Place stationary equipment in locations that will have a lesser noise impact on nearby sensitive receivers.
- Turn off equipment when not in use.
- Limit the use of enunciators or public address systems, except for emergency notifications.
- Equipment used in construction should be maintained in proper operating condition, and all loads should be properly secured, to prevent rattling and banging.
- Schedule work to avoid simultaneous construction activities that both generate high noise levels.
- Use equipment with effective mufflers.
- Minimize the use of backup alarms.

Monitoring: No monitoring is required.

b) Ground-borne vibration and/or ground-borne noise would be generated during construction of the proposed Project, which could be felt by adjacent land uses. The primary source of groundborne vibration will be operation of heavy equipment, such as bulldozers; however, the impacts will be temporary and will end once construction is complete. Construction of the Project will involve the temporary operation of vehicles and equipment which could result in localized, short-term vibration increases during the permitted hours of construction established by the County. With work limited to daytime hours and adherence to the general good practice construction noise control techniques and adherence to MM NOI-2, temporary construction noise is not expected to have a significant impact on surrounding properties.

Finding of Fact: Less than Significant with Mitigation

# Mitigation:

MM NOI-2: To reduce construction noise levels, the following measures shall be implemented at the Project site.

- Staging areas should be placed as far from occupied receivers as possible on the Project site to limit any additional unnecessary noise exposure at sensitive receivers.
- Place stationary equipment in locations that will have a lesser noise impact on nearby sensitive receivers.
- Turn off equipment when not in use.
- Limit the use of enunciators or public address systems, except for emergency notifications.
- Equipment used in construction should be maintained in proper operating condition, and all loads should be properly secured, to prevent rattling and banging.
- Schedule work to avoid simultaneous construction activities that both generate high noise levels.
- Use equipment with effective mufflers.
- Minimize the use of backup alarms.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
PALEONTOLOGICAL RESOURCES:				
<ul> <li>28. Paleontological Resources         <ul> <li>a) Directly or indirectly destroy a unique paleonto- logical resource, site, or unique geologic feature?</li> </ul> </li> </ul>			$\boxtimes$	

**Source(s):** Riverside County General Plan Figure OS-8 "Paleontological Sensitivity"

## Findings of Fact:

a) Pursuant to the Riverside County General Plan Multipurpose Open Space Element, Figure OS8, Paleontological Sensitivity, and the Riverside County GIS Parcel Report for the Project site, the potential for paleontological resources occurring on the site is low. General Plan Policy OS 19.7 states "Whenever existing information indicates that a site proposed for development has low paleontological sensitivity as shown on Figure OS-8, no direct mitigation is required unless a fossil is encountered during site development. Should a fossil be encountered, the County Geologist shall be notified, and a paleontologist shall be retained by the Project proponent. The paleontologist shall document the extent and potential significance of the paleontological resources on the site and establish appropriate mitigation measures for further site development." In addition to such County policies, there are a number of existing State and federal laws that regulate development impacts to paleontological resources, including those outlined under the California Public Resources Code Paleontological Resources Preservation Act. Project conformance with existing regulations intended for the protection of sensitive paleontological resources will reduce potential impacts to sensitive paleontological resources to a less than significant level.

Findings of Fact: Less than Significant Impact.

Mitigation: No mitigation is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
POPUL ATION AND HOUSING Would the Project				
<ul> <li>29. Housing         <ul> <li>a) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?</li> </ul> </li> </ul>				
b) Create a demand for additional housing, particularly housing affordable to households earning 80% or less of the County's median income?				
c) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				

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

## Findings of Fact:

a) The Project site is generally undeveloped and vacant. The site does not include any existing housing and no people are located onsite. Therefore, the Project would not displace any people or housing or necessitate replacement housing elsewhere.

Findings of Fact: No Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

b) The Project proposes the development of 71 mobile modular home residential units. The Project will not create a demand for additional housing, particularly housing affordable to households earning 80 percent or less of the County's median income. No impact would occur.

Findings of Fact: No Impact Is Identified.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

c) The Project involves the construction and operation of 71 mobile home residences on approximately 10.02 acres in the County of Riverside. The Project site has General Plan land use designation of Mixed Use Arealand use designation with no defined residential densities per acre. According to the General Plan, standards of building intensity for residential uses are stated as the allowable range of dwelling units per net acre. On a net acre basis, the 71 mobile home residences would be developed on 9.07 net acres, which would result in 7.94 units per net acre. The Project is consistent with the General Plan land use designation. Population, housing and employment is currently anticipated in the County of

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Riverside. The entitlement application submitted concurrently with the environmental document will ensure the population growth related to this project is planned and the needed infrastructure to sustain the development is adequate. Less than significant impacts are anticipated.

