

Draft Environmental Impact Report SCH No. 2022120110

Rider and Patterson Business Center

General Plan Amendment No. 220003 (GPA220003) Change of Zone No. 2200003 (CZ2200003) Tentative Parcel Map No. 38337 (TPM38337) Plot Plan No. 220004 (PPT220004)

Riverside County, California

Lead Agency

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

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CEQA Consultant

T&B Planning, Inc. 3200 El Camino Real, Suite 100 Irvine, CA 92602

Project Applicant

GCP Capital Properties, LLC 500 Newport Center Drive, #630 Newport Beach, CA 92660

Lead Agency Discretionary Permits

General Plan Amendment No. 220003 (GPA220003) Change of Zone No. 2200003 (CZ2200003) Tentative Parcel Map No. 38337 (TPM38337) Plot Plan No. 220004 (PPT220004)

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Table 4.20-13	Retail Supply and Demand Comparison – Multiple Dry Years (AFY)4.20-25
Table 4.20-14	Wholesale Supply and Demand Comparison – Multiple Dry Years (AFY)4.20-25
Table 4.20-15	Project Solid Waste Generation
Table 6-1	Alternatives to the Project – Comparison of Environmental Impacts



ACRONYMS,	ABBREVIATIONS AND UNITS OF MEASURE
<u>Acronym</u>	<u>Definition</u>

8	Section
\$ 8	Sections
>	greater than
>	greater than or equal to
24/7	24 hours per day, 7 days per week
	1 57 5 1
A/C	air conditioning
A-P Act	Alquist-Priolo Earthquake Fault Zoning Act
a.m.	Ante Meridiem (between the hours of midnight and noon)
AAQS	Ambient Air Quality Standards
AB	Assembly Bill
ABAU	Adjusted Business As Usual
AC	Acres
ACM	Alternative Calculation Method
ACMs	asbestos containing materials
ACCMs	Asbestos Containing Construction Materials
ACS	American Community Survey
ADP	Area Drainage Plan
ADT	Average Daily Traffic
AERMOD	Air Quality Dispersion Modeling
AF	acre-feet
AFY	Acre Feet per Year
AIA	Airport Influence Area
AIRFA	American Indian Religious Freedom Act
ALUC	Airport Land Use Commission
ALUP	Airport Land Use Plan
amsl	Above Mean Sea Level
ANSI	American National Standards Institute
A-P Act	Alquist-Priolo Earthquake Fault Zoning Act
APS	Alternative Planning Strategy
APSA	Aboveground Petroleum Storage Act
APN	Assessor Parcel Number
AQIA	Air Quality Impact Analysis
AQMIS	Air Quality and Meteorological Information System
AQMP	Air Quality Management Plan
ARB	Air Reserve Base
ASTM	American Society of Testing and Materials
BAAQMD	Bay Area Air Quality Management District
BACM	Best Available Control Measure



BC	black carbon
BFFP	Board of Forestry and Fire Protection
BFSA	BFSA Environmental Services
bgs	Below ground surface
BMPs	Best Management Practices
BMP	Best Management Practice
BP	Business Park
BTR	Biological Technical Report
BTS	backbone transmission system
BTU	British thermal unit
C_2Cl_4	perchloroethylene
C_2F_6	Hexafluoroethane
C_2H_6	Ethane
C ₂ H ₄ O	acetaldehyde
C_4H_6	1,3-butadiene
C_6H_6	benzene
CA	California
CadnaA	Computer Aided Noise Abatement
CA MUTCD	California Manual on Uniform Traffic Control Devices
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAFE	Corporate Average Fuel Economy
CalARP	California Accidental Release Prevention
CalEEMod TM	California Emissions Estimator Model
CalEnviroScre	en California Communities Environmental Health Screening Tool Version 4.0
CalEPA	California Environmental Protection Agency
CalFire	California Department of Forestry and Fire Protection
CalGreen	California Green Building Standards Code
Cal OES	California Governor's Office of Emergency Services
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
Calveno	California Vehicle Noise Emission Level
CAP	Climate Action Plan
CAPP	Community Air Protection Program
CAPCOA	California Air Pollution Control Officers Association
CAPSA	Criteria Area Plant Survey Area
CAPSSA	Criteria Area Plant Species Survey Area
CARB	California Air Resources Board
CASSA	Criteria Area Species Survey Area
CASP	California Aviation System Plan
CAT	Climate Action Team
CBC	California Building Code
CBSC	California Building Standards Code



ity Act
•



СО	Carbon Monoxide
CO_2	Carbon Dioxide
CO ₂ e	Carbon Dioxide Equivalent
СОН	coefficient of haze
СОНЬ	carboxyhemoglobin
СОР	Community Oriented Policing Program
СОР	Conference of the Parties
COPPS	Community Oriented and Policing Problem Solving Program
CPEP	Clean Power and Electrification Pathway
CPUC	California Public Utilities Commission
CRA	Cultural Resources Assessment
CREC	controlled recognized environmental condition
CRHR	California Register of Historical Resources
CRMP	Cultural Resource Management Plan
CRPR	California Rare Plant Rank
Cr(VI)	hexavalent chromium
CSA	Community Service Area
СТА	core transport agent
CTC	California Transportation Commission
СТР	Clean Truck Program
CTR	California Toxics Rule
CUPA	California Unified Program Agency
CWA	Clean Water Act
CWC	California Water Code
CWL	California Watch List
cy	Cubic Yards
CZ	Change of Zone
dB	Decibel
dBA	A-weighted Decibels
DBESP	Determination of a Biologically Equivalent or Superior Preservation
DC/TP	discover clause/treatment plan
DEH	Department of Environmental Health
DHS	Department of Health Services
DIF	Development Impact Fee
DIVCA	Digital Infrastructure and Video Competition Act
DMV	Department of Motor Vehicles
DOE	Determination of Eligibility
DOE	United States Department of Energy
DOSH	Division of Occupational Safety and Health
DPM	Diesel Particulate Matter
DPR	Department of Parks and Recreation
DRRP	Diesel Risk Reduction Plan
DTSC	Department of Toxic Substances Control





DU/AC	Dwelling units per acre
DWR	Department of Water Resources
EA	Environmental Assessment
EAC	Existing plus Ambient plus Cumulative (without Project)
EC	elemental carbon
EDR	Environmental Data Resources, Inc.
EIA	Energy Information Administration
EIC	Eastern Information Center
EIR	Environmental Impact Report
EIS	Environmental Impact Statement
EMFAC	Emission Factor Model
EMWD	Eastern Municipal Water District
EO	Executive Order
EPA	Environmental Protection Agency
EPCRA	Emergency Planning and Community Right-To-Know Act
EPS	Emission Performance Standard
ERO	Electric Reliability Organization
ESA	Endangered Species Act
ESA	Environmental Site Assessment
ESFR	Early Suppression, Fast Response (fire sprinkler system)
et seq.	et sequentia, meaning "and the following"
ETW	equivalent test weight
EV	Electric Vehicle
٥E	degrees Fahrenheit
	Enderal Axiation Administration
	floor area ratio
FAR	Federal Communications Commission
FCC	Final Environmental Impact Depart
	Final Environmental Impact Report
FEMA	Federal Emergency Management Agency
FERC	Federal Energy Regulatory Commission
FESA	Federal Endangered Species Act
FGC	Fish and Game Code
FHSZ	Fire Hazard Severity Zone
FHWA	Federal Highway Administration
FICON	Federal Interagency Committee on Noise
FIMA	Federal Insurance and Mitigation Administration
FIRM	Flood Insurance Rate Map
FMMP	Farmland Mapping and Monitoring Program
tt .	teet
FTA	Federal Transit Administration
FYI	For Your Information



Gal	gallon
GBN	ground-based noise
GBV	ground-based vibration
GCC	Global Climate Change
Gg	Gigagram
GHG	Greenhouse Gas
GHGA	Greenhouse Gas Analysis
GIS	Geographic Information System
g/L	grams per liter
GLA	Glenn Lukos Associates, Inc.
GMZ	Groundwater Management Zone
GPA	General Plan Amendment
gpd	Gallons per Day
gpm	Gallons per minute
GPS	Global Positioning System
GSA	Groundwater Sustainability Agencies
GSP	Groundwater Sustainability Plan
GT&S	Gas Transmission and Storage
GVWR	Gross Vehicle Weight Rating
GWh	gigawatt hours
GWP	Global Warming Potential
	C
H ₂ O	Water Vapor
HANS	Habitat Acquisition and Negotiation Strategy
HAPs	hazardous air pollutants
HCA	Housing Crisis Act
HCM	Highway Capacity Manual
HCP	Habitat Conservation Plan
HDT	heavy duty truck
HDV	Heavy-duty vehicles
HFC	Hydrofluorocarbons
HHD	heavy-heavy duty trucks
HI	Hazard Index
HMBEP	Hazardous Materials Business Emergency Plan
HMC	Hazard Management Consulting
HMIS	Hazardous Materials Inventory Statements
HMMP	Hazardous Materials Management Plan
HMTA	Hazardous Materials Transportation Act
HMTUSA	Hazardous Materials Transportation Uniform Safety Act
Нр	horsepower
Hp-hr-gal	horsepower hour per gallon
HR	hour
HRA	Health Risk Assessment
HREC	historical recognized environmental condition





HRI	Historical Resource Inventory
HSC	Health and Safety Code
HSWA	Hazardous and Solid Waste Amendments
HWCL	Hazardous Waste Control Law
HVAC	Heating, Ventilation, and Air Conditioning
HY	Horizon Year
Hz	hertz (cycles per second)
Ι	Interstate
i.e.	that is
IA	Implementing Agreement
IEPR	Integrated Energy Policy Report
in/sec	inches per second
IPCC	Intergovernmental Panel on Climate Change
ISO	Independent Service Operator
ISO	Independent System Operator
ISO	International Organization for Standardization
ISTEA	Intermodal Surface Transportation Efficiency Act
ITE	Institute of Transportation Engineers
ITIP	Interregional Transportation Improvement Plan
ITP	incidental take permit
IWMA	Integrated Waste Management Act of 1989
IWMP	Integrated Waste Management Plan
JD	Jurisdictional Delineation
JPA	Joint Powers Authority
JPR	Joint Project Review
kBTU	kilo-British Thermal Units
kg	kilogram
kWh	kilowatt-hour
LACM	Los Angeles County Museum of Natural History
LADWP	Los Angeles Department of Water and Power
lbs	pounds
lbs/day	pounds per day
LCA	Life-cycle analysis
LCD	liquid crystal display
LCFS	low carbon fuel standard
LDA	Light duty autos
LDT1	light duty trucks 1
LDT2	light duty trucks 2
LDV	Light duty vehicles
LED	light-emitting diode





Leq	equivalent continuous sound pressure level
LHD	light-heavy duty trucks
LHDT1	light-heavy duty trucks 1
LHDT2	light-heavy duty trucks 2
LHMWD	Lake Helmet Municipal Water District
LI	Light Industrial
Lmax	Maximum level measured over the time interval
LOS	Level of Service
LPSRA	Lake Perris State Recreation Area
LRA	local responsibility area
	1
LSA	Lake and Streambed Alteration
LSE	load-serving entities
LST	localized significance threshold
LSTs	Localized Significance Thresholds
LTOs	Licensed Timber Operators
LULUCF	Land-Use, Land-Use Change and Forestry
Lw	reference sound power level
	1
m	meter
MARB	March Air Reserve Base
MARB/IPA	March Air Reserve Base Inland Port Airport
MATES	Multiple Air Toxics Exposure Study
MBTA	Migratory Bird Treaty Act
MCY	motorcycle
MDAQMD	Mojave Desert Air Quality Management District
MDP	Master Drainage Plan
MDR	Medium Density Residential
MDV	medium duty vehicles
MEISC	maximally exposed individual school child
MEIR	maximally exposed individual receptor
MEIW	maximally exposed individual worker
mg	milligrams
MG	million gallons
mgd	million gallons per day
MHD	medium-heavy duty truck
MICR	Maximum Individual Cancer Risk
MM	Mitigation Measure
MMcfd	million cubic feet per day
MMRP	Mitigation Monitoring and Reporting Program
MMTs	million metric tons
MMTCO ₂ e	million metric tons of carbon dioxide equivalent
mpg	miles per gallon
Mph	Miles per hour
1	L





MPO	Metropolitan Planning Organization
MPO/RTPA	Metropolitan Planning Organizations/Regional Transportation Planning Agencies
MRZ	Mineral Resource Zone
MS4	Municipal Separate Storm Sewer System
M-SC	Manufacturing-Service Commercial (zoning)
MSHCP	Multiple Species Habitat Conservation Plan
MT	metric ton
MTCO2e	Metric Tons of Carbon Dioxide Equivalent
MUTCD	Manual on Uniform Traffic Control Devices
MVAP	Mead Valley Area Plan
MWD	Metropolitan Water District
N/A	Not Applicable
N_2	Nitrogen
N_2O	nitrous oxide
n.d.	no date
NAHC	Native American Heritage Commission
NAAQS	National Ambient Air Quality Standards
NATA	National Air Toxic Assessment
NB	Northbound
NCCP	Natural Community Conservation Plan
NDC	nationally determined contributions
NEPSA	Narrow Endemic Plant Survey Area
NEPSSA	Narrow Endemic Plant Species Survey Area
NERC	North American Electric Reliability Corporation
NESHAP	National Emission Standards for Hazardous Air Pollutants
NFIP	National Flood Insurance Program
NHL	National Historic Landmark
NHP	National Register of Historic Places
NHPA	National Historic Preservation Act
NIA	Noise Impact Analysis
NIOSH	National Institute for Occupational Safety and Health
No.	Number
NO	Nitric Oxide
NO_2	Nitrogen Dioxide
NO _X	Nitrogen Oxides
N_2	Nitrogen
N_2O	Nitrous Oxide
NF ₃	nitrogen trifluoride
NIOSH	National Institute for Occupational Safety and Health
NMFS	National Marine Fisheries Service
NOP	Notice of Preparation
NPDES	National Pollutant Discharge Elimination System
n.p.	No page



NPA	No project alternative
NPDES	National Pollutant Discharge Elimination System
NPL	National Priorities List
NPPA	Native Plant Protection Act
NPS	National Park Service
NPS	non-point source
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
NTR	National Toxics Rule
NVIA	Noise and Vibration Impact Assessment
	1
O ₂	Oxygen
0 ₃	Ozone
OBD-II	On-Board Diagnostic
OAG	Office of Attorney General
ОЕННА	Office of Environmental Health Hazard Assessment
OES	Office of Emergency Services
OHWM	Ordinary High-Water Mark
OHP	Office of Historic Preservation
OIH	Office of Industrial Hygiene
OPR	Office of Planning and Research
Ord	Ordinance
OS	Open Space
OS-CH	Open Space-Conservation Habitat
OSHA	Occupational Safety and Health Act
OSHA	Occupational Safety and Health Administration
0.0111	
P-WQMP	Preliminary Water Quality Management Plan
PA	Program Agency
Pb	Lead
PCBs	Polychlorinated biphenyls
PCEs	Passenger Car Equivalents
pc/mi/ln	passenger cars per mile per lane
PDF	Project Design Feature
PEL	permissible exposure limit
PeMS	Caltrans' Performance System Website
PFCs	Perfluorocarbons
PG&E	Pacific Gas and Electric
p.m.	Post Meridiem (between the hours of noon and midnight)
PM	post meridiem (between the hours of noon and midnight)
PM	Particulate Matter
PM _{2.5}	Fine Particulate Matter (2.5 microns or smaller)
PM ₁₀	Fine Particulate Matter (10 microns or smaller)
POLA	Port of Los Angeles



POLB	Port of Long Beach
POU	publicly owned utilities
pp.	pages
PP	Plot Plan
ppb	parts per billion
pph	persons per household
ppm	parts per million
ppt	parts per trillion
PPV	peak particle velocity
P-WQMP	Preliminary Water Quality Management Plan
PRC	Public Resources Code
PRIMP	Paleontological Resource Impact Mitigation Program
PRPA	Paleontological Resources Preservation Act
PV	photovoltaic
RCA	Regional Conservation Authority
RCALUC	Riverside County Airport Land Use Commission
RCDEH	Riverside County Department of Environmental Health
RCDWR	Riverside County Department of Waste Resources
RCFCWCD	Riverside County Flood Control and Water Conservation District
RCFD	Riverside County Fire Department
RCHCA	Riverside County Habitat Conservation Agency
RCP	Regional Comprehensive Plan
RCPG	The SCAG Regional Comprehensive Plan and Guide
RCPLS	Riverside County Public Library System
RCNM	Roadway Construction Noise Model
RCRA	Resource Conservation and Recovery Act
RCSD	Riverside County Sheriff Department
RCVLDR	Rural Community – Very Low Density Residential
RCWD	Rancho California Water District
Rd.	Road
REC	Recognized environmental condition
REMEL	Reference Mean Emission Level
RFG-2	Reformulated Gasoline Regulation
RHNA	The SCAG Regional Housing Needs Assessment
RIVTAM	Riverside Transportation Analysis Model
RMM	Riverside Municipal Museum
RMS	root mean square
ROG	reactive organic gases
ROW	Right-of-Way
RPS	Renewable Portfolio Standards
RR	Rural Residential
RTA	Riverside Transit Authority
RTP	Regional Transportation Plan



RTPA	Regional Transportation Planning Agency
RTP	Regional Transportation Plan
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
RWRF	Regional Water Reclamation Facility
SAA	Streambed Alteration Agreement
SARA	Superfund Amendments and Reauthorization Act
SB	Southbound
SB	Senate Bill
SBA	Small Building Alternative
SBCM	San Bernardino County Museum
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SCE	Southern California Edison
SCG	Southern California Geotechnical
SCH	California State Clearinghouse (Office of Planning and Research)
SCS	Sustainable Communities Strategy
SDAB	San Diego Air Basin
SDG&E	San Diego Gas and Electric
SDNHM	San Diego Natural History Museum
SDWA	Safe Drinking Water Act
SF_6	Sulfur Hexafluoride
SF/s.f.	square foot or square feet
SFP	School Facilities Program
SFP	State fully protected
SGMA	Sustainable Groundwater Management Act
SHA	Safe Harbor Agreement
SHMA	Seismic Hazards Mapping Act
SHPO	State Historic Preservation Office
SHRC	State Historical Resources Commission
SHS	State Highway System
SIP	State Implementation Plan
SJGB	San Jacinto Groundwater Basin
SKR	Stephen's Kangaroo Rat
SKR HCP	Stephen's Kangaroo Rat Habitat Conservation Plan
SLF	Sacred Lands File
SMARA	Surface Mining Reclamation Act
SNUR	Significant New Use Rule
SO_2	Sulfur Dioxide
SO ₄	Sulfates
SO_X	Sulfur Oxides



SOC	Statement of Overriding Considerations
SoCal Gas	Southern California Gas Company
SRA	Source Receptor Area
SRA	State responsibility area
SRA	Source Receptor Area
SSC	Species of Special Concern
STIP	Statewide Transportation Improvement Program
SWP	State Water Project
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
SWRCB	Storm Water Resources Control Board
ТА	Transportation Analysis
TAC	Toxic Air Contaminants
TAZ	traffic analysis zone
TCRs	Tribal Cultural Resources
TDA	Transportation Development Act
TEA-21	Transportation Equality Act for 21st Century
THP	Timber Harvesting Plan
TIA	Traffic Impact Analysis
TOD	transit-oriented developments
TPA	Transit Priority Area
tpd	tons per day
TPM	Tentative Parcel Map
tpy	tons per year
TS	Traffic Signal
TSCA	Toxic Substances Control Act
TSF	Thousand Square Feet
TUMF	Transportation Uniform Mitigation Fee
μg	microgram
$\mu g/m^3$	microgram per cubic meter
UBC	Uniform Building Code
UFP	ultrafine particles
UNFCCC	United Nations' Framework Convention on Climate Change
URBEMIS	URBan EMISsions
U.S.	United States
USACE	United States Army Corps of Engineers
USCB	United States Census Bureau
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGS	United Stated Geological Society
UWMP	Urban Water Management Plan
UWMP Act	Urban Water Management Plan Act



VdB	vibration decibel notation
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	Vehicle Miles Traveled
VOCs	Volatile Organic Compounds
VPH	Vehicles per Hour
VVUSD	Val Verde Unified School District
WDR	Water discharge report
WDRs	Waste Discharge Requirements
WMI	Watershed Management Initiative
WMIE	Waste Management of the Inland Empire
WRCOG	Western Riverside Council of Governments
WSC	Western Science Center
WQMP	Water Quality Management Plan
WRI	World Resources Institute
WRP	Waste Recycling Plan
WRRA	Water Reuse and Recycle Act
WSA	Water Supply Assessment
WUI	wildland-urban interface
YBP	Years before Present
yr	year
ZORI	Zones of Required Investigation



S.O EXECUTIVE SUMMARY

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

This Draft Environmental Impact Report (EIR), having California State Clearinghouse (SCH) No. 2022120110, was prepared in accordance with CEQA Guidelines Article 9, Sections 15120-15132 to evaluate the potential environmental impacts associated with planning, constructing, and operating the proposed Project, which consists of applications for General Plan Amendment (GPA220003), Change of Zone (CZ2200003), Tentative Parcel Map (TPM38337), and a Plot Plan (PPT220004), which are collectively referred to herein as the "Project" or "proposed Project." This EIR does not recommend approval or denial of the proposed Project; rather, this EIR is a source of factual information regarding potential impacts that the Project may cause to the physical environment. The Draft EIR will be available for public review for a minimum period of 45 days. After consideration of public comment, the County of Riverside will consider certifying the Final EIR and adopting required findings.

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

- 1. Aesthetics
- 2. Agriculture and Forestry Resources
- 3. Air Quality
- 4. Biological Resources
- 5. Cultural Resources
- 6. Energy
- 7. Geology and Soils
- 8. Greenhouse Gas Emissions
- 9. Hazards and Hazardous Materials
- 10. Hydrology and Water Quality
- 11. Land Use and Planning

- 12. Mineral Resources
- 13. Noise
- 14. Paleontological Resources
- 15. Population and Housing
- 16. Public Services
- 17. Recreation
- 18. Transportation
- 19. Tribal Cultural Resources
- 20. Utilities and Service Systems
- 21. Wildfire



Refer to EIR Section 4.0, *Environmental Analysis*, for a full account and analysis of the subject matters listed above. For each of the aforementioned subject areas, this EIR describes: 1) the physical conditions that existed at the approximate time this EIR's NOP was filed with the California State Clearinghouse (December 6, 2022); 2) discloses the type and magnitude of potential environmental impacts resulting from Project planning, construction, and operation; and 3) if warranted, recommends feasible mitigation measures that would reduce or avoid significant adverse environmental impacts that the proposed Project may cause. A summary of the proposed Project's significant environmental impacts is included in this Executive Summary as Table S-1, *Summary of Impacts, Mitigation Measures, and Conclusions*. Riverside County applies mitigation measures that it determines: 1) are feasible and practical for project applicants to implement; 2) are feasible and practical for Riverside County to monitor and enforce; 3) are legal for Riverside County to impose; 4) have an essential nexus to the Project's impacts; and 5) would result in a benefit to the physical environment. CEQA does not require the Lead Agency to impose mitigation measures that are duplicative of mandatory regulatory requirements.

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

S.1 PROJECT SYNOPSIS

S.1.1 LOCATION AND SETTING

The 40.88-acre Project site and approximately 4.57 acres of off-site Project-related disturbance area are located within unincorporated western Riverside County, California. More specifically, and as depicted on EIR Figure 2-2, the Project site is located at the southwest corner of the intersection of Rider Street and Patterson Avenue. The Project site encompasses Assessor's Parcel Numbers (APNs) 317-201-(006, 008, 010, 011, 018, 022, 023, and 024). The Project site is located in Section 13, Township 4 South, Range 4 West, San Bernardino Baseline and Meridian. Under existing conditions, the majority of the 40.88-acre Project site is vacant and undeveloped and was previously used for stockpiling earthwork materials from a nearby grading operation at some time between 1984 and 1990, which resulted in substantial disturbances to the property. These portions of the Project site are covered by low-lying vegetation that is routinely disced for fire abatement purposes. The southern portions of the Project site are developed with three large-lot residential homes along with several ancillary structures and ornamental landscaping which includes numerous large mature trees.

S.1.2 PROJECT SUMMARY DESCRIPTION

The Project as evaluated herein consists of applications for a General Plan Amendment (GPA220003), Change of Zone (CZ2200003), Tentative Parcel Map (TPM38337), and Plot Plan (PPT220004), as described below. In total, the Project site acreage is 40.88 acres and up to 4.45 acres off-site would be physically disturbed by Project-related construction activities including but not limited to roadway and infrastructure improvements.

• GPA220003 is a proposal to change the General Plan land use designation of ±36.0 acres of the Project site from "Community Development – Medium Density Residential (CD-MDR)" to "Community



Development – Light Industrial (LI)." (The balance of the Project site would remain designated CD-MDR.)

- CZ2200003 is a proposal to change the zoning classification of ±36.0 acres of the Project site from "One-Family Dwellings (R-1)," "Light Agriculture (A-1-1)," and "Rural Residential (R-R-1)" to "Industrial Park (I-P)." (The balance of the Project site would retain its R-1 zoning classification.)
- TPM38337 is a proposal to consolidate the Project site's existing eight parcels into one ±36.0-acre parcel (Parcel 1), three residential parcels [Lot A (±1.16 acres), Lot C (±0.21 acres), and Lot E (±0.23 acres), and two parcels to accommodate roadway cul-de-sacs (Lot B ±0.23 acres; Wildwood Lane) and Lot D (± 0.20 acres; Sunny Canyon Street)]. The remaining site acreage (±2.85 acres) would be dedicated to the County for public road improvements along the Project site's frontages with Rider Street, Patterson Avenue, and Walnut Street (Lots F through K).
- PPT220004 is a proposal to entitle Parcel 1 for development with a 591,203 square-foot (s.f.) building, which would include 7,300 s.f. of ground floor office space, 7,300 s.f of mezzanine office space, and 576,603 s.f of warehouse space. A total of 84 truck docking doors are proposed, positioned on the northern and southern sides of the building. Approximately 6.0 acres of Parcel 1 along the western parcel boundary would consist of a landscaped berm forming a buffer between the proposed building and an existing residential community to the west. Frontage improvements would occur along Patterson Avenue, Walnut Street, and Rider Street, with a sidewalk and community trail proposed along Patterson Avenue and Walnut Street and a sidewalk proposed along Rider Street. In addition to roadway frontage improvements, other off-site improvements would include: 2) paving and striping on Rider Street west of the Project site boundary; 2) improvements at the intersection of Rider Street/Patterson Avenue; 3) the installation of a traffic signal at the intersection of Rider Street/Harvill Avenue; 4) the installation of a storm drain extending from the southeastern corner of the site to connect with an existing storm drain pipe near the Patterson Avenue//Walnut Street intersection; and 5) the installation of a storm drain paralleling the southern side of Rider Street and extending from the northeastern corner of the Project site, east to connect with an existing concrete pipe located just west of the Rider Street/Harvill Avenue intersection.

S.2 AREAS OF CONTROVERSY AND ISSUES TO BE RESOLVED

Substantive issues raised in response to the NOP are summarized in Table 1-1 of EIR Section 1.0. The purpose of this table is to present the primary environmental issues of concern raised by public agencies and the general public during the NOP review period. The table is not intended to list every comment received by the County during the NOP review period. Regardless of whether or not a comment is listed in the table, all applicable comments received in responses to the NOP are addressed in this EIR. Based on comments received during the NOP review period, concerns were raised regarding potential impacts to air quality, health risks, biological resources, cultural resources, greenhouse gas emissions, land use compatibility, mineral resources, water supply, sewer demands, impacts due to potential use of transport refrigeration units (TRUs), and project alternatives. No other areas of controversy were identified as part of the NOP process, beyond comments regarding the Project's potential environmental effects.



S.3 **PROJECT ALTERNATIVES**

S.3.1 NO DEVELOPMENT ALTERNATIVE

The No Development Alternative (NDA) considers no new development/disturbance on the Project site beyond that which occurs under existing conditions. As such, the southern portions of the Project site would continue to be used for residential uses on approximately 6.1 acres, while the remaining 34.8 acres of the Project site would continue to consist of vacant and undeveloped land. Under the NDA, no improvements would be made to the Project site and none of the Project's roadway, utility, or other infrastructure improvements would occur. This Alternative was selected by the Lead Agency to compare the environmental effects of the proposed Project with an alternative that would leave the Project site in its existing condition.

S.3.2 NO PROJECT ALTERNATIVE

The No Project Alternative (NPA) assumes development of the 40.88-acre Project site in accordance with the Project site's adopted General Plan and Mead Valley Area Plan (MVAP) land use designation of "Medium Density Residential (MDR)." Under this alternative, the approximately 6.1 acres of the Project site that are developed with residential uses would continue to be developed with the existing residential uses and ancillary structures. The approximately 34.8 acres of the Project site that are undeveloped would be developed with MDR land uses. According to Appendix E to the Riverside County General Plan, the mid-point density for the MDR land use designation is 3.5 dwelling units per acre (du/ac). Thus, under the NPA the 34.8 acres of the Project site that are currently undeveloped would be developed with 122 residential dwelling units (34.8 acres x 3.5 du/acre = 121.8 du). In consideration of the three existing residential units, a total of 125 dwelling units would be constructed or would continue operation on the Project site under the NPA. As also noted in Appendix E to the General Plan, the average household size in the MVAP area is 3.79; thus, under the NPA the Project site would have a total future population of approximately 474 persons (125 du x 3.79 persons/du = 473.75 persons), or an increase of approximately 463 persons as compared to existing conditions. All remaining components of Project, including proposed infrastructure and roadway improvements, would otherwise be similar to the proposed Project. This Alternative was selected by the Lead Agency to compare the environmental effects of the proposed Project with an alternative that would allow for buildout of the Project site in accordance with the site's existing General Plan and MVAP land use designations.

S.3.3 REDUCED PROJECT ALTERNATIVE

The Reduced Project Alternative (RPA) assumes the Project site would be developed with three residential lots and a warehouse building, but the proposed warehouse building would be reduced in size from approximately 591,203 s.f. under the proposed Project to approximately 394,135 s.f. under the RPA (representing a reduction in building area by approximately 33%). Portions of the warehouse lot not used for the building would be used for parking and trailer storage. All other components of the RPA would be the same as the proposed Project, including proposed infrastructure and roadway improvements. This alternative was selected by the Lead Agency in order to evaluate an alternative that would reduce the Project's significant and unavoidable impacts to transportation, which in turn also would reduce the Project's less-than-significant impacts due to air quality and greenhouse gas (GHG) emissions.



S.3.4 SMALL BUILDING ALTERNATIVE

Pursuant to the County's Transportation Analysis Guidelines for Level of Service and Vehicle Miles Traveled (December 2020), general light industrial developments with less than 179,000 s.f. of building area are presumed to result in a less-than-significant transportation impact due to VMT. Thus, this alternative was selected to allow the Lead Agency (Riverside County) to consider a design for the Project site that would avoid the Project's significant and unavoidable impact due to VMT. The Small Building Alternative (SBA) assumes the Project site would be developed with three residential lots and a warehouse building, but the proposed warehouse building would be reduced in size from approximately 591,203 s.f. under the proposed Project to approximately 175,000 s.f. under the SBA (representing a reduction in building area by approximately 70%). The portions of the warehouse lot not used for the building would be used for parking and trailer storage. All other components of the SBA would be the same as the proposed Project, including proposed infrastructure and roadway improvements. This alternative was selected by the Lead Agency in order to evaluate an alternative that would avoid the Project's less-than-significant and unavoidable impacts to transportation, which in turn also would reduce the Project's less-than-significant impacts due to air quality and greenhouse gas (GHG) emissions. The SBA is identified as the Environmentally Superior Alternative.

S.4 EIR PROCESS

As a first step in the CEQA compliance process, Riverside County determined that the proposed Project likely would result in significant environmental effects and distributed a Notice of Preparation (NOP) for public review on December 6, 2022. An Initial Study was not prepared for the Project, and thus this EIR evaluates all of the environmental subjects listed in Appendix G to the CEQA Guidelines, as set forth in the County's standard Environmental Assessment Checklist form. This EIR has been prepared as a Project EIR pursuant to CEQA Guidelines § 15161. As described by CEQA Guidelines § 15161, a Project EIR is the most common type of EIR that: 1) examines the environmental impacts of a specific development project; 2) should focus primarily on the changes in the environment that would result from the development of the project; and 3) shall examine all phases of the project, including planning, construction, and operation.

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

Before taking action to approve the Project, Riverside County (serving as the Lead Agency) has the obligation to: (1) ensure this EIR has been completed in accordance with CEQA; (2) review and consider the information contained in this EIR as part of its decision-making process; (3) make a statement that this EIR reflects Riverside County's independent judgment; (4) ensure that all significant effects on the environment are



avoided or substantially lessened where feasible; and, if necessary (5) make written findings for each unavoidable significant environmental effect stating the reasons why mitigation measures or project alternatives identified in this EIR are infeasible and citing the specific benefits of the proposed Project that outweigh its unavoidable adverse effects (CEQA Guidelines §§ 15090-15093).

S.5 SUMMARY OF IMPACTS, MITIGATION MEASURES AND CONCLUSIONS

S.5.1 EFFECTS FOUND NOT TO BE SIGNIFICANT

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

S.5.2 IMPACTS OF THE PROPOSED PROJECT

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

Traffic Noise: Significant and Unavoidable Direct and Cumulatively-Considerable Impact. Potential mitigation measures were considered and were found to be infeasible for reducing the Project's offsite traffic noise level increase (when considering traffic noise in isolation of other noise sources) affecting three residential lots on the segment of Patterson Avenue north of Placentia Avenue. Potential mitigation considered included the use of rubberized asphalt hot mix pavement and the installation of off-site noise barriers adjacent to the impacted roadway segment. While rubberized asphalt could provide some nominal noise reduction, rubberized asphalt is only effective in the reduction of tire-on-pavement noise at higher speeds and would not materially reduce the Project's traffic noise increase. Because the use of rubberized asphalt would not materially lower off-site traffic noise levels at potentially affected receptors, rubberized asphalt is not considered effective and feasible as mitigation. Regarding the potential installation of noise barriers at the impacted residential lots, the barriers would need to be high enough and long enough to block the line-of-sight from the noise source (at 11.5 feet high for trucks) to the receiver and it is not practical given the need for driveway openings and the usability of front and side yards to construct 11.5 foot-high uninterrupted barriers at this offsite location along Patterson Avenue. Further, the significant impact is identified for traffic noise in isolation of other noise sources and the existing ambient noise levels at the affected residential lots currently exceed the calculated existing traffic noise levels, so it expected that the noise-sensitive land uses adjacent to Patterson Avenue would not perceive a significant traffic noise level increase even though one is calculated by noise modeling to occur.