Findings of Fact: Less Than Significant Impact

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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

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

## 30. Fire Services

**Source(s)**: Riverside County General Plan Safety Element; Ordinance No. 659 (Public Services Development Impact Fees for New Development); Ordinance No. 787 (Requirements for High Occupancy Structures for Fire Protection).

Implementation of the proposed Project may indirectly necessitate future provision of additional fire protection services. The Riverside County Fire Department (RCFD) provides fire protection and emergency medical services to the Project area and would continue to do so following Project implementation. Currently, the Project area is served by Riverside County Fire Station Number 11, located at 33020 Maiden Lane, Lake Elsinore, CA 92530. The County of Riverside requires the payment of development impact fees prior to the final inspection by the Building and Safety Department for any residential dwelling.

Future development accommodated by the Project would also be subject to General Plan Policy LU 5.1, General Plan Policy S 5.1, and County Ordinance 787. Policy LU 5.1 prohibits new development from exceeding the ability to adequately provide supporting infrastructure and services, including fire protection services, and Policy S 5.1 requires proposed development to incorporate fire prevention features. County Ordinance No. 787 includes requirements for high-occupancy structures to further protect people and structures from fire risks, including requirements that buildings not impede emergency egress for fire safety personnel and that equipment and apparatus would not hinder evacuation from fire, including potential blockage of stairways or fire doors. Development would also be required to demonstrate compliance with any applicable California Building and Fire Codes, which are implemented to ensure new development meets minimum standards for access, fire flow, building ignition and fire resistance, fire protection systems and equipment, defensible space, and setback requirements. Adherence to the above-mentioned existing General Plan Policies and Ordinances, as well as existing State regulations, would ensure that potential physical impacts associated with the provision of fire protection services remain less than significant.

Findings of Fact: Less than Significant Impact.

Mitigation: No mitigation is required.

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Monitoring: No monitoring is required.

#### 31. Sheriff Services

#### **Source(s)**: Riverside County General Plan

The Project area is partially developed and is currently serviced by the Riverside County Sheriff's Department (RCSD) and would continue to be serviced by RCSD. The RCSD's ability to support future growth is dependent upon the financial ability to hire additional deputies and provide equipment for staff. Accordingly, future development accommodated through the proposed Project would be subject to Riverside County Ordinance No. 659, which requires new development to pay the DIF used to fund public facilities, including law enforcement facilities and supplies. The costs associated with the hiring of additional officers would be funded through Riverside County Board of Supervisor decisions on the use of general fund monies (i.e., property and tax). Payment of these fees would help to offset any future impacts associated with the site development accommodated through the Project.

Findings of Fact: Less than Significant Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

32.	Schools		$\boxtimes$	

Source(s): School District correspondence, GIS database, Ordinance 460.

<u>Findings of Fact</u>: The proposed Project is an age-qualified (55+) residential development project. It is not anticipated that the project would add school aged children to the existing local school student capacity. Notwithstanding, the Project would be required to pay applicable school impact fees prior to issuance of building permits pursuant to Ordinance 460. Therefore, potential impacts associated with schools would be less than significant and no mitigation would be required.

Findings of Fact: Less than Significant Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

33. Libraries

# **Source(s):** Riverside County General Plan

The Project involves the construction and operation of 71 mobile home residences on approximately 10.02 acres in the County of Riverside. The closest library to the Project property is Wildomar Library, located approximately 5.20 miles east of the Project at 34303 Mission Trail, Wildomar, CA 92530. Riverside County's Development Impact Fee Ordinance No. 659 requires new development to pay fees for library services, which is intended to offset any incremental increase in need for libraries. Payment

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of these fees would help to offset any impacts associated with the site development accommodated through the Project. As such, potential impacts associated with libraries would be less than significant and no mitigation is required.

Findings of Fact: Less than Significant Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

# 34. Health Services

## **Source(s)**: Riverside County General Plan

<u>Findings of Fact</u>: The Project site is located within the service area of several hospitals. If required, compliance with County Ordinance No. 659 requires a development impact fee payment to the County, of which funds may be partially allocated to public health services and facilities. Impacts to public medical facilities and resources associated with the proposed Project are considered less than significant and no mitigation is required

Findings of Fact: Less than Significant Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
RECREATION Would the Project:				
<b>35. Parks and Recreation</b> a) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				
b) Increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				
c) Be located within a Community Service Area (CSA) or recreation and park district with a Community Parks and Recreation Plan (Quimby fees)?				

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

a-b) Project implementation will include a 2,000-square-foot community clubhouse with a swimming pool and spa, dog park, pedestrian walking trails, and landscaped areas. The development of the recreational facilities will provide new spaces for outdoor activities for the future residents of the Project.

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It should be noted that the recreational areas developed by the Project would be private and would not add to the inventory of parks in the Project area; however, the recreational uses within the Project would reduce the use of public parks within the Project area. The recreational facilities are not anticipated to have an adverse physical effect on the environment. Less than significant impacts are expected.

Findings of Fact: Less than Significant Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

c) The Project site is not located within the boundaries of any adopted Community Parks and Recreation Plan and the park dedication. The Project will be required to pay park fees in accordance with Riverside County Ordinance No. 460, Section 10.35 (Park and Recreation Fees and Dedications). Payment of these fees would help to offset any impacts associated with the site development accommodated through the Project, and impacts would be less than significant.

Findings of Fact: Less than Significant Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

# 36. Recreational Trails Image: Second structure a) Include the construction or expansion of a trail Image: Second structure system? Image: Second structure

**Source(s)**: Riverside County General Plan Figure C-6 Trails and Bikeway System, County Service Area No. 142

a) As discussed above, the Project includes private pedestrian walking trails. The Project is not required to provide or expand recreational trails. The recreational facilities are not anticipated to have an adverse physical effect on the environment. Less than significant impacts are expected.

Findings of Fact: Less than Significant Impact.

Mitigation: No mitigation is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
TRANSPORTATION Would the Project:				
37. Transportation			$\bowtie$	
a) Conflict with a program, plan, ordinance, or policy				
addressing the circulation system, including transit, roadway,				
bicycle, and pedestrian facilities?				
b) Conflict or be inconsistent with CEQA Guidelines				
section 15064.3, subdivision (b)?				
c) Substantially increase hazards due to a geometric			$\square$	
design feature (e.g., sharp curves or dangerous				
intersections) or incompatible uses (e.g. farm equipment)?				
d) Cause an effect upon, or a need for new or altered				
maintenance of roads?			$\square$	
e) Cause an effect upon circulation during the			$\square$	
Project's construction?				
f) Result in inadequate emergency access or access				
to nearby uses?				

**Source(s):** Riverside County General Plan, Riverside County Transportation Commission, Riverside County Long Range Transportation Study, December 2019 Riverside County Transportation Analysis Guidelines for Level of Service Vehicle Miles Traveled, December 2020, Trip Generation Memorandum (December 17, 2019) prepared by Ganddini Group, and Project Application Materials

a-b) The project is within the jurisdiction of the County of Riverside. The County has adopted guidance on evaluating VMT for transportation impacts under CEQA. For this project the County of Riverside's, "Transportation Analysis Guidelines for Level of Service, Vehicle Miles Traveled", December 2020. These guidelines provide guidance on evaluating VMT for transportation-related impacts under CEQA. The Guidelines recognize that certain projects based on type, location, size and other contexts could lead to a presumption of less than significance (i.e. the project's VMT would not cause a transportation impact) and would not need additional VMT analysis. The Guidelines provide the following screening criteria:

1. Small Projects: This applies to projects with low trip generation per existing CEQA exemptions or based on the County Greenhouse Gas Emissions Screening Tables, result in a 3,000 Metric Tons of Carbon Dioxide Equivalent (MTCO2e) per year screening level threshold."

2. Projects Near High Quality Transit: High quality transit provides a viable option for many to replace automobile trips with transit trips resulting in an overall reduction in VMT.

3. Local Retail: The introduction of new Local-serving retail has been determined to reduce VMT by shortening trips that will occur.

4. Affordable Housing: Lower-income residents make fewer trips on average, resulting in lower VMT overall.

5. Local Essential Service: As with Local-Serving Retail, the introduction of new Local Essential services shortens non-discretionary trips by putting those goods and services closer to residents.

6. Map-Based Screening: This method eliminates the need for complex analyses by allowing existing VMT data to serve as a basis for the screening smaller developments. Note that screening is limited to residential and office projects.

7. Redevelopment Projects: Projects with lower VMT than existing on-site uses, can under limited circumstances, be presumed to have a non-significant impact. In the event this screening does not apply, projects should be analyzed as though there is no existing uses on site (project analysis cannot take credit for existing VMT).