Transportation: Significant and Unavoidable Direct and Cumulatively-Considerable Impact. The Project would generate approximately 16.8 Vehicle Miles Traveled (VMT) per employee, which would exceed the County threshold of 14.2 VMT per employee by 18.31%. The Project's total VMT per Service Population (SP) would be approximately 38.78, which would exceed the identified threshold of significance of 37.87 by 2.40%. Therefore, the Project would conflict with or be inconsistent with CEQA Guidelines § 15064.3(b), which represents a significant of the proposed Project. As the future building tenants are not known for the Project, the effectiveness of any potential commute trip reduction measure may be limited. In addition to specific tenancy considerations, locational context is also a major factor relevant to the potential application and effectiveness of Transportation Demand Management (TDM) measures. A project may only realize a quantifiable reduction in commute VMT under the most favorable circumstances and ideal local conditions when implementing trip reduction measures. In practical terms, ideal conditions are rarely realized due to variables such as locational context limitations (i.e., non-urban areas). Additionally, to achieve ideal conditions a project must achieve one hundred percent employee participation, and maximum employee eligibility, which are not generally expected. This is more difficult to presume since future building tenants are not known at this time. Although the Project would be subject to compliance with Mitigation Measure MM 4.18-2, which would serve to reduce the Project's VMT, the effectiveness of commute trip reduction measures such as those listed in Mitigation Measure MM 4.18-2 cannot be guaranteed to reduce Project VMT to a level of less than significant. No additional feasible mitigation measures are available to measurable reduce the Project's VMT. Therefore, the Project's VMT impact is considered significant and unavoidable.



Table S-1	Summary of Impacts, Mitigation Measures, and Conclusions
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Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/ Monitoring Parties	Implementation Stage
4.1 Aesthetics				
Threshold a: The Project site is not located within the viewshed of any officially designated State or County scenic highways or State-Eligible scenic highways. Although the Project site is located approximately 0.4-mile west of I-215, a County-eligible scenic highway, views of the Project site from I-215 are largely obstructed by existing development and landscaping that occurs between the Project site and I-215. As such, Project impacts to scenic highways would be less than significant.	Less than Significant	Mitigation measures are not required.		
Thresholds b and c: The Project would not substantially damage scenic resources; obstruct any prominent scenic vista or view open to the public; result in the creation of an aesthetically offensive site open to public view; substantially degrade the existing visual quality or character of the site or its surroundings; or conflict with applicable zoning and other regulations governing scenic quality. Impacts would be less than significant.	Less than Significant			
Threshold d: Project compliance with the provisions of County Ordnance No. 655 would be assured through future County review of building permits. Impacts due to a conflict with Ordinance No. 655 would be less than significant.	Less than Significant			
Thresholds e and f: Mandatory compliance with Riverside County Ordinance Nos. 655 and 915, would ensure that Project-related lighting and glare would not adversely affect day or nighttime views in the area, and also would ensure the Project does not expose residential property to unacceptable light levels. Impacts would be less than significant.	Less than Significant			



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/ Monitoring Parties	Implementation Stage
4.2 Agriculture and Forestry Resources				
Threshold a: Based on the FMMP, the Project site does not contain any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. As such, the Project would not convert FMMP-designated Farmland to a non-agricultural use, and no impact would occur.	No Impact			
Threshold b: The Project would convert two parcels zoned A-1-1 (zoning for primarily agricultural purposes) to a non- agricultural use. However, because the two parcels are already used for a non-agricultural use (residential), the Project would not impact agricultural resources on agriculturally-zoned land. Furthermore, there are no components of the proposed Project that would interfere with agricultural production on adjacent lands, as a majority of the area surrounding the Project site is developed with residential, school, church, warehouse, industry, and storage yard uses. The Project site is not subject to a Williamson Act Contract and is not located within an agricultural preserve. Accordingly, impacts would be less than significant.	Less than Significant			
Threshold c: Although the Project site occurs within 300 feet of agriculturally-zoned property, the Project would be subject to the provisions of Riverside County Ordinance No. 625, which protects agricultural operations from nuisance complaints and encourages the development, improvement, and long-term viability of agricultural land. With mandatory compliance with Riverside County Ordinance No. 625, impacts due to the development of non-agricultural uses within 300 feet of agriculturally zoned property would be less than significant. Threshold d: Assuming mandatory compliance with	Less than Significant Less than			
Riverside County Ordinance No. 625, there are no	Significant			



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/ Monitoring Parties	Implementation Stage
components of the Project that would involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non- agricultural use. Impacts would be less than significant. Thresholds e, f and g: There are no forest lands in the Project vicinity, and no lands in the Project vicinity are zoned for timberland, timberland production, or forest uses. The Project would not result in the conversion of forest land to non-forest use. No impact would occur	No Impact			
4.3 Air Quality				
Threshold a: Prior to mitigation, the Project would have the potential to result in or cause NAAQS or CAAQS violations due to emissions of VOCs during construction. Although the Project would not be consistent with the site land use and zoning designations, Project construction and operational-source emissions would not exceed the Regional Thresholds or LSTs. Notwithstanding, due to the Project's construction-related emissions, prior to mitigation the Project would be inconsistent with and has the potential to obstruct implementation of the SCAQMD 2016 AQMP. This is evaluated as a significant impact for which mitigation would be required.	Less than Significant with Mitigation MM 4.3-1	MM 4.3-1 As a condition of building permit(s), architectural coatings shall consist of "Super-Compliant" low VOC paints which have been reformulated to exceed the regulatory VOC limits put forth by SCAQMD's Rule 1113. Super-Compliant low VOC paints shall be no more than 10 grams per liter (g/L) of VOC. Alternatively, the applicant may utilize tilt-up concrete buildings that do not require the use of architectural coatings. This requirement shall be noted in bid documents issued to prospective construction contractors. Construction contractors shall maintain records demonstrating compliance with these requirements, and shall make such records available for inspection by Riverside County upon request.	Project Applicant, Construction Contractor/ Riverside County Building and Safety Department	Prior to issuance of Building Permits
Threshold b: As indicated in Table 4.3-9, Project operational-related regional emissions would not exceed any of the SCAQMD Regional Thresholds for criteria pollutants. As such, Project regional operational-related emissions would not result in a cumulatively-considerable net increase of any criteria pollutant for which the Project region is non- attainment under an applicable federal or State ambient air quality standard, and impacts would be less than significant. However, as indicated in Table 4.3-8, Project construction- related regional emission would exceed the SCAQMD	Less than Significant with Mitigation MM 4.3-1			



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/ Monitoring Parties	Implementation Stage
Regional Thresholds for VOC emissions. Therefore, prior to mitigation the Project's construction-related emissions would result in a cumulatively-considerable net increase of a criteria pollutant (i.e., VOCs) for which the Project region is non- attainment under an applicable federal or State ambient air quality standard (i.e., ozone), resulting in a significant impact.				
Threshold c: As indicated in Table 4.3-10 and Table 4.3-11, Project-related construction and long-term operational emissions would not exceed the SCAQMD LSTs for any criteria pollutant. Additionally, the Project considered herein would not produce the volume of traffic required to generate a CO "hot spot" either in the context of the 2003 Los Angeles hot spot study or based on representative BAAQMD CO threshold considerations. In addition, based on a Project- specific HRA (Technical Appendix B2), the Project would not expose the MEIR, MEIW, or MEISC to cancer risks exceeding the SCAQMD significance threshold of 10 in one million or non-cancer health risks exceeding the applicable significance threshold of 1.0. Therefore, the Project would not expose sensitive receptors, which are located within one (1) mile of the Project site, to substantial pollutant concentrations, and impacts would be less than significant.	Less than Significant			
Threshold d: The Project does not propose land uses typically associated with emitting objectionable odors. Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and is thus considered less than significant. Additionally, it is expected that Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with Riverside County's solid waste	Less than Significant			



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/ Monitoring Parties	Implementation Stage
regulations. The proposed Project also would be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, odors associated with the proposed Project construction and operations would be less than significant and no mitigation is required.				
4.4 Biological Resources				
Threshold a: The proposed Project would not conflict with the SKR HCP, with the mandatory payment of fees pursuant to Riverside County Ordinance No. 663. The Project would not result in a conflict with the MSHCP Reserve Assembly requirements. However, prior to mitigation, the Project would conflict with MSHCP Section 6.1.2 due to permanent impacts to 0.35-acre of riparian/riverine resources, although the Project would not result in any conflicts with Section 6.1.2 due to impacts to fairy shrimp or riparian birds. Although the Project largely would comply with the UWIGs pursuant to MSHCP Section 6.1.4, during nighttime Project construction activities the Project has the potential to conflict with the lighting provisions of the MSHCP in the event that lands to the southwest have been incorporated into the	Less than Significant with Mitigation MM 4.4-1 MM 4.4-2 MM 4.4-3	MM 4.4-1 Prior to issuance of grading permits, the Project Applicant shall provide evidence (e.g., receipts) to Riverside County demonstrating that permanent impacts to 0.14-acre of Regional Water Quality Control Board (RWQCB) jurisdiction and permanent impacts to 0.35-acre (2,880 linear feet) of California Department of Fish and Wildlife (CDFW)/Multiple Species Habitat Conservation Plan (MSHCP) jurisdiction, of which 0.13- acre consists of vegetated riparian habitat, have been mitigated at a minimum 2:1 mitigation-to-impact ratio, including a minimum of 1:1 establishment, through the purchase of rehabilitation, re- establishment, and/or establishment mitigation credits at an approved mitigation bank or in-lieu fee program within the San Jacinto River and/or Santa Ana River Watershed.	Project Applicant, Project Biologist/ Riverside County Environmental Programs Department	Prior to issuance of grading permits
 MSHCP Conservation Area, resulting in a potentially significant near-term impact. The Project also has the potential to conflict with MSHCP Section 6.3.2 related to the burrowing owl, if the Project site were to become occupied prior to commencement of construction activities. Thresholds b and c: The Project would not result in any impacts to special status plants because no special-status plants occur on site. Although burrowing owl was confirmed absent from the Project site during focused surveys conducted by GLA in 2022, there is nonetheless the potential 	Less than Significant with Mitigation MM 4.4-3 MM 4.4-4	 MM 4.4-2 Prior to approval of grading or building permits that allow for nighttime construction activities, Riverside County shall condition such permits to require that any lighting elements used in conjunction with nighttime construction activities shall be shielded and directed away from open space areas to the southwest of the Project site. This requirement also shall be included as a note on the grading or building plans. The Project's construction contractor shall permit inspection by Riverside County staff to verify compliance with this requirement. MM 4.4-3 In accordance with Multiple Species Habitat 	Project Applicant, Construction Contractors/ Riverside County Building and Safety Department Project Applicant,	Prior to commencement of activities involving nighttime construction and during nighttime construction activities Prior to issuance
that the Project site could become occupied by the burrowing owl prior to the commencement of construction activities; thus, prior to mitigation, the Project's impacts to burrowing		Conservation Plan (MSHCP) Objective 6, prior to issuance of grading permits or other permits authorizing ground disturbance or discing, the Project Applicant shall retain a qualified biologist to	Project Biologist/ Riverside County Environmental	of grading permits



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/ Monitoring Parties	Implementation Stage
owl would be potentially significant. Although Project impacts due to the loss of habitat for the loggerhead shrike (foraging role only), white-tailed kite (foraging role only), yellow warbler, and Los Angeles pocket mouse would be less than significant with mandatory payment of MSHCP fees pursuant to Riverside County Ordinance No. 810, the Project has the potential to result in impacts to nesting birds regulated by the MBTA and CFGC, resulting in a potentially significant impact. The Project would not result in any impacts to vernal pools or species associated with vernal pools		 perform a burrowing owl survey at all potentially suitable habitat sites within the Project's limits of disturbance within 30 days of the commencement of any ground-disturbing activities at the Project site, as discussed below. A. Pre-Construction Survey: The pre-construction survey shall be performed by a qualified biologist that will survey the site for the presence/absence of burrowing owls within 30 days prior to commencement of ground-disturbing activities at the Project site. If burrowing owls are detected on-site during the pre-construction 	Programs Department	
Threshold d: The Project site does not contain habitat that would support wildlife nursery sites, and therefore cumulatively-considerable impacts native wildlife nursery sites would not occur. In addition, the Project site has historically been disturbed and is surrounded by low density residential and undeveloped lands to the north, south, and east, by industrial warehouse development to the southeast,	Less than Significant	survey, the owls shall be relocated/excluded from the site outside of the breeding season following accepted protocols, and subject to the approval of the Western Riverside County Regional Conservation Authority (RCA) and Wildlife Agencies (i.e., California Department of Fish and Wildlife (CDFW) and/or U.S. Fish and Wildlife Service (USFWS)).		
and by single-family residential development to the west. Although the Project site may provide for the local movement of wildlife, including small and medium-sized mammals, the Project site is not part of a significant regional wildlife movement corridor as identified by the MSHCP. Therefore, the Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites, and impacts would be less than significant.		 B. Burrowing Owl Management Plan: In the event that burrowing owl is determined to be present, or in the event that an assumption is made that the burrowing owl occurs on-site, a burrowing owl management plan shall be prepared and implemented in coordination with the Western Riverside County Regional Conservation Authority (RCA) and California Department of Fish and Wildlife (CDFW) that shall detail the relocation of owls from the Project site, passively and/or actively. If additional site visits determine the species is absent, then the pre-construction survey (as discussed above) shall instead be implemented. 		
Threshold e: The proposed Project would permanently impact approximately 45.45 acres of lands through grading, including areas of remedial grading that would not be restored to pre-Project conditions. Permanent impacts include	Less than Significant with Mitigation MM 4.4-1	 C. A copy of the results of the pre-construction survey (and all additional surveys), as well as copies of the Burrowing Owl Management Plan, if required, shall be 		



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/ Monitoring Parties	Implementation Stage
 approximately 11.45 acres of developed/ornamental areas, 7.74 acres of disturbed buckwheat scrub, 26.12 acres of ruderal/disturbed lands, and 0.13-acre of southern willow scrub. One sensitive vegetation community, southern willow scrub, would be impacted by the Project, while the remaining vegetation/land use types are not considered to comprise sensitive vegetation communities. Specifically, the Project would result in impacts to approximately 0.13-acre of southern willow scrub, which is considered to comprise vegetated riparian habitat. Project impacts to 0.13-acre of southern willow scrub therefore represents a significant impact of the proposed Project for which mitigation would be required. Threshold f: As indicated in EIR Table 4.4-2 and Table 4.4-3, implementation of the proposed Project would result in a total of 0.14-acre of RWQCB jurisdictional area and 0.35- acre of CDFW/MSHCP jurisdictional areas, of which 0.13- acre consists of vegetated riparian habitat. Although removal of these features trigger CWA Section 401 and CFGC Section 1602 permitting/authorizations, the removal of 0.35 acre of State waters consisting of shallow, ephemeral drainages, and including 0.13 acre of riparian habitat, would not significantly impact water resources or associated biological resources in the vicinity or at a regional level. Regardless, the loss of jurisdictional areas on site would require permits from the Regional Board and CDFW. As such, Project impacts to 0.14-acre of RWQCB jurisdiction, none of which consist of jurisdictional wetlands, and 0.35- acre of CDFW/MSHCP ju	Less than Significant with Mitigation MM 4.4-1	provided to the County of Riverside Planning Department for review and approval (in the case of the Burrowing Owl Management Plan) prior to any vegetation clearing and ground disturbance activities. MM 4.4-4 As a condition of grubbing and grading permits, vegetation clearing shall be conducted outside of the bird nesting season (February 1 to August 31) to the extent feasible. If avoidance of the nesting season is not feasible, a nesting bird survey shall be conducted by a qualified biologist within no more than 72 hours of such scheduled disturbance, to determine the presence of nests or nesting birds. If active nests are identified, the biologist shall establish appropriate buffers around the vegetation (typically 500 feet for raptors and sensitive species, 300 feet for non-raptors/non-sensitive species). All work within these buffers shall be halted until the nesting effort is finished (i.e., the juveniles are surviving independent from the nest). The biologist shall review and verify compliance with these nesting boundaries and shall verify the nesting effort has finished. Work may resume within the buffer area when no other active nests are found. Alternatively, a qualified biologist may determine that construction can be permitted within the buffer areas and would develop a monitoring plan to prevent any impacts while the nest continues to be active (eggs, chicks, etc.). Upon completion of the survey and any follow-up construction avoidance management, a report shall be prepared and submitted to Riverside County for mitigation monitoring compliance record keeping. If vegetation removal is not completed within 72 hours of a negative survey during nesting season, the nesting survey must be repeated to confirm the absence of nesting birds.	Riverside County Environmental Programs Department	Prior to issuance of grubbing or grading permit
Threshold g: Aside from the SKR HCP and MSHCP, which are addressed under the analysis of Threshold a., the only	No Impact			



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/ Monitoring Parties	Implementation Stage
other local policies or ordinances protecting biological resources are the Riverside County Oak Tree Management Guidelines and Riverside County Ordinance No. 559 (Regulating the Removal of Trees). The Project site does not contain any oak trees subject to the Riverside County Oak Tree Management Guidelines. Additionally, the Project site does not occur at an elevation exceeding 5,000 feet amsl; thus, Riverside County Ordinance No. 559 is not applicable to the proposed Project. Therefore, and aside from potential impacts due to a conflict with the MSHCP (as addressed under the analysis of Threshold a.), the Project would not conflict with any local policies or ordinances protecting.				
biological resources, such as a tree preservation policy or ordinance, and no impact would occur.				
4.5 Cultural Resources				
Thresholds a and b: Although implementation of the Project would impact two historic-age buildings, neither building is considered historically or architecturally significant and have been determined ineligible CRHR listing. No other potential historic resources were identified within the Project site or off-site improvement areas. However, there is a potential for previously-undiscovered historical resources to occur beneath the surface of areas planned for physical impact (i.e., grading) as part of the Project. Potential impacts to previously-undiscovered historical resources would be significant on both a direct and cumulatively-considerable basis prior to mitigation. Thresholds c and d: Based on the results of the Project's CRA, the Project site does not contain any known archaeological sites or resources. As such, the Project would	Less than Significant with Mitigation MM 4.5-2 MM 4.5-3 MM 4.5-4 MM 4.5-5 Less than Significant with Mitigation	MM 4.5-1 Native American Monitor: Prior to the issuance of grading permits, the Developer/Permit Applicant shall enter into an agreement with the consulting tribe(s) for a Native American Monitor. The Native American Monitor(s), shall be on-site during all initial ground disturbing activities and excavation of the southern portion of the Project site including clearing, grubbing, tree removals, grading and trenching. In conjunction with the Archaeological Monitor(s), the Native American Monitor(s) have the authority to temporarily divert, redirect, or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources. The Developer/Permit Applicant shall submit a fully executed copy of the agreement to the County Archaeologist to ensure compliance with this requirement. Upon verification, the Archaeologist shall clear this condition. This agreement shall not modify any condition of approval or mitigation measure.	Project Applicant/ County Archaeologist	Prior to issuance of grading permit, during grading, during construction
not result in any impacts to previously-identified archaeological sites or resources. Notwithstanding, there is a	MM 4.5-1 MM 4.5-2	MM 4.5-2 Project Archaeologist and CRMP: Prior the issuance of	Proiect	Prior to issuance
possibility that previously-undiscovered subsurface	MM 4.5-3	a grading permit, the Developer/Permit Applicant shall provide	Applicant/Project	of grading permit,



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/ Monitoring Parties	Implementation Stage
 archaeological resources may be impacted by development of the Project as proposed. Therefore, Project impacts to previously-undiscovered archaeological resources would be significant prior to mitigation. Threshold e: The Project site does not contain a cemetery and no known cemeteries are located within the immediate site vicinity. The Project Applicant would be required to comply with the applicable provisions of California HSC § 7050.5 and California PRC § 5097 et. seq., in the unlikely event that buried human remains are encountered during construction. Compliance with these mandatory requirements would reduce potential impacts to less than significant. 	MM 4.5-4 MM 4.5-5 Less than Significant	evidence to the County of Riverside Planning Department that a County certified professional archaeologist ("Project Archaeologist") has been contracted to implement a Cultural Resource Monitoring Program (CRMP). A CRMP shall be developed that addresses the details of all activities and provides procedures that must be followed in order to reduce the impacts to cultural and historic resources to a level that is less than significant, as well as address potential impacts to undiscovered buried archaeological resources associated with the Project. A fully executed copy of the contract and a wet-signed copy of the Monitoring Plan shall be provided to the County Archaeologist to ensure compliance. Working directly under the Project Archaeologist, an adequate number of qualified Archaeological Monitors shall be present to ensure that all earth moving activities are observed, and shall be on-site during all grading activities for areas to be monitored, including off-site improvements. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of the inspections will be determined by the Project Archaeologist.	Archaeologist/ County Archaeologist	during grading, during construction
		MM 4.5-3 Unanticipated Resources: A cultural resource, for this condition, is defined as being a feature and/or three or more artifacts in close association with each other. If during ground disturbance activities, unanticipated cultural resources are discovered, the following procedures shall be followed: All ground-disturbance activities within 100 feet of the discovered cultural resource shall be halted and the applicant shall call the County Archaeologist immediately upon discovery of the cultural resource. A meeting shall be convened between the developer, the Native American tribal representative), and the County Archaeologist to discuss the significance of the find. At the meeting with the aforementioned parties, a decision is to be made, with the concurrence of the County Archaeologist, as to the	Project Applicant/ Project Archaeologist/ County Archaeologist	Prior to issuance of grading permit, during grading, during construction



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/ Monitoring Parties	Implementation Stage
		appropriate treatment (documentation, recovery, avoidance, etc.) for the cultural resource. Resource evaluations shall be limited to nondestructive analysis. Further ground disturbance shall not resume within the area of the discovery until the appropriate treatment has been accomplished.		
		MM 4.5-4 Artifact Disposition: Prior to the grading permit final inspection, the landowner(s) shall relinquish ownership of all cultural resources that are unearthed on the Project property during any ground-disturbing activities, including previous investigations and/or Phase III data recovery. All historic archeological materials revered during the archaeological investigations, including collections made during an earlier project such as testing of archaeological sites that took place years ago, shall be curated at the Western Science Center, a Riverside County curation facility that meets State Resources Department office of Historic Preservation Guidelines for the Curation of Archaeological Resources, one of the following treatments shall be applied:	Project Applicant,/ Project Archaeologist/ County Archaeologist	Prior to grading permit final inspection
		a. Reburial of the resources on the Project property. The measures for reburial shall include, at least, the following: Measures to protect the reburial area from any future impacts. Reburial shall not occur until all required cataloging, analysis and studies have been completed on the cultural resources, with an exception that sacred items, burial goods and Native American human remains are excluded. Any reburial processes shall be culturally appropriate. Listing of contents and location of the reburial shall be included in the confidential Phase IV Report. The Phase IV Report shall be filed with the County under a confidential cover and not subject to a Public Records Request.		



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/ Monitoring Parties	Implementation Stage
		 b. If reburial is not agreed upon by the Consulting Tribes, then the resources shall be curated at a culturally appropriate manner at the Western Science Center, a Riverside County curation facility that meets State Resources Department Office of Historic Preservation Guidelines for the Curation of Archaeological Resources ensuring access and use pursuant to the Guidelines. The collection and associated records, including title, shall be transferred and are to be accompanied by payment of the fees necessary for permanent curation. Evidence of curation in the form of a letter from the curation facility stating that subject archaeological materials have been received and that all fees have been paid, shall be provided by the landowner to the County. There shall be no destructive or invasive testing on sacred items, burial goods and Native American human remains. MM 4.5-5 Final Phase IV Report: Prior to the grading permit final inspection, a Phase IV Cultural Resources Monitoring Report shall be submitted that complies with the Riverside County Planning Department's requirements for such reports for all ground disturbing activities associated with the grading permit. The report shall follow the County of Riverside Planning Department Cultural Resources (Archaeological) Investigations Standard Scopes of Work posted on the TLMA website. The report shall include results of any feature relocation or residue analysis required as well as evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting and evidence that any artifacts have been treated in accordance to the procedures stipulated in the Cultural Resources for the required cultural Resources Program (CRMP). 	Project Applicant, Project Archaeologist/ County Archaeologist	Prior to grading permit final inspection



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/ Monitoring Parties	Implementation Stage
4.6 Energy				
Threshold a : Project construction and operations would not result in the inefficient, wasteful, or unnecessary consumption of energy. Further, the energy demands of the Project can be accommodated within the context of available resources and energy delivery systems. The Project would therefore not cause or result in the need for additional energy producing or transmission facilities. The Project would not engage in wasteful or inefficient uses of energy and aims to achieve energy conservations goals within the State of California. As such, Project impacts due to wasteful, inefficient, or unnecessary consumption of energy resources would be less than significant requiring no mitigation.	Less than Significant	Mitigation measures are not required.	N/A	N/A
Threshold b : Energy consumed by the Project's operation is calculated to be comparable to, or less than, energy consumed by other warehouse projects of similar scale and intensity that are operating in California, as the Project would be subject to current regulatory requirements. Based on the analysis presented herein, the Project would not conflict with or obstruct a federal or State plan for renewable energy or energy efficiency, and impacts would be less than significant.	Less than Significant			
4.7 Geology and Soils				
Thresholds a and c: The potential for surface fault rupture to occur at the site is considered low. Impacts due to rupture of a known earthquake would therefore be less than significant. However, the Project site is located in a seismically active area of southern California and is expected to experience moderate to severe ground shaking during the lifetime of the Project. However, a significant impact could occur if the Project did not comply with the site-specific recommendations of the Project's Geotechnical Investigation (Technical Appendix F).	Less than Significant with Mitigation MM 4.7-1	MM 4.7-1 Prior to issuance of grading or building permits, the Riverside County Building and Safety Department shall verify that all of the recommendations given in Section 6.0 of the Project's March 23, 2022 "Geotechnical Investigation, Proposed Warehouse, SWC Rider Street and Patterson Avenue, Riverside County (Perris Area), California," prepared by Southern California Geotechnical and included as Technical Appendix F to the Project's EIR, are incorporated into the Project's grading and building plans and implemented by the construction contractors. These recommendations include but are not limited to: a) over-excavation in the southeast portion of the proposed building area	Project Applicant/ County Building and Safety Department	Prior to approval of any future implementing developments



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Threshold b: The Project site is located within a zone of "low" liquefaction susceptibility. The subsurface exploration performed at the site identified conditions that are considered to be non-conducive to liquefaction. Accordingly, the Project would not be subject to seismic-related ground failure, including liquefaction, and no impact would occur.	No Impact	and remedial grading across the site to remove organic soils and near-surface alluvium and near-surface bedrock and replacement with compacted structural fill; b) verification of acceptable soluble sulfate concentrations at the completion of building pad grading; c) verification of acceptable soil expansion indexes at the completion of building pad grading; d) use of a polyethylene encasement for ductile iron pipe; e) the periodic conduct of		
Threshold d: Although hillsides occur approximately 0.2- mile to the south, they have low landslide hazard risk and rockfall risk to the Project site. Due to the low probability of liquefaction to occur on site, the potential for lateral spreading is also considered low. Impacts due to collapse hazards could occur if proposed grading activities are not conducted in accordance with the site-specific recommendations of the Project's geotechnical study.	Less than Significant with Mitigation MM 4.7-1	compaction tests by a geotechnical engineer over the course of the Project's grading operation; and f) building foundation design, floor slab design, building and retaining wall design, and pavement design per the requirements of applicable Building Codes and to the specifications of a licensed geotechnical engineer. Alternatively, the Project shall comply with the findings and recommendations of any geotechnical studies that may be required in association with future grading and/or building permits.		
Threshold e: Subsidence at the Project site following development is estimated to be $0.1\pm$ feet. A significant impact could occur if proposed grading activities are not conducted in accordance with the site-specific recommendations of the Project's geotechnical study.	Less than Significant with Mitigation MM 4.7-1			
Threshold f: There are no volcanoes in the Project region; thus, no impacts due to volcanic hazards would occur. Due to the lack of an on-site body of water or other bodies of water within close proximity to the site that have the potential to result in site inundation, the potential for the Project site to be impacted by seiches is considered low. As such, impacts due to seiches would be less than significant. Additionally, although several existing hill forms occur to the south of the Project site, these hill forms exhibit substantial amounts of rock outcroppings, thereby indicating that the chance of mudflow hazards is low. Accordingly, impacts due to mudflow hazards would be less than significant	Less than Significant			



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/ Monitoring Parties	Implementation Stage
Thresholds g: The Project site would be graded in a manner that largely approximates the site's existing topographic conditions with exception of a proposed landscaped berm. Earthwork activities are expected to balance on site and no import or export of soils would be required. The Project would not result in a substantial change in topography or ground surface relief features, and impacts would be less than significant.	Less than Significant			
Thresholds h: Large slopes proposed as part of the Project's grading plan include a proposed landscaped berm along the western Project boundary, which would measure up to approximately 36 feet in height, and slopes around the proposed bioretention basin, which would measure up to approximately 18 feet in height. A potentially significant impact would occur due to the proposed slopes higher than 10 feet if the Project was to fail to incorporate the recommendations of the Project's Geotechnical Study (Technical Appendix F).	Less than Significant with Mitigation MM 4.7-1			
Thresholds i: There are no septic systems on site under existing conditions. Impacts associated with the Project's proposed sewer improvements are inherent to the Project's construction phase and have been evaluated throughout this EIR accordingly. There are no impacts associated with the Project's proposed sewer improvements that have not already been evaluated, and where necessary, mitigated to the maximum feasible extent by this EIR. Accordingly, the Project would not result in grading that affects or negates subsurface sewage disposal systems, and impacts would be less than significant.	Less than Significant			
Threshold j and m: The Project would not result in substantial soil erosion or loss of topsoil. The Project Applicant would be required to obtain an NPDES permit for	Less than Significant			



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/ Monitoring Parties	Implementation Stage
construction activities and adhere to a Stormwater Pollution Prevention Plan (SWPPP) as well as SCAQMD Rule 403 and Riverside County Ordinance Nos. 457 and 460. With mandatory compliance to these regulatory requirements, the potential for water and wind erosion impacts during construction would be less than significant. Following development, wind and water erosion on the Project site would be minimized, as the areas disturbed during construction would be landscaped or covered with impervious surfaces and drainage would be controlled through a storm drain system. Furthermore, the Project is required by law to implement a WQMP during operation, which would preclude substantial erosion impacts in the long-term. Impacts would be less than significant.	No Impact			
materials possess a very low expansion potential (Expansion Index = 1 to 18). Accordingly, the Project would not be located on expansive soil, as defined in Section 1803.5.3 of the California Building Code (2019), and would not create substantial risks to life or property; thus, no impact would occur.				
Threshold I: Sewer service to the proposed Project would be provided by the EMWD, and no septic tanks or alternative wastewater disposal systems are proposed as part of the Project. Accordingly, no impact would occur.	No Impact			
4.8 Greenhouse Gas Emissions				
Threshold a: The Project would emit approximately 5,006.24 MTCO2e per year (or a net increase of 4,951.47 MTCO2e/yr with consideration for the existing land uses at the Project site); thus, the proposed Project would exceed the County's CAP Update screening threshold of 3,000	Less than Significant with Mitigation MM 4.8-1	MM 4.8-1 Prior to issuance of building permits, the Project Applicant shall demonstrate that appropriate building construction measures shall apply to achieve a minimum of 100 points per Appendix D to the Riverside County 2019 Climate Action Plan (CAP) Update. The conceptual measures anticipated for the	Project Applicant/ Riverside County Planning Department	Prior to issuance of building permit



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/ Monitoring Parties	Implementation Stage
MTCO2e per year. Accordingly, prior to mitigation, Project- related GHG emissions would have the potential to result in a significant cumulatively-considerable impact on the environment.	Loss there	Project are listed in Table ES-2 of the Project's Greenhouse Gas Analysis (GHGA) technical report (appended to the Project's EIR as Technical Appendix G). The conceptual measures may be replaced with other measures as listed in Appendix D to the 2019 Riverside County CAP Update, as long as they are replaced at the		
the Riverside County CAP Update, which also represents a potential conflict with the CARB 2022 Scoping Plan. This is considered a direct and cumulatively-considerable impact of the proposed Project.	Significant with Mitigation MM 4.8-1	100 points per Appendix D to the 2019 Riverside County CAP Update. The County shall verify implementation of the identified measures prior to final building inspection.		
4.9 Hazards and Hazardous Materials				
Thresholds a and b: Based on the Project's Phase I ESA (Technical Appendix H), the Project site does not contain any RECs. Although the existing single-family residences on site may contain ACCMs and/or LBP, compliance with applicable regulations during construction would ensure that Project demolition activities do not expose nearby sensitive receptors or construction workers to significant health risks. With respect to construction activities, the Project would be subject to compliance with all applicable federal, State, and local laws and regulations regarding the transport, use, and storage of hazardous construction-related materials, including but not limited to requirements imposed by the EPA and DTSC, as well as the Santa Ana RWQCB pertaining to water quality. With mandatory compliance with applicable hazardous materials regulations, the Project would result in less-than-significant impacts due to the creation of a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials during the construction phase. Additionally, with mandatory regulatory compliance, along with mandatory compliance with Riverside County Ordinance No. 651.5, potential hazardous materials impacts associated with long-term operation of the Project are determined to be less than	Less than Significant	Mitigation measures are not required.	N/A	N/A



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/ Monitoring Parties	Implementation Stage
significant and mitigation is not required.				
Threshold c: The Project site does not contain any emergency facilities nor does it serve as an emergency evacuation route. Additionally, there are no emergency response plans or emergency evacuation plans in effect in the local area. Accordingly, implementation of the proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan, and no impact would occur	No Impact			
Threshold d: There are no existing or planned schools within one-quarter mile of the Project site. The nearest school is the Val Verde High School, which is located approximately 0.6-mile northeast of the Project site and east of I-215. Accordingly, the Project would not emit hazardous emissions, or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, and impacts would be less than significant.	Less than Significant			
Threshold e : Based on the results of the Project's Phase I ESA (Technical Appendix H), the Project site is not located on any list of hazardous materials sites complied pursuant to Government Code Section 65962.5. Accordingly, no impact would occur.	No Impact			
Thresholds f, g, and h: The Project site is located within the Airport Influence Area (AIA) for the MARB and is located within ALUCP Compatibility Zone C2. Because the Project site is located within the AIA for the MARB, the Project required review by the Riverside County Airport Land Use Commission (RCALUC). In accordance with the MARB ALUCP, the Riverside County ALUC reviewed the Project for consistency with the ALUCP. Based on the result of the	Less than Significant			



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/ Monitoring Parties	Implementation Stage
ALUC's review, on February 9, 2023 the Project was determined to be fully consistent with the March ARB ALUCP, subject to compliance with several standard conditions of approval. As such, the Project would result in less-than-significant impacts due to a conflict with the MARB ALUCP.				
Threshold i: There are no private airstrips in the Project vicinity. The nearest private airport facility is Perris Valley Airport, located approximately 4.2 miles southeast of the Project site. However, according to the Riverside County ALUCP policy document, the Project site is not located within the AIA for the Perris Valley Airport, and also is not identified as being located within any of the Compatibility Zones for the Perris Valley Airport (ALUC, 2010). As such, the Project would not result in a safety hazard for people residing or working in the Project area associated with private airports or heliports, and no impact would occur.	No Impact			
4.10 Hydrology and Water Quality				
Thresholds a., b., and i: The Project would be served potable water by the EMWD and does not include any proposed groundwater wells on site; thus, Project impacts to groundwater supplies would be less than significant. Additionally, the total amount of runoff from the site would not change with Project development, and as such Project- related runoff would be conveyed to downstream facilities where groundwater recharge would continue to occur. Additionally, water quality impacts during construction, including potential impacts due to a conflict with the Basin Plan and the West San Jacinto GMP, would be less than significant. In addition, with implementation of the proposed Project, all runoff generated on site would be appropriately treated by the Project's BMPs prior to ultimate discharge from the site and the Project would not adversely affect	Less than Significant	Mitigation measures are not required.	N/A	N/A