*Small Projects Screening.* The County Guidelines lists two types of screening criteria that may apply to "small projects". The first is a vehicle trip threshold of 110 trips per day. According to the Trip Generation Memorandum prepared for the Project, the proposed Project is forecast to generate approximately 303 daily trips. The Project would exceed this daily trip threshold because the project would have 303 trips per day. County Guidelines also identifies land use projects that are forecast to generate greenhouse gas (GHG) emissions below 3,000 MTCO<sub>2</sub>e per year are also assumed to cause a less than significant VMT impact. With the conservative assumptions provided in the Greenhouse Gas Analysis section, the Project is estimated to generate only 598 MTCO<sub>2</sub>e annually which is below the 3,000 MTCO<sub>2</sub>e threshold. Therefore, the Small Projects screening criteria is met. Therefore, project VMT impacts would be less than significant pursuant to Riverside County's screening criteria.

Further, the Project is not expected to result in a substantial increase in vehicle trips and congestion to the areas circulation system because the density of development is consistent with the General Plan. The Project would be reviewed for consistency with all applicable County plans and would be required to comply with State and County design regulations. Impacts are considered less than significant.

Findings of Fact: Less than Significant Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

c) The Project proposes to construct internal roadways and access driveways along Union Street and Corydon Road. The project was reviewed by Riverside County Transportation Department for compliance with Ordinance 461.11 County Road Standards and County Standard Specifications. The project was further conditioned (TS/Geometrics) to ensure road alignment and striping complies with Riverside County standards. As such, the impacts are deemed less than significant and not mitigation will be required.

Findings of Fact: Less than Significant Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

d) The Project is proposing to construct internal roadways, access driveways, and site adjacent roadway improvements on Union Street and Corydon Road. Internal roadways will consist of 25-foot rights-of-way with 35-foot wide public access and utility easements, to include sidewalks, curbs and gutters consistent with the Riverside County General Plan. Union Street and Corydon Road will be constructed to the proposed right-of-way width along the corresponding Project site boundaries, to including include sidewalks, curbs and gutters consistent with the Riverside County General Plan. The construction of these roadway facilities consistent with the General Plan are not expected to significantly alter regional or interregional travel. These roadways would require routine, intermittent maintenance; however, maintenance of public streets would not result in any significant impacts to the environment. The Project would contribute traffic to off-site public roadways; however, public roads require periodic maintenance as part of their inherent operational activities, and such maintenance would not result in substantial

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impacts to the environment. Taxes and provisions of Riverside County Ordinance No. 659 which require payment of the DIF by future development applicants under the proposed Project would fund general County roadway maintenance. Therefore, a less than significant impact would occur.

Findings of Fact: Less than Significant Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

e) During the construction phase of the Project, traffic to and from the Project site would be generated by activities such as construction employee trips, delivery of construction materials, and use of heavy equipment. Vehicular traffic associated with construction employees would be substantially less than daily and peak hour traffic volumes generated during Project operational activities, especially because construction activities typically begin and end outside of the peak hour; therefore, a majority of the construction employees would not be driving to or from the Project site during hours of peak congestion. Traffic volumes from construction workers is not expected to result in a substantial adverse effect to the local roadway system because most trips would occur during non-peak hours. Deliveries of construction materials to the Project site would also have a nominal effect to the local roadway network because most trips would occur during non-peak hours. Construction materials would be delivered to the site throughout the construction phase based on need and would not occur on an everyday basis. Heavy equipment would be utilized on the Project site during the construction phase. Because most heavy equipment is not authorized to be driven on public roadways, most equipment would be delivered and removed from the site via flatbed trucks. As with the delivery of construction materials, the delivery of heavy equipment to the Project site would not occur on a daily basis, but would occur periodically throughout the construction phase on need. Union Street and Corydon Road would remain open with no reasonably foreseeable lane closures. Therefore, the Project's potential to cause an effect upon circulation during the Project's construction would be less than significant.

Findings of Fact: Less than Significant Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

f) The proposed Project would comply with the California Fire Code. The California Fire Code would all be followed in development of the proposed Project. During construction, the Project site would remain accessible from Union Street and Corydon Road. The internal circulation system would be designed to a width to accommodate emergency vehicles pursuant to the 2019 California Fire Code requirements and the Riverside County Fire Department. Prior to Project approval, the Riverside County Fire Department would review the Final Site Plan to ensure adequate emergency access to the site is provided. If additional features are required, the Project would need to incorporate these as conditions of approval. Based on compliance with the applicable California Fire Code and review and approval by the Riverside County Fire Department, the proposed Project would provide adequate emergency access. Impacts would be less than significant.

Findings of Fact: Less than Significant Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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38. Bike Trails		$\boxtimes$
a) Include the construction or expansion of a bike		
system or bike lanes?		

Source(s): Riverside County General Plan

a) According to the Riverside County General Plan Circulation Element Figure C-7, Riverside County Trails and Bikeway System, there are no designated bicycle trails/lanes along the adjacent roadways. The Project does not propose a bicycle trail system or bike lanes, nor is the Project required to construct or expand any of the existing bike trail/lane systems within the Project vicinity. No impact would occur.

Findings of Fact: No Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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

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

<b>39. Tribal Cultural Resources</b> a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?		
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? (In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.)		

Source(s): County Archaeologist, AB52 Tribal Consultation

a-b) Changes in the California Environmental Quality Act, effective July 2015, require that the County address a new category of cultural resources – tribal cultural resources – not previously included within the law's purview. Tribal Cultural Resources are those resources with inherent tribal values that are difficult to identify through the same means as archaeological resources. These resources can be identified and understood through direct consultation with the tribes who attach tribal value to the resource. Tribal cultural resources may include Native American archaeological sites, but they may

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also include other types of resources such as cultural landscapes or sacred places. Also relevant is the category termed "traditional cultural property" (TCP) which is typically associated with cultural resource management performed under federal auspices. According to Guidelines for Evaluating and Documenting Traditional Cultural Properties (Parker and King 1998), "traditional" in this context refers to those beliefs, customs, and practices of a living community of people that have been passed down through the generations, usually orally or through practice. The traditional cultural significance of a historic property, then, is significance derived from the role the property plays in a community's historically rooted beliefs, customs, and practices. A TCP can be defined, generally, as one that is eligible for inclusion in the NRHP because of its association with cultural practices or beliefs of a living community that (a) are rooted in that community's history, and (b) are important in maintaining the continuing cultural identity of the community. A landscape can be a TCP by extension a TCR, provided the cultural landscape meets the criteria and that the landscape is geographically defined in terms of the size and scope.

The appropriate treatment of tribal cultural resources is determined through consultation with tribes.

In compliance with Assembly Bill 52 (AB52), notices regarding this project were mailed to all requesting tribes on August 16, 2017. No response was received form the Pala Band of Indians, the Morongo Band, Rincon Band of Luiseno Indians, Ramona Band of Cahuilla Indians, Colorado River Indian Tribes, or the Quechan Historic Preservation Officer.

Consultations were requested by the Soboba Band of Luiseno Indians (Soboba), the Pechanga Band of Luiseno Indians (Pechanga), the Cahuilla Band (Cahuilla).

Soboba responded in an emailed letter dated September 14, 2017. Consultation was initiated and the project was discussed during a meeting held October 02, 2017. Project documents were provided to Soboba on November 27, 2018, and consultation was concluded on April 09, 2019. No specific impacts to Tribal Cultural resources were identified.

Cahuilla responded in an email dated August 17, 2017. Consultation was initiated and the project was discussed October 02, 2017. Project documents were provided to Cahuilla on November 27, 2018, and consultation was concluded on July 17, 2019. No specific impacts to Tribal Cultural resources were identified.

Pechanga responded in an emailed letter dated August 23, 2017. Consultation was initiated on September 11, 2017. This project was discussed during a meeting held on October 19, 2017. According to the tribe, the area was used in the past for gathering tobacco. On November 27, 2018, project documents were provided to the tribe. No specific impacts to Tribal Cultural resources were identified. Consultation was concluded on July 17, 2019.

Although no impacts to Tribal Cultural Resources were identified by the tribes, the project will be required to adhere to State Health and Safety Code Section 7050.5 in the event that human remains are encountered and by ensuring that no further disturbance occur until the County Coroner has made the necessary findings as to origin of the remains. Furthermore, pursuant to Public Resources Code Section 5097.98 (b), remains shall be left in place and free from disturbance until a final decision as to the treatment and their disposition has been made. In addition, CEQA requires the Lead Agency to address any unanticipated cultural resources discoveries during Project construction. Therefore, a condition of approval that dictates the procedures to be followed should any unanticipated cultural resources be identified during ground disturbing activities has been placed on this project. Thus, impacts are considered to be less than significant.

Findings of Fact: Less than Significant Impact.