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/ Monitoring Parties	Implementation Stage
surface water or groundwater quality. Accordingly, the proposed Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface water or groundwater quality; would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge; and would not conflict with the Santa Ana Region Basin Plan or the San Jacinto GMP. Impacts would be less than significant. Thresholds c and f: Grading proposed as part of the Project generally would maintain the site's existing drainage patterns, with runoff continuing to flow in a generally northeasterly direction towards existing storm drains within Rider Street. In addition, although the Project has the potential to result in a substantial increase in peak flows from the Project site, the proposed onsite storm drain system would be sized during the Project's final design phase to sufficiently restrict flow rates to the existing condition discharge rate. As such, implementation of the proposed Project would not result in an increase in peak runoff from the Project site and therefore would not result in the alteration of any downstream receiving waters. Additionally, because existing drainage facilities downstream are adequately sized to accommodate peak runoff from the Project site and surrounding areas under existing conditions, and because peak runoff from the Project site as proposed, the Project would not contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems. Impacts would be less than significant.	Less than Significant			
Threshold d: With mandatory adherence to the SWPPP requirements, effects associated with construction-related erosion, siltation, water quality, and flooding on downstream water sources and flood control systems would be maintained	Less than Significant			



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/ Monitoring Parties	Implementation Stage
at a level below significance. With development of the Project site, large portions of the Project site would consist of impervious surfaces, with areas of pervious surfaces largely confined to landscaped areas. Thus, the potential for erosion hazards on site would be substantially decreased as compared to existing conditions with buildout of the Project site. In addition, as compared to the existing conditions of the Project site, the Project would not result in an increase in peak runoff from the site, and therefore runoff from the Project site would not cause or contribute to any increased erosion hazards downstream. As such, long-term erosion impacts would be less than significant Threshold e and g: Although the Project has the potential to result in a substantial increase in peak flows from the Project site, the proposed onsite storm drain system would be sized during the Project's final design phase to sufficiently restrict flow rates to the existing condition discharge rate. As such, 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, and impacts would be less than significant. In addition, the Project site is located within	Less than Significant			
 Zone X (unshaded), which includes areas determined to be outside the 0.2% annual chance floodplain. Accordingly, the Project has no potential to impede or redirect flood flows, and no impact would occur Threshold h: The Project site is located within "Zone X (unshaded)," which includes areas determined to be outside 	Less than Significant			
the 0.2% annual chance floodplain. Accordingly, the Project has no potential result in the release of pollutants due to site inundation, and no impacts would occur. The Project site is located approximately 36 miles from the Pacific Ocean. As such, the Project has no potential to risk the release of pollutants due to inundation by tsunamis, and no impact				



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/ Monitoring Parties	Implementation Stage
would occur. Due to the lack of an on-site body of water or other bodies of water within close proximity to the site that have the potential to result in site inundation, the potential for the subject site to be impacted by seiches is considered low. Additionally, according to Figure 5 of the General Plan Safety Element, the Project site is not located within a dam inundation area, thereby further demonstrating that the Project site is not subject to inundation by seiches. As such, impacts due to seiches would be less than significant				
4.11 Land Use and Planning				
 Threshold a: The Project would not conflict with the General Plan, MVAP, Connect SoCal, or any other land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Additionally, there are no impacts due to land use incompatibility that have not already been evaluated and mitigated to the maximum feasible extent in relevant sections of this EIR; therefore, Project impacts due to land use incompatibility would be less than significant. Threshold b: The Project would not disrupt or divide the physical arrangement of an established community (including 	Less than Significant Less than Significant	Mitigation measures are not required.	N/A	N/A
a low-income or minority community), and impacts would be less than significant.				
4.12 Mineral Resources				
Threshold a: The Project site does not contain any known mineral resources that would be of value to the region or the residents of the State. Accordingly, with implementation of the proposed Project there would be no impact to known mineral resources.	No Impact	Mitigation measures are not required.	N/A	N/A
Threshold b: The Project would not result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other	No Impact			



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/ Monitoring Parties	Implementation Stage
land use plan, and no impact would occur.				
Threshold c: The Project would not be an incompatible land use located adjacent to a State classified or designated area or existing surface mine, and no impact would occur.	No Impact			
Threshold d: The Project would not expose people or property to hazards from proposed, existing, or abandoned quarries or mines, and no impact would occur.	No Impact			
4.13 Noise				
Thresholds a : The MARB/IPA runway is located approximately 2 miles northeast of the Project site. Based on the 2018 noise level contours for the MARB/IPA, the Project development area is located outside the 60 dBA CNEL noise level contour boundaries and the Project's industrial and residential land use is considered clearly acceptable. As such, the Project would not exposed people residing or working in the area to excessive noise levels from airport operations, and impacts would be less than significant.	Less than Significant	Mitigation measures are not required.	N/A	N/A
Threshold b: There are no private airstrips in the Project vicinity. The nearest private airport facility is the Perris Valley Airport, located approximately 4.2 miles southeast of the Project site within the City of Perris. According to Map PV-3 of the Riverside County Airport Land Use Compatibility Plan (ALUCP), the Project site is located well outside of the 55 dBA CNEL noise contour for the Perris Valley Airport, indicating that the Project site would be subject to noise levels of less than 55 dBA CNEL associated with the Perris Valley Airport. The Project's single-family residential land use is considered clearly acceptable exterior noise levels below 55 dBA CNEL, while the Project's light industrial use is considered clearly acceptable exterior noise levels below 60 dBA CNEL. As such, both the residential	Less than Significant			



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/ Monitoring Parties	Implementation Stage
and warehouse building components of the Project would not be exposed to excessive noise levels associated with the Perris Valley Airport, and impacts would therefore be less than significant.				
than significant. Threshold c: As shown in Table 4.13-9, Project-related construction noise levels are expected to range from 57.9 to 76.1 dBA Leq at the nearest receiver locations and would not expose nearby sensitive receptors to Project-related construction noise levels exceeding the 80 dBA Leq significance threshold; therefore, the noise impacts due to Project construction noise would be less than significant at all receiver locations. Table 4.13-10 shows that the noise levels associated with the nighttime concrete pour activities during Project construction are estimated to range from 40.8 to 44.1 dBA Leq, which would not exceed the FTA 70 dBA Leq nighttime residential noise level threshold at all the nearest noise sensitive receiver locations; thus, the noise impacts due to Project construction nighttime concrete pour noise activity are considered less than significant at all receiver locations. With respect to Project operations, Table 4.13-14 and Table 4.13-15 show that the Project's operations would not expose any nearby sensitive receivers to noise levels exceeding the daytime threshold of 55 dBA Leq or the nighttime threshold of 45 dBA Leq; thus, the Project's operational noise impacts would be less than significant at the nearest noise-sensitive receiver locations. Table 4.13-16 through Table 4.13-18 demonstrate that Project traffic-related noise increases would not exceed the identified thresholds of	Significant and Unavoidable	No feasible mitigation measures are available.		
significance, with exception of the segment of Patterson Avenue north of Placentia Avenue, which would experience a noise increase of up to 6.1 dBA CNEL. Because the existing ambient noise levels currently exceed the calculated existing traffic noise levels, it expected that the noise- sensitive land uses adjacent to the Patterson Avenue would				



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/ Monitoring Parties	Implementation Stage
not perceive a significant off-site incremental traffic noise level increase due to the Project traffic. Regardless, when traffic noise is considered in isolation of other noise sources, the Project's traffic noise increase would be significant and cumulatively considerable on the segment of Patterson Avenue north of Placentia Avenue. Threshold d: At distances ranging from 50 to 141 feet from Project construction activities, construction vibration velocity levels are 0.016 to 0.074 in/sec PPV and would remain below the continuous vibration threshold of 0.3 PPV at all receiver locations. Therefore, the Project-related vibration impacts would be less than significant during the construction activities at the Project site. Project operations would not include the use of any stationary equipment that would result in excessive vibration levels. Additionally, because all roadways that would carry Project-related truck traffic are regularly maintained by Riverside County so as to prevent discontinuous pavement (e.g., potholes), truck traffic associated with the Project's long-term operations would not generate substantial amounts of groundborne vibration. Therefore, construction and long-term operation of the proposed Project would not result in the generation of excessive ground-borne vibration or ground-borne noise levels, and impacts would be less than significant.	Less than Significant			
4.14 Paleontological Resources				
Threshold a: The Project would not impact any known paleontological resources or unique geological features. However, the Pleistocene older alluvial fan sediments in the Project area have a high potential to contain significant, nonrenewable fossil remains, and Riverside County classifies portions of the Project site as having a "High B" sensitivity rating for paleontological resources. Any earth-moving activities beyond the disturbed topsoil may disrupt or adversely affect paleontological resources. This is considered	Less than Significant with Mitigation MM 4.14-1	MM 4.14-1 Prior to the issuance of grading permits, the Project Applicant shall retain a qualified paleontologist approved by Riverside County to create and implement a Project- specific plan for monitoring site grading/earth-moving activities (Project Paleontologist). The Project Paleontologist retained shall review the approved development plan and grading plan and conduct any pre-construction work necessary to render appropriate monitoring and mitigation requirements as appropriate. These requirements shall be documented by the Project Paleontologist in	Project Applicant, Project Paleontologist/ County Geologist, Planning Department	Prior to the issuance of grading permits and during grading and ground- disturbing activities



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/ Monitoring Parties	Implementation Stage
a potentially significant impact on both a direct and cumulatively-considerable basis.		a Paleontological Resource Impact Mitigation Program (PRIMP). This PRIMP shall be submitted to the County Geologist for approval prior to issuance of a grading permit. Information to be contained in the PRIMP, at a minimum and in addition to other industry standards and Society of Vertebrate Paleontology standards, is as follows:		
		Prior to issuance of grading permits, a qualified vertebrate paleontologist ("Project Paleontologist") shall review the Project grading plans and geotechnical report data, with particular regard to location and depth of earth moving and the rock unit(s) being encountered. The review is for the purpose of assessing potential for fossil remains being encountered by earth moving. If previously undisturbed strata with potential for containing fossil remains will be encountered by earth moving, the following measures shall be implemented.		
		<u>Museum Storage Agreement.</u> The Western Science Center (WSC), Natural History Museum of Los Angeles County (LACM), San Diego Natural History Museum (SDNHM), San Bernardino County Museum (SBCM), or Riverside Municipal Museum (RMM) shall be the designated museum repository for any vertebrate, invertebrate, and plant fossil remains and associated specimen data and corresponding geologic and geographic site data that might be recovered from the site as a result of the PRIMP. Prior to any earth moving at the Project site, the Project Paleontologist shall develop a formal agreement with the museum regarding final disposition and permanent storage and maintenance of the fossil collection and associated data. The agreement shall cover, but not necessarily be limited to, museum requirements regarding: 1) level of treatment of the collection: 2)		
		requirements regarding: 1) level of treatment of the collection; 2) storage and maintenance fees, if any; 3) purchase of specimen storage cabinets and drawers, as well as specimen trays, vials, specimen data cards, and other curatorial supplies, if required. Discovery Clause/Treatment Plan. As part of the PRIMP, the		



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/ Monitoring Parties	Implementation Stage
		Project Paleontologist shall develop a discovery clause/treatment plan (DC/TP) to allow for the additional tasks (recovery, geologic mapping, fossiliferous rock sample processing, specimen preparation, identification, curation, cataloging, data entry, specimen storage, and maintenance by museum) and manpower required to treat a large or productive fossil occurrence that cannot be treated without diverting the monitor from routine monitoring. The DC/TP shall also include approved procedures and lines of communication to be followed by specific individuals if fossil remains are uncovered by earth moving, particularly when a paleontological monitor is not present at the site. Names and telephone numbers of contact personnel shall be included in the lines of communication. The preparation of the required PRIMPs for future grading permits would ensure compliance with these requirements.		
		 <u>Pre-Construction Meeting.</u> The Project Paleontologist or field supervisor, as well as a paleontological construction monitor, shall attend a preconstruction meeting to explain the PRIMP to construction contractor and the developer's construction workers. The presentation shall summarize mitigation procedures to be employed by PRIMP personnel and shall detail procedures and lines of communication to be followed by specific Project personnel when fossil remains are found at the site. The Project Paleontologist or field supervisor shall inform the construction contractor and the developer's construction workers of the following items: 1) Routine mitigation measures (primarily monitoring and test screening) to be employed by a monitor during earth moving. 2) The potential for fossil remains being uncovered by earth 		
		moving in particular areas of the site and the need to implement specific actions and additional mitigation measures when a fossil occurrence is uncovered by earth		



Potential Environmental Impact	Significance Determination		Mitigation Measures (MMs)	Responsible/ Monitoring Parties	Implementation Stage
		3) 4) 4a) 4b) 4c) 5) 5a) 5b)	moving. Functions and responsibilities of the monitor when fossil remains are uncovered by earth moving and can be recovered without diverting the monitor from monitoring (temporarily divert earth moving around fossil site until remains evaluated, recovered, and earth moving allowed to proceed through site by monitor; if approved by construction contractor, enlist assistance of earth-moving equipment and operator to expedite recovery of remains, obviate need for additional personnel, and reduce any potential construction delay). Functions and responsibilities of the monitor when a fossil occurrence is uncovered by earth moving and is sufficiently large or productive that it cannot be recovered without diverting the monitor from monitoring. Flag the site. Advise construction contractor to avoid fossil site until further notice. Call the Project Paleontologist or field supervisor to site. Functions and responsibilities of the Project Paleontologist or field supervisor when notified by the monitor that a large or productive fossil occurrence has been uncovered by earth moving and cannot be recovered without diverting the monitor from monitoring. Evaluate occurrence to determine if recovery is warranted. If recovery is warranted, notify construction contractor and the Project developer of necessity for implementing additional mitigation measures specified in DC/TP initiating increased level of monitoring, if not already in effect, in immediate vicinity of fossil site and assigning additional personnel to PRIMP. Within 24 hours mobilize recovery crew to recover		
		,	occurrence; supervise recovery of occurrence and its transport to laboratory facility or to location elsewhere at site approved by construction contractor for initial/field		



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/ Monitoring Parties	Implementation Stage
		 processing of a fossiliferous rock sample or to laboratory facility for preparation of a fossil specimen. 5c) If warranted and approved by construction contractor, enlist assistance of the earth-moving equipment and operator to expedite recovery of occurrence. 5d) To obviate need for additional personnel and reduce any potential construction delay, after recovery of occurrence, have construction contractor allow earth moving to proceed through fossil site. 5e) Notify Project developer of recovery (or of decision not to recover fossil occurrence, if appropriate) and of authorization for earth moving to proceed through fossil site. 6) Responsibilities of the construction contractor and earthmoving equipment operators if fossil remains are uncovered by earth moving, particularly if a monitor is not present at the site when the remains are encountered. 6a) Avoid disturbance of fossil site by earth moving. 6b) Notify monitor, the Project Paleontologist or the field supervisor and Project developer of the fossil occurrence. 6c) Avoidance of fossil site by earth-moving activities. 6d) Assist with equipment and operator to expedite recovery of occurrence. If warranted, the Project Paleontologist or field supervisor and a monitor shall give a similar presentation to the earth-moving equipment on recognizing fossil remains in the field, informed of their responsibilities if they observe fossil remains when the monitor is not present at the site (avoid disturbance of occurrence by earth moving; have construction contractor and a monitor shall give a similar presentation to the earth-moving equipment operators at one of their earliest safety meetings. The operators shall be instructed on recognizing fossil remains in the field, informed of their responsibilities if they observe fossil remains when the monitor is not present at the site (avoid disturbance of occurrence by earth moving; have construction contractor call monitor to fossi		



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/ Monitoring Parties	Implementation Stage
		<u>Monitoring Earth Moving</u> . Earth moving shall be monitored by a paleontological monitor only in those areas of the site where earth moving will disturb soils greater than 4 feet deep (monitoring will not be conducted in areas in which soils will be buried, but not disturbed) and where paleontological resources have the potential to occur. Monitoring shall not be implemented until earth moving has reached a depth of 4 feet below current grade. Monitoring shall consist of visually inspecting freshly exposed rock and debris for larger fossil remains and periodically dry test screening a small (25 pound) sample of rock and debris with a 20-mesh box screen for smaller vertebrate fossil remains. Monitoring shall be conducted on a full-time basis. However, if too few or no fossil remains are uncovered by earth moving in areas underlain by a particular rock unit, monitoring can be reduced, generally, to half or quarter time or suspended once 50% of earth moving in the area underlain by the rock unit has been completed. Alternatively, if sufficient fossil remains are uncovered by earth moving, monitoring may be increased in areas underlain by the fossil- bearing rock unit, at least in the immediate vicinity of the fossil site.		
		Large-Specimen Evaluation and Recovery Option. If a large fossil specimen is found as a result of monitoring earth moving and the specimen can be recovered without significantly diverting the monitor from monitoring, earth moving shall be temporarily diverted around the fossil site and the specimen shall be evaluated, and, if warranted, excavated, covered with a protective plaster-impregnated burlap jacket, if required, and recovered. If necessary, earth-moving equipment and an operator shall be enlisted to expedite recovery of the specimen and obviate the need for additional personnel, and the construction contractor shall be 		



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/ Monitoring Parties	Implementation Stage
		 allowed to have earth moving proceed through the fossil site immediately after recovery of the specimen. A temporary field number shall be assigned to the specimen; the field number, a preliminary field identification, and pertinent specimen (field number, identification by taxon and element) and geologic (particularly stratigraphic level within rock unit) and geographic site data (location, elevation) recorded in the monitor's daily monitoring log; and the field number recorded and the fossil site location plotted on a map of the site. At the end of the day the monitor or, following his next site inspection, the field supervisor shall transport the fossil remains and associated data to a laboratory facility for further treatment. If appropriate, samples of fossil wood will be submitted for carbon- 14 dating analysis. 2) If a fossil specimen is found and is sufficiently large that it cannot be recovered without significantly diverting the monitor from monitoring, the fossil site shall be flagged with colored survey ribbon to temporarily divert earth moving around the site, the construction contractor shall be advised to avoid the site until 		
		further notice, and the Project Paleontologist or field supervisor shall be called to the site. The grading contractor will notify the Project developer and Project Paleontologist of the occurrence and of the avoidance of the site. The Project Paleontologist or field supervisor in turn shall evaluate the specimen to determine if recovery is warranted.		
		 2a) If specimen recovery is not warranted, no further action will be taken to preserve the fossil site or remains, and the construction contractor will be allowed to have earth moving proceed through the site immediately. 2b) If specimen recovery is warranted, the Project Paleontologist or field supervisor shall notify the construction contractor and Project developer of the 		



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/ Monitoring Parties	Implementation Stage
		 necessity for implementing additional mitigation measures specified in the DC/TP, initiating full-time monitoring, if not already in effect, at least in the immediate vicinity of the site in areas underlain by the fossil-bearing rock unit, and assigning additional personnel to the PRIMP. Within 24 hours a recovery crew shall be mobilized to recover the specimen. The size of the crew shall reflect the size of the specimen and the need to recover the specimen as quickly as possible. The specimen shall be excavated with hand tools, covered with a protective plaster-impregnated burlap jacket, and recovered. If necessary and approved by the construction contractor, earthmoving equipment and an operator shall be enlisted to expedite recovery of the specimen, reduce any potential construction delay, and obviate the need for additional personnel. The construction contractor shall be allowed to have earth moving proceed through the fossil site immediately after recovery of the specimen; the field number, a preliminary field identification, and pertinent specimen (field number, identification by taxon and element) and geologic (particularly stratigraphic level within rock unit) and geographic site data (location, elevation) recorded in the monitor's daily monitoring log; and the field number recorded, and the fossil site location plotted on a map of the site. The field supervisor and, if necessary, a crew member shall transport the fossil specimen and associated site data to a laboratory facility for further treatment. 		
		Small-Specimen Sample Evaluation, Recovery, and Processing. If a sufficient number of smaller vertebrate fossil remains are found at one site as a result of test screening by the paleontological monitor, the fossil site shall be flagged with colored survey ribbon to temporarily divert earth moving around		



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/ Monitoring Parties	Implementation Stage
		 the site. The construction contractor shall be advised to avoid the site until further notice, and if requested by the monitor to expedite recovery of a fossiliferous rock sample, reduce any potential construction delay and obviate the need for additional personnel, the construction contractor shall have earth-moving equipment and an operator acquire a rock sample from the fossil site and transport the sample, if possible, to a nearby temporary location at the site approved by the construction contractor. If a sample is recovered, the construction contractor shall be allowed to have earth moving proceed through the fossil site immediately after recovery of the sample. The Project Paleontologist or field supervisor shall be called to the fossil/storage site to determine if the fossil site/sample is sufficiently productive to warrant recovery of a large sample of fossiliferous rock to process for additional small remains. 1) If the site/sample is determined too unproductive or the remains too poorly preserved or insufficiently diagnostic, no further action will be taken to preserve the fossil site/sample or remains, and the construction contractor will be allowed to have earth moving proceed through the fossil/storage site immediately. 		
		2) If sample recovery is warranted, the Project Paleontologist or field supervisor shall notify the construction contractor and Project developer of the necessity for implementing additional mitigation measures specified in the DC/TP and assigning additional personnel to the PRIMP.		
		2a) Within 24 hours, a recovery crew shall be mobilized to recover the sample. The size of the crew shall reflect the need to recover the sample as quickly as possible. The field supervisor shall record the size and supervise recovery of the sample. Up to 3 tons of fossiliferous rock shall be		



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/ Monitoring Parties	Implementation Stage
		 recovered. The sample shall be excavated with hand tools for recovery. If necessary and if approved by the construction contractor, earth-moving equipment and an operator shall be enlisted to expedite transportation of the sample to the processing facility site, obviate the need for additional personnel, and reduce any potential construction delay and the construction contractor will be allowed to have earth moving proceed through the fossil site immediately after recovery of the sample. 2b) A temporary field number shall be assigned to the sample; the field number and pertinent specimen (field number, identification by taxon and element) and geologic (particularly stratigraphic level within rock unit) and geographic site data (location, elevation) recorded in the monitor's daily monitoring log; and the field number recorded, and the fossil site location plotted on a map of the site. The field supervisor and, if necessary, a crew member will transport the sample to a location elsewhere at the site approved by the construction contractor or to an offsite location for initial/field processing (wet screening) of the sample. The total weight of all samples from each fossil-bearing rock unit at the site shall not exceed 3 tons. 		
		2c) If warranted, the field supervisor shall set up a field processing facility for wet screening the sample at a site location approved by the construction contractor. Wet screening shall consist of sieving rock through a 20-(and/or finer) mesh box screen immersed in a tub of water to remove the smaller (clay and silt) particles from the larger (sand and rock) particles and small fossil remains and could result in a reduction in sample weight/volume in excess of 90%. If necessary, rock shall be soaked in an environmentally safe dispersant (citrus oil) prior to screening to improve the separation of the clay particles		



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/ Monitoring Parties	Implementation Stage
		from the rest of the sample during screening. The monitor shall conduct wet screening if screening can be accomplished without diverting the monitor from monitoring. If it is not possible to have the monitor perform the wet screening, a field technician shall be assigned to the task. Following the next site inspection, the field supervisor will transport the concentrate (larger particles and small fossil remains) generated by initial processing to a laboratory facility for final/laboratory processing.		
		2d) If the fossil remains in the concentrate are sufficiently fossilized (dense), an environmentally safe heavy liquid (sodium polytungstate), if appropriate, shall be used by the senior vertebrate paleontologist to separate the remains from the remaining sand and rock particles. When added to a beaker filled with heavy liquid, the concentrate will separate, the particles floating to the surface, and the remains sinking to the bottom, from where they are retrieved. This technique can result in a further sample weight/volume reduction in excess of 90% (less than 1% of original sample size). The final concentrate shall be examined under a microscope and fossil specimens recovered from any remaining sand and rock particles. If the fossil bone in the original concentrate is not sufficiently dense for use of the heavy-liquid separation technique, the entire sample of concentrate shall be sorted under a microscope for fossil remains. Recovered fossil remains shall then be treated as outlined herein.		
		2e) During the final processing of a sample, the senior vertebrate paleontologist shall continually evaluate the results of field and laboratory processing. If the sample is insufficiently productive or the fossil remains are too poorly preserved, the senior vertebrate paleontologist shall		



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/ Monitoring Parties	Implementation Stage
		have the option of discontinuing further laboratory		
		remainder of the sample suspended and disposing of the		
		remainder of the sample and upprocessed concentrate		
		Similarly, processing shall be discontinued if, after		
		preliminary identification of some specimens, the remains		
		are determined insufficiently diagnostic or diverse		
		taxonomically, or the species represented are the same as		
		those in another sample from the fossil-bearing rock unit.		
		If appropriate, small splits from one or more samples shall		
		be submitted for palynological analysis.		
		Fossil Treatment. Final treatment of all fossil specimens recovered		
		from the site as a result of the PRIMP shall be conducted at a		
		laboratory facility. Larger vertebrate fossil specimens shall be		
		removed from their protective jackets, prepared to the point of		
		identification using hand tools, and hardened or stabilized with a		
		penetrating solution by a preparator. All recovered fossil		
		specimens shall be identified to the lowest taxonomic level		
		possible by knowledgeable vertebrate and invertebrate		
		paleontologists and, if required, other knowledgeable		
		paleontologists (i.e., paleobotanists, micropaleontologists,		
		palynologists). The specimens shall then be curated (assigned and		
		labeled with museum specimen data and corresponding site		
		numbers, placed in specimen trays and, if appropriate, vials with		
		completed specimen data cards), catalogued (specimen and site		
		numbers and specimen data and corresponding geologic and		
		geographic site data, respectively, archived [entered into		
		appropriate catalogs and computerized databases]), and		
		accessioned into the museum lossil collection, where they will be		
		permanently stored, maintained, and, along with associated data,		
		the possible exception of those tasks (curation, cataloging) that		
		might be conducted by mission staff all treatment of the fossil		
		specimens shall be conducted by a laboratory technician. Fossil		


Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/ Monitoring Parties	Implementation Stage
		specimen preparation, identification, curation, and cataloguing are now required before a fossil collection will be accepted by most museum repositories, including the WSC, LACM, SDNHM, SBCM, and RMM. Moreover, the scientific importance of a fossil specimen cannot be evaluated until the specimen has been identification often is not possible without prior preparation. <u>Final Report.</u> A final technical report of findings shall be prepared by the Project Paleontologist and shall describe the site's stratigraphy, summarize field and laboratory methods employed during the PRIMP, include a taxonomic list and an inventory of catalogued fossil specimens recovered as a result of the PRIMP, evaluate the scientific importance of the specimens, and discuss the relationship of the fossil assemblage from any newly recorded fossil site at the project site to relevant fossil assemblages from fossil sites in other areas. The report shall be submitted to the contractor and County Geologist. Submission of the final report will signify completion of the PRIMP and will ensure Project compliance with Public Resources Code Section 21081.6 (mitigation monitoring, reporting, and compliance). All reports shall be signed by the Project Paleontologist and all other professionals responsible for the report's content (e.g., Project Geologist), as appropriate. One original signed copy of the report(s) shall be submitted to the County Geologist along with a copy of this condition and the grading plan for appropriate case processing and tracking. These documents should not be submitted to the Project Planner, Plan Check staff, Land Use Counter or any other County office. In addition, the Project Applicant shall submit proof of hiring (i.e. copy of executed contract, retainer agreement, etc.) a Project Paleontologist for the in-grading implementation of the PRIMP.		



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/ Monitoring Parties	Implementation Stage
4.15 Population and Housing				
Threshold a: Although the Project would result in the removal of three existing residential homes on site, the removal of these three homes from the Project site would not substantially affect the supply of housing in the County and would not displace substantial numbers of existing people or housing necessitating the construction of replacement housing elsewhere. Adequate housing opportunities exist or are planned within the Riverside County region to accommodate the existing residents on the Project site, and there would be no direct need for the construction of replacement housing as a result of Project implementation. Furthermore, although not proposed for development as part of the Project, the Project's TPM accommodates three residential lots, which would offset the loss of three residential units from the site should these lots develop with residential units. As such, impacts would be less than significant.	Less than Significant	No mitigation measures are required.	N/A	N/A
Threshold b: Although the Project would result in approximately 574 future employees, Riverside County currently suffers from a poor jobs-housing ratio, wherein there are not enough jobs within the County to prevent the need for County residents to travel outside the region for employment. Thus, by developing the Project site with employment-generating land uses, the Project would assist the County in improving its jobs-housing balance. Furthermore, the Riverside County General Plan designates areas of the County in which lower-income housing can be accommodated to meet the County's RHNA obligations, and does not rely on residential development on the Project site in order to meet its RHNA obligations. Moreover, it is anticipated that any future employees generated by the Project could be accommodated by existing residential	Less than Significant			



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/ Monitoring Parties	Implementation Stage
communities and/or by future residential uses to be constructed in accordance with the General Plan Land Use Plan or the general plans of cities within the County, and that no additional housing, including housing affordable to households earning 80% or less of the County's median income, would be required to accommodate Project-related employees. Impacts would be less than significant. Threshold c : Although the Project would result in the generation of more employees than anticipated by the General Plan, Riverside County currently suffers from a poor jobs-housing ratio, wherein there are not enough jobs within the County to prevent the need for County residents to travel outside the region for employment. Thus, by developing the Project site with employment-generating land uses, the Project sould assist the County in improving its jobs- housing balance. Housing for these employees does not represent "substantial" unplanned population growth, as there is already sufficient housing in the County to accommodate workers. Furthermore, the Project's proposed roadway and other infrastructure (e.g., water, sewer, storm drain, etc.) improvements have been designed and sized to serve the proposed Project, and would not indirectly induce growth in the local area. Thus, the Project would not induce substantial unplanned population growth in the area, either directly or in dimensional sized to serve the proposed Project.	Less than Significant			
4.16 Public Services				
Threshold a: Although the Project would place additional demand on the RCFD and incrementally contribute to a need for new or expanded fire protection facilities, the RCFD has not proposed to expand or construct a new fire station in the Project's service area. With payment of mandatory DIF fees, the proposed Project's potential direct and cumulatively-considerable impacts to the Riverside County Fire	Less than Significant	Mitigation measures are not required.	N/A	N/A



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Department would be reduced to less-than-significant levels.				
Threshold b: With payment of mandatory DIF fees, the proposed Project's potential direct and cumulatively-considerable impacts to the Riverside County Sheriff's Department would be reduced to less-than-significant levels, and the Project would not result in or require the construction of new police protection facilities that could result in a significant impact to the environment.	Less than Significant			
Threshold c: The Project would not directly generate a resident population, and thus would not directly impact school services in the local area. Although the Project may indirectly result in new residents within the service area of the VVUSD, and thus may indirectly result in an incremental increase in demand for new school facilities, there are no current publicly-available plans detailing where such facilities would be built. The payment of mandatory school impact fees would ensure that the Project would result in less-than-significant direct or cumulatively-considerable impacts to the ability of the VVUSD to provide for school services.	Less than Significant			
Threshold d: The Project would not directly generate a resident population, and thus would not directly impact library services in the local area. Although the Project may indirectly result in new residents within the local area, and thus could result in an incremental demand for increased library facilities, the County has no plans to expand or build new library facilities in the Project site vicinity. The Project would be required to contribute DIF fees, which would be used in part to provide for library space and/or new book volumes. Accordingly, with payment of DIF fees, Project impacts to library services and facilities are evaluated as less than significant on both a direct and cumulatively-	Less than Significant			



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considerable basis.				
Threshold e: With payment of mandatory DIF fees, the Project would result in less-than-significant direct and cumulatively-considerable impacts to health services facilities, and the Project would not result in or require the construction of new health services facilities that could result in a significant impact to the environment.	Less than Significant			
4.17 Recreation				
Thresholds a and d: The physical construction of the on-site trails and pedestrian facilities has been addressed under the relevant issue areas identified throughout this EIR (e.g., air quality, biological resources, cultural resources, etc.). Under each of these topics, the Project impacts are determined to be less than significant, or mitigation measures have been identified to reduce impacts to the maximum feasible extent. There are no components of the planned trails or pedestrian facilities on site that have not already been addressed and accounted for throughout this EIR. Accordingly, Project impacts due to parkland development on site would be less than significant, requiring no mitigation beyond that which is identified in other portions of this EIR.	Less than Significant	Mitigation measures are not required.	N/A	N/A
Threshold b : Although the Project would accommodate three residential lots that could be developed with residential uses in the future, the addition of these three residential homes would be completely offset by the proposed demolition of the three existing homes in the southern portions of the Project site. The Project's proposed warehouse building would not directly or indirectly generate a population that would increase the use of existing neighborhood and regional parks or other recreational facilities, as a majority of the Project's future jobs are anticipated to be filled by existing or future planned residents	Less than Significant			



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/ Monitoring Parties	Implementation Stage
within the County. Accordingly, implementation of the proposed Project would not result in the increased use or substantial physical deterioration of an existing neighborhood or regional park, and impacts would be less than significant.				
Threshold c: The Project site is not located within a CSA that was established for recreational facilities, the Project site is not located within a Community Parks and Recreation Plan, and the Project is not subject to payment of in-lieu fees (Quimby fees) for recreational facilities pursuant to § 10.35 of Riverside County Ordinance No. 460. Accordingly, impacts due to a conflict with a Community Parks and Recreation Plan and due to the need for payment of in-lieu fees for parkland acquisition and construction would be less than significant.	Less than Significant			
4.18 Transportation				
 Threshold a: The proposed Project would be fully consistent with Connect SoCal, the Riverside County CMP, and the Riverside County General Plan Circulation Element. There are no components of the proposed Project that would conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, or pedestrian facilities. Impacts would be less than significant. Threshold b: The Project would generate approximately 16.8 VMT per employee, which would exceed the County 	Less than Significant Significant and Unavoidable with	MM 4.18-1 Prior to the issuance of grading permits or improvement plans affecting a public street, the Project Applicant shall prepare and Riverside County shall approve a temporary traffic control plan. The temporary traffic control plan shall comply with the applicable requirements of the California Manual on Uniform Traffic Control Devices (CMUTD). A requirement to comply with the temporary traffic control plan shall be noted on all grading and building plans and also shall be specified in bid documents issued to prospective construction contractors	Project Applicant/ Riverside County Planning Department	Prior to issuance of grading permit
threshold by 18.31%. The Project's total VMT per SP would be approximately 38.78, which would exceed the identified threshold of significance of 37.87 by 2.40%. Therefore, the Project would conflict with or be inconsistent with CEQA Guidelines § 15064.3(b), which represents a significant of the proposed Project.	Mitigation MM 4.18-2	MM 4.18-2 Required Commute Trip Reduction Program: Future building lease or sales agreements shall include a requirement to implement a voluntary program to discourage single-occupancy vehicle trips for employees and encourage alternative modes of transportation such as carpooling, taking transit, walking, and biking. Examples of potential Commute Trip Reduction (CTR) program features include the following:	Project Applicant/ Riverside County Planning Department	Prior to issuance of certificate of occupancy



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 Threshold c: All physical improvements planned as part of the Project would be in conformance with applicable Riverside County standards. Although the Project's truck traffic has the potential to conflict with traffic from residential uses, particularly residential uses to the west and south, the Project has been designed to locate the access driveways into the site along Patterson Avenue and Rider Street, and away from the existing residential uses to the west and south. Furthermore, the Project area already is developed with a number of warehouses, all of which also generate truck traffic. Therefore, the Project would not substantially increase hazards due to incompatible uses, and impacts would be less than significant. Threshold d: Although the Project would result in the increased maintenance of roadways and would increase traffic on existing and planned roadways, any incremental increase in the need to maintain public roadway facilities would be offset by tax revenue generated by the Project's proposed land uses. There are no components of the proposed Project that would result in or require a substantial increase in expenditures by Riverside County for public road maintenance such that environmental impacts would be made to roadways abutting the Project site, including Rider Street, Patterson Avenue, and Walnut Street. The Project has the potential to adversely impact circulation in the local area during the construction of proposed improvements to these roadways. This is conservatively evaluated as a significant impact for which mitigation would be required in the form of a traffic control plan for implementing developments. 	Less than Significant Less than Significant Less than Significant with Mitigation MM 4.17-1	 a) b) c) d) e) f) g) 	Designated Employee Transportation Coordinator (ETC): Identify an Employee Transportation Coordinator (ETC) as part of future site operations. The role of ETC is to provide education and point of contact for commute-related questions and commuter benefits. Marketing of Commuter Benefits for Employees: Provide commuter benefit materials to new hires. Additionally, provide an on-site message board (physical or digital) to educate employees of commuter benefits. Pre-Tax Transit Pass Benefits: Provide employees access to WageWorks (or comparable) to purchase transit passes or other approved commuter expenses pre-tax. Bicycle Parking: Provide on-site secure bike parking facilities and storage lockers. Carpool and Vanpool Ride-Matching Services: Provide information about Waze Carpool and other carpool/vanpool ride-matching services to employees. Preferential Parking: Provide preferential carpool/vanpool parking spaces to encourage carpooling, vanpools, and clean air electric vehicles. Guaranteed Ride Home (GRH) Program. Establish a GRH program for employees that arrive to work by carpool, vanpool, or transit and need to leave work early or are unable to use normal commute accommodations. The GRH Program can be provided via local transportation network companies		
a traffic control plan for implementing developments.					