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Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
UTILITIES AND SERVICE SYSTEMS Would the Project:				
<b>40.</b> Water a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage systems, whereby the construction or relocation would cause significant environmental effects?				
b) Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years?			$\boxtimes$	

Source(s): EVMWD Urban Water Master Plan Master Plan; Ordinance No. 348 Ordinance No. 859

a) The Project site is served by Elsinore Valley Municipal Water District (EVMWD). Water is not currently provided to the Project site as it is vacant; however, existing water facilities are located within Union Street. The Project would install onsite water lines that would be located within each of the residential streets and serve each of the proposed mobile home residences. The new onsite water system would convey water supplies to the proposed mobile home residences and landscaping through plumbing/landscape features that are compliant with the CalGreen Plumbing Code for efficient use of water. The construction activities related to the onsite water infrastructure that would be needed to serve the proposed mobile home residences would not result in significant environmental effects, and impacts would be less than significant.

Findings of Fact: Less than Significant Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

b) The proposed Project would result in an increased demand for water supplies from the 71 residential units. The Elsinore Valley Municipal Water District (EVMWD) 2020 Urban Water Management Plan (UWMP) details that in 2020 the water demand in the City for residential uses was 129 gallons per day per capita, which was below the water use target of 188.6 gallons per day per capita. To provide a conservative estimate of Project water use, a generation rate of 188.6 gallons per capita per day was used to estimate water demand from the proposed Project. The proposed Project is anticipated to result in 144 additional residents at full occupancy. Based on the City's 2020 water use target of 188.6 gallons per capita per day, the 144 additional residents would generate a water demand of 27,158 gallons per day (approximately 30.4 acre-feet per year). The project would limit water demand by inclusion of low-flow plumbing and irrigation fixtures, pursuant to the California Title 24 requirements.

The EVMWD's 2020 UWMP estimates water supply increase to 47,219 and total water demand of 38,932 in 2025. The Project's demand of 30.4 acre-feet per year equates to 0.08 percent of projected

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water demand in 2025. Therefore, the EVMWD would have water supplies available to serve the Project. Because the Project's residential uses are consistent with the existing General Plan land use and zoning designation of the site, which are used to project future water demands, the demand from the Project is included in the UWMP demand projections.

The Project would be consistent with Riverside County's General Plan land use designation. According to the 2020 Urban Water Management Plan (UWMP) and Water Shortage Contingency Plan (WSCP), EVMWD's supply of water would be sufficient during both normal years and multiple dry year conditions between 2025 and 2045 to meet all of the estimated needs, including the Project. Compliance with County and State-required water management and conservation regulations would assist in reducing the amount of water supplies required by future development. The County's pre-application review procedure (as stipulated by Ordinance 348, Section 18.2.B, Pre-Application Review) and development review process would ensure consistency with County General Plan policies. Ordinance No. 859 requires new development Projects to install water-efficient landscapes, thus limiting water applications and minimizing water runoff and water erosion in landscaped areas. In addition, the General Plan requires new development to implement water conservation features. Compliance with Riverside County Ordinance No. 859, County and EVMWD review, conformance with the EVMWD UWMP would ensure potential impacts on water supply are less than significant.

Findings of Fact: Less than Significant Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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

Source(s): EVMWD Urban Water Master Plan; Ordinance No. 592; Ordinance No. 659

a) EVMWD provides wastewater treatment services to the Project site via a sewer line within Union Street. The Project would install sewer lines that would be located within each of the residential streets and serve each of the proposed mobile home residences. The new sewer lines would extend offsite to connect with the existing offsite sewer line within the Union Street right-of-way. The proposed sewer lines would be sized to serve the Project. The construction activities related to installation of the onsite sewer infrastructure that would serve the Project, is included as part of the proposed Project and would not result in significant environmental effects, and impacts would be less than significant.

Future development accommodated by the Project would be required to uphold Ordinance No. 659, which mitigates growth impacts in Riverside County by ensuring that development impact fees are collected and expended to provide necessary facilities (including wastewater facilities), commensurate with ongoing levels of development. Future development would also be subject to Ordinance No. 592, which sets various standards for sewer use, construction, and industrial wastewater discharges to protect both water quality and the infrastructure conveying and treating wastewater. In consideration CEQ / EA No

of the above, impacts relative to the construction or expansion of new wastewater treatment facilities would be less than significant.

Findings of Fact: Less than Significant Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

b) EVMWD operates and maintains sewer collection pipes in the project area that feed into EVMWD's trunk sewers that convey wastewater to the Regional Water Reclamation Facility that has a regular capacity of 8.0 million gallons per day (MGD) and is going through an expansion to provide an additional 4 MGD of treatment capacity. Based on EVMWD's Sewer System Master Plan (SSMP) wastewater generation rate of 2,400 gallons per day per acre for medium high density residential (6 to 12 dwelling units per net acre), the proposed project would generate approximately 21,768 gallons per day over the 9.07-acre portion of the site that is slated for residential development. According to EVMWD's SSMP, planned developments are projected to add approximately 7.91 million gallons per day (MGD) of new wastewater flows within the EVMWD service area by 2050. The project generated 21,768 gallons per day is within the 7.91 MGD of additional demand that is forecast for the service area. Therefore, impacts related to wastewater treatment capacity would be less than significant.

Findings of Fact: Less than Significant Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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

Source(s): Cal Recycle Solid Waste Information System Facility Detail; Riverside County EIR No. 521

a) Future development accommodated by the proposed Project would generate solid waste that would be disposed of in the El Sobrante Landfill. According to the CalRecycle website, the El Sobrante Landfill has a remaining capacity of 143,977,170 cubic yards of waste. Riverside County EIR No. 521 (Theoretical Solid Waste Generation for Existing and Build out Condition) uses the solid waste generation factor of 0.41 tons per dwelling unit per year for residential development. Using this solid waste generation factor, the Project is expected to generate approximately 29.11 tons of solid waste annually (71 units X 0.41). As such, future construction and operation activities accommodated through Project implementation would not produce a significant excess of solid waste outside of the capacity identified Riverside County No. 521. Solid waste disposal needs may also be accommodated at other landfill sites in the County.

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Findings of Fact: Less than Significant Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

b) Future development anticipated with the proposed Project would also be subject to the Riverside County Department of Waste Resources (RCDWR) Design Guidelines for Refuse and Recyclables Collection and Loading Areas, as well as standard-practice Conditions of Approval, including the issuance of a clearance letter by RCDWR. The clearance letter outlines Project-specific requirements to ensure that individual Project developers provide adequate areas for collecting and loading recyclable materials, such as "paper products, glass and green wastes." No building permits would be issued unless/until RCWDR verifies compliance with the clearance letter conditions. These requirements would apply to all future development activities in the Project area and would reduce the demand on landfills serving the community.

The Project will comply with all applicable solid waste statutes, policies and guidelines. The Project will also comply with the recycling requirements of Cal Green and develop a waste management plan that will include diverting at least 50% of construction and demolition material from landfills. No impacts are expected relative to applicable solid waste regulations.

Findings of Fact: Less than Significant Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

#### 43. Utilities

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

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

# **Source(s):** Project Application Materials, Utility Companies

a) The Project site is served by Southern California Edison for electricity. All utilities are available to the site and the extension of all onsite utilities will occur with the Project's existing footprint and no new construction of facilities will need to be constructed or relocated. Impacts associated with the construction and operation of utilities are an inherent part of the Project's construction process and operational characteristics, and the environmental effects associated with the Project's construction phase have been evaluated throughout this document. There are no unique conditions associated with the Project's proposed utility service connections that would result in impacts to the environment that have not already been addressed by this document. Impacts would be less than significant.

Findings of Fact: Less than Significant Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

b) The Project will not require natural gas. No impacts are expected relative to natural gas.

c) The Projet site is served by Frontier and Time Warner Cable for communication systems. All utilities are available to the site and the extension of all onsite utilities will occur with the Project's existing footprint and no new construction of facilities will need to be constructed or relocated. Impacts associated with the construction and operation of utilities are an inherent part of the Project's construction process and operational characteristics, and the environmental effects associated with the Project's proposed utility service connections that would result in impacts to the environment that have not already been addressed by this document. Impacts would be less than significant.

Findings of Fact: No Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

d-f) As previously stated, all utilities are available to the site and the extension of all onsite utilities will occur with the Project's existing footprint and no new construction of facilities will need to be constructed or relocated. Impacts associated with the construction and operation of street lighting, public facilities maintenance, and other governmental services are an inherent part of the Project's construction process and operational characteristics, and the environmental effects associated with the Project's construction sasociated with the Project's proposed utility service connections that would result in impacts to the environment that have not already been addressed by this document. Impacts would be less than significant.

Findings of Fact: Less than Significant Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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

44. Wildfire Impacts		$\square$	
a) Substantially impair an adopted emergency response			
plan or emergency evacuation plan?			
b) Due to slope, prevailing winds, and other factors,		$\square$	
exacerbate wildfire risks, and thereby expose Project			

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occupants to, pollutant concentrations from a wildfire or the			
uncontrolled spread of a wildfire?			
c) Require the installation or maintenance of associated		$\square$	
infrastructure (such as roads, fuel breaks, emergency water			
sources, power lines or other utilities) that may exacerbate			
fire risk or that may result in temporary or ongoing impacts to			
the environment?			
d) Expose people or structures to significant risks,		$\square$	
including downslope or downstream flooding or landslides,			
as a result of runoff, post-fire slope instability, or drainage			
changes?			
e) Expose people or structures either directly or			
indirectly, to a significant risk of loss, injury, or death			
involving wildland fires?			
~			