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 Threshold f: Under long-term operating conditions, the Project would have no effect on emergency access in the local area, and impacts would be less than significant. However, during proposed frontage improvements to Rider Street, Patterson Avenue, and Walnut Street, there is a potential that the Project could adversely affect emergency access or access to nearby uses. This is conservatively evaluated as a significant impact for which mitigation would be required in the form of a traffic control plan for implementing developments. Threshold g: As part of the Project, frontage improvements would occur along Patterson Avenue, Walnut Street, and Rider Street, with a sidewalk and community trail proposed along Patterson Avenue and Walnut Street and a sidewalk proposed along Rider Street. Impacts associated with the construction of these trail segments are inherent to the Project's construction phase, and have been evaluated throughout this EIR under the appropriate subject heading (e.g., biological resources, etc.). There would be no impacts to the environment specifically related to the construction of the Project's frontage improvements that have not already been evaluated and mitigated for throughout this EIR. Accordingly, impacts would be less than significant 	Less than Significant with Mitigation 4.17-1 Less than Significant			
4.19 Tribal Cultural Resources				
Impact Threshold a. & b.: The Project site does not contain any known tribal cultural resources. In the unlikely event that human remains are encountered during Project construction, mandatory compliance with State Health and Safety Code Section 7050.5 is required, which is a mandatory requirement and is not considered mitigation.	Less than Significant	No mitigation is required.	N/A	N/A



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4.20 Utilities and Service Systems				
Threshold a: Although the Project would require construction of new or expanded water, wastewater conveyance, and stormwater drainage systems, impacts associated with the construction of such facilities have been evaluated throughout this EIR under the appropriate subject headings (e.g., air quality, biological resources, etc.). Where significant direct or cumulative impacts are identified, mitigation measures have been imposed to reduce the Project's impacts to the maximum feasible extent. There are no environmental impacts that would occur specifically related to the Project's proposed water, sewer, and drainage improvements that have not already been addressed. As such, with the mitigation measures specified in this EIR, Project impacts due to water, sewer, and drainage improvements would be less than significant. Additionally, the Project's wastewater generation would represent approximately 1.4% of the current available treatment capacity at the Moreno Valley RWRF, and approximately 0.9% of the current available treatment capacity at the Perris Valley RWRF. Accordingly, the Project would not result in or require the expansion of the existing facilities at the Moreno Valley RWRF or the Perris Valley RWRF, and impacts would therefore be less than significant.	Less than Significant	The mitigation measures identified throughout this EIR for Project-related construction impacts (e.g., air quality, biological resources, etc.) shall apply. Project impacts to utilities and service systems would be less than significant; therefore, no additional mitigation is required related to utilities and service system improvements proposed as part of the Project.	N/A	N/A
Threshold b: The UWMP and the Project's WSA (Technical Appendix O) demonstrate that the EMWD would have sufficient water supplies even during single and multiple dry years to meet the projected demand within its district through year 2045. Because the Project's anticipated water demand would be substantially less than the demand projections identified by the 2020 UWMP for the Project site, it can be concluded that the EMWD would have sufficient water supplies to serve the Project based on existing entitlements	Less than Significant			



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and resources. Additionally, the Project would not require or result in the construction of new water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Therefore, impacts associated with the Project's water demand would be less than significant.				
Threshold c: Impacts associated with the Project's proposed sewer improvements are inherent to the Project's construction phase, and impacts have been evaluated throughout this EIR under the appropriate subject headings (e.g., air quality, biological resources, etc.). Where significant direct or cumulative impacts are identified, mitigation measures have been imposed to reduce the Project's impacts to the maximum feasible extent. There are no environmental impacts that would occur specifically related to the Project's proposed sewer improvements that have not already been addressed in pertinent sections of this EIR. As such, with the mitigation measures specified in this EIR, Project impacts due to proposed sewer improvements would be less than significant.	Less than Significant			
Threshold d: The Project's wastewater generation would represent approximately 1.4% of the current available treatment capacity at the Moreno Valley RWRF, and approximately 0.9% of the current available treatment capacity at the Perris Valley RWRF. Accordingly, the Project would not result in or require the expansion of the existing facilities at the Moreno Valley RWRF or the Perris Valley RWRF, and impacts would therefore be less than significant.	Less than Significant			
Threshold e: Regional solid waste facilities would have adequate capacity to handle solid waste generated by the Project's construction and operational phases. The Project would not generate solid waste in excess of State or local	Less than Significant			



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standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Accordingly, impacts would be less than significant.				
Threshold f: With mandatory compliance to AB 939, AB 341, and RCDWR's programs and policies, the Project would not result in a significant impact due to noncompliance with regulations related to solid waste. A less-than-significant impact would occur.	Less than Significant			
Threshold g: Impacts associated with the construction or expansion of utility facilities would be less than significant or otherwise mitigated to the maximum feasible extent by this EIR. No additional mitigation would be required	Less than Significant			
4.21 Wildfire				
Threshold a: The Project site and surrounding areas are not identified as evacuation routes, and there are no adopted emergency response plans or emergency evacuation plans applicable to the Project area. During construction and at Project build-out, the proposed Project would be required to maintain adequate access for emergency vehicles. Accordingly, the Project would not impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan, and impacts would be less than significant.	Less than Significant	Mitigation measures are not required.	N/A	N/A
Threshold b and e: The Project would provide for a setback between the proposed warehouse building and areas subject to wildland fire hazards ranging in width from 250 feet to 350 feet, while the future residential uses would not be subject to wildland fire hazards. Landscaped areas of the Project would consist of a variety of trees, shrubs and groundcover irrigated with an automatic irrigation system, and thus would not exacerbate wildfire risks in the local area.	Less than Significant			



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/ Monitoring Parties	Implementation Stage
The proposed setbacks and roadway areas of between 250 and 350 feet in width would exceed the requirements of the Riverside County Fire Protection and Emergency Medical Master Plan, thereby ensuring that future development on site would not be subject to, and would not exacerbate, wildfire risks. Accordingly, the Project would not exacerbate wildfire risks, and thereby would not expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Additionally, the Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Impacts would be less than significant.				
Threshold c: The Project would provide for a setback between the proposed warehouse building and areas subject to wildland fire hazards ranging in width from 250 feet to 350 feet, while the future residential uses would not be subject to wildland fire hazards. Areas located between the proposed warehouse building and areas subject to wildfire hazards would consist of parking areas and drive aisles; ornamental vegetation; and improved roadways (i.e., Rider Street, Patterson Avenue, and Walnut Street). Ornamental vegetation would be irrigated with an automatic irrigation system, and thus would not exacerbate fire risk in the local area. Impacts associated with development of the Project site, including the construction of parking and landscaped areas on site and improvements to abutting roadways, are inherent to the Project's construction phase, and impacts associated with such features have been evaluated throughout this EIR under the appropriate subject heading (e.g., biological resources, etc.). Accordingly, the Project would not exacerbate fire risk or involve improvements that may result in temporary or ongoing impacts to the environment that have not already been addressed throughout this EIR, and impacts would therefore be less than significant	Less than Significant			



Rider and Patterson Business Center Environmental Impact Report

Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/ Monitoring Parties	Implementation Stage
Threshold d: Under existing and proposed conditions, the Project site exhibits little topographic variation, and development on site as proposed would not involve features subject to wildland fire hazards. Landscaped areas proposed for the Project site would be irrigated with an automatic irrigation system, and thus would not exacerbate fire risk in the local area. Thus, improvements proposed as part of the Project would not result in an increase in wildfire hazard- related risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Areas surrounding the Project site are identified as having a "Very High" susceptibility to wildfire hazards; however, there are no large slopes on any of the lands immediately surrounding the Project site. As such, the Project site is not subject to landslides or slope instability that may occur in the surrounding area as a result of wildfires. Moreover, improvements proposed as part of the Project would provide for a setback between the proposed warehouse building and areas subject to wildland fire hazards ranging in width from 250 feet to 350 feet (refer to the discussion and analysis of Threshold b. and e.), while the future residential uses would not be subject to wildland fire hazards. Therefore, the Project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-	Less than Significant		Parties	
fire slope instability, or drainage changes, and impacts would be less than significant.				



1.0 INTRODUCTION

1.1 PURPOSES OF CEQA AND LEGAL AUTHORITY FOR THIS EIR

This Environmental Impact Report (EIR) complies with the California Environmental Quality Act (Public Resources Code (PRC) Section (§) 2100 et. seq. ("CEQA"), as amended, and the CEQA State Guidelines (Title 14 California Code of Regulations (CCR) § 15000 et. seq.) ("CEQA Guidelines"), as amended. As stated by CEQA Guidelines § 15002(a), the basic purposes of CEQA are to:

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

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

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

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

- 1. Adoption by resolution of a General Plan Amendment (GPA 220003);
- 2. Adoption by ordinance of a Change of Zone (CZ 2200003);
- 3. Adoption by resolution of Parcel Map No. 38337 (TPM 38337); and
- 4. Adoption by resolution of Plot Plan No. 220004 (PPT 220004).



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

As a first step in the CEQA compliance process, Riverside County determined that implementation of the Project has the potential to result in significant environmental effects, and a Project EIR, as defined by CEQA Guidelines § 15161, is required. As stated in CEQA Guidelines § 15161, a Project EIR should "...focus primarily on the changes in the environment that would result from the development project" and "...examine all phases of the project including planning, construction, and operation." This EIR represents the independent judgment of Riverside County (as the Lead Agency) and evaluates the physical environmental effects that could result from constructing and operating the proposed Project. Acting as Lead Agency, Riverside County will: a) evaluate this EIR to determine if the Project's physical environmental impacts are adequately disclosed; b) assess the adequacy and feasibility of identified mitigation measures and the potential addition, modification to, or deletion of mitigation measures, standard conditions of approval, or Project design features; c) consider alternatives to the Project that would reduce or eliminate significant environmental effects of the Project; and, if necessary, d) consider Project benefits that may override the Project's unavoidable and unmitigable significant effects on the environment.

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

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

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

- **The Planning Commission**: The Planning Commission will recommend to the Board of Supervisors whether the Project's applications, which include GPA 220003, CZ 2200003, TPM 38337, and PPT 220004, should be approved, modified, or denied, and will recommend to the Board of Supervisors whether to certify the Final EIR (FEIR) with or without modifications.
- **Board of Supervisors**: The Board of Supervisors will decide whether to approve, modify, or deny GPA 220003, CZ 2200003, TPM 38337, and PPT 220004. Project-related approvals will be subject



to noticed public hearings held before the Board of Supervisors. Upon approval or conditional approval of the Project and certification of the Final EIR by the Board of Supervisors, the County would conduct additional discretionary and administrative level reviews as needed to implement the Project.

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

1.2 SUMMARY OF THE PROJECT EVALUATED BY THIS EIR

The County of Riverside is the Lead Agency for the proposed Project, under whose authority this EIR has been prepared. For purposes of this EIR, the term "Project" refers to the Project's discretionary applications (GPA 220003, CZ 2200003, TPM 38337, and PPT 220004) and the discretionary actions required to implement the Project, as proposed, and all of the activities associated with Project implementation including planning, construction, and long-term operations. The Project site comprises approximately 40.88 acres located at the southwest corner of the intersection of Rider Street and Patterson Avenue within the Mead Valley Area Plan (MVAP) of unincorporated Riverside County. The Project as evaluated herein consists of applications for a General Plan Amendment (GPA 220003), Change of Zone (CZ 2200003), Tentative Parcel Map (TPM 38337), and Plot Plan (PPT 220004) to allow for the future development of the Project site. Approximately 35.97 acres (net) of the Project site are proposed for development of a 591,203 square foot (s.f.) warehouse building with 84 truck docking doors along the northern and southern sides of the building, along with parking areas for trucks and passenger vehicles and landscape areas. In this 35.97-acre area, an approximately 6.0 acres along the western Project site boundary would consist of a landscaped berm forming a buffer between the proposed building and an existing residential community to the west. The Project also would accommodate three residential lots in the western portions of the Project site (although no homes would be constructed as part of the Project), as well as two lots that would accommodate the completion of the cul-de-sacs for Wildwood Lane and Sunny Canyon Street. Remaining areas of the Project site would consist of roadway dedications for Rider Street, Patterson Avenue, and Walnut Street. Access to the Project is proposed via one driveway connecting with Rider Street and two driveways connecting with Patterson Avenue.

Specifically, the Project Applicant is requesting the following governmental approvals from Riverside County to implement the Project (refer to Chapter 3.0, *Project Description*, for a complete description of the Project's construction and operational characteristics):

- General Plan Amendment No. 220003 (GPA 220003): GPA 220003 is a proposal to change the General Plan land use designation for ±36.0 acres of the property from "Community Development Medium Density Residential (CD-MDR)" to "Community Development Light Industrial (LI)." (The balance of the Project site would remain designated CD-MDR.)
- Change of Zone No. 2200003 (CZ 2200003): The Riverside County Zoning Ordinance (Ordinance No. 348), which is part of the County's Municipal Code, assigns a zoning classification to all properties in the County boundaries. All development within the County is required, by law, to comply with the provisions of the Zoning Ordinance. Under existing conditions, the Project site is zoned for "One-



Family Dwellings (R-1)," "Light Agriculture (A-1-1)," and "Rural Residential (R-R-1)." CZ 2200003 would change the zoning classification for ± 36.0 acres of the property from R-1, A-1-1, and R-R-1 to "Industrial Park (I-P)." (The balance of the Project site would retain its R-1 zoning classification.)

- Tentative Parcel Map No. 38337 (TPM 38337) would consolidate the Project site's existing eight parcels into one ±36.0-acre parcel (Parcel 1), three residential parcels [Lot A (±1.16 acres), Lot C (±0.21 acres), and Lot E (±0.23 acres)], and two parcels to accommodate roadway cul-de-sacs (Lot B ±0.23 acres; Wildwood Lane) and Lot D (± 0.20 acres; Sunny Canyon Street). The remaining site acreage (±2.85 acres) would be dedicated to the County for public road improvements along the Project site's frontages with Rider Street, Patterson Avenue, and Walnut Street (Lots F through K).
- Plot Plan No. 220004 (PPT 220004) is a proposal to entitle a 591,203 s.f. light industrial building, which would include 7,300 s.f. of ground floor office space, 7,300 s.f. of mezzanine office space, and 576,603 s.f. of warehouse space. A total of 84 truck docking doors are proposed along the northern and southern sides of the building. Approximately 6.0 acres of Parcel 1 along the western parcel boundary would consist of a landscaped berm forming a buffer between the proposed building and an existing residential community to the west.

1.3 CEQA PROCESS OVERVIEW

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

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

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

An EIR is prepared in two key stages. First, a Draft EIR is prepared and distributed for public and agency review. Once comments on the Draft EIR are received, responses to those comments and any additional relevant project information are prepared and compiled in a Final EIR. Both of these documents (i.e., the Draft EIR and the Final EIR), along with any related technical appendices and reference sources, represent the complete record of the EIR. Throughout this document, the terms Final EIR or Draft EIR may be used



interchangeable since both are part of the ultimate EIR record; however, "Draft EIR" may be used specifically when referring to information provided in the volume made available for the CEQA-required 45-day public review period.

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

1.4 EIR SCOPE, FORMAT, AND CONTENT

1.4.1 EIR SCOPE

Pursuant to the procedural requirements of CEQA, on December 6, 2022, the County filed a Notice of Preparation (NOP) with the California Office of Planning and Research (State Clearinghouse) and the Riverside County Clerk to indicate that an EIR would be prepared to evaluate the Project's potential to impact the environment. The NOP also was distributed to surrounding property owners, Responsible and Trustee agencies, and other interested parties for a 30-day public review period that commenced on December 7, 2022 and concluded on January 5, 2023. The NOP was distributed for public review to solicit responses to help the County identify the full scope and range of potential environmental concerns associated with the Project so that these issues could be fully examined in this EIR.

In addition, a publicly-noticed EIR Scoping Meeting was held at the Riverside County Administrative Center, 1st Floor Conference Room 2A, located at 4080 Lemon Street, Riverside, California, 92501 on January 9, 2023, which provided members of the general public an additional opportunity to comment on the scope of environmental issues to be addressed in this EIR.

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

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources

- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions



- Hazards/Hazardous Materials
- Hydrology/Water Quality
- Land Use/Planning
- Mineral Resources
- Noise
- Paleontological Resources
- Population/Housing

- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities/Service Systems
- Wildfire

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

Commenter	Date	Comments	Location in EIR Where Comment(s) Addressed
Native American Heritage Commission (NAHC)	12/07/2022	 Gives information about AB 52 and SB 18 consultation requirements. Recommends use of Native American Tribal Contact Lists and Sacred Lands File searches from the NAHC Recommends an archaeological records search from the California Historical Research Information Center (CHRIS) Recommends the preparation of a professional report detailing findings if an archaeological inventory survey. Recommends that mitigation provisions provide for the identification and evaluation of inadvertently discovered archaeological resources; disposition of recovered cultural items that are not burial associated; and the treatment and disposition of inadvertently discovered Native American human remains. 	For all comments: 4.5, <i>Cultural Resources</i> 4.19, <i>Tribal Cultural</i> <i>Resources</i>
California Department of Fish and Wildlife (CDFW)	12/27/2022	 Recommends the EIR include an assessment of flora and fauna within and adjacent to the Project site. Recommends an assessment of habitat types within and around the Project Site. Recommends a general biological inventory of fish, amphibian, reptile, bird, and mammal species present or have the potential to be present within 	For all comments: 4.4, <i>Biological Resources</i>

Table 1-1	Summary of NOP	Comments
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Commenter	Date	Comments	Location in EIR Where Comment(s) Addressed
		each habitat type onsite and within adjacent areas that could be affected by the Project.	
		 Recommends a complete, recent inventory of rare threatened, endangered, and other sensitive species located within the Project footprint and within offsite areas with the potential to be affected including California Species of Special Concerr (CSSC) and California Fully Protected Species. Recommends a thorough, recent, floristic-based assessment of special status plants and natural communities. 	
		• Requests information on the regional setting, with special emphasis on resources rare or unique to the region.	
		• Requests a full accounting of all open space and mitigation/conservation lands within and adjacent to the Project.	
		• Requests a discussion of potential impacts from lighting, noise, human activity, defensible space and wildlife-human interactions.	
		 Requests a discussion of potential indirect Project impacts on biological resources, including resources in areas adjacent to the Project footprint 	
		 Requests an evaluation of impacts to on-site and adjacent open space lands from both the construction of the Project and any long-term operational and maintenance needs. 	
		 Recommends a cumulative effects analysis and appropriate mitigation. 	
		• States that a CESA Incidental Take Permit (ITP) mustbe obtained if the Project has the potential to result in "take" of State-listed CESA species, either through construction or over the life of the Project	
		 Recommends early consultation, as significant modification to the proposed Project and avoidance, minimization, and mitigation measures may be necessary to obtain a CESA ITP. 	
		 States that the Proposed Project is within the Western Riverside County Multiple Species Habitat Conservation Plan. 	
		• States that the Project is located within the MSHCP Criteria Area.	



Commenter	Date	Comments	Location in EIR Where Comment(s) Addressed
		• States that the County is obligated to notify the Western Riverside County Regional Conservation Authority (RCA), through the Joint Project/Acquisition Review Process	
		• Recommends the EIR identify the specific Area Plan and Area Plan Subunit within which the Project is located, and the associated Planning Species and Biological Issues and Considerations that may apply to the Project	
		• Recommends the County demonstrate how the Project is consistent with Section 7.0 of the MSHCP.	
		• Recommends that for projects proposed inside the MSHCP Criteria Area, the EIR should include a discussion of the Project and its consistency with Covered Activities	
		• Recommends the DEIR include a discussion of the Project and MSHCP Allowable Uses (Section 7.4) and Conditionally Compatible Uses (Section 7.4.2) in MSHCP Conservation Area such as trails.	
		• Recommends referring to the procedures described in Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools section (MSHCP Section 6.1.2)	
		States that the MSHCP identifies that assessment of these areas include identification and mapping of riparian/riverine areas and vernal pools.	
		• States that the Project site has the potential to provide suitable foraging and/or nesting habitat for burrowing owl	
		• States that the County is required to implement the Urban/Wildlands Interface Guidelines (MSHCP Section 6.1.4).	
		 States that the Project occurs within the Stephens' kangaroo rat Habitat Conservation Plan (SKR HCP) fee area boundary States that drainage features may traverse some of the parcels within the Project's scope and it is likely that the Project applicant will need to notify CDFW per Fish and Game Code Section 1602. 	
		 Recommends incorporation of water-wise concepts in Project landscape design plans Requests reporting of any special status species and natural communities detected during Project 	



Commenter	Date	Comments	Location in EIR Where Comment(s) Addressed
		surveys to the California Natural Diversity Database (CNDDB)	
		• States that the Project would have an impact on fish and/or wildlife, and assessment of filing fees is necessary.	
California Geological Survey (CGS)	12/28/22	• States that the EIR should discuss the location of the project with respect to specific mineral resource zones identified in CGS Special Report 231 and identify any impact the development may have on the availability of these mineral resources	4.12, Mineral Resources
Eastern Municipal Water District (EMWD)	12/8/22	• States that the proponents of implementing development projects should engage with EMWD and consult EMWD's Development Services Department	4.20, Utilities and Service Systems
CARE CA	1/05/2023	• Requests clearly articulated assumptions as part of the Project Description.	3.0, Project Description.
		• Concerns about air quality and public health; requests preparation of a Health Risk Assessment.	4.3, Air Quality
		 States that the County must include California Air Resources Board (CARB) recommended design measures if the Project will not include cold storage. Request for a mobile source Health Risk Assessment (HRA) 	4.3, Air Quality4.3, Air Quality
		 Requests that mitigation measures be effective and enforceable and that they incorporate modern technology. 	4.0, Environmental Analysis
		• Requests imposition of all feasible mitigation and study of reasonable range of alternatives, including at least two environmentally superior alternatives to the Project.	6.0, Alternatives
		• Requests that all sources and referenced materials be made available.	7.0, References
South Coast Air Quality Management District (SCAQMD)	1/05/2023	 Recommends SCAQMD's CEQA Air Quality handbook and website be used as guidance in preparing the air quality analysis and greenhouse gas analyses. Recommends aritaria pollutant amissions has a set of the set	For all comments: 4.3, <i>Air Quality</i>
		 Recommends criteria pollutant emissions be compared to SCAQMD's CEQA regional pollutant emissions significance thresholds and local significance thresholds. 	
		• Requests identification of air quality impacts from all phases of the project and all air pollutant sources.	



Commenter	Date	Comments	Location in EIR Where Comment(s) Addressed
		 States that air quality impacts from both construction and operations should be calculated. Recommends that a mobile source health risk assessment be prepared. Concerned about public health impacts of siting warehouses within proximity of sensitive land uses Requests that in the event of significant air quality impacts, mitigation measures go beyond what is required by law Recommends specific design considerations to reduce air quality and health risk impacts. Informs of the requirement to comply with Rule 2305. 	
Sheila Marie Hale	1/05/2023	 Expresses concerns with warehouses next to homes, schools and churches. Expresses concerns with pollution and noise 	4.0, Environmental Analysis4.3, Air Quality
Debbie Walsh	12/31/2022	 Acknowledges that the Project Site is located in an Environmental Justice Community. Questions zoning and General Plan designations and comments on consistency of the Project with the Mead Valley Area Plan Questions the Western Riverside County MSHCP HANS process and requirements pertaining to the Project Site. Claims that surrounding rural roads are not equipped for large-scale trucking. Expresses concern about the Project Site being near existing housing. Expresses concerns about the Project being located in proximity to a school. Also expresses concerns about potential noise, traffic, and health impacts. Questions the capacity of Southern California Edison (SCE) to service cumulative development in Mead Valley 	 4.13, Noise 2.0, Environmental Setting 4.11, Land Use and Planning 4.4, Biological Resources 4.18, Transportation 4.0, Environmental Analysis 4.3, Air Quality 4.18, Transportation 4.13, Noise 4.20, Utilities and Service Systems



Commenter	Date		Comments	Location in EIR Where Comment(s) Addressed
		•	Claims that the Project will eliminate affordable	4.15, Population and
			housing within the Environmental Justice	Housing
			Community of Mead Valley.	

1.4.2 CONTENT AND ORGANIZATION OF THIS EIR

This EIR contains all of the information required to be included in an EIR as specified by the CEQA Statute and Guidelines (California PRC, § 21000 et. seq. and CCR, Title 14, Chapter 5). This EIR is organized in the following manner:

- Section S.0, Executive Summary, provides an overview of the EIR document and CEQA process. The Project, including its objectives, is described, and the location and regional setting of the Project site is documented. In addition, the Executive Summary discloses potential areas of controversy related to the Project, including those issues identified by other agencies and the public, and identifies potential alternatives to the proposed Project that would reduce or avoid significant impacts, as required by CEQA. Finally, the Executive Summary provides a summary of the Project's impacts, mitigation measures, and conclusions, in a table that forms the basis of the EIR's Mitigation Monitoring and Reporting Program.
- Section 1.0, Introduction, provides introductory information about the CEQA process and the responsibilities of the County of Riverside, serving as the Lead Agency for this EIR; a brief description of the Project; the purpose of this EIR; applications proposed by the Project Applicant that would require discretionary County approvals; permits and approvals required by other agencies; and an overview of the EIR format.
- Section 2.0, Environmental Setting, describes the environmental setting, including an overview of the regional and local setting, as well as descriptions of the Project site's physical conditions and surrounding context. The existing setting is defined as the condition of the Project site and surrounding area at the approximate date this EIR's NOP was released for public review on December 6, 2022. The setting discussion also addresses the relevant regional planning documents that apply to the Project site and vicinity.
- Section 3.0, Project Description, serves as the EIR's Project Description for purposes of CEQA and contains a level of specificity commensurate with the level of detail proposed by the Project, including the summary requirements pursuant to CEQA Guidelines § 15123. This Section provides a detailed description of the Project, including its purpose and main objectives; design features; landscaping; site drainage; utilities; grading and construction characteristics; and operational characteristics expected over the Project's lifetime. In addition, the discretionary actions required of the County of Riverside and other government agencies to implement the Project are discussed.
- Section 4.0, Environmental Analysis, provides an analysis of the potential direct, indirect, and cumulative impacts that may occur from implementing the proposed Project. The topics analyzed in



this section include the topics summarized above under Section 1.4.1. A conclusion concerning significance is reached for each discussion; mitigation measures are presented as warranted. The environmental changes identified in Section 4.0 and throughout this EIR are referred to as "effects" or "impacts" interchangeably. The CEQA Guidelines also describe the terms "effects" and "impacts" as being synonymous (CEQA Guidelines § 15358).

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

The analyses in Section 4.0 are based in part upon technical reports that are appended to this EIR. Information also is drawn from other sources of analytical materials that directly or indirectly relate to the proposed Project and are cited in Section 7.0, *References*. Where the analysis demonstrates that a physical adverse environmental effect may or would occur without undue speculation, feasible mitigation measures are recommended to reduce or avoid the significant effect. Mitigation measures must be fully enforceable, have an essential nexus to a legitimate governmental interest, and be "roughly proportional" to the impacts of the Project. The discussion then indicates whether the identified mitigation measures would reduce impacts to below a level of significance. In most cases, implementation of the mitigation measures are not available or feasible to reduce an identified impact to below a level of significance, the environmental effect is identified as a significant and unavoidable adverse impact, for which a Statement of Overriding Considerations (SOC) would need to be adopted by the County of Riverside pursuant to CEQA Guidelines § 15093.

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



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

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

Table 1-2	Location of CEQA Required Topics
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1.4.3 INCORPORATION BY REFERENCE

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

Therefore, the detailed technical studies, reports, and supporting documentation that were used in preparing this EIR are bound separately as Technical Appendices. The Technical Appendices are available for review at the Riverside County Planning Department, 4080 Lemon Street, 12th Floor, Riverside, CA 92502, during the County's regular business hours or can be requested in electronic form by contacting the County's Planning Department. The individual technical studies, reports, and supporting documentation that comprise the Technical Appendices are as follows:



- A. Notice of Preparation (NOP) and Written Comments on the NOP
- B1. Air Quality Impact Analysis
- B2. Mobile Source Health Risk Assessment
- C1. Biological Technical Report
- C2. Jurisdictional Delineation
- C3. Determination of Biologically Equivalent or Superior Preservation (DBESP) Analysis
- D. Phase I Cultural Resources Assessment
- E. Energy Analysis
- F. Geotechnical Investigation
- G. Greenhouse Gas Analysis
- H. Phase I Environmental Site Assessment
- I1. Preliminary Hydrology Report
- I2. Preliminary Water Quality Management Plan (P-WQMP)
- J. Noise and Vibration Analysis
- K. Paleontological Assessment
- L1. VMT Analysis
- L2. Traffic Analysis
- M. Written Correspondence
- N. General Plan Consistency Analysis
- O. Water Supply Assessment

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

1.5 <u>Responsible and Trustee Agencies</u>

The California PRC (§ 21104) requires that all EIRs be reviewed by responsible and trustee agencies (see also CEQA Guidelines § 15082 and § 15086(a)). As defined by CEQA Guidelines § 15381, "the term 'Responsible Agency' includes all public agencies other than the Lead Agency which have discretionary approval power over the project." A Trustee Agency is defined in CEQA Guidelines § 15386 as "a state agency having jurisdiction by law over natural resources affected by a project which are held in trust for the people of the State of California." The known Responsible and Trustee Agency, whether identified in this EIR or not, as part of their decision-making process in relation to the proposed Project.

- California Department of Fish and Wildlife (CDFW) is identified as a Trustee Agency for issuance of a 1602 Streambed Alteration Agreement.
- Santa Ana Regional Water Quality Control Board (RWQCB) is identified as a Responsible Agency that would be responsible for issuing a Waste Discharge Order for Project impacts to RWQCB

jurisdictional areas pursuant to Section 13260 of the California Water Code. The Santa Ana RWQCB also would be responsible for issuance of a National Pollutant Discharge Elimination System (NPDES) Permit to ensure that on-site water flows do not result in siltation, other erosional effects, or degradation of surface or subsurface water quality, and for issuance of a Construction General Permit.

- **Riverside County Flood Control and Water Conservation District (RCFCWCD)** is identified as a Responsible Agency that is responsible for approving the Project's drainage infrastructure.
- **Eastern Municipal Water District (EMWD)** is identified as a Responsible Agency that would review and approve proposed water and sewer connections.
- Southern California Edison (SCE) is identified as a Responsible Agency for the approval of utility pole relocations and the undergrounding of electrical lines.
- South Coast Air Quality Management District (SCAQMD) is a potential Responsible Agency in the event that any future tenant of the Project site requires a permit to construct or permit to operate. These permits are required to install or operate equipment pursuant to SCAQMD Rules related to specific types and quantities of air pollutant emissions.

1.6 AREAS OF CONTROVERSY

Substantive issues raised in response to the NOP were previously summarized in Table 1-1. The purpose of this table is to present the primary environmental issues of concern raised by public agencies and the general public during the NOP review period. Table 1-1 is not intended to list every comment received by the County during the NOP review period. Regardless of whether or not a comment is listed in the table, all applicable comments received in responses to the NOP are addressed in this EIR. Based on comments received during the NOP review period, primary concerns were raised regarding potential impacts to biological resources and to sensitive human receptors located near the Project Site. No other areas of controversy were identified as part of the NOP process, beyond comments regarding the Project's potential environmental effects.

1.7 ISSUES TO BE RESOLVED BY THE DECISION-MAKING BODY

The primary issues to be resolved by the decision-making body for the proposed Project involves the Project's significant and unavoidable impacts in the issue area of transportation (vehicle miles traveled (VMT)), which is addressed in EIR Subsection 4.18. The Riverside County Board of Supervisors will need to evaluate whether there is feasible mitigation measures available to reduce the Project's unavoidable impact to the maximum feasible extent. The Board of Supervisors also will make a determination as to whether the Project's benefits outweigh the adverse environmental effects in support of adopting a Statement of Overriding Considerations pursuant to CEQA Guidelines § 15093. Finally, the Board of Supervisors will decide whether to approve one of the Project alternatives in lieu of the proposed Project, if it is determined that one of the alternatives is feasible and its approval would substantially reduce or avoid significant environmental impacts.



2.0 ENVIRONMENTAL SETTING

This Section 2.0 is provided pursuant to CEQA Guidelines Section (§) 15125(a) and includes a description of the physical environmental conditions in the vicinity of the Project site and its off-site improvement areas from both a local and regional perspective as it existed at the approximate time the Notice of Preparation (NOP) was published for this EIR, which occurred on December 6, 2022. This Section provides a brief overview of resources on and surrounding the Project site; additional detail regarding existing conditions for individual issue areas (e.g., biology, geology, etc.) is provided within the appropriate subsection headings within Section 4.0, *Environmental Analysis*, of this EIR.