**Source(s)**: Riverside County General Plan Figure S-11 "Wildfire Susceptibility", Riverside County GIS database; Ordinance No. 695 (Abatement of Hazardous Vegetation); Ordinance No. 787 (Adoption of the 2016 California Fire Code)

a) The Project site is vacant and moderately covered with vegetation. The Project site is adjacent to residences, roadways, commercial uses, and undeveloped areas within the urban environment. The Project site is not within or adjacent to any wildland areas. According to the CalFire Hazard Severity Zone map, the Project site is within a high fire hazard zone. The proposed onsite street system would meet County design standards for emergency access. Permitting these roadways would provide adequate and safe circulation to, from, and through the Project area for emergency responders. Because the Project is not located within a high fire hazard zone and is required to comply with all applicable County Ordinance Nos 695 and 787, potential impacts related to wildfire emergency response or evacuation would not occur.

#### Findings of Fact: Less than Significant Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

b) While the proposed Project would allow future development within a Very High fire hazards zone, the County of Riverside Building and Safety Department has developed a number of protocols and regulations in order to protect development and reduce fire hazard impacts within these areas. These regulations include Riverside County Ordinance No. 787, which adopts the Uniform Fire Code that requires future development to adhere to standards developed to reduce loss of life and property due to fire risk, and Riverside County Ordinance No. 695, which requires the abatement of hazardous vegetation. As noted in Response 44(a) above, the Riverside County Fire Department Fire Protection and Emergency Medical Services Strategic Plan also provides facility, service, and equipment planning in order to reduce potential loss due to fire risk. All future discretionary development applications are sent to the County Fire Department for review and comment on each individual development's sitespecific Project design and to make recommendations on fire safety and emergency access. Each sitespecific Project design would be modified as needed prior to approval to ensure compliance with Fire Department requirements to ensure that future development would not exacerbate wildfire risks due to slope, prevailing winds, or other factors, and thereby, would not expose future occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Therefore, impacts would be less than significant.

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#### Findings of Fact: Less than Significant Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

c-e) All discretionary applications for the Project are required to be sent to the County Fire Department for review and comment on the development's site-specific Project design and to make recommendations on fire safety and emergency access. The site-specific Project design would be modified as needed prior to approval to ensure compliance with Fire Department requirements to ensure that future development would not require the installation or maintenance of associated infrastructure that may exacerbate fire risk or result in temporary or ongoing impacts to the environment. In addition, this process ensures that the Project would not expose people or structures to significant flood risks including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Further, the Project design would be modified prior to approval to ensure compliance with Fire Department requirements which ensures that impacts related to risk of loss, injury, or death due to wildland fire are less than significant.

Findings of Fact: Less than Significant Impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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

# Source(s): Staff Review

<u>Findings of Fact</u>: The proposed Project would not directly 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 proceeds of California history or prehistory. Potential impacts to habitat and/or wildlife from development of the Project would be reduced to less than significant through implementation of the proposed mitigation measures. As such, potential impacts would be mitigated through the implementation of standard County-approved measures and the recommended mitigation measures identified in the impact discussions above.

<b>46.</b> Have impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a Project are considerable when viewed in connection with the effects of past Projects, other current Projects and probable future Projects)?			
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### Source(s): Staff Review

The proposed Project's impacts would be individually limited and not cumulatively considerable. The Project involves the construction and operation of 71 mobile modular home residences on approximately 10.02 acres in the County of Riverside. The Project site has General Plan land use designation of Medium High Density Residential land use designation that provides for residential densities up to 8 dwelling units per acre. The Project is consistent with the General Plan land use designation for the site. All of the potential impacts related to implementation of the Project would be less than significant or reduced to a less than significant level with implementation of mitigation measures that would be imposed by the County and would effectively reduce environmental impacts. The Project would not result in substantial effects to any environmental resource topic that could be come cumulatively significant.

47.	Have	environmental	effects	that	will	cause	$\square$	
substa	antial adv	verse effects on	human be	eings,	either	directly		
or ind	rectly?							

### Source(s): Staff Review

The proposed Project would not result in environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly, following implementation of recommended mitigation measures prescribed above. All potential long-term impacts would be reduced to less than significant levels through implementation of required mitigation measures, as described in the impact discussions above.

### VI. EARLIER ANALYSES

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

Earlier Analyses Used, if any: N/A

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

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

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