2.1 <u>REGIONAL SETTING AND LOCATION</u>

The 40.88-acre Project site and approximately 4.57 acres of off-site Project-related disturbance area are located within unincorporated western Riverside County, California. Figure 2-1, *Regional Map*, depicts the Project site's location within the regional vicinity. As shown, Riverside County abuts San Bernardino County to the north; Orange County to the west; and San Diego and Imperial Counties to the south. Riverside County is located in an urbanizing area of southern California commonly referred to as the Inland Empire. The Inland Empire is an approximate 28,000 square-mile region comprising western San Bernardino County, western Riverside County, and the eastern reaches of Los Angeles County. As of 2018, Southern California Association of Governments (SCAG) estimates that Riverside County as a whole had a population 2,415,954 (SCAG, 2019, p. 3) SCAG estimates that the population will increase to 22.1 million by 2040. (SCAG, 2020, p. 48)

2.2 LOCAL SETTING AND LOCATION

The Project site is located within the western region of unincorporated Riverside County, California. As depicted in Figure 2-2, *Vicinity Map*, the Project site is within the Mead Valley Area Plan (MVAP) of unincorporated Riverside County. More specifically, and as depicted on Figure 2-2, the Project site is located at the southwest corner of the intersection of Rider Street and Patterson Avenue. The Project site encompasses Assessor's Parcel Numbers (APNs) 317-210-(006, 008, 010, 011, 018, 022, 023, and 024) and public right-of-way. The Project site is located in Section 13, Township 4 South, Range 4 West, San Bernardino Baseline and Meridian. (RCIT, n.d.)

The area immediately surrounding the Project site contains a variety of uses, including vacant parcels and parcels developed with residential, school, church, warehouse, industries, storage yard, and other uses. This area of Riverside County is an Environmental Justice community, meaning that the community is environmentally disadvantaged. The census tract containing the Project site (Census Tract 6065042904) is ranked by the State as being in the 55th percentile for pollution burden which, based on the Census Tract's demographic characteristics, results in the Office of Environmental Health Hazard Assessment (OEHHA) ranking the area in the 81st percentile of communities that are disproportionately burdened by multiple sources of pollution (OEHHA, 2022).

OEHHA's California Communities Environmental Health Screening Tool: CalEnviroScreen 4.0, is a screening methodology that the State uses to identify California communities that are disproportionately burdened by



multiple sources of pollution. The CalEnviroScreen 4.0 indicators for the Project site's Census Tract based on information collected between 2016 and 2019 are shown below.

Indicator	% Burden	Indicator	% Burden
Exposures		Environmental Effects	
Ozone:	95	Cleanup Sites	60
PM 2.5:	55	Groundwater Threats	14
Diesel PM:	14	Hazardous Waste	71
Pesticides:	53	Impaired Waters	0
Toxic Releases:	44	Solid Waste	0
Traffic:	90	Sensitive Populations	
Drinking Water Contaminants:	10	Asthma	66
Lead in Housing:	55	Low Birth Weight	49
Cleanups:	60	Cardiovascular Disease	91
Groundwater Threats:	14	Socioeconomic Factors	
Hazardous Waste:	71	Education	93
Impaired Water:	0	Linguistic Isolation	84
Solid Waste:	0	Poverty	84
		Unemployment	93
		Housing Burden	80

Table 2-1CalEnviroScreen Indicators for Census Tract 6065042904

Source: (OEHHA, 2022)

Exposure indicators are based on measurements of different types of pollution that people may come into contact with. Environmental effects indicators are based on the locations of toxic chemicals in or near communities. Sensitive population indicators measure the number of people in a community who may be more severely affected by pollution because of their age or health. Socioeconomic factor indicators are conditions that may increase people's stress or make healthy living difficult and cause them to be more sensitive to pollution's effects. As indicated in Table 2-1, for the Project site's Census Tract based on 2016 - 2019 data, the highest environmental exposures (over 90%) are from ozone (O₃) and traffic. The highest population and socioeconomic factors (over 80%) are compromised health conditions related to cardiovascular disease and a population with high levels of poverty, unemployment, linguistic isolation, housing burden and low levels of educational attainment.

In addition, the Project site is designated as an Environmental Justice (EJ) community by the Riverside County General Plan and is located in a SB 535 Disadvantaged Community identified by the California Environmental Protection Agency (CalEPA). The State provides California Climate Investment funding appropriated by the State Legislature from the proceeds of the State's Cap-and-Trade Program for investment in disadvantaged communities. The funding is used for programs that reduce emissions of greenhouse gases with at least 25% of the funding going to projects that provide a benefit to disadvantaged communities and at least 10 percent of the funding going to projects located within those communities (CalEPA, 2022).



2.3 SURROUNDING LAND USES AND DEVELOPMENT

Land uses in the immediate vicinity of the Project site are illustrated on Figure 2-3, *Surrounding Land Uses and Development*, and described below.

- <u>North</u>: To the north of the Project site is Rider Street, to the north of which are residential uses, undeveloped lands, and undeveloped lands that are subject to periodic discing for fire abatement purposes.
- <u>East</u>: To the east of the Project site is Patterson Avenue, to the immediate east of which are several existing residences, a church (U-Turn for Christ), and undeveloped lots that are periodically disturbed for fire abatement purposes. East of these uses are warehouses, and outdoor storage yards. To the southeast of the Project site on the southeast corner of Patterson Avenue and Walnut Street is a warehouse.
- <u>South.</u> To the south of the Project site is Walnut Street, to the south of which are several residential lots containing homes and ancillary buildings, as well as undeveloped lands that are subject to periodic discing for fire abatement purposes.
- <u>West</u>: To the west of the Project site is an existing medium-density residential community of singlefamily homes, with one home in the community also used as a day care. To the west of this residential community is rural and undeveloped land and Oak Grove at the Ranch, a non-public learning center for socially-, emotionally-, and behaviorally-challenged children and adolescents, ages 5 to 22 years.

2.4 LOCAL PLANNING CONTEXT

CEQA Guidelines § 15125(d) requires that EIRs identify the general plans and regional plans that are applicable to the project under evaluation and recognize potential inconsistencies. Plans that are applicable to the Project evaluated in this EIR and related to use of the land are summarized below. Additional information is provided about these plans and other applicable regional plans in the corresponding subsections of Section 4.0, *Environmental Analysis*.

2.4.1 SCAG REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY

The Southern California Association of Governments (SCAG) is a regional agency established pursuant to California Government Code (CGC) § 6500, also referred to as the Joint Powers Authority (JPA) law. SCAG is designated as a Council of Governments (COG), a Regional Transportation Planning Agency (RTPA), and a Metropolitan Planning Organization (MPO). The Project site is within SCAG's regional authority. On September 3, 2020, SCAG's Regional Council approved and adopted the 2020-2045 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) ("Connect SoCal"). Connect SoCal is the applicable Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) for the Project. The goals of Connect SoCal are to: 1) Encourage regional economic prosperity and global competitiveness; 2) Improve mobility, accessibility, reliability, and travel safety for people and goods; 3) Enhance the preservation, security, and resilience of the regional transportation system; 4) Increase person and goods movement and travel choices within the transportation system; 5) Reduce greenhouse gas emissions and improve air quality; 6) Support



healthy and equitable communities; 7) Adapt to a changing climate and support an integrated regional development pattern and transportation network; 8) Leverage new transportation technologies and data-driven solutions that result in more efficient travel; 9) Encourage development of diverse housing types in areas that are supported by multiple transportation options; 10) Promote conservation of natural and agricultural lands and restoration of habitats. Performance measures and funding strategies also are included to ensure that the adopted goals are achieved through implementation of the RTP. (SCAG, 2020)

2.4.2 COUNTY OF RIVERSIDE GENERAL PLAN AND MEAD VALLEY AREA PLAN

The prevailing planning document for the Project site and its surrounding area is the Riverside County General Plan. The Project site is located within the Mead Valley Area Plan (MVAP) portion of the Riverside County General Plan. As depicted on Figure 2-4, *Existing General Plan Land Use Designations*, the County's General Plan and MVAP designate the 40.88-acre Project site for "Medium Density Residential (MDR)" land uses (RCIT, n.d.). The MDR land use designation is intended to accommodate single-family attached and detached residences with a density range of 5 to 8 dwelling units per acre and minimum lot sizes ranging from 4,000 to 6,500 square feet (s.f.) (Riverside County, 2021a, Table LU-4). The proposed warehouse use on ± 36.0 acres of the Project site is not consistent with the property's existing General Plan land use designation.

2.4.3 ZONING

The Riverside County Zoning Ordinance is intended to implement the Riverside County General Plan's land use plan. As shown on Figure 2-5, *Existing Zoning Classifications*, under existing conditions a majority of the Project site is zoned for "One-Family Dwellings (R-1)," two parcels along the central southern boundary are zoned "Light Agriculture (A-1-1)," and two parcels near the southeast corner of the Project site are zoned "Rural Residential (R-R-1)." The R-1 zoning classification is intended to allow for one-family dwellings, with limited agricultural and equestrian uses. The A-1-1 zoning classification allows for one-family dwellings and limited agricultural uses, with minimum one-acre lot sizes. The R-R-1 zoning classification allows for one-family dwellings for one-family dwellings and limited agricultural uses, with minimum one-acre lot sizes. (Riverside County, 2021c; RCIT, n.d.). The proposed warehouse use on ± 36.0 acres of the Project site is not consistent with the property's existing zoning designations.

2.4.4 WESTERN RIVERSIDE COUNTY MULTIPLE SPECIES HABITAT CONSERVATION PLAN

The Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), a regional Habitat Conservation Plan (HCP), was adopted on June 17, 2003, and an Implementing Agreement (IA) was executed between the United States Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW), and participating entities. The intent of the Western Riverside County MSHCP is to preserve native vegetation and meet the habitat needs of multiple species, rather than focusing preservation efforts on one species at a time. The MSHCP identifies Criteria Areas, in which habitat conservation efforts are targeted. As shown on Figure 2-6, *MSHCP Cell Groups and Criteria Cells*, the Project site is located within the northeast corner of Criteria Cell 2432 within MVAP Cell Group B (RCIT, n.d.). The following are the MSHCP requirements for Cell Group B:

Conservation within this Cell Group will contribute to assembly of Proposed Noncontiguous Habitat Block 4. Conservation within this Cell Group will focus on assembly of coastal sage scrub and grassland habitat. Areas conserved within this Cell Group will be connected to coastal sage scrub and



grassland habitat proposed for conservation in Cell Group A to the west and to coastal sage scrub habitat proposed for conservation in Cell #2529 to the east and #2633 to the south. Conservation within this Cell Group will range from 70%-80% of the Cell Group focusing in the southern portion of the Cell Group. (Riverside County, 2003, Table 3-10)

The Project site is located in the northeast corner of Cell Group B, targeted for conservation under the MSHCP. However, all properties located within MSHCP Cells are subject to the County's Habitat Acquisition and Negotiation Strategy (HANS) process, which is the process the County uses to delineate conservation areas on specific properties.

In addition to conservation criteria within areas designated to be included within the MSHCP Reserve System, the MSHCP also identifies a number of additional survey and conservation requirements. The Project site is not located within an MSHCP Survey area for amphibians or mammals, although the entire Project site occurs within an MSHCP burrowing owl survey area. The Project site is not located within a narrow endemic plant species survey area or a criteria species survey area. (RCA, n.d.)

Refer to EIR Subsection 4.4, *Biological Resources*, for a complete description of applicable MSHCP requirements and an evaluation of the Project's consistency with the MSHCP.

2.5 EXISTING PHYSICAL SITE CONDITIONS

Pursuant to CEQA Guidelines § 15125, the physical environmental condition for purposes of establishing the setting of an EIR is the environment as it existed at the time the EIR's NOP was released for public review. The NOP for this EIR was released for public review on December 6, 2022. The following subsections provide a description of the Project site's physical environmental condition ("existing conditions") as of that approximate date. The site's physical conditions and surrounding areas are shown on Figure 2-7, *Aerial Photograph*. More detailed information regarding the Project's site's environmental setting as it relates to a specific environmental issue area is provided in the various subsections of EIR Section 4.0, *Environmental Analysis*.

2.5.1 LAND USE

As shown on Figure 2-7, under existing conditions the majority of the 40.88-acre Project site is vacant and undeveloped and was previously used for stockpiling earthwork materials from a nearby grading operation at some time between 1984 and 1990, which resulted in substantial disturbances to the property. These portions of the Project site are covered by low-lying vegetation that is routinely disced for fire abatement purposes. The southern portions of the Project site are developed with three large-lot residential homes along with several ancillary structures and ornamental landscaping which includes numerous large mature trees. (Google Earth, 2021)

2.5.2 SITE TOPOGRAPHY

As shown in Figure 2-8, *USGS Topographic Map*, the topography of the Project site slopes gently downwards from the southwest corner to the northeast corner of the site, with elevations on site ranging from approximately 1,602 feet above mean sea level (amsl) at the Project's southwest corner to approximately 1,533 feet amsl near the northeast corner of the property.



2.5.3 AIR QUALITY AND CLIMATE

The Project site is located in the 6,745-square-mile South Coast Air Basin (SCAB), which includes portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County. The SCAB is bound by the Pacific Ocean to the west, the San Gabriel, San Bernardino, the San Jacinto Mountains to the north and east, and San Diego County to the south. The SCAB is within the jurisdiction of the SCAQMD, the agency charged with bringing air quality in the SCAB into conformity with federal and State air quality standards.

As documented in the Project's Air Quality Impact Analysis (*Technical Appendix B1* to this EIR), although the climate of the SCAB is characterized as semi-arid, the air near the land surface is quite moist on most days because of the presence of a marine layer. More than 90% of the SCAB's rainfall occurs from November through April. Temperatures during the year range from an average minimum of 36°F in January to over 100°F in the summer. During the late autumn to early spring rainy season, the SCAB is subjected to wind flows associated with the traveling storms moving through the region from the northwest. This period also brings five to ten periods of strong, dry offshore winds, locally termed "Santa Ana[s]" each year. (Urban Crossroads, 2022a, p. 10)

2.5.4 AGRICULTURE AND FORESTRY RESOURCES

As more fully discussed in EIR Subsection 4.2, *Agriculture and Forestry Resources*, the California Department of Conservation (CDC) Farmland Mapping and Monitoring Program (FMMP) identifies "Important Farmland" to include lands mapped as "Prime Farmland," "Farmland of Statewide Importance," and "Unique Farmland." A majority of 40.88-acre Project site is classified by the FMMP as "Farmland of Local Importance," while the southern portions of the Project site (generally corresponding to the existing residential uses) are classified as "Other Lands" (CDC, 2021). The Project site does not contain any "Important Farmland" types. The Project site is not primarily zoned for agricultural use, is not currently used for agricultural production, and is not subject to any Williamson Act contracts or County Agricultural Preserves. Additionally, no forestry resources occur on the site under existing conditions (Riverside County, 2015a, Figure 4.5.2; RCIT, n.d.)

2.5.5 BIOLOGICAL RESOURCES

Refer to Subsection 2.4.4 above for contextual information regarding the Western Riverside County MSHCP. On the Project site and in the Project's off-site improvement areas, four primary vegetation/land cover types are present. Much of the area consists of ruderal/disturbed land and developed land with ornamental vegetation. Disturbed buckwheat scrub occurs on 7.74 acres centrally located in the lower elevations of the Project site and southern willow scrub occurs on 0.13-acre in the northwestern portion of the site (GLA, 2022a, pp. 23-24). Four drainage features associated with urban runoff occur on the Project site and a roadside ditch occurs along the southern side of Rider Street off-site to the east where a Project-related storm drain improvement would occur. These isolated ephemeral features have CDFW and RWQCB jurisdiction, but do not support a relatively permanent flow of water nor are they connected to any downstream jurisdictional waters site (GLA, 2022a, pp. 11-13). The Project site is not part of a wildlife corridor and is not located in any critical habitat areas defined by the U.S. Fish and Wildlife Service (GLA, 2022a, p. 42). Refer to EIR Subsection 4.4, *Biological Resources*, for a detailed description of the vegetation communities that occur on the Project site and in the Project's off-site disturbance areas.



2.5.6 GEOLOGY, SOILS, AND EROSION POTENTIAL

The Project site is located in the Peninsular Ranges geomorphic province of California. The Peninsular Ranges province extends from the Los Angeles Basin southeast to Baja California and from the Pacific Ocean eastward to the Coachella Valley and Colorado Desert. The province consists of numerous northwest to southeast-trending mountain ranges and valleys that are geologically controlled by several major active faults. The Project site is located within and near the central part of the Perris block, which is bounded on the northeast by the San Jacinto fault zone, on the north by the Sierra Madre-Cucamonga fault zone, and on the west by the Elsinore Fault zone.

The Project site contains sandy loam soils having moderate to high erosion potential. The soils are predominantly underlain by early Pleistocene (Map Symbol Qvof) old alluvial valley deposits, and SCG anticipates based on their geotechnical investigations hat the near-surface older alluvium is underlain by Val Verde tonalite (Map Symbol Kvt). (SCG, 2022, p. 9)

2.5.7 Hydrology

The Project site is located in the Santa Ana River watershed, which drains a 2,840 square mile area and is the principal surface flow waterbody in the region. Locally, the water runs onto the site from the south and west as sheet flow. Runoff from the Project site generally drains to the northeasterly corner of the site and discharges off-site. The total existing 100-year peak flow rate from the Project site including the offsite areas that run onto the site is approximately 134.1 cubic feet per second (cfs) over 87.20 acres (Thienes, 2022a). Refer to EIR Subsection 4.10, *Hydrology and Water Quality*, for additional information regarding the site's existing drainage conditions.

2.5.8 NOISE

The most common and substantial source of noise in Riverside County is mobile noise generated by transportation-related sources. Other sources of noise are the various land uses (i.e., industrial, commercial, institutional, and residential) that generate stationary-source noise. The Project site abuts Rider Street to the north, Patterson Avenue to the east, and Walnut Street to the south. As shown in EIR Table 4.13-1, the ambient recorded noise levels in the Project area range from 46.6 to 58.9 dBA Leq during daytime hours and from 42.2 to 56.8 dBA Leq during nighttime hours. (Urban Crossroads, 2022e, p. 26) Refer to EIR Subsection 4.13, *Noise*, for additional information regarding the site's existing noise conditions.

2.5.9 TRANSPORTATION

Regional access to the Project site is available from Interstate 215 (I-215) via the Placentia Avenue and Ramona Expressway interchanges. I-215 is located approximately 0.48-miles east of the Project site.

As shown on Figure 8 of the Mead Valley Area Plan (MVAP), the Riverside County General Plan and MVAP classify I-215 as an "Expressway (220' ROW)" facility. Along the Project site's frontages, Rider Street is classified as a "Secondary (100' ROW)" facility and Patterson Avenue is also classified as a "Secondary (100' ROW)" facility. Walnut Street that abuts the southern boundary of the Project site is not classified by the MVAP. (Riverside County, 2021b, Figure 8)



For the County of Riverside, the countywide average Work Vehicle Miles Traveled (VMT) per employee is 14.2 miles (Urban Crossroads, 2022f). Riverside County is currently served by the Riverside Transit Authority (RTA), a public transit agency serving the unincorporated Riverside County region. RTA Route 27 runs along the I-215 Freeway and stops at Perris High School (on Nuevo Road) and runs between the Perris Station Transit Center and the Galleria at Tyler in the City of Riverside. RTA Route 41 runs along Ramona/Cajalco Expressway and has existing bus stops to the west and east of Harvill Avenue, which is located approximately 0.8-mile from the Project site. There are currently no transit routes or stops along the Harvill Avenue corridor near the proposed Project. Transit service is reviewed and updated by RTA periodically to address ridership, budget, and community demand needs. Changes in land use can affect these periodic adjustments which may lead to either enhanced or reduced service where appropriate. (Urban Crossroads, 2022g, p. 29)

2.5.10 PUBLIC FACILITIES

Fire protection services for the Project site are provided by the Riverside County Fire Department (RCFD). The RCFD provides a full range of fire services within the County and contracting cities. The fire station that serves the Project site is Station 59 (Mead Valley), which is located approximately 2.7 roadway miles west of the Project site. The Project site also could be served by Station 90 (North Perris City), which is located approximately 5.1 roadway miles east of the Project site. (Google Earth, 2021) These fire stations are staffed full-time, 24 hours per day, 7 days per week with a minimum three-person crew, including paramedics, operating a "Type 1" structural firefighting apparatus.

The Riverside County Sheriff's Department (RCSD) provides community policing for the Project area. The Sheriff Station serving the Project area is the Perris Station, located at 137 North Perris Boulevard in Perris, CA, approximately 3.2 miles southeast of the Project site (Google Earth, 2021). In addition to community policing, other services provided by the Sheriff's Department include, but are not limited to, operating of the emergency 911 system, operating correctional facilities, performing traffic control, and providing crime prevention education. Also, the Sheriff's Department coordinates with volunteer groups such as Neighborhood Watch Programs and the Community Oriented and Policing Problem Solving (COPPS) Program and the Community Oriented Policing (COP) Program.

The Project site is located within the Val Verde Unified School District (VVUSD). The nearest public schools to the Project site include the Val Verde Elementary School, located approximately 1.1 mile southeast of the Project site; Thomas Rivera Middle School, located approximately 1.8 miles northwest of the Project site; and Val Verde High School, located approximately 0.6-mile northeast of the Project site (Google Earth, 2021).

There is one park within a two-mile radius of the Project site, Paragon Park, which is located approximately 1.8 miles east of the Project site. Recreational facilities available at Paragon Park include a tennis court, skate park, full basketball court, handball court, picnic areas, and a large open play field. (Google Earth, 2021)

The Project site is located within the Riverside County Public Library System (RCPLS) service area. The nearest library servicing the Project site is the Mead Valley Library, located at 21580 Oakwood Street, Perris, CA, approximately 1.7 miles west of the Project site. (Google Earth, 2021)


2.5.11 UTILITIES AND SERVICE SYSTEMS

A. <u>Water Service</u>

The Project site is located in the service area of the Eastern Municipal Water District (EMWD). EMWD provides potable water, recycled water, and wastewater services to an area of approximately 555 square miles in western Riverside County. The service area includes seven incorporated cities in addition to unincorporated areas of Riverside County. EMWD provides both retail and wholesale water service covering a total population of over 800,000. EMWD is both a retail and wholesale agency. EMWD's local supplies include groundwater, desalinated groundwater, and recycled water. (EMWD, 2021a, pp. E-2, 3-2, and 3-23)

In addition to the potable water system, EMWD maintains a regional recycled water system that provides tertiary-treated recycled water to customers for agricultural, landscape irrigation, environmental, and industrial use. EMWD's recycled water system consists of four regional water reclamation facilities (RWRFs) that treat municipal sewage and produce water for recycling. The four RWRFs, the San Jacinto Valley RWRF, the Moreno Valley RWRF, the Temecula Valley RWRF, and the Perris Valley RWRF, are spread throughout EMWD's service area. A network of pipelines connects the four RWRFs, as well as several distribution storage ponds, to manage the delivery of recycled water. (EMWD, 2021a. p. 3-3)

Water service is currently provided to the existing residential uses located on the southern portion of the Project site. Under existing conditions, there is a 14-inch water main located within the existing improved right-of-way (ROW) of Patterson Avenue and a 12-inch water main within the existing improved ROW for Rider Street. Recycled water currently is not available in the Project area.

B. <u>Sewer Service</u>

EMWD is responsible for all wastewater collection and treatment in its service area and has five operational RWRFs. Inter-connections between the local collection systems serving each treatment plant allow for operational flexibility, improved reliability, and expanded deliveries of recycled water. All of EMWD's RWRFs produce tertiary effluent, suitable for all permitted uses, including irrigation of food crops and full-body contact. The five RWRFs currently have a combined capacity of 78,000,000 gallons per day (gpd), or approximately 87,371 acre-feet per year (AFY). Collectively, the RWRFs collect and treat approximately 50.4 million gpd of wastewater and have a capacity to treat approximately 78.0 million gpd. Sewer flows from the Project area are treated by either the Moreno Valley RWRF or the Perris Valley RWRF, which have a combined daily capacity of 38.0 million gpd and typical daily flows of 27.0 million gpd. (EMWD, n.d.)

Under existing conditions, there is an 8-inch sewer main that extends easterly from Wildwood Lane, extends northerly through the site near the western Project boundary, then to the east, and then north to an existing 8-inch sewer main located within Rider Street. In addition, there is an existing 8-inch sewer main within Walnut Street.

C. <u>Solid Waste Services</u>

The Riverside County Department of Waste Resources (RCDWR) is responsible for the efficient and effective landfill disposal of non-hazardous waste within the County, and operates six active landfills in addition to holding a contract agreement to dispose of waste at the private El Sobrante Landfill (Riverside County, 2015a,



p. 4.17-36). Solid waste generated in the Project area is disposed of at either the El Sobrante Landfill, Lamb Canyon Landfill, or Badlands Landfill. The El Sobrante Landfill is currently permitted to receive 16,054 tons per day (tpd), while the average daily tonnage in June 2022 was 11,003 tpd. The Lamb Canyon Landfill is permitted to receive 5,000 tpd, while data from June 2022 shows that the Lamb Canyon Landfill received a daily average of approximately 2,095.7 tpd. The Badlands Landfill is permitted to receive 4,800 tpd, while in May 2022 the Badlands Landfill received an average of 2,479 tpd. (RCDWR, 2022a; RCDWR, 2022b; RCDWR, 2022c)

D. <u>Other Services</u>

The Project site also is located in the service territories of the Southern California Gas Company (natural gas) and Southern California Edison (electricity) (California Energy Commission, 2020a; California Energy Commission, 2020b).

2.5.12 RARE AND UNIQUE RESOURCES

As required by CEQA Guidelines § 15125(c), the environmental setting should identify any inconsistencies between a proposed project and applicable general, specific, or regional plans, and place special emphasis on resources that are rare or unique to that region and would be affected by the project. The principal discretionary actions required of Riverside County to implement the Project are described in detail in Section 3.0, *Project Description*, and are listed in Table 3-1, *Matrix of Project Approvals/Permits*. Based on the existing conditions of the Project site and surrounding area described above and discussed in more detail in Section 4.0, *Environmental Analysis*, the Project site does not contain any rare or unique resources.





Lead Agency: Riverside County





Source(s): Esri, Nearmap Imagery (September 2022), RCTLMA (2022)



Lead Agency: Riverside County

Vicinity Map



2.0 Environmental Setting



Source(s): Esri, Nearmap Imagery (September 2022), RCTLMA (2022)

0 250 500 1,000 Feet

Lead Agency: Riverside County

Figure 2-3

Surrounding Land Uses and Development

SCH No. 2022120110



2.0 Environmental Setting



Source(s): Esri, Nearmap Imagery (September 2022), RCTLMA (2022)

250 500 125

Lead Agency: Riverside County

Existing General Plan Land Use Designations





250 500 125

Lead Agency: Riverside County

Existing Zoning Classifications



2.0 Environmental Setting



Source(s): Esri, Nearmap Imagery (September 2022), RCTLMA (2022)

1,300 650 325 S Feet

Lead Agency: Riverside County

SCH No. 2022120110

MSHCP Cell Groups and Criteria Cells





Source(s): Esri, Nearmap Imagery (September 2022), RCTLMA (2022)



Lead Agency: Riverside County

Figure 2-7

Aerial Photograph

SCH No. 2022120110





Source(s): Esri, RCTLMA (2022), USGS (2013)



Lead Agency: Riverside County

Figure 2-8

USGS Topographic Map



3.0 PROJECT DESCRIPTION

This Section 3.0 provides all of the information required of an EIR Project Description by the California Environmental Quality Act (CEQA) Guidelines Section (§) 15124, including a description of the Project's precise location and boundaries; a statement of the Project's objectives; a description of the Project's technical, economic, and environmental characteristics; and a description of the intended use of this EIR, including a list of the government agencies that are expected to use this EIR in their decision-making process; a list of the permits and approvals that are required to implement the project; and a list of related environmental review and consultation requirements.

3.1 SUMMARY OF THE PROPOSED PROJECT

The Project as evaluated herein consists of applications for a General Plan Amendment (GPA220003), Change of Zone (CZ2200003), Tentative Parcel Map (TPM38337), and Plot Plan (PPT220004). In total, the Project site acreage is 40.88 acres and up to 4.45 acres off-site would be physically disturbed by Project-related construction activities including but not limited to roadway and infrastructure improvements.

- GPA220003 is a proposal to change the Project Site's General Plan land use designation of ±36.0 acres of the Project site from "Community Development Medium Density Residential (CD-MDR)" to "Community Development Light Industrial (LI)." The balance of the Project site would remain designated CD-MDR.
- CZ2200003 is a proposal to change the zoning classification of ±36.0 acres of the Project site from "One-Family Dwellings (R-1)," "Light Agriculture (A-1-1)," and "Rural Residential (R-R-1)" to "Industrial Park (I-P)." The balance of the Project site would retain its R-1 zoning classification)
- TPM38337 is a proposal to consolidate the Project site's existing eight parcels into one ±36.0-acre parcel (Parcel 1), three residential parcels [Lot A (±1.16 acres), Lot C (±0.21 acres), and Lot E (±0.23 acres), and two parcels to accommodate roadway cul-de-sacs (Lot B ±0.23 acres; Wildwood Lane) and Lot D (± 0.20 acres; Sunny Canyon Street)]. The remaining site acreage (±2.85 acres) would be dedicated to the County for public road improvements along the Project site's frontages with Rider Street, Patterson Avenue, and Walnut Street (Lots F through K).
- PPT220004 is a proposal to entitle Parcel 1 for development with a 591,203 square-foot building, which would include 7,300 square-feet of ground floor office space, 7,300 square-feet of mezzanine office space, and 576,603 square-feet of warehouse space. A total of 84 truck docking doors are proposed, positioned on the northern and southern sides of the building. Approximately 6.0 acres of Parcel 1 along the western parcel boundary would consist of a landscaped berm forming a buffer between the proposed building and an existing residential community to the west. Frontage improvements would occur along Patterson Avenue, Walnut Street, and Rider Street, with a sidewalk and community trail proposed along Patterson Avenue and Walnut Street and a sidewalk proposed along Rider Street. In addition to roadway frontage improvements, other off-site improvements would include: 2) paving and striping on Rider Street west of the Project site boundary; 2) improvements at



the intersection of Rider Street/Patterson Avenue; 3) the installation of a traffic signal at the intersection of Rider Street/Harvill Avenue; 4) the installation of a storm drain extending from the southeastern corner of the site to connect with an existing storm drain pipe near the Patterson Avenue//Walnut Street intersection; and 5) the installation of a storm drain paralleling the southern side of Rider Street and extending from the northeastern corner of the Project site, east to connect with an existing concrete pipe located just west of the Rider Street/Harvill Avenue intersection.

3.2 <u>REGIONAL SETTING</u>

The Project site encompasses 40.88 acres and is located within the western portion of Riverside County. Figures 2-1 and 2-2 (previously presented) depict the Project site's location within the regional vicinity. As shown, Riverside County abuts San Bernardino County to the north; Orange County to the west; and San Diego and Imperial Counties to the south. Riverside County is located in an urbanizing area of southern California commonly referred to as the Inland Empire. The Inland Empire is an approximate 28,000 square-mile region comprising western San Bernardino County, western Riverside County, and the eastern reaches of Los Angeles County.

3.3 PROJECT LOCATION AND SETTING

The 40.88-acre Project site that is the subject of this EIR is located within the Mead Valley community of unincorporated Riverside County, west of Interstate 215 (I-215), south of State Routes 91 (SR 91) and 60 (SR 60), and north of State Route 74 (SR 74). More specifically, and as previously depicted on Figure 2-2, the 40.88-acre Project site is located south of Rider Street, west of Patterson Avenue, and north of Walnut Street. Wildwood Lane and Sunny Canyon Street dead-end into the Project site from the west, which serve a residential subdivision of single-family homes located west of the Project site. The Project site encompasses Assessor's Parcel Numbers (APNs) 317-210-006, 317-210-008, 317-210-010, 317-210-011, 317-210-018, 317-210-022, 317-210-023, and 317-210-024. Under existing conditions, the northern portions of the Project site are vacant and undeveloped, and were previously used for stockpiling of earthwork materials. The southern portion of the Project site is developed with three single-family homes and accessory structures on lots ranging from 1.05 to 2.0 acres in size. The undeveloped portions of the Project site are regularly disced for weed and fire abatement purposes.

Land uses in the vicinity of the Project site include residential homes, a private daycare, a learning center for challenged youth and adolescents and undeveloped lands to the west; residential uses and undeveloped lands to the south; a warehouse to the southwest; residential uses, a church, a building used for fencing supply materials, warehouses, an outdoor storage yard, and undeveloped lands to the east; and residential uses and undeveloped lands to the north. The vicinity of the Project site is designated as an Environmental Justice community by the Riverside County General Plan, which means that residents are environmentally disadvantaged based on pollution burden and socioeconomic factors. Refer to EIR Section 2.0, *Environmental Setting*, for a more detailed description of the local setting and surrounding land uses.

3.4 STATEMENT OF OBJECTIVES

The underlying purpose and goal of the proposed Project is to develop an underutilized property in the community of Mead Valley with an economically viable, employment-generating use that is compatible with



the surrounding area. This underlying goal aligns with various aspects of the SCAG's 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS; also referred to as "Connect SoCal"), particularly the facilitation of goods movement industries and the generation of local employment opportunities that can reduce the need for long commutes to and from work. The following objectives are intended to achieve these underlying purposes:

- A. To attract economic investment to the Mead Valley community of Riverside County to support the growing goods movement supply chain.
- B. To develop supply chain uses in close proximity to designated truck routes and the State highway system to avoid or shorten vehicular trip lengths on other roadways.
- C. To expand economic development, facilitate job creation, and increase the tax base for Riverside County by accommodating and diversifying facilities needed to support the goods movement supply chain.
- D. To develop a warehouse building in the Mead Valley community of unincorporated Riverside County that is designed to meet contemporary industry standards and be economically competitive with similar buildings in the local area and region.
- E. To attract new employment-generating businesses to unincorporated Riverside County, thereby growing the economy and providing a more equal jobs-housing balance in the local area that will reduce the need for members of the local workforce to commute outside the area for employment.
- F. To develop a use that has architectural design and operational characteristics that are compatible with other existing and planned developments in the local area.
- G. To provide a physical buffer between warehousing and residential land uses consisting of a berm, landscaping, and fencing, to aid in visual screening and compatible land use transitions in Mead Valley.
- H. To complete unfinished streets in a Mead Valley residential subdivision.

3.5 PROJECT'S COMPONENT PARTS AND DISCRETIONARY APPROVALS

The Project as evaluated herein involves applications for a General Plan Amendment (GPA), Change of Zone (CZ), Tentative Parcel Map (TPM), and Plot Plan (PP) to allow for the development of 36.0 acres of the 40.88acre Project site with a 591,203 s.f. warehouse building and landscaped buffer/berm. The remaining acreage would be allocated to public roads and three residentially-zoned lots that would contribute to the residential subdivision to the west of the Project site. Principal discretionary actions required of Riverside County to implement the Project are described in detail below. Additional discretionary and administrative actions that would be necessary to implement the proposed Project are listed in Table 3-3, *Matrix of Project Approvals/Permits*, at the end of this Section.



3.5.1 GENERAL PLAN AMENDMENT NO. 220003

The Riverside County General Plan assigns a land use designation to all properties within the County's jurisdiction. Development is required by law to comply with the provisions of the County's General Plan. The Project Applicant is seeking a General Plan Amendment (GPA No. 220003) to modify the adopted General Plan and Mead Valley Area Plan (MVAP) land use designations for the Project site to reflect the land uses proposed as part of Plot Plan No. 220004 (discussed below). As depicted on Figure 3-1, *GPA No. 220003*, under existing conditions the Riverside County General Plan designates the 40.88-acre Project site for "Community Development – Medium Density Residential (CD-MDR)" land uses. As part of GPA No. 220003, 36.0 acres of the Project site would be re-designated for "Community Development – Light Industrial (LI)" land uses. The LI land use designation is intended to accommodate industrial and related uses including warehousing/distribution, assembly and light manufacturing, repair facilities, and supporting retail uses (Riverside County, 2021a, Table LU-4). The western portion of the Project site would retain its CD-MDR designation. Refer to Figure 3-1, *GPA No. 220003*.

3.5.2 CHANGE OF ZONE NO. 2200003

The Riverside County Zoning Ordinance (Riverside County Ordinance No. 348), which is part of the County's Municipal Code, assigns a zoning classification to all properties within unincorporated Riverside County. Development is required by law to comply with the provisions of the Zoning Ordinance. Under existing conditions, a majority of the northern and western portions of the Project site are zoned for "One-Family Dwellings (R-1)," two parcels along the central portion of the Project's southern boundary are zoned "Light Agriculture (A-1-1)," and two parcels in the southeast corner of the Project site are zoned "Rural Residential (R-R-1)." As depicted on Figure 3-2, *CZ No. 2200003*, Change of Zone No. 2200003 (CZ No. 2200003) would change the zoning classification of 36.0 acres of the Project site to "Industrial Park (I-P)." The I-P zoning classification allows for a variety of industrial and manufacturing uses, as well as service and commercial land uses. Ordinance No. 348 requires approval of a plot plan for any proposed industrial uses. (Riverside County, 2021c). The western portion of the Project site R-1 zoning classification.

3.5.3 TENTATIVE PARCEL MAP NO. 38337 (TPM NO. 38337)

The Project also includes an application for Tentative Parcel Map No. 38337 (TPM No. 38337). As shown on Figure 3-3, *TPM No. 38337*, the parcel map would consolidate the Project site's existing eight parcels into a \pm 36.0-acre parcel (Parcel 1), three residential parcels [Lot A (\pm 1.16 acres), Lot C (\pm 0.21 acres), and Lot E (\pm 0.23 acres), and two parcels to accommodate roadway cul-de-sacs (Lot B \pm 0.23 acres; Wildwood Lane) and Lot D (\pm 0.20 acres; Sunny Canyon Street)]. The remaining site acreage (\pm 2.85 acres, Lots F through K) would be dedicated to the County for public road improvements along the Project site's frontages with Rider Street, Patterson Avenue, and Walnut Street. As shown on Figure 3-3 and on Figure 3-4, *Proposed Roadway Improvement Sections*, the Project Applicant would make the following public roadway dedications and improvements:

• <u>Rider Street</u>. As part of TPM No. 38337, the Project Applicant would dedicate additional right-of-way (Lots F, G, and H) along the site's frontage with Rider Street. As part of the Project, improvements to Rider Street would occur along the Project site's frontage to include the construction of additional roadway surface (the width of which varies), curb and gutter, a five-foot-wide curb-separated sidewalk,



and streetscape landscaping. Lane restriping also would occur on Rider Street to the east and to the west of the Project site.

- <u>Patterson Avenue</u>. As part of TPM No. 38337, the Project Applicant would dedicate additional rightof-way (Lot I) along the Project site's frontage with Patterson Avenue. Improvements proposed along the Project site's frontage with Patterson Avenue would include the installation of additional roadway surface (the width of which varies), and the construction of curb and gutter, a six-foot-wide curbadjacent sidewalk, streetscape landscaping, and a 10-foot-wide community trail with split rail fence to the west of the sidewalk.
- <u>Walnut Street</u>. As part of TPM No. 38337, the Project Applicant would dedicate additional right-ofway along the Project site's frontage with Walnut Street. Improvements proposed along the Project site's frontage with Walnut Street would include the installation of additional roadway surface (the width of which varies), and the construction of curb and gutter, a six-foot-wide curb-adjacent sidewalk, streetscape landscaping, and a 10-foot-wide community trail with split rail fence to the north of the sidewalk.

3.5.4 PLOT PLAN NO. 220004

A. <u>Site Plan and Building Configuration</u>

As shown Figure 3-5, *Site Plan*, Plot Plan No. 220004 is proposed on 36.0 acres of the Project site (Parcel 1 of TPM No. 38337) for development of the parcel with a 591,203 square-foot building, which would include 7,300 square-feet of ground floor office space, 7,300 square-feet of mezzanine office space, and 576,603 square-feet of warehouse space. A total of 84 truck docking doors are proposed, positioned on the northernand southern-facing sides of the building. Approximately 6.0 acres of Parcel 1 along the western parcel boundary would consist of a landscaped berm forming a buffer between the proposed building and an existing residential community to the west.

B. <u>Grading and Site Work</u>

Grading of the Project site would require a total of 257,950 cubic yards (cy) of cut and 257,950 cy of fill, requiring no import or export of earth material. A berm rising approximately 20 feet in height having a maximum 2:1 slope is proposed to be created in the western portion of the Plot Plan area to serve as a landscaped buffer and visual screen between the proposed development and an existing residential subdivision located west of the Project site. Other proposed manufactured slopes would be limited to around a proposed bioretention basin in the northeastern corner of the Project site and around the northeastern corner of the proposed building and between Patterson Avenue and the proposed adjacent parking lot and building to the west. A retaining wall would be installed between Walnut Street and the Project's development pad. The resulting condition would be the Project's building pad being lower in elevation than Walnut Street, lower in elevation than the residential subdivision to the west, higher in elevation than Rider Street, higher in elevation than Patterson Avenue near the north part of the site, and about even with Patterson Avenue near the southern portion of the site.



C. <u>Architectural Design</u>

The proposed building elevations are depicted on Figure 3-6, *Architectural Building* Elevations. As shown, the building would be constructed of concrete tilt-up panels painted with a mix of gray and tan color tones. The main visitor entrances along the northeastern and southeastern portions of the building would be treated with light grey reflective glazing (glass). The building would have a flat roofline with parapet accents measuring up to 45 feet to the roofline and 47 feet to the top of the parapets. A total of 42 docking doors and two grade-level ramps would be positioned along the northern façade of the building and the southern façade of the building (for a total of 84 dock doors and 4 ramps). The truck courts would be enclosed by screen walls.

D. Landscaping

Figure 3-7, *Preliminary Landscaping Plan*, depicts the preliminary landscape plan for the Project. As shown, landscaping would consist of a variety of trees, shrubs, and groundcover. Trees are proposed along the site's frontages with Rider Steet, Patterson Avenue, and Walnut Street, around the proposed bioretention basin, in and around passenger vehicle parking areas, and on the berm proposed to be constructed along the western perimeter of the development area to separate the light industrial development area from the existing residential subdivision to the west. Trees also would be planted around the ends of the new Wildwood Lane and Sunny Canyon Street cul-de-sacs that that would be installed at the western site perimeter. In total, approximately 10.5 acres of the Project site is proposed to be landscaped, with approximately 60% of all on-site parking areas shaded by trees at maturity. Landscaping would comply to all applicable County codes and ordinances including drought-tolerant, low water usage requirements.

E. <u>Walls and Fencing</u>

As shown on Figure 3-8, *Wall and Fence Plan*, 14-foot-high screen walls would enclose the Project's truck courts. A 4-foot-high vinal fence would occur along the trails proposed to parallel Patterson Avenue and Walnut Street, and would continue around the proposed bioretention basin in the northeast corner of the site. A retaining wall also would occur along Walnut Street. An eight-foot-high tube steel fence would occur along the western perimeter of the light industrial development area and wrap around areas of the Project site to the west that would have a residential designation, until or unless those residential areas are identified for a use other than vacant land.

F. <u>Circulation Improvements</u>

Frontage improvements would occur along Patterson Avenue, Walnut Street, and Rider Street, with a sidewalk and community trail proposed along Patterson Avenue and Walnut Street and a sidewalk proposed along Rider Street. The Project's design includes a primary truck driveway connecting with Rider Street, designed to accept left turns in and right turns out for trucks, to prevent trucks from traveling west of the Project site on Rider Street. A secondary truck driveway is proposed connecting with Patterson Avenue accommodating right-in and right-out turn movements only, and a passenger vehicle-only driveway also connecting with Patterson Avenue and allowing full turning movements. No driveways are proposed to connect with Walnut Street.

West of the industrial development area, the Project includes the installation of cul-de-sacs at the existing termini of Wildwood Lane and Sunny Canyon Street, for the benefit of the existing residential subdivision to the west.



In addition to these improvements, off-site circulation improvements that would occur with the Project would include: 1) paving and striping on Rider Street west of the Project site boundary; 2) improvements at the intersection of Rider Street/Patterson Avenue; and 3) the installation of a traffic signal at the intersection of Rider Street/Harvill Avenue.

G. <u>Water, Sewer, Drainage, and Dry Utilities</u>

1. Water and Sewer Service

Potable water service would be provided by the Eastern Municipal Water District (EMWD). Reclaimed water service currently is not available in the area. Sewer service also would be provided by EMWD. Site-adjacent connections would be made to water and sewer infrastructure in Rider Street. Wastewater generated by the Project would be conveyed to either the Moreno Valley Regional Water Reclamation Facility (RWRF) or the Perris Valley RWRF for treatment. Combined these RWRFs have a daily capacity of 38.0 million gpd and typical daily flows of 27.0 million gpd. (EMWD, n.d.)

2. Drainage

Runoff generated on development site would be collected by a series of storm drain inlets, which would convey site runoff either northeasterly to a bioretention basin or southerly to an underground chamber installed beneath the building's southerly truck court. Following detention and water quality treatment, water from the bioretention basin would be conveyed to a new proposed 48-inch inch storm drain line that would be installed as part of the Project paralleling the southern side of Rider Street and extending from the northeastern corner of the Project site, east to connect with an existing 60-inch concrete pipe located just west of the Rider Street/Harvill Avenue intersection. From the underground chamber in the southern truck court, a new storm drain line would be installed extending from the southeastern corner of the site to connect with an existing storm drain pipe near the Patterson Avenue/Walnut Street intersection.

3. Dry Utilities

Electric, natural gas, and fiber lines would be installed to service the proposed Project, with site-adjacent connections. Existing overhead electric lines located along Walnut Street would be undergrounded during the Project's construction along the Project site's frontage. Power poles located along Rider Street and Patterson Avenue would be protected in place or relocated near their existing locations to accommodate roadway improvements to be installed as part of the Project.

3.6 PROJECT CONSTRUCTION AND OPERATIONAL CHARACTERISTICS

3.6.1 CONSTRUCTION DETAILS

For purposes of analysis throughout this EIR, it is assumed that implementation of the Project would result in physical disturbance of the 40.88-acre Project site and up to 4.45 acres of additional off-site improvement areas. Refer to Figure 3-9, *Limits of Physical Disturbance*.

For purposes of analysis throughout this EIR, it is assumed that construction activities would commence as early as February 2024 and complete in August 2025. The construction schedule assumed for analytical purposes in this EIR is presented in Table 3-1, *Construction Duration*. Should construction occur any time



after these dates, construction-related impacts would be lower than presented in this EIR because as time passes older and more polluting construction equipment is replaced with newer and less polluting equipment. The duration of construction activity and associated equipment presented in Table 3-2, *Construction Equipment Fleet*, represents a reasonable approximation of the expected construction fleet as required per the CEQA Guidelines.

Construction Activity	Start Date	End Date	Days
Demolition	02/01/2024	02/14/2024	10
Site Preparation	02/15/2024	03/13/2024	20
Grading	03/14/2024	06/26/2024	75
Building Construction	06/27/2024	08/06/2025	290
Paving	05/22/2025	08/06/2025	55
Architectural Coating	06/19/2025	08/06/2025	35

íable 3-1	Construction Duration
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(Urban Crossroads, 2022a, Table 4-3)

Construction Activity	Equipment	Amount	Hours Per Day
	Concrete/Industrial Saws	2	8
Demolition	Excavators	6	8
	Rubber Tired Dozers	4	8
Cita Duamanatian	Rubber Tired Dozers	4	8
Site Preparation	Crawler Tractors	6	8
	Excavators	2	8
	Graders	1	8
Graders	Rubber Tired Dozers	1	8
	Scrapers	2	8
	Crawler Tractors	2	8
	Cranes	2	8
Building Construction	Forklifts	5	8
	Generator Sets	2	8
	Welders	2	8
	Crawler Tractors	5	8
	Pavers	2	8



Daving	Paving Equipment	2	8
1 aving	Rollers	2	8
Architectural Coating	Air Compressors	2	8

(Urban Crossroads, 2022a, Table 4-4)

3.6.2 OPERATIONAL CHARACTERISTICS

At the time this EIR was prepared, the future user(s) of the proposed warehouse building was unknown. For the purposes of this EIR, the building is assumed to be operational 24 hours per day, seven days per week, with exterior loading and parking areas illuminated at night. No refrigeration of the warehouse is proposed. Employees and visitors would travel to and from the Project site primarily by passenger vehicle or truck. A Traffic Study was prepared for the proposed Project by Urban Crossroads, Inc. which calculated that the estimated number of daily vehicle trips generated by the Project would be 1,260, of which 224 are expected to be truck trips. On-site activities exterior to the building would include vehicle movements, vehicle parking and electric charging, loading and unloading of trailers at designated loading bays, and people walking and biking on the perimeter sidewalks and trails and interior to the Project site. On-site landscaping including on the landscaped berm along the western Project site boundary would be maintained by the Project site owner or occupant.

3.7 SUMMARY OF REQUESTED ACTIONS

The County of Riverside has primary approval responsibility for the proposed Project. As such, the County serves as the Lead Agency for this EIR pursuant to CEQA Guidelines § 15050. The role of the Lead Agency was previously described in detail in Section 1.0 of this EIR. As part of the approval process for the proposed Project, the County's Planning Commission will hold a public hearing to consider this EIR, the Project's General Plan Amendment (GPA220003), Change of Zone (CZ2200003), Tentative Parcel Map (TPM38337), and a Plot Plan (PPT220004). The Planning Commission will make advisory recommendations to the Board of Supervisors on whether to approve, approve with changes, or not approve these applications and whether to certify this EIR. A public hearing will then be held before the Board of Supervisors, which will consider the information contained in this EIR and the EIR's Administrative Record in its decision-making processes, and will certify or decline to certify this EIR, and will approve, approve with changes, or not approve proposed General Plan Amendment (GPA220003), Change of Zone (CZ220003), Tentative Parcel Map (TPM38337), and a Plot Plan (PPT220004).

3.8 RELATED ENVIRONMENTAL REVIEW AND CONSULTATION

Should the County Board of Supervisors approve the Project, subsequent to approval of GPA220003, CZ2200003, TPM38337, and PPT220004, additional discretionary applications would be required to implement the Project. Additionally, the County would be required to conduct additional CEQA review should there be any future implementing discretionary approvals, and would evaluate whether the implementing discretionary action(s) meet the conditions of CEQA Guidelines §§ 15162 and 15163 requiring preparation of a Subsequent or Supplemental EIR. If the implementing discretionary action(s) do not meet the conditions of CEQA Guidelines §§ 15162 or 15163, then an Addendum to this EIR may be prepared in accordance with CEQA Guidelines § 15164.



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

Public Agency	Approvals and Decisions
County of Riverside	
Riverside County Planning Commission	• Recommend to the Board of Supervisors whether to approve, approve with changes, or not approve General Plan Amendment (GPA220003), Change of Zone (CZ2200003), Tentative Parcel Map (TPM38337), and Plot Plan (PPT220004).
Riverside County Board of Supervisors	• Approve, approve with changes, or not approve General Plan Amendment (GPA220003), Change of Zone (CZ2200003), Tentative Parcel Map (TPM38337), and Plot Plan (PPT220004).
Subsequent Riverside County Discretio	nary and Ministerial Approvals
Riverside County Subsequent Implementing Approvals: Planning Department and/or Building & Safety	 Issue Grading Permits. Issue Building Permits. Approve Road Improvement Plans. Issue Encroachment Permits. Accept public right-of-way dedications. Authorize nighttime construction activities, if proposed.
Other Agencies – Subsequent Approvo	Is and Permits
San Diego Regional Water Quality Control Board	 Issuance of a National Pollutant Discharge Elimination System (NPDES) Permit Issuance of a Construction General Permit Issuance of a Waste Discharge Order pursuant to Section 13260 of the California Water Code
California Department of Fish and Wildlife (CDFW)	Approval of a Streambed Alternation Agreement
Riverside County Flood Control and Water Conservation District (RCFCWCD)	Approval of proposed drainage infrastructure
South Coast Air Quality Management District (SCAQMD)	• Permits and approvals associated with operation of stationary equipment, if proposed.
Southern California Edison (SCE)	• Approvals associated with undergrounding or relocating power poles and lines.
Eastern Water Municipal Water District (EMWD)	• Approval of proposed water and sewer connections and improvements

Table 3-3 Iviality of Project Approvals/Permi	Table 3-3	Matrix of Project Approvals/Permits
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Source(s): Esri, Nearmap Imagery (September 2022), RCTLMA (2022)



Lead Agency: Riverside County

3.0 Project Description

Figure 3-1

General Plan Amendment No. 220003





Source(s): Esri, Nearmap Imagery (September 2022), RCTLMA (2022)



Lead Agency: Riverside County

3.0 Project Description

Figure 3-2

Change of Zone No. 2200003





Source(s): Thienes Engineering, Inc. (04-05-2023)



Lead Agency: Riverside County



CONCRETE

TREE

PALM TREE IRON FENCE BLOCK WALL

INDICATES PROPOSED CONTOUR

INDICATES EXISTING CONTOUR

INDICATES EXISTING DESCRIPTION/ELEVATION

Figure 3-3

Tentative Parcel Map No. 38337





Proposed Roadway Improvements Sections

Lead Agency: Riverside County

to

SCH No. 2022120110





Source(s): Bastien and Associates, Inc. (12-06-2022)



Lead Agency: Riverside County

3.0 Project Description

loor Office	7,300 s.f.
ne Office	7,300 s.f.
se	576,603 s.f.
a	
Building Height	47 feet
Clear Height	36 feet
back:	49'-0"
d Setback:	50'-0"
1 Setback:	49'-0"
e Required	235,215 s.f. (15%)
e Provided (Parcel 1)	427 983 s f (25 33%)
	.21,000 0.1. (20.0070)
ed Per	
erside Ordinance No. 348.4773 Article X, I-P Zone (Indus an sheet A1.4.1 and A1.4.2 Herein	trial Park), Section 18.12)
d	
Proposed Property Line	
Easement Line	
Proposed Fire Hydrant, Per Civil Underground	
Proposed Wall Mounted Light Fixt., per Site Photometric	Sheet A1.3
Potential Interior Wall Location	
 8' High Fencing, per Sheet A1.5 4' High Fencing, per Sheet A1.5 	
Solid Dark Hatch Represents Landscape Area	
Lot A, C and E: Future Use To Be Determined by Owne	r
Diagonal Hatch Represents Painted Striping	
Solid Light Hatch Represents On-Site Hardscape	
Proposed Building	
,	

Figure 3-5

Site Plan





North Elevation (Rider Street)



East Elevation (Patterson Avenue)



Source(s): Bastien and Associates, Inc. (12-06-2022)



Lead Agency: Riverside County



3.0 Project Description

Figure 3-6

Architectural Building Elevations





Source(s): Emerald Design (12-06-2022)



Lead Agency: Riverside County

3.0 Project Description

XUNE UNDER 24" BOX 66 LOW 20" X 20" FLAM 6" BOX 7 MOD 35" X 40" FLAM 36" BOX 169 LOW 25" X 25" FLAM 36" BOX 169 LOW 45" X 25" FLAM 36" BOX 116 LOW 40" X 30" FLAM 36" BOX 116 LOW 60" X 20" FLAM 15" BTH 5 LOW 60" X 20" FLAM 15" BTH 5 LOW 30" X 35" FLAM 24" BOX 69 LOW 40" X 40" FLAM 24" BOX 69 LOW 40" X 40" FLAM 24" BOX 69 LOW 45" X 45" FLAM 24" BOX 61 LOW 2" X 3" FLAM 5GAL @ 36" OC LOW 2" X 3" FLAM 5GAL @ 36" OC LOW 2" X 3" FLAM 5GAL @ 36" OC LOW 2" X 3" FLAM 5GAL @ 36" OC LOW 7" X 3" SGAL @ 3	NAME	SIZE	QTY.	H2O USE	HEIGHT AND SPREAD
LTAME 60° BOX 7 MOD 35° X 40' 36° BOX 169 LOW 25° X 25' E 24° BOX 17 MOD 45° X 25' PINE 36° BOX 116 LOW 40° X 30' PINE 20° BTH 8 MOD 80° X 40' PINE 15° BTH 5 LOW 60° X 20' MA 24° BOX 69 LOW 40° X 40' MA 24° BOX 61 LOW 40° X 40' MA 24° BOX 61 LOW 2'X 10' MA 5GAL @ 36° OC LOW 2'X 10' MA 5GAL @ 36° OC LOW 4'X 2' MAREL 15GAL @ 36° OC LOW 4'X 3' MAREL 15GAL @ 36° OC LOW 3'X 3' MAREL 5GAL @ 36° OC LO	RUNK IUSEUM RDE	24" BOX	66	LOW	20' X 20'
A3° BOX169LOW25' X 25'E24' BOX17MOD45' X 25'PINE3° BOX116LOW40' X 30'PINE3° BOX116LOW40' X 30'PINE15 BTH5LOW60' X 20'PINE15 BTH5LOW60' X 20'PINE24' BOX69LOW40' X 40'PINE24' BOX61LOW40' X 40'PINE5CAL03' CLOW45' X 45'PINE5CAL03' CLOW6' X 10'PINE5CAL03' CLOW2' X 3'PINE5CAL03' CLOW2' X 3'PINE5CAL03' CLOW4' X 2'PINE15 GAL03' CLOW4' X 2'PINE15 GAL03' CLOW4' X 3'PINE16 AL03' CLOW4' X 3'PINE16 AL03' CLOW4' X 3'PINE16 AL03' CLOW3' X 3'PINE16 AL03' CLOW3' X 3'PINE5GAL03' CLOW3' X 3'PINE <t< td=""><td>FLAME LTI</td><td>60" BOX</td><td>7</td><td>MOD</td><td>35' X 40'</td></t<>	FLAME LTI	60" BOX	7	MOD	35' X 40'
E 24" BOX 17 MOD 45" X 25" PINE 36" BOX 116 LOW 40" X 30" PINE 20" BTH 8 MOD 80" X 40" FAN 15" BTH 5 LOW 60" X 20" FAN 15" BTH 5 LOW 60" X 20" FAN 24" BOX 69 LOW 40" X 40" A 24" BOX 69 LOW 40" X 40" A 24" BOX 61 LOW 40" X 40" AME SCAL @ 36" OC LOW 6" X 10" MAME SGAL @ 36" OC LOW 2" X 3" AME SGAL @ 36" OC LOW 2" X 3" ARRE 15 GAL @ 36" OC LOW 4" X 3" ARRE 5 GAL @ 36" OC LOW 3" X 3" ARRE 5 GAL @ 36" OC LOW 3" X 3" ARRE 5 GAL @ 36" OC LOW 3" X 3" ARRE 5 GAL @ 36" OC LOW 3" X 3" ARARE 5 GAL		36" BOX	169	LOW	25' X 25'
PINE 36° BOX 116 LOW 40 X 30 M 20 BTH 8 MOD 80 X 40 FAN 15 BTH 5 LOW 60 X 20 TD 24° BOX 190 LOW 30' X 35 MA 24° BOX 69 LOW 40' X 40' MA 24° BOX 69 LOW 40' X 40' MA 24° BOX 61 LOW 40' X 40' MAM 56AL 61 LOW 40' X 40' MAM 56AL 636° CC LOW 6' X 10' MAM 56AL 636° CC LOW 2' X 3' MAREL 15 GAL 636° CC LOW 4' X 2' ARREL 15 GAL 636° CC LOW 4' X 2' ARREL 16AL 636° CC LOW 3' X 3' JVE 5GAL 636° CC	Е	24" BOX	17	MOD	45' X 25'
M 20 BTH 8 MOD 80 X 40' FAN 15 BTH 5 LOW 60 X 20' FAN 15 BTH 5 LOW 60 X 35' FAN 24" BOX 190 LOW 30 X 35' FAN 24" BOX 69 LOW 40 X 40' AIA 24" BOX 61 LOW 40 X 40' AIA 24" BOX 61 LOW 45 X 45' FAN 5GAL @ 36" OC LOW 6' X 10' FED 5GAL @ 36" OC LOW 2' X 3' FARREL 15 GAL @ 36" OC LOW 4' X 2' ARREL 15 GAL @ 36" OC LOW 4' X 3' ARREL 15 GAL @ 36" OC LOW 3' X 3' IVE 5 GAL @ 36" OC LOW 3' X 3' IVE 5 GAL @ 36" OC LOW 3' X 3' IVE 5 GAL @ 36" OC LOW 3' X 3' IVE 5 GAL @ 36" OC LOW 3' X 3' IVE 5 GAL @ 36" OC LOW 3' X 3' IVE 5 GAL @ 36" OC LOW 3' X 3' IVE 5 GAL @ 36" OC	PINE	36" BOX	116	LOW	40' X 30'
FAN IS BTH 5 LOW 60 X 20' IAA 24" BOX 190 LOW 30 X 35 IAA 24" BOX 69 LOW 40 X 40' A 24" BOX 61 LOW 40 X 40' A 24" BOX 61 LOW 45 X 45' IAME SIZE QUANTITY H2O USE HEIGHT AND SPREAD ED 5 GAL @ 36" OC LOW 6'X 10' ED 5 GAL @ 36" OC LOW 2'X 3' ARREL 15 GAL @ 36" OC LOW 4'X 2' ARREL 15 GAL @ 36" OC LOW 4'X 3' IV 1 GAL @ 36" OC LOW 3'X 3' IVE 5 GAL @ 36" OC LOW 3'X 3' IVE 5 GAL @ 36" OC LOW 3'X 3' IVE 5 GAL @ 36" OC LOW 3'X 3' IVE 5 GAL @ 36" OC LOW 3'X 3' IVE 5 GAL @ 36" OC LOW 3'X 3' IVE 5 GAL @ 36" OC LOW 3'X 3' IVE 5 GAL @ 36" OC LOW 3'X 3' IVE 5 GAL @ 36" OC </td <td>М</td> <td>20' BTH</td> <td>8</td> <td>MOD</td> <td>80' X 40'</td>	М	20' BTH	8	MOD	80' X 40'
The set of the s	FAN	15' BTH	5	LOW	60' X 20'
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IAME SIZE QUANTITY H2O USE HEIGHT AND SPREAD FED 5 GAL @ 36° OC LOW 6'X 10' W 5 GAL @ 36° OC LOW 2'X 3' S GAL @ 36° OC LOW 2'X 10' S GAL @ 36° OC LOW 2'X 10' USH GAL @ 36° OC LOW 2'X 3' ARREL 15 GAL @ 36° OC LOW 4'X 2' ARREL 15 GAL @ 36° OC LOW 4'X 3' SS 5 GAL @ 36° OC LOW 3'X 3' JVE 5 GAL @ 36° OC LOW 3'X 3' JVE 5 GAL @ 36° OC LOW 3'X 3' JVE 5 GAL @ 36° OC LOW 3'X 3' G 5 GAL @ 36° OC LOW 3'X 3' G 5 GAL @ 36° OC LOW 3'X 3' G 5 GAL @ 36° OC LOW 3'X 3' G 5 GAL	A	24" BOX	61	LOW	45' X 45'
IAME SIZE QUANTITY H2O USE HEIGHT AND SPREAD ED 5 GAL @ 36° OC LOW 6' X 10' W 5 GAL @ 36° OC LOW 2' X 3' 5 GAL @ 36° OC LOW 2' X 10' 5 GAL @ 36° OC LOW 2' X 10' 5 GAL @ 36° OC LOW 2' X 3' ARREL 15 GAL @ 36° OC LOW 4' X 2' ARREL 15 GAL @ 36° OC LOW 4' X 3' SS 5 GAL @ 36° OC LOW 3' X 3' IVE 5 GAL @ 36° OC LOW 3' X 3' IVE 5 GAL @ 36° OC LOW 3' X 3' IVE 5 GAL @ 36° OC LOW 3' X 3' IVE 5 GAL @ 36° OC LOW 3' X 3' IVE 5 GAL @ 36° OC LOW 3' X 3' IVE 5 GAL @ 36° OC LOW 3' X 3' IVE 5 GAL <t< th=""><th></th><th></th><th></th><th></th><th></th></t<>					
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W 5 GAL @ 36° OC LOW 2° X 3' 5 GAL @ 48° OC LOW 2° X 10' 5 GAL @ 36° OC LOW 2° X 3' V 1 GAL @ 18° OC LOW 4° X 2' ARREL 15 GAL @ 36° OC LOW 4° X 3' SS 5 GAL @ 36° OC LOW 3° X 3' IVE 5 GAL @ 36° OC LOW 3° X 3' IVE 5 GAL @ 36° OC LOW 3' X 3' IVE 5 GAL @ 36° OC LOW 3' X 3' ON 1 GAL @ 36° OC LOW 3' X 3' G 5 GAL @ 36° OC LOW 3' X 3' G 5 GAL @ 36° OC LOW 3' X 3' G 5 GAL @ 36° OC LOW 3' X 3' G 5 GAL @ 36° OC LOW 3' X 3' SECIES (NOT TO SECCEES INOT TO EOW 3' X 3' 3'	ED	5 GAL	@ 36" OC	LOW	6' X 10'
5 GAL @ 48° OC LOW 2 X 10' SGAL @ 36° OC LOW 3'X 5' USH 1 GAL @ 18° OC LOW 4'X 2' ARREL 15 GAL @ 36° OC LOW 4'X 3' A 5 GAL @ 36° OC LOW 4'X 3' SS 5 GAL @ 36° OC LOW 3'X 3' IVE 5 GAL @ 36° OC LOW 3'X 3' IVE 5 GAL @ 36° OC LOW 3'X 3' IVE 5 GAL @ 36° OC LOW 3'X 3' IVE 5 GAL @ 36° OC LOW 3'X 3' IVE 5 GAL @ 36° OC LOW 3'X 3' IVE 5 GAL @ 36° OC LOW 3'X 3' IA 5 GAL @ 36° OC LOW 3'X 3' IA 5 GAL @ 36° OC LOW 3'X 3' IA 5 GAL @ 36° OC LOW 3'X 3' IA 5 GAL @ 18° OC	W	5 GAL	@ 36" OC	LOW	2' X 3'
S GAL @ 36° OC LOW 3' X 5' V 1 GAL @ 18° OC LOW 4' X 2' ARREL 15 GAL @ 36° OC LOW 2' X 3' A 5 GAL @ 36° OC LOW 4' X 3' SS 5 GAL @ 36° OC LOW 3' X 3' IVE 5 GAL @ 36° OC LOW 3' X 3' ON 1 GAL @ 36° OC LOW 3' X 3' V 5 GAL @ 36° OC LOW 3' X 3' G 5 GAL @ 36° OC LOW 3' X 3' G 5 GAL @ 36° OC LOW 3' X 3' G 5 GAL @ 36° OC LOW 3' X 3' G 5 GAL @ 36° OC LOW 3' X 3' G 5 GAL @ 18° OC LOW 3' X 3' SPECIES (NOT TO EXCEED 12' IN HEIGHT) LOW 3' X 3'		5 GAL	@ 48" OC	LOW	2' X 10'
V 1 GAL @ 18° OC LOW 4° X 2' ARREL 15 GAL @ 36° OC LOW 2° X 3' A 5 GAL @ 36° OC LOW 4° X 3' SS 5 GAL @ 36° OC LOW 3' X 3' IVE 5 GAL @ 36° OC LOW 3' X 3' ON 1 GAL @ 36° OC LOW 3' X 3' V 5 GAL @ 36° OC LOW 3' X 3' Y 5 GAL @ 36° OC LOW 3' X 3' G 5 GAL @ 36° OC LOW 3' X 3' G 5 GAL @ 36° OC LOW 3' X 3' G 5 GAL @ 18° OC LOW 3' X 3' DROUGHT TOLERANT, SPECIES (NOT TO EXCEED 12' IN HEIGHT) LOW 3' X 3'	USH	5 GAL	@ 36" OC	LOW	3' X 5'
ARREL 15 GAL @ 36" OC LOW 2" X 3" A 5 GAL @ 36" OC LOW 4" X 3" SS 5 GAL @ 36" OC LOW 3" X 3" LIVE 5 GAL @ 36" OC LOW 3" X 3" VIVE 5 GAL @ 36" OC LOW 3" X 3" VON 1 GAL @ 36" OC LOW 3" X 3" Y 5 GAL @ 36" OC LOW 3" X 3" Y 5 GAL @ 36" OC LOW 3" X 3" G 5 GAL @ 36" OC LOW 3" X 3" G 5 GAL @ 18" OC LOW 3" X 3" DROUGHT TOLERANT, SPECIES (NOT TO EXCEED 12" IN HEIGHT) LOW 3" X 3"	V	1 GAL	@ 18" OC	LOW	4' X 2'
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5 GAL @ 36° OC LOW 3' X 3' 5 GAL @ 36° OC LOW 3' X 3' IA G 5 GAL @ 18° OC LOW 3' X 3' DROUGHT TOLERANT, LOW SPECIES (NOT TO EXCEED 12° IN HEIGHT)	'ON Y	1 GAL	@ 36" OC	LOW	3' X 3'
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G 5 GAL @ 18" OC LOW 3' X 3' DROUGHT TOLERANT, LOW SPECIES (NOT TO EXCEED 12" IN HEIGHT)	I	5 GAL	@ 36" OC	LOW	3' X 3'
DROUGHT TOLERANT, LOW SPECIES (NOT TO EXCEED 12" IN HEIGHT)	3	5 GAL	@ 18" OC	LOW	3' X 3'
	DROUG SPECIE EXCEE	GHT TOLE S (NOT TO D 12" IN H	RANT,) IEIGHT)	LOW	
	EA				
EA					

Figure 3-7

Preliminary Landscaping Plan





Source(s): Bastien and Associates, Inc. (12-06-2022)



Lead Agency: Riverside County

Figure 3-8

Wall and Fence Plan





Source(s): Esri, Nearmap Imagery (September 2022), RCTLMA (2022)

0 150 300 600 Feet

Lead Agency: Riverside County

Figure 3-9

Limits of Physical Disturbance

SCH No. 2022120110



4.0 ENVIRONMENTAL ANALYSIS

4.1.1 SUMMARY OF EIR SCOPE

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

In compliance with the procedural requirements of CEQA, a Notice of Preparation (NOP) was prepared and distributed for a 30-day public review period on December 6, 2022, in accordance with CEQA Guidelines § 15082. An Initial Study was not prepared for the Project, and as such the NOP indicated that the required EIR will evaluate all of the topics listed in Appendix G to the CEQA Guidelines, as implemented by Riverside County and the County's standard Environmental Assessment (EA) Form. Public comment on the scope consisted of written comments received by the Riverside County in response to the NOP issued for this EIR. A publicly-noticed Scoping Session also was held as part of a Riverside County Planning Director's Hearing on January 9, 2023 at the Riverside County Administrative Building (4080 Lemon Street, Riverside, CA 92501). Pursuant to Appendix G to the CEQA Guidelines and the County's standard EA form, this EIR evaluates 21 primary environmental subject areas, as listed below. Each Subsection evaluates several specific subject matters related to the general topic of the Subsection. The title of each Subsection is not limiting; therefore, refer to each Subsection for a full account of the subject matters addressed therein.

- 4.1 Aesthetics
- 4.2 Agriculture and Forest Resources
- 4.3 Air Quality
- 4.4 Biological Resources
- 4.5 Cultural Resources
- 4.6 Energy
- 4.7 Geology and Soils
- 4.8 Greenhouse Gas Emissions
- 4.9 Hazards and Hazardous Materials
- 4.10 Hydrology and Water Quality
- 4.11 Land Use and Planning

- 4.12 Mineral Resources
- 4.13 Noise
- 4.14 Paleontological Resources
- 4.15 Population and Housing
- 4.16 Public Services
- 4.17 Recreation
- 4.18 Transportation
- 4.19 Tribal Cultural Resources
- 4.20 Utilities and Service Systems
- 4.21 Wildfire

4.1.2 SCOPE OF CUMULATIVE EFFECTS ANALYSIS

CEQA requires that an EIR contain an assessment of the cumulative impacts that may be associated with a proposed project. As noted in CEQA Guidelines § 15130(a), "an EIR shall discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable." "[A] cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects creating related impacts" (CEQA Guidelines §15130(a)(1)). As defined in CEQA Guidelines § 15355:

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



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

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

The summary of projections approach is used in this EIR, except for the evaluation of near-term vehicular traffic-related air quality and noise impacts, which rely instead on the list of projects approach. This methodology was determined to be appropriate by Riverside County because long-range planning documents contain a sufficient amount of information to enable an analysis of cumulative effects for all subject areas, with exception of vehicular-related air quality and noise effects, which require a greater level of detailed study.

Under this approach, the cumulative analysis under most sections considers impacts to each issue area based on the presumed buildout of the Riverside County General Plan as well as the general plans of any nearby jurisdictions that occur within the cumulative study area for each subject area. For most issue areas, this would encompass nearby areas within unincorporated Riverside County, nearby portions of the City of Perris, and nearby portions of the City of Moreno Valley, although the cumulative study area may be smaller or larger depending on the issue area under evaluation. For example, for the issue area of aesthetics, the cumulative study area is defined by the Project's viewshed (i.e., off-site areas with views of the Project site), which encompasses lands within the immediate Project vicinity (i.e., within approximately two miles of the Project site). For the issue of hydrology and water quality, by contrast, the cumulative study area is defined as the Santa Ana River Watershed, which encompasses portions of San Bernardino, Riverside, Orange, and Los Angeles Counties. For the issue of biology, the cumulative study area corresponds to the boundaries of the Western Riverside County Multiple Habitat Species Conservation Plan (MSHCP), as the MSHCP provides for the conservation of a wide variety of special status plant and animal species and encompasses a broad region that generally represents biological conditions associated with the Project area; thus, the cumulative study area for biological resources includes all future land uses within western Riverside County as called for by the general plans of the County and the various cities that are included in the MSHCP region. Refer to the individual Subsections within EIR Section 4.0 for a description of the specific cumulative study area used for each subject area evaluated in this EIR.

As noted, for most issue areas, nearby portions of unincorporated Riverside County and nearby portions of the City of Moreno Valley and the City of Perris are used as the Project's cumulative study area. This cumulative study area encompasses a large area surrounding the Project site that has similar environmental characteristics as the Project area. This area generally contains a variety of residential, light industrial, and commercial land



uses, with portions of the area comprising undeveloped lands and open space. This study area exhibits similar characteristics in terms of climate, geology, and hydrology. This study area also encompasses the service areas of the Project site's primary public service and utility providers. Areas outside of this study area either exhibit topographic, climatological, or other environmental circumstances that differ from those of the Project area, or are simply too far from the proposed Project site to produce environmental effects that could be cumulatively considerable.

The analysis of cumulatively-considerable vehicular-related impacts to air quality and noise uses a combined approach, utilizing the list of projects approach for the near-term analysis of cumulatively-considerable traffic impacts, and the summary of projections approach for the evaluation of long-term cumulatively-considerable traffic impacts. With the combined approach, the cumulative impact analyses for the analysis of vehicular-related impacts to air quality and noise impacts overstate the Project's (and Project-related components') potential cumulatively-considerable impacts as compared to an analysis that would rely solely on the list of projects approach or solely on the summary of projections approach; therefore, the combined approach provides a conservative, "worst-case" analysis for cumulative traffic-related air quality and noise impacts.

For near-term conditions, the analyses of cumulatively-considerable vehicular-related air quality and noise impacts are based on existing traffic conditions plus ambient growth and the manual addition of traffic from past, present, and reasonably foreseeable projects, and includes approved and pending development projects in proximity to the Project site that would contribute traffic to the same transportation facilities as the Project, as well as large, traffic-intensive projects farther from the Project site that have the potential to affect regional transportation facilities. This methodology recognizes development projects that have the potential to contribute measurable traffic to the same intersections, roadway segments, and/or State highway system facilities as the proposed Project and have the potential to be made fully operational in the foreseeable future. As shown on Table 4.0-1, *Cumulative Projects List*, and as depicted on Figure 4.0-1, *Cumulative Development Location Map*, the near-term cumulative impact analysis of traffic-related air quality and noise impacts includes 31 other past, present, and reasonably foreseeable projects within this study area in addition to the summary of projections (Urban Crossroads, 2022g, Table 4-3). The analysis of long-term cumulatively-considerable traffic impacts considers full buildout of nearby portions of unincorporated Riverside County, the City of Moreno Valley, and the City of Perris, based on the general plan land use plans for these jurisdictions.

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



N.,		Low of the sl	Quantity
NO.	Project Name/Case No.	Land Use'	Units
RCI	Thrifty Oil Warehouse	Warehousing	194.479 TSF
RC2	Placentia Truck Drop Lot	Truck Trailer Storage	8.06 AC
RC3	Harvill & Water Logistics	High-Cube Fulfillment Center Warehouse	304.376 TSF
		High-Cube Cold Storage Warehouse	130.447 TSF
RC4	Barker Logistics	High-Cube Fulfillment Center Warehouse	699.630 TSF
RC5	Dedeaux Harvill Truck Terminal	Truck Terminal	55.700 TSF
RC6	Harvill & Rider Warehouse	General Light Industrial	50.249 TSF
		High-Cube Transload Short-Term Warehouse	284.746 TSF
RC7	WPC Perris	High-Cube Fulfillment Center Warehouse	384.448 TSF
		High-Cube Cold Storage Warehouse	96.112 TSF
RC8	Majestic Freeway Busines Center (Building 11)	High-Cube Fulfillment Center Warehouse	391.045 TSF
RC9	PPT190029	Warehousing	36.000 TSF
RC10	PPT210021	Trailer Maintenance Facility/Storage	16.200 TSF
RC11	PPT210133	Warehousing	350.481 TSF
RC12	Majestic Freeway Busines Center (Building 13)	High-Cube Fulfillment Center Warehouse	322.997 TSF
RC13	Patterson & Harvill Warehouse	Warehousing & Cold Storage	100.190 TSF
RC14	CUP03599	Hotel	103 RM
RC15	Majestic Freeway Busines Center (Buildings	Warehousing	354.583 TSF
	14A,14B)		
RC16	PP16763	Warehousing	19.500 TSF
RC17	PP16823	Manufacturing	22.000 TSF
RC18	PP16932	Manufacturing	12.000 TSF
RC19	PP21207	Warehousing	311.412 TSF
RC20	PP23170	Warehousing	286.829 TSF
RC21	PP23342	Warehousing	180.551 TSF
RC22	Majestic Freeway Busines Center (Buildings	High-Cube Fulfillment Center Warehouse	1,195.740
	1,3,4)	5	TSF
RC23	PPT190005	Warehousing	333.553 TSF
RC24	PPT190006	Warehousing	289.556 TSF
RC25	PPT190028	Warehousing	197.856 TSF
RC26	TR27997	Multifamily Housing	120 DU
RC27	Seaton Commerce Center	High-Cube Fulfillment Center Warehouse	210.800 TSF
RC28	Harvill & Cajalco Warehouse	General Light Industrial & Truck Yard	99.770 TSF
RC29	Patterson & Cajalco Warehouse	Warehousing & Cold Storage	107.968 TSF
RC30	Seaton & Cajalco High Cube Warehouse	Warehousing & Cold Storage	350.481 TSF
RC31	Seaton & Cajalco High Cube Warehouse	General Light Industrial	98.940 TSF

Table 4-1 Cumula	tive Projects List
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¹ TSF = Thousand Square Feet; DU = Dwelling Units; RM = Rooms; TPY = Tons Per Year (Urban Crossroads, 2022g, Table 4-3)





Source(s): Urban Crossroads (01-23-2023)



Lead Agency: Riverside County

Figure 4-1

Cumulative Development Location Map



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

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

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

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

Environmental impacts associated with buildout of the cumulative study area were evaluated in CEQA compliance documents prepared for the respective general plans of each of the above-named jurisdictions. The location where each of these CEQA compliance documents is available for review is provided below. All of the CEQA compliance documents listed below are herein incorporated by reference pursuant to CEQA Guidelines § 15150.



- Riverside County General Plan Program EIR No. 521 (SCH No. 2009041065), available for review at the Riverside County Planning Department, located at 4080 Lemon Street, 12th Floor, Riverside, California 92501.
- City of Moreno Valley General Plan Update EIR (SCH No. 2020039022), available for public review at the City of Moreno Valley Planning Division, located at 14177 Frederick St., Moreno Valley, California 92552.
- City of Perris General Plan 2030 Final EIR (SCH No. 2004031135), available for public review at the City of Perris Planning Division, 101 N. D Street, Perris, California 92570.

4.1.3 IDENTIFICATION OF IMPACTS

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

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

Serving as the CEQA Lead Agency for this EIR, Riverside County is responsible for determining whether an adverse environmental effect identified in this EIR should be classified as significant or less than significant. While Riverside County has generally elected to use the thresholds presented in CEQA Guidelines Appendix G, it should be noted that CEQA affords the County discretion to formulate standards of significance, and recognizes that the significance of a particular impact may vary with the setting (14 California Code of Regulations (CCR), § 15064(b).) The standards of significance used in this EIR are based on the independent judgment of Riverside County, taking into consideration the current CEQA Guidelines Appendix G, Riverside County's Municipal Code, and adopted County policies and ordinances; the judgment of the technical experts that prepared this EIR's Technical Appendices; performance standards adopted, implemented, and monitored by regulatory agencies; significance standards recommended by regulatory agencies; and the standards in CEQA that trigger the preparation of an EIR. As required by CEQA Guidelines § 15126.2(a), impacts are identified in this EIR as direct, indirect, cumulative, short-term, long-term, on-site, and/or off-site impacts of the proposed Project. A summarized "impact statement" is provided in each Subsection following the analysis.

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

• <u>No Impact:</u> An adverse change in the physical environment would not occur.


- <u>Less-than-Significant Impact</u>: An adverse change in the physical environment would occur but the change would not be substantial or potentially substantial and would not exceed the threshold(s) of significance presented in this EIR.
- <u>Significant Impact</u>: A substantial or potentially substantial adverse change in the physical environment would occur and would exceed the threshold(s) of significance presented in this EIR, requiring the consideration of mitigation measures.

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

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

For any impact identified as significant and unavoidable, Riverside County would be required to adopt a statement of overriding considerations pursuant to CEQA Guidelines § 15093 in order to approve the Project despite its significant impact(s) to the environment. The statement of overriding considerations would list the specific economic, legal, social, technological, and other benefits of the Project, supported by substantial evidence in the Project's administrative record, that outweigh the unavoidable impacts.



4.1 <u>Aesthetics</u>

This Subsection 4.1 describes the aesthetic qualities and visual resources present on the Project site and in the site's vicinity and evaluates the potential effects that the Project may have on these resources. Descriptions of existing visual characteristics, both on site and in the vicinity of the Project site, and the analysis of potential impacts to aesthetic resources are based, in part, on site photographs included as part of the Project's application materials, analysis of aerial photography (Google Earth, 2022), and Project application materials related to the proposed development that were submitted to Riverside County and described in Section 3.0, *Project Description*, of this EIR. This Subsection also is based in part on information and policies contained in the Riverside County General Plan (Riverside County, 2021a), Riverside County GIS database (RCIT, n.d.), Riverside County Ordinance No. 348 (Riverside County, 2021c), Riverside County Ordinance No. 655 (Riverside County, 1988), and Riverside County Ordinance No. 915 (Riverside County, n.d.).

4.1.1 EXISTING CONDITIONS

A. Existing Aesthetic Conditions

The Project site comprises approximately 40.88 acres located at the southwest corner of Rider Street and Patterson Avenue in the Mead Valley community of unincorporated Riverside County. Under existing conditions, the southernmost portions of the site developed with three single family homes on lot sizes ranging from 1.05 acres to 2.0 acres, with the remainder of the site consisting of earthwork stockpiles and disturbed lands that are routinely subject to fire abatement (i.e., discing). The topography of the Project site slopes gently downwards from the southwest corner to the northeast corner of the site, with elevations on site ranging from approximately 1,602 feet above mean sea level (amsl) at the Project's southwest corner to approximately 1,533 feet amsl near the northeast corner of the property.

To illustrate the existing visual conditions of the Project site in more detail, a photographic inventory was prepared. Figure 4.1-1, *Site Photograph Key Map*, depicts the locations of the four vantage photographs, each of which are described below. These photographs, shown on Figure 4.1-2 and Figure 4.1-3, were taken in December 2021 and provide a representative visual inventory of the site's visual characteristics as seen from surrounding public viewing areas.

- <u>Site Photograph 1 (Figure 4.1-2)</u>: Site Photograph 1 was taken at the corner of Rider Street at Patterson Avenue, looking southwest. In the foreground, the paved portions of Rider Street and Patterson Avenue are visible, with utility poles visible along the southern edge of Rider Street. A large advertising sign for a nearby church facility (U-Turn for Christ) is prominently visible on the Project site, along with signage prohibiting dumping and trespassing. Beyond these existing signs, the majority of the Project site appears relatively flat, and is covered by low-lying vegetation that is routinely subject to discing for fire abatement purposes. The existing ornamental trees associated with the residential structures on site are visible in the left portion of the photograph in the distance. The residential homes located west of the Project site are visible in the distance along the horizon in the right portion of the photograph.
- <u>Site Photograph 2 (Figure 4.1-2)</u>: Site Photograph 2 was taken from the intersection of Patterson Avenue at Walnut Street facing northwest. As shown, the paved portion of Patterson Avenue is visible



in the lower right corner of the image, with a small parking area for one of the existing residents on site visible in the left half of the photo. A chain link fence is visible beyond the parking area, beyond which is a single-family home. The remaining portions of the view from this location are dominated by the existing ornamental trees on site.

- <u>Site Photograph 3 (Figure 4.1-3)</u>: Site Photograph 3 was taken from the southwest corner of the Project site, facing northeast. Walnut Street, which consists of an unpaved dirt roadway, is visible in the bottom portion of the photo, with an unpaved roadway providing access to the interior portions of the Project site visible in the left portion of the photo. In the left portion of the photo, the view is dominated by relatively flat land that is covered with sparse vegetation that is regularly subject to discing for fire abatement purposes, along with scattered refuse (including a tire). In the right portion of the photo is one of the existing residences on site, along with several large ornamental trees. A large number of ornamental trees also are visible in the distance along the horizon, beyond which existing developments are visible.
- <u>Site Photograph 4 (Figure 4.1-3)</u>: Site Photograph 4 was taken from the northwest corner of the Project site, facing southeast. The paved section of Rider Street is visible in the lower left portion of the photo, with an existing power pole and wooden palette visible in the right portion of the photo. From this location, the Project site appears to consist of vacant land that is covered by low lying vegetation that is regularly disced for fire abatement purposes. The ornamental trees associated with the existing residences on the site are visible along the horizon.

B. <u>Scenic Highways</u>

According to Figure 10 of the Riverside County General Plan's Mead Valley Area Plan (MVAP), and as shown on Figure 4.1-4, *Mead Valley Area Plan Scenic Highways*, there are no State or County designated scenic highways within the Project vicinity. The nearest State-eligible scenic highway is SR 74, located approximately 3.3 miles south of the Project site. The nearest County-eligible scenic highway is Interstate 215 (I-215), located approximately 0.4-mile east of the Project site. (Riverside County, 2021b, Figure 10; Google Earth, 2022)

4.1.2 APPLICABLE REGULATORY REQUIREMENTS

A. <u>Riverside County General Plan</u>

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

The Multipurpose Open Space Element of the Riverside County General Plan also addresses open space and scenic resources in Riverside County. According to the Multipurpose Open Space Element, scenic resources include: "...areas that are visible to the general public and considered visually attractive" and "...natural landmarks and prominent or unusual features of the landscape." Hillsides and ridges that rise above urban or



rural areas or highways can also be considered scenic backdrops. Additionally, the Multipurpose Open Space Element defines scenic vistas as "...points, accessible to the general public, that provide a view of the countryside." Riverside County General Plan Policy OS 21.1 intends to "[i]dentify and conserve the skylines, view corridors, and outstanding scenic vistas within Riverside County." (Riverside County, 2021a, pp. OS-52 to OS-53)

The Circulation Element, Land Use Element, and Multipurpose Open Space Element of the Riverside County General Plan also identify scenic corridors, which are roadways (including State and County eligible and designated scenic highways) that traverse scenic resources, and identify policies that are intended to protect and maintain the scenic resources within these corridors (Riverside County, 2021a, p. OS-52). Scenic highways in the Project vicinity are depicted on Figure 4.1-4. As noted in the MVAP, Policy MVAP 12.1 seeks to "Protect the scenic highways in the Mead Valley planning area from change that would diminish the aesthetic value of adjacent properties in accordance with the Scenic Corridors sections of the General Plan Land Use, Multipurpose Open Space, and Circulation Elements." (Riverside County, 2021b, p. 46).

B. <u>Riverside County Ordinance No. 348, Land Use Ordinance</u>

Riverside County's Land Use Ordinance No. 348 establishes allowable uses of land and sets standards for what and how land may be developed. The ordinance protects the people and property of Riverside County from development of unsuitable land uses and aims to ensure that built areas are developed safely and with minimal conflict with surrounding lands. Ordinance No. 348 also identifies requirements for landscaping associated with development proposals. The landscaping of development projects should enhance the visual character and aesthetic quality of a site and its surroundings. (Riverside County, 2021c)

C. <u>Riverside County Ordinance No. 655, Regulating Light Pollution</u>

Riverside County has adopted an ordinance regulating light pollution (Ordinance No. 655). Ordinance No. 655 is intended to restrict the permitted use of certain light fixtures emitting light into the night sky which could have a detrimental effect on astronomical observation and research. Ordinance No. 655 sets forth requirements for lamp source and shielding of light emissions for outdoor fixtures to reduce "skyglow" or light pollution that affects day or nighttime views from the Mt. Palomar Observatory, which is located approximately 39.4 miles southeast of the Project site. As shown on MVAP Figure 7 (Mead Valley Area Plan Mt. Palomar Observatory Lighting Policy Area), the Project site is located within the limits of "Zone B" of the Mt. Palomar Observatory Lighting Policy Area (Riverside County, 2021b, Figure 7). As such, the Project site is subject to the outdoor lighting policies and requirements applicable to Zone B that are stated in Riverside County Ordinance No. 655. This Ordinance includes specific standards for lighting fixtures installed along public roadways and in other common areas and applies to all new development. The use of low-pressure sodium lamps is encouraged where possible by Ordinance No. 655, and the Ordinance also requires the shielding of all nonexempt outdoor lighting fixtures, specifies the hours of operation for non-exempt outdoor lighting fixtures used to illuminate an outdoor advertising display. (Riverside County, 1988)

D. <u>Riverside County Ordinance No. 915, Regulating Outdoor Lighting</u>

The County of Riverside has adopted an ordinance regulating outdoor lighting (Ordinance No. 915). Ordinance No. 915 is intended to provide minimum requirements for outdoor lighting in order to reduce light



trespass. Ordinance No. 915 provides regulations on adequate lighting shielding, glare, and light trespass in order to ensure all development in Riverside County installs lighting in a way that does not jeopardize the health, safety, or general welfare of Riverside County residents and degrade their quality of life. (Riverside County, n.d.)

4.1.3 BASIS FOR DETERMINING SIGNIFICANCE

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

- a. Have a substantial effect upon a scenic highway corridor within which it is located;
- b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings and unique or landmark features; obstruct any prominent scenic vista or view open to the public; or result in the creation of an aesthetically offensive site open to public view;
- c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings. (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality;
- d. Interfere with the nighttime use of the Mt. Palomar Observatory, as protected through Riverside County Ordinance No. 655;
- e. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area; or
- *f. Expose residential property to unacceptable light levels.*

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

4.1.4 IMPACT ANALYSIS

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

As previously indicated and as depicted on Figure 4.1-4, there are no officially-designated scenic highway corridors within the Project's viewshed. The nearest State-eligible scenic highway is SR 74, located approximately 3.3 miles south of the Project site. However, due to distance, intervening topography (including several existing hill forms to the south of the Project site), and intervening development, the Project site is not visible from SR 74. Although the Project site is located approximately 0.4-mile west of I-215, a County-eligible scenic highway, views of the Project site from I-215 are largely obstructed by existing development



governing scenic quality?

and landscaping that occurs between the Project site and I-215. Therefore, the Project site is not prominently visible from any officially-designated or eligible State or County scenic highways, and impacts would be less than significant.

<u>Threshold b.</u> :	Would the Project substantially damage scenic resources, including, but not limited to, tree					
	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?					
<u>Threshold c.</u> :	In non-urbanized areas, would the Project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations					

Under existing conditions, the Project site does not contain any rock outcroppings or other unique or landmark features that would represent scenic resources. Although the Project site contains several trees along the site's frontage with Rider Street and surrounding the existing residential uses in the southern portions of the Project site, these existing trees are not visually prominent except in areas immediately surrounding the Project site. In addition, the Project's application materials include a landscape plan that would replace the existing trees on site by several rows of trees proposed along the site's northern, eastern, and southern boundaries, and on and around a landscaped berm proposed along the site's western boundary. Accordingly, the Project would not substantially damage any scenic resources, including trees, rock outcroppings, or unique or landmark features, and impacts would be less than significant.

As demonstrated by the site photos presented on Figure 4.1-2 and Figure 4.1-3, the Project site and immediately surrounding areas do not offer any prominent scenic vistas or views of scenic resources. Scenic vistas and views available from the Project site are mostly limited to areas immediately surrounding the Project site, while more distant views are obstructed by topography, vegetation, and existing developments. Accordingly, the Project would not obstruct any prominent scenic vista or view open to the public, and impacts would be less than significant.

Implementation of the Project as proposed would result in the conversion of a majority of the Project site from a largely undeveloped property that contains three existing single-family homes to a proposed light industrial business center that would include a 591,203 s.f. warehouse building. Although this represents a substantial change to the visual character of the Project site, the Project's Plot Plan application materials include site-specific plans detailing the architectural and landscaping characteristics of the Project. The design of the Project as shown in the Project's Plot Plan application materials would ensure that the proposed development is not visually offensive. The proposed truck courts would be surrounded by solid screen walls. Also, refer to Figure 4.1-5, *Site Sections*, which illustrates that the landscaped berm proposed along the western portion of the Project site would block views of the proposed warehouse building from the residential community located to the west. For the reasons presented herein, the Project would not result in the creation of an aesthetically offensive site open to public view. Impacts would be less than significant.



According to mapping information from the United States Census Bureau (USCB), the Project site is located in an urbanized area (USCB, 2010). The proposed Project is designed in conformity with all components of the County's zoning regulations and ordinances that address visual quality, and the Project Applicant is not seeking any waivers or reductions of requirements as set forth in the County's Municipal Code. Accordingly, the Project would not conflict with applicable zoning and other regulations governing scenic quality, and impacts would be less than significant.

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

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

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

<u>Threshold f.</u>: Would the Project expose residential property to unacceptable light levels?

Development of the Project site would be subject to Riverside County Ordinance No. 915. Ordinance No. 915 requires that all outdoor luminaires shall be located, adequately shielded, and directed such that no direct light falls outside the parcel of origin, or onto the public right-of-way. In order to conceptually demonstrate compliance with Ordinance No. 915, a photometric plan is included as part of the Project's Plot Plan application materials, which demonstrates that proposed lighting would not expose neighboring properties to spillover lighting, including the existing residential uses to the immediate west of the Project site. Accordingly, the Project would not expose neighboring properties to unacceptable light levels and would not adversely affect day or nighttime views in the area, and impacts would be less than significant.

Furthermore, none of the Project's proposed building materials would consist of reflective materials, except for the proposed windows at the office locations at the northeast and southeast corners of the building, which would not be mirrored and would have similar low-potential glare characteristics as do other glass windows on buildings in the Project vicinity. The proposed Project does not include any components that would generate



substantial amounts of reflective surfaces. Accordingly, implementation of the Project would result in a less-than-significant impact related to new sources of light or glare.

Based on the foregoing analysis, and because the Project would be required to comply with the lighting provisions of Riverside County Ordinance No. 915, impacts due to Project lighting and glare would be less than significant.

4.1.5 CUMULATIVE IMPACT ANALYSIS

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

As discussed under the analysis of Threshold a., there are no officially-designated scenic highway corridors within the Project's viewshed. Although the Project site is located approximately 0.4-mile west of I-215, a County-eligible scenic highway, views of the Project site from I-215 are largely obstructed by existing development and landscaping that occurs between the Project site and I-215. The proposed development would appear as a continuation of existing development patterns to the east and southeast of the Project site, which includes a mixture of light industrial uses including warehouses. Furthermore, a majority of the Project site appears as a disturbed and largely unvegetated parcel of land under existing conditions. As part of the Project, the site would be fully landscaped, including along the site's frontages with surrounding roadways, where street trees, shrubs, and groundcover are proposed. A landscaped berm is also proposed along the western property line. As such, the Project would not have a substantial effect on a scenic highway corridor, and impacts would be less-than-cumulatively considerable.

Aside from scattered trees in the northern portion of the Project site and surrounding the existing residential homes in the southern portions of the Project site, the Project site does not contain any scenic resources under existing conditions. The majority of the Project site appears as a relatively flat property that is covered in low lying vegetation that is routinely disced for fire abatement purposes. Although the Project would result in the removal of the existing trees, the Project would include extensive landscaping, including trees that would be provided on site and along the site's frontages with abutting roadways. Accordingly, Project impacts to scenic resources would be less than significant on a cumulatively-considerable basis.

As discussed under the analysis of Thresholds b. and c., the Project site and immediately surrounding areas do not offer any prominent scenic vistas or views of scenic resources. Scenic vistas and views available from the Project site are mostly limited to areas immediately surrounding the Project site, while more distant views are obstructed by topography, vegetation, and existing developments. Accordingly, cumulatively-considerable impacts to prominent scenic vistas or views open to the public would be less than significant.

In addition, mandatory compliance with the Project's application materials, which include site-specific plans detailing the architectural and landscaping characteristics of the Project, would ensure that the proposed development is not visually offensive. Accordingly, cumulatively-considerable impacts due to the creation of an aesthetically offensive site open to public view would be less than significant.



As previously indicated, although the Project site is located in an urbanized area, the Project has been designed to fully conform with all components of the County's zoning regulations and ordinances related to visual quality (USCB, 2010). Accordingly, the Project has no potential to conflict with zoning or other regulations governing scenic quality, and impacts would therefore be less-than-cumulatively considerable.

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

The proposed Project as well as other cumulative developments within the Project's viewshed would be subject to compliance with Riverside County Ordinance Nos. 655 and 915. In order to conceptually demonstrate compliance with Ordinance No. 915, a photometric plan was prepared as part of the Project's application materials (refer to Sheet A 1.3), which demonstrates that proposed lighting would not expose neighboring properties to spillover lighting, including the existing residential uses to the immediate west of the Project site. Although the Project and cumulative developments may incorporate building materials with the potential to create glare, only limited building materials such as glass would have the potential to create glare impacts, and such impacts would be minor and would not adversely affect day or nighttime views in the area. Impacts due to light and glare would be less-than-cumulatively considerable.

4.1.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

<u>Threshold a.: Less-than-Significant Impact</u>. The Project site is not located within the viewshed of any officially designated State or County scenic highways or State-Eligible scenic highways. Although the Project site is located approximately 0.4-mile west of I-215, a County-eligible scenic highway, views of the Project site from I-215 are largely obstructed by existing development and landscaping that occurs between the Project site and I-215. As such, Project impacts to scenic highways would be less than significant.

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

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

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



4.1.7 COUNTY REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

Applicable Regulations and Design Requirements

The following are regulations and design requirements that apply to the proposed Project and that reduce or preclude aesthetic impacts. Although compliance with mandatory regulatory requirements does not technically meet CEQA's definition for mitigation, they are specified herein as requirements for the Project.

- The Project is required to comply with Riverside County Ordinance No. 655, which sets forth requirements for lamp source and shielding of light emissions for outdoor fixtures to reduce "skyglow" or light pollution that affects day or nighttime views from the Mount Palomar Observatory (located approximately 36.5 miles south of the Project site in northern San Diego County). Pursuant to the requirements of Ordinance No. 655, all lighting shall consist of low-pressure sodium lighting, or other lamp types that emit 4050 lumens or less. If light fixtures are proposed above 4050 lumens, then the lighting shall be fully shielded in conformance with the requirements of Ordinance No. 655.
- The Project is required to comply with Riverside County Ordinance No. 915, which provides minimum requirements for outdoor lighting to reduce light trespass. Ordinance No. 915 provides regulations for adequate lighting shielding, glare, and light trespass in order to ensure all development in Riverside County installs lighting in a way that does not jeopardize the health, safety, or general welfare of Riverside County residents and degrade their quality of life.

Mitigation

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



Rider and Patterson Business Center Environmental Impact Report



Source(s): Esri, NearMap Imagery (September 2023)



Lead Agency: Riverside County

Figure 4.1-1

Site Photograph Key Map

SCH No. 2022120110





Source(s): Esrl, Nearmap Imagery (September 2022



View 1: From northeast corner of the project site, at the intersection of Rider St & Patterson Ave, facing southwest.



View 2: From southeast corner of the project site, at the intersection of Walnut St & Patterson Ave, facing northwest.

Figure 4.1-2



Lead Agency: Riverside County

Site Photographs 1 and 2

SCH No. 2022120110





curce(s): Esrl, Nearmap Imagery (September 2022



View 3: From southwest corner of the project site, along Walnut St, facing northeast.



View 4: From northwest corner of the project site, along Rider St, facing southeast.

Figure 4.1-3



SCH No. 2022120110



Lead Agency: Riverside County





Mead Valley Area Plan Scenic Highways

Lead Agency: Riverside County

to

SCH No. 2022120110





Section A-A



Source(s): Bastien and Associates, Inc. (12-06-2022)



Lead Agency: Riverside County



4.1 Aesthetics

Figure 4.1-5

Site Sections

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4.2 AGRICULTURE AND FORESTRY RESOURCES

The information and analysis in this Subsection 4.2 are based in part on information obtained from the California Department of Conservation (CDC) Farmland Mapping & Monitoring Program (FMMP) (CDC, 2021), Riverside County GIS (RCIT, n.d.), and the Riverside County General Plan Amendment 960 Final EIR (Riverside County, 2015b). Refer to Section 7.0, *References*, for a complete list of these and other reference sources.

4.2.1 EXISTING CONDITIONS

A. <u>Forestry Resources</u>

The Project site is located in the Mead Valley area of unincorporated Riverside County, the eastern portion of which is a rapidly urbanizing area that generally contains developments and dry, sparsely-vegetated natural terrain. As shown in Figure 4.5.2 of the Riverside County General Plan Update Draft EIR No. 521, aside from sparsely scattered lowland forests/woodlands, there are no forestry resources in the Project site's vicinity under existing conditions. The nearest forest land to the Project site occurs within the Cleveland National Forest, located approximately 15 miles west of the Project site. (Riverside County, 2015a, Figure 4.5.2)

B. <u>Agricultural Resources</u>

1. Regional Agricultural Setting

According to information available from the Riverside County Agricultural Commissioner's Office, the top three categories of agricultural resources cultivated in Riverside County (by value) are nursery stock, milk, and alfalfa. In 2020 (the most recent year for which data is available), the total gross value of agricultural production in Riverside County was approximately \$1.42 billion, which represents a 7.3% increase from 2019 when total values were \$1.32 billion. (Agricultural Commissioner, 2021)

The CDC reports that agricultural lands face continuing pressure from urbanization and rising production costs. The CDC's "2014-2016 California Farmland Conversion Report" summarizes land use conversion between 2014 and 2016 (the most recent years for which information has been reported by the CDC), and states that Riverside County as a whole experienced a net loss of 855 acres of Important Farmland between 2014 and 2016, representing a decline of 0.4% (CDC, n.d., Table A-25). Important Farmlands, as defined by Riverside County, include Prime Farmland, Statewide Important Farmland, and Unique Farmland.

2. Previous and Existing Site Conditions

According to the Project's Phase I Environmental Site Assessment (ESA) (*Technical Appendix H*), the Project site was used for agricultural production since at least 1961. Agricultural operations ceased in the southern portions of the Project site with the development of the three existing homes, which were constructed in approximately 1967. Agricultural uses on the balance of the site ceased as recently as 2009, when large portions of the Project site were used for stockpiling of earthwork materials. Under existing conditions, the Project site is vacant with exception of the three residential homes and is not used for agricultural production.



3. Zoning

As described in EIR Section 2.0, *Environmental Setting*, under existing conditions a majority of the Project site is zoned for "One-Family Dwellings (R-1)." Two parcels along the southern boundary are zoned for "Light Agriculture (A-1-1)," and two parcels in the southeastern portions of the Project site are zoned "Rural Residential (R-R-1)." According to Riverside County Ordinance No. 625, the R-1 and R-R-1 zoning classifications do not comprise lands that are zoned primarily for agricultural purposes. The A-1-1 zoning classification does meet the County's definition for lands that are zoned primarily for agricultural purposes. The two A-1-1 zoned parcels are Assessor's Parcel Number (APN) 317-210-006 (1.23 acres) and APN 317-210-011 (1.46 acres). (Riverside County, 1994; RCIT, n.d.)

4. Agricultural Land Designations

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

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

- **Prime Farmland (P)**: Farmland with the best combination of physical and chemical features able to sustain long-term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date. (CDC, 2004, p. 6)
- Farmland of Statewide Importance (S): Farmland similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date. (CDC, 2004, p. 6)
- Unique Farmland (U): Farmland of lesser quality soils used for the production of the state's leading agricultural crops. This land is usually irrigated, but may include non-irrigated orchards or vineyards as found in some climatic zones in California. Land must have been cropped at some time during the four years prior to the mapping date. (CDC, 2004, p. 6)

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

As shown on Figure 4.2-1, *FMMP Farmland Map*, a majority of the Project site is classified by the FMMP as "Farmland of Local Importance," while the southern portions of the Project site (generally corresponding to the existing residential uses) are classified as "Other Lands" (CDC, 2021) "Farmland" is defined in Section II (a) of Appendix G of the California Environmental Quality Act (CEQA) Guidelines and by Riverside County to mean "Prime Farmland," "Farmland of Statewide Importance," or "Unique Farmland." Thus, the Project site does not contain any "Farmland" as mapped by the FMMP.

5. Williamson Act Land Preserves and Agricultural Preserves

Agricultural preserves are the result of Riverside County's participation in the California Land Conservation Act (CLCA) of 1965, also known as the Williamson Act, California Government Code § 51200, et seq. This program allows owners of agricultural land to have their properties assessed for tax purposes on the basis of agricultural production rather than current market value. The main purpose of the Williamson Act is to encourage property owners to continue to farm their land, and to prevent the premature conversion of farmland to urban uses. According to Riverside County GIS, the Project site is not included in any agricultural preserves, and is not subject to a Williamson Act Contract. The nearest agricultural preserve and Williamson Act contracted land occurs approximately 0.9-mile southeast of the Project site (Perris Valley 3 Agricultural Preserve). (RCIT, n.d.)

4.2.2 APPLICABLE REGULATORY REQUIREMENTS

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



A. <u>State Regulations</u>

1. California Land Conservation Act (CLCA)

The CLCA of 1965, also known as the Williamson Act (California Government Code § 51200, et seq.), enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space use. In return, landowners receive property tax assessments that are much lower than normal because they are based upon farming and open space uses as opposed to full market value. Pursuant to California Government Code § 51230, counties and cities may establish Agricultural Preserves, which define boundaries of those areas within which the city or county will be willing to enter into contracts pursuant to the CLCA. Contracts pursuant to the CLCA are only allowed for areas within established Agricultural Preserves. Agricultural Preserves generally must be at least 100 acres in size; however, a city or county may allow for lesser acreage if a finding is made that the characteristics of the agricultural enterprises in the area are unique and that the establishment of preserves of less than 100 acres is consistent with the general plan of the county or city. Once established, land uses within an Agricultural Preserve must be agricultural in nature, or other such uses that are not incompatible with agricultural uses. (CDC, 2019; CA Legislative Info, n.d.)

2. Farmland Mapping and Monitoring Program (FMMP)

The goal of the CDC's FMMP is to provide consistent, timely, and accurate data to decision makers for use in planning for the present and future of California's agricultural land resources. To meet this goal, the FMMP's objective is to provide maps and statistical data to the public, academia, and local, state, and federal governments to assist them in making informed decisions for the best utilization of California's farmland. The FMMP was established in 1982 in response to what was by then a critical need for data on the nature, location, and extent of farmland, grazing land, and urban built-up areas in the State. California Government Code § 65570 mandates FMMP to biennially report to the Legislature on the conversion of farmland and grazing land, and to provide maps and data to local government and the public. The FMMP was also directed to prepare and maintain an automated map and database system to record and report changes in the use of agricultural lands. It was the intent of the Legislature and a broad coalition of building, business, government, and conservation interests that FMMP be non-regulatory, and provide a consistent and impartial analysis of agricultural land use and change in California. With this in mind, FMMP provides basic data from which observations and analyses can be made in the land use planning process. Pursuant to the FMMP, all lands within California are classified into one of seven map categories, as previously summarized in subsection 4.2.1. (CDC, 2004, p. 3)

3. California Forest Practice Act

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

B. Local Regulations

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



- <u>Riverside County Ordinance No. 509</u>: This ordinance establishes uniform rules which apply to Agricultural Preserves. This ordinance determines which uses are agricultural or compatible uses within an Agricultural Preserve and prohibits all other uses within an Agricultural Preserve.
- <u>Riverside County Ordinance No. 625</u>: This "Right-to-Farm" Ordinance requires that development of non-agricultural uses adjacent to properties zoned primarily for agricultural purposes and that have been in agricultural use for at least three years surrender rights to file nuisance complaints. A note is to be added to the Environmental Constraints Sheet for any tentative land division that states:

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

4.2.3 Basis for Determining Significance

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

- a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use;
- b. Conflict with existing agricultural zoning, agricultural use or with land subject to a Williamson Act contract or land within a Riverside County Agricultural Preserve;
- c. Cause development of non-agricultural uses within 300 feet of agriculturally zoned property (Ordinance No. 625 "Right-to-Farm");
- *d.* Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use;
- e. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Govt. Code section 51104(g));
- f. Result in the loss of forest land or conversion of forest land to non-forest use; or
- g. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of forest land to non-forest use.



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

4.2.4 IMPACT ANALYSIS

<u>Threshold a.</u>: Would the Project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

As shown on Figure 4.2-1, a majority of the Project site is classified by the FMMP as "Farmland of Local Importance," while the southern portions of the Project site (generally corresponding to the existing residential uses) are classified as "Other Lands." There are no portions of the Project site that are classified as containing Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. (CDC, 2021) As such, the Project would not convert FMMP-designated Farmland to a non-agricultural use, and no impact would occur.

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

As defined by Riverside County Ordinance No. 625, "lands primarily zoned for agricultural use" include properties that are zoned for A-1 (Light Agriculture), A-P (Light Agriculture with Poultry), A-2 (Heavy Agriculture), A-D (Agriculture-Dairy), or C/V (Citrus/Vineyard) (Riverside County, 1994). Under existing conditions, two parcels on the site along the southern Project boundary are zoned A-1-1: APN 317-210-006 (1.23 acres) and APN 317-210-011 (1.46 acres). (RCIT, n.d.). Although the proposed Project is not consistent with the existing agricultural zoning classification applied to these two parcels, it should be noted that these parcels are not used for agricultural production under existing conditions and have not been used for agricultural uses since the 1960s. Also, no adjacent parcels are used for agricultural production (Google Earth, 2022). Due to the lack of agricultural uses on the site and the absence of agricultural uses on adjacent parcels under existing conditions, the Project's proposed Change of Zone (CZ2200003), which would change the zoning classification of the two A-1-1 zoned parcels to "Industrial Park (I-P)," would not directly or indirectly cause adverse physical changes to an agricultural resource. Under existing conditions, the southern portions of the Project site consist of residential uses, while the remaining portions of the Project site consist of vacant and undeveloped land that was formerly used as a stockpile area for earthwork materials. No portions of the Project site are used for agricultural production under existing conditions. Furthermore, there are no agricultural uses in the surrounding area under existing conditions, with exception of lands that appear to be used for dryland farming. There are no components of the proposed Project that would interfere with the use of these properties for dryland farming. Accordingly, the Project would not conflict with any existing agricultural uses, and impacts would be less than significant.

According to Riverside County GIS, the Project site is not included in any agricultural preserves and is not subject to a Williamson Act Contract. The nearest agricultural preserve and Williamson Act contracted land occurs approximately 0.9-mile southeast of the Project site (Perris Valley 3 Agricultural Preserve). (RCIT, n.d.) Due to distance, the Project has no potential to conflict with any lands subject to a Williamson Act contracted within an Agricultural Preserve. Impacts would be less than significant.



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

Under existing conditions, parcels within 300 feet of the Project site and that are zoned for agricultural uses include one parcel to the south of the Project site and four parcels to the east of the Project site, all of which are zoned for A-1-1 uses (RCIT, n.d.). However, the Project would be subject to the provisions of Riverside County Ordinance No. 625, which protects agricultural operations from nuisance complaints and encourages the development, improvement, and long-term viability of agricultural land. Mandatory compliance with Ordinance No. 625 would ensure that Project-related construction and operational activities would not indirectly cause or contribute to the conversion of off-site farmland to non-agricultural use. Based on the mandatory compliance with Ordinance No, 625. impacts would be less than significant

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

There are no components of the Project that would involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use. Although agricultural uses occur in the Project vicinity (refer to the discussion of Threshold c.), there are no components of the proposed Project that could indirectly affect these existing agricultural uses. Additionally, as indicated under the analysis of Threshold c., the Project would be subject to the provisions of Riverside County Ordinance No. 625, which protects agricultural operations from nuisance complaints and encourages the development, improvement, and long-term viability of agricultural land. Compliance with Ordinance No. 625 would ensure that future development on site does not result in indirect impacts to existing agricultural uses in the surrounding area. Thus, the Project would not result in any other changes to the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use, and impacts would be less than significant.

<u>Threshold e.</u> :	Would the Project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Govt. Code section 51104(g))?
<u>Threshold f.</u> :	<i>Would the Project result in the loss of forest land or conversion of forest land to non-forest use?</i>
<u>Threshold g.</u> :	Would the Project involve other changes in the existing environment which, due to their location or nature, could result in conversion of forest land to non-forest use?

The Project site and surrounding areas are not zoned for forest land (as defined in Public Resources Code (PRC) § 12220(g)), timberland (as defined by PRC § 4526), or timberland zoned Timberland Production (as defined by Government Code § 51104(g)) (RCIT, n.d.). As such, the Project has no potential to conflict with such zoning, and no impact would occur.

As shown in Figure 4.5.2 of the Riverside County General Plan Update Draft EIR No. 521, which was prepared in conjunction with the County's 2015 General Plan Update, aside from sparsely scattered lowland



forests/woodlands there are no forestry resources in the Project's vicinity under existing conditions. The nearest forest land to the Project site is the Cleveland National Forest, located approximately 15 miles west of the Project site; however, no timber production occurs in association with the Cleveland National Forest (Riverside County, 2015a, Figure 4.5.2). Based on a review of aerial imagery, there are no forest-related uses within the vicinity of the Project site (Google Earth, 2022). As such, the Project has no potential to result in the loss of forest land or conversion of forest land to non-forest use, and no impact would occur.

Furthermore, the Project would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of forest land to non-forest use. No impact would occur.

4.2.5 CUMULATIVE IMPACT ANALYSIS

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

As discussed under Threshold a., the Project site does not contain any Farmland as defined by CEQA Guidelines Appendix G Section II(a), and would not result in the conversion of any Farmland to non-agricultural use. Accordingly, no cumulatively-considerable impacts to Farmland would occur with implementation of the proposed Project.

As discussed under the analysis of Threshold b., although two of the parcels on site are zoned A-1-1, which is an agricultural zoning classification pursuant to Riverside County Ordinance No. 625, these parcels are not used for agricultural production under existing conditions. Furthermore, with approval of the Project's Change of Zone (CZ2200003), the Project would be fully consistent with the site's zoning designation. As also discussed under the analysis of Threshold b., there are no components of the proposed Project that would interfere with the continued use of surrounding properties for dryland farming. Furthermore, the Project site is not subject to a Williamson Act Contract and is not located within an agricultural preserve. Accordingly, Project impacts due to conflicts with agricultural zoning, agricultural use, or with land subject to a Williamson Act Contract or located within an agricultural preserve would be less than significant on a cumulativelyconsiderable basis.

Although the Project site occurs within 300 feet of agriculturally-zoned property, the Project would be subject to the provisions of Riverside County Ordinance No. 625, which protects agricultural operations from nuisance complaints and encourages the development, improvement, and long-term viability of agricultural land. Other cumulative developments within the Project vicinity that are located within 300 feet of agriculturally-zoned property similarly would be subject to compliance with Ordinance No. 625. Mandatory compliance with Ordinance No. 625 would ensure that cumulatively-considerable impacts due to the conversion of off-site farmland to non-agricultural use would be less than significant.



There are no components of the Project that would involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use. Accordingly, cumulatively-considerable impacts would not occur.

The Project site and surrounding areas are not zoned for forest land (as defined in PRC § 12220(g)), timberland (as defined by PRC § 4526), or timberland zoned Timberland Production (as defined by Government Code § 51104(g)). As such, the Project has no potential to conflict with such zoning, and no cumulatively-considerable impacts would occur. In addition, the Project has no potential to result in the loss of forest land or conversion of forest land to non-forest use, and no cumulatively-considerable impacts due to the loss or conversion of forest land would occur. Additionally, there are no components of the proposed Project that could result in the conversion of forest land to non-forest use, as there are no lands used for forest land uses; thus, no cumulatively-considerable impacts would occur.

4.2.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

<u>Threshold a.: No Impact</u>. Based on the FMMP, the Project site does not contain any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. As such, the Project would not convert FMMP-designated Farmland to a non-agricultural use, and no impact would occur.

<u>Threshold b.: Less-than-Significant Impact</u>. The Project would convert two parcels zoned A-1-1 (zoning for primarily agricultural purposes) to a non-agricultural use. However, because the two parcels are already used for a non-agricultural use (residential), the Project would not impact agricultural resources on agriculturally-zoned land. Furthermore, there are no components of the proposed Project that would interfere with agricultural production on adjacent lands, as a majority of the area surrounding the Project site is developed with residential, school, church, warehouse, industry, and storage yard uses. The Project site is not subject to a Williamson Act Contract and is not located within an agricultural preserve. Accordingly, impacts would be less than significant.

<u>Threshold c.: Less-than-Significant Impact</u>. Although the Project site occurs within 300 feet of agriculturallyzoned property, the Project would be subject to the provisions of Riverside County Ordinance No. 625, which protects agricultural operations from nuisance complaints and encourages the development, improvement, and long-term viability of agricultural land. With mandatory compliance with Riverside County Ordinance No. 625, impacts due to the development of non-agricultural uses within 300 feet of agriculturally zoned property would be less than significant.

<u>Threshold d.: Less-than-Significant Impact</u>. Assuming mandatory compliance with Riverside County Ordinance No. 625, there are no components of the Project that would involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use. Impacts would be less than significant.

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

4.2.7 COUNTY REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

Applicable Regulations and Design Requirements

The following are applicable regulations and design requirements that apply to the proposed Project and that reduce or preclude impacts to agriculture. Although compliance with mandatory regulatory requirements does not technically meet CEQA's definition for mitigation, they are specified herein as requirements for the Project.

• The Project is required to comply with Riverside County Ordinance No. 625, which is a "Right-to-Farm" Ordinance. The following note shall be added to the Project's Environmental Constraints Sheet pertaining to parcels within 300 feet of the Project site that are zoned A-1-1, A-P, A-2, A-D or C/V.

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

Mitigation

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





Source(s): CDC (January 2021)



Lead Agency: Riverside County

FMMP Farmland Map

SCH No. 2022120110



4.3 <u>AIR QUALITY</u>

This Subsection 4.3 is based on two technical reports prepared by Urban Crossroads, Inc. (Urban Crossroads). The first report addresses the Project's potential to result in regional and localized air quality impacts, and is entitled, "Rider & Patterson Business Center (PPT220004) Air Quality Impact Analysis" (herein, "AQIA"), dated February 15, 2023, and included as *Technical Appendix B1* to this EIR (Urban Crossroads, 2023a). The second report addresses the Project's potential to result in health risk impacts to sensitive receptors and workers due to diesel particulate matter (DPM) from Project-related heavy-duty diesel trucks. The second report is entitled, "Rider & Patterson Business Center (PPT220004) Mobile Source Health Risk Assessment" (herein, "HRA"), dated February 15, 2023, and included as *Technical Appendix B2* to this EIR (Urban Crossroads, 2023b). Refer to Section 7.0, *References*, for a complete list of these and other reference sources.

4.3.1 EXISTING CONDITIONS

A. <u>South Coast Air Basin</u>

The Project site is located in the South Coast Air Basin (SCAB) within the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD was created by the 1977 Lewis-Presley Air Quality Management Act, which merged four county air pollution control bodies into one regional district. Under the Act, the SCAQMD is responsible for bringing air quality in areas under its jurisdiction into conformity with federal and State air quality standards. The Project site is located within the SCAB, a 6,745-square mile subregion of the SCAQMD, which includes portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County. The SCAB is bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east, and the San Diego Air Basin to the south. (Urban Crossroads, 2023a, p. 10)

B. <u>Regional Climate</u>

The regional climate has a substantial influence on air quality in the SCAB. In addition, the temperature, wind, humidity, precipitation, and amount of sunshine influence air quality. The annual average temperatures throughout the SCAB vary from the low to middle 60s degrees Fahrenheit (°F). Due to a decreased marine influence, the eastern portion of the SCAB shows greater variability in average annual minimum and maximum temperatures. January is the coldest month throughout the SCAB, with average minimum temperatures of 47°F in downtown Los Angeles and 36°F in San Bernardino. All portions of the SCAB have recorded maximum temperatures above 100°F. (Urban Crossroads, 2023a, p. 10)

Although the climate of the SCAB can be characterized as semi-arid, the air near the land surface is quite moist on most days because of the presence of a marine layer. This shallow layer of sea air is an important modifier of SCAB climate. Humidity restricts visibility in the SCAB, and the conversion of sulfur dioxide (SO₂) to sulfates (SO₄) is heightened in air with high relative humidity. The marine layer provides an environment for that conversion process, especially during the spring and summer months. The annual average relative humidity within the SCAB is 71% along the coast and 59% inland. Since the ocean effect is dominant, periods of heavy early morning fog are frequent and low stratus clouds are a characteristic feature. These effects decrease with distance from the coast. (Urban Crossroads, 2023a, p. 10)



More than 90% of the SCAB's rainfall occurs from November through April. The annual average rainfall varies from approximately 9 inches in Riverside to 14 inches in downtown Los Angeles. Monthly and yearly rainfall totals are extremely variable. Summer rainfall usually consists of widely scattered thunderstorms near the coast and slightly heavier shower activity in the eastern portion of the SCAB with frequency being higher near the coast. Due to its generally clear weather, about three-quarters of available sunshine is received in the SCAB. The remaining one-quarter is absorbed by clouds. The ultraviolet portion of this abundant radiation is a key factor in photochemical reactions. On the shortest day of the year, there are approximately 10 hours of possible sunshine, and on the longest day of the year, there are approximately 14½ hours of possible sunshine. (Urban Crossroads, 2023a, pp. 10-11)

The importance of wind to air pollution is considerable. The direction and speed of the wind determines the horizontal dispersion and transport of air pollutants. During the late autumn to early spring rainy season, the SCAB is subjected to wind flows associated with the traveling storms moving through the region from the northwest. This period also brings five to ten periods of strong, dry offshore winds, locally termed "Santa Anas" each year. During the dry season, which coincides with the months of maximum photochemical smog concentrations, the wind flow is bimodal, typified by a daytime onshore sea breeze and a nighttime offshore drainage wind. Summer wind flows are created by the pressure differences between the relatively cold ocean and the unevenly heated and cooled land surfaces that modify the general northwesterly wind circulation over southern California. Nighttime drainage begins with the radiational cooling of the mountain slopes. Heavy, cool air descends the slopes and flows through the mountain passes and canyons as it follows the lowering terrain toward the ocean. Another characteristic wind regime in the SCAB is the "Catalina Eddy," a low level cyclonic (counterclockwise) flow centered over Santa Catalina Island which results in an offshore flow to the southwest. On most spring and summer days, some indication of an eddy is apparent in coastal sections. (Urban Crossroads, 2023a, p. 11)

In the SCAB, there are two distinct temperature inversion structures that control vertical mixing of air pollution. During the summer, warm high-pressure descending (subsiding) air is undercut by a shallow layer of cool marine air. The boundary between these two layers of air is a persistent marine subsidence/inversion. This boundary prevents vertical mixing which effectively acts as an impervious lid to pollutants over the entire SCAB. The mixing height for the inversion structure is normally situated 1,000 to 1,500 feet above mean sea level (amsl). (Urban Crossroads, 2023a, p. 11)

A second inversion-type forms in conjunction with the drainage of cool air off the surrounding mountains at night followed by the seaward drift of this pool of cool air. The top of this layer forms a sharp boundary with the warmer air aloft and creates nocturnal radiation inversions. These inversions occur primarily in the winter when nights are longer and onshore flow is weakest. They are typically only a few hundred feet amsl. These inversions effectively trap pollutants, such as Nitrogen Oxides (NO_X) and carbon monoxide (CO) from vehicles, as the pool of cool air drifts seaward. Winter is therefore a period of high levels of primary pollutants along the coastline. (Urban Crossroads, 2023a, p. 11)



C. <u>Wind Patterns</u>

The distinctive climate of the Project site vicinity and the SCAB is determined by terrain and geographical location. The SCAB is located in a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean in the southwest quadrant with high mountains forming the remainder of the perimeter. Wind patterns across the south coastal region are characterized by westerly and southwesterly during the day and easterly or northeasterly breezes at night. Winds are characteristically light although the speed is somewhat greater during the dry summer months than during the rainy winter season. (Urban Crossroads, 2023a, pp. 11-12)

D. <u>Criteria Pollutants</u>

Criteria pollutants are pollutants that are regulated through the development of human health based and/or environmentally based criteria for setting permissible levels. Criteria pollutants, their typical sources, and health effects are described below.

1. Carbon Monoxide (CO)

CO is a colorless, odorless gas produced by the incomplete combustion of carbon-containing fuels, such as gasoline or wood. CO emissions come from any source that burns fuel such as automobiles, trucks, heavy construction equipment, farming equipment, and residential heating. CO concentrations tend to be highest during the winter morning, when little to no wind and surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines, unlike ozone (O₃), motor vehicles operating at slow speeds are the primary source of CO in the SCAB. The highest ambient CO concentrations are generally found near congested transportation corridors and intersections. (Urban Crossroads, 2023a, Table 2-1)

Individuals with a deficient blood supply to the heart are the most susceptible to the adverse effects of CO exposure. The effects observed include earlier onset of chest pain with exercise, and electrocardiograph changes indicative of decreased oxygen (O_2) supply to the heart. Inhaled CO has no direct toxic effect on the lungs but exerts its effect on tissues by interfering with O2 transport and competing with O_2 to combine with hemoglobin present in the blood to form carboxyhemoglobin (COHb). Hence, conditions with an increased demand for O_2 supply can be adversely affected by exposure to CO. Individuals most at risk include fetuses, patients with diseases involving heart and blood vessels, and patients with chronic hypoxemia (O_2 deficiency) as seen at high altitudes. (Urban Crossroads, 2023a, Table 2-1)

2. Sulfur Oxides (SO_x)

 SO_2 is a colorless, extremely irritating gas or liquid. It enters the atmosphere as a pollutant mainly as a result of burning high sulfur-content fuel oils and coal and from chemical processes occurring at chemical plants and refineries. When SO_2 oxidizes in the atmosphere, it forms SO_4 . Collectively, these pollutants are referred to as sulfur oxides (SO_X). Sources of SO_X include coal or oil burning power plants and industries, refineries, and diesel engines. (Urban Crossroads, 2023a, Table 2-1)



A few minutes of exposure to low levels of SO_2 can result in airway constriction in some asthmatics, all of whom are sensitive to its effects. In asthmatics, increase in resistance to air flow, as well as reduction in breathing capacity leading to severe breathing difficulties, are observed after acute exposure to SO_2 . In contrast, healthy individuals do not exhibit similar acute responses even after exposure to higher concentrations of SO_2 . Animal studies suggest that despite SO_2 being a respiratory irritant, it does not cause substantial lung injury at ambient concentrations. However, very high levels of exposure can cause lung edema (fluid accumulation), lung tissue damage, and sloughing off of cells lining the respiratory tract. Some population-based studies indicate that the mortality and morbidity effects associated with fine particles show a similar association with ambient SO_2 levels. In these studies, efforts to separate the effects of SO_2 from those of fine particles have not been successful. It is not clear whether the two pollutants act synergistically, or one pollutant alone is the predominant factor. (Urban Crossroads, 2023a, Table 2-1)

3. Nitrogen Oxides (NO_x)

Nitrogen Oxides (NO_X) consist of nitric oxide (NO), nitrogen dioxide (NO₂), and nitrous oxide (N₂O) and are formed when nitrogen (N₂) combines with O₂. Their lifespan in the atmosphere ranges from one to seven days for NO and NO₂, to 170 years for N₂O. NO_X is typically created during combustion processes and are major contributors to smog formation and acid deposition. NO_X results from any source that burns fuel such as automobiles, trucks, heavy construction equipment, farming equipment and residential heating. NO₂ is a criteria air pollutant and may result in numerous adverse health effects. It absorbs blue light, resulting in a brownish-red cast to the atmosphere and reduced visibility. Of the seven types of NO_X compounds, NO₂ is the most abundant in the atmosphere. As ambient concentrations of NO₂ are related to traffic density, commuters in heavy traffic may be exposed to higher concentrations of NO₂ than those indicated by a regional monitoring station. (Urban Crossroads, 2023a, Table 2-1)

Population-based studies suggest that an increase in acute respiratory illness, including infections and respiratory symptoms in children (not infants), is associated with long-term exposure to NO₂ at levels found in homes with gas stoves, which are higher than ambient levels found in Southern California. Increase in resistance to air flow and airway contraction is observed after short-term exposure to NO₂ in healthy subjects. Larger decreases in lung functions are observed in individuals with asthma or chronic obstructive pulmonary disease (e.g., chronic bronchitis, emphysema) than in healthy individuals, indicating a greater susceptibility of these sub-groups. In animals, exposure to levels of NO₂ considerably higher than ambient concentrations result in increased susceptibility to infections, possibly due to the observed changes in cells involved in maintaining immune functions. The severity of lung tissue damage associated with high levels of Ozone (O₃) exposure increases when animals are exposed to a combination of O₃ and NO₂. (Urban Crossroads, 2023a, Table 2-1)

4. Ozone (O₃)

O₃ is a highly reactive and unstable gas that is formed when reactive organic gases (ROG) and NO_X, both byproducts of internal combustion engine exhaust, undergo slow photochemical reactions in the presence of sunlight. ROG sources include any source that burns fuels (e.g., gasoline, natural gas, wood, oil), solvents, petroleum processing, and storage and pesticides. O₃ concentrations are generally highest during the summer



months when direct sunlight, light wind, and warm temperature conditions are favorable to the formation of this pollutant. (Urban Crossroads, 2023a, Table 2-1)

Individuals exercising outdoors, children, and people with preexisting lung disease, such as asthma and chronic pulmonary lung disease, are considered to be the most susceptible subgroups for O_3 effects. Short-term exposure (lasting for a few hours) to O_3 at levels typically observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes. Elevated O_3 levels are associated with increased school absences. In recent years, a correlation between elevated ambient O_3 levels and increases in daily hospital admission rates, as well as mortality, has also been reported. An increased risk for asthma has been found in children who participate in multiple outdoor sports and live in communities with high O_3 levels. O_3 exposure under exercising conditions is known to increase the severity of the responses described above. Animal studies suggest that exposure to a combination of pollutants that includes O_3 may be more toxic than exposure to O_3 alone. Although lung volume and resistance changes observed after a single exposure diminish with repeated exposures, biochemical and cellular changes appear to persist, which can lead to subsequent lung structural changes. (Urban Crossroads, 2023a, Table 2-1)

5. Particulate Matter (PM)

Particulate matter (PM) includes inhalable particles with diameters that are generally 10 micrometers and smaller, which are referred to as PM_{10} , and fine inhalable particles with diameters that are generally 2.5 micrometers and smaller, which are referred to as $PM_{2.5}$.

 PM_{10} is a major air pollutant consisting of tiny solid or liquid particles of soot, dust, smoke, fumes, and aerosols. Sources of PM_{10} include road dust, windblown dust, and construction. PM_{10} also is formed from other pollutants (acid rain, NO_X , SO_X , and organics), and from the incomplete combustion of any fuel. Particulate matter pollution is a major cause of reduced visibility (haze) which is caused by the scattering of light and consequently the significant reduction of air clarity. The size of the particles (10 microns or smaller, about 0.0004 inches or less) allows them to easily enter the lungs where they may be deposited, resulting in adverse health effects. Additionally, PM_{10} is a criteria air pollutant.

 $PM_{2.5}$ is a similar air pollutant to PM_{10} consisting of tiny solid or liquid particles that are 2.5 microns or smaller (often referred to as fine particles). $PM_{2.5}$ comes from fuel combustion in motor vehicles, equipment, and industrial sources, and residential and agricultural burning. $PM_{2.5}$ also is formed from reaction of other pollutants (acid rain, NO_X, SO_X, and organics). These particles are formed in the atmosphere from primary gaseous emissions that include SO₄ formed from SO₂ release from power plants and industrial facilities and nitrates that are formed from NO_X release from power plants, automobiles, and other types of combustion sources. The chemical composition of fine particles highly depends on location, time of year, and weather conditions. $PM_{2.5}$ is a criteria air pollutant. (Urban Crossroads, 2023a, Table 2-1)

A consistent correlation between elevated ambient fine particulate matter (PM_{10} and $PM_{2.5}$) levels and an increase in mortality rates, respiratory infections, number and severity of asthma attacks and the number of hospital admissions has been observed in different parts of the United States and various areas around the



world. In recent years, some studies have reported an association between long-term exposure to air pollution dominated by fine particles and increased mortality, reduction in lifespan, and an increased mortality from lung cancer. Daily fluctuations in $PM_{2.5}$ concentration levels have also been related to hospital admissions for acute respiratory conditions in children, to school and kindergarten absences, to a decrease in respiratory lung volumes in normal children, and to increased medication use in children and adults with asthma. Recent studies show lung function growth in children is reduced with long-term exposure to particulate matter. The elderly, people with preexisting respiratory or cardiovascular disease, and children appear to be more susceptible to the effects of high levels of PM_{10} and $PM_{2.5}$. (Urban Crossroads, 2023a, Table 2-1)

6. Volatile Organic Compounds (VOCs)

Volatile Organic Compounds (VOCs) are hydrocarbon compounds (any compound containing various combinations of hydrogen and carbon atoms) that exist in the ambient air. VOCs contribute to the formation of smog through atmospheric photochemical reactions and/or may be toxic. Compounds of carbon (also known as organic compounds) have different levels of reactivity; that is, they do not react at the same speed or do not form O₃ to the same extent when exposed to photochemical processes. VOCs often have an odor, and some examples include gasoline, alcohol, and the solvents used in paints. Exceptions to the VOC designation include CO, carbon dioxide (CO₂), carbonic acid, metallic carbides or carbonates, and ammonium carbonate. VOCs are a criteria pollutant since they are a precursor to O₃, which is a criteria pollutant. The terms VOC and ROG (as discussed below) are used interchangeably. (Urban Crossroads, 2023a, Table 2-1)

Organic chemicals are widely used as ingredients in household products. Paints, varnishes, and wax all contain organic solvents, as do many cleaning, disinfecting, cosmetic, degreasing, and hobby products. Fuels are made up of organic chemicals. All of these products can release organic compounds while in use, and, to some degree, when they are stored. (Urban Crossroads, 2023a, Table 2-1)

Breathing VOCs can irritate the eyes, nose, and throat; can cause difficulty breathing and nausea; and can damage the central nervous system as well as other organs. Some VOCs can cause cancer. Not all VOCs have all these health effects, though many have several. (Urban Crossroads, 2023a, Table 2-1)

7. Reactive Organic Gases (ROGs)

Similar to VOCs, ROGs are also precursors in forming O3 and consist of compounds containing methane (CH₄), ethane (C₂H₆), propane, butane, and longer chain hydrocarbons, which are typically the result of some type of combustion/decomposition process. Smog is formed when ROG and NO_X react in the presence of sunlight. ROGs are a criteria pollutant since they are a precursor to O₃, which is a criteria pollutant. The terms ROG and VOC (see above discussion) are used interchangeably. Sources of ROGs and health effects of ROGs are similar to VOCs, and are described above. (Urban Crossroads, 2023a, Table 2-1)

8. Lead (Pb)

Lead (Pb) is a heavy metal that is highly persistent in the environment and is considered a criteria pollutant. In the past, the primary source of Pb in the air was emissions from vehicles burning leaded gasoline. The major sources of Pb emissions include ore and metals processing, particularly Pb smelters; resource recovery; the



deterioration of Pb-based paints; and leaded gasoline use and piston-engine aircraft operating on leaded aviation gasoline. Other stationary sources include waste incinerators, utilities, and lead-acid battery manufacturers. (Urban Crossroads, 2023a, Table 2-1)

Fetuses, infants, and children are more sensitive than others to the adverse effects of Pb exposure. Exposure to low levels of Pb can adversely affect the development and function of the central nervous system, leading to learning disorders, distractibility, inability to follow simple commands, and lower intelligence quotients. In adults, increased Pb levels are associated with increased blood pressure. (Urban Crossroads, 2023a, Table 2-1)

9. Odor

Odor means the perception experienced by a person when one or more chemical substances in the air come into contact with the human olfactory nerves. Odors can come from many sources including animals, human activities, industry, nature, and vehicles. (Urban Crossroads, 2023a, Table 2-1)

Offensive odors can potentially affect human health in several ways. First, odorant compounds can irritate the eye, nose, and throat, which can reduce respiratory volume. Second, studies have shown that the VOCs that cause odors can stimulate sensory nerves to cause neurochemical changes that might influence health, for instance, by compromising the immune system. Finally, unpleasant odors can trigger memories or attitudes linked to unpleasant odors, causing cognitive and emotional effects such as stress. (Urban Crossroads, 2023a, Table 2-1)

E. <u>Existing Air Quality</u>

Existing air quality is measured at established SCAQMD air quality monitoring stations. Monitored air quality is evaluated in the context of ambient air quality standards. These standards are the levels of air quality that are considered safe, with an adequate margin of safety, to protect the public health and welfare. National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) currently in effect are shown in Table 4.3-1, *Ambient Air Quality Standards*. (Urban Crossroads, 2023a, p. 19)

The determination of whether a region's air quality is healthful or unhealthful is determined by comparing contaminant levels in ambient air samples to the State and federal standards. The most recent State and federal standards were updated by the California Air Resources Board (CARB) on May 4, 2016 and are presented in Table 4.3-1. The air quality in a region is considered to be in attainment by the State if the measured ambient air pollutant levels for O₃, CO, SO₂ (1 and 24 hour), NO₂, PM₁₀, and PM_{2.5} do not exceed standards. All other standards are not to be equaled or exceeded. It should be noted that the three-year period is presented for informational purposes and is not the basis for how the State assigns attainment status. Attainment status for a pollutant means that the SCAQMD meets the standards set by the U.S. Environmental Protection Agency (EPA) or the California EPA (CalEPA). Conversely, nonattainment means that an area has monitored air quality that does not meet the NAAQS or CAAQS standards. In order to improve air quality in nonattainment areas, CARB has implemented a State Implementation Plan (SIP). The SIP outlines the measures that the State



Ambient Air Quality Standards							
Dellutent	Averaging	California S	tandards ¹	National Standards ²			
Pollutant	Time	Concentration ³	Method ⁴	Primary 3.5	Secondary 3,6	Method 7	
Ozone (O ₃) ⁸	1 Hour	0.09 ppm (180 µg/m ³)	Ultraviolet Photometry	-	Same as	Ultraviolet Photometry	
	8 Hour	0.070 ppm (137 µg/m ³)		0.070 ppm (137 µg/m ³)	Primary Standard		
Respirable Particulate Matter (PM10) ⁹	24 Hour	50 µg/m ³	Gravimetric or Beta Attenuation	150 µg/m ³	Same as	Inertial Separation and Gravimetric Analysis	
	Annual Arithmetic Mean	20 µg/m ³		-	Primary Standard		
Fine Particulate Matter (PM2.5) ⁹	24 Hour	-	-	35 µg/m ³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis	
	Annual Arithmetic Mean	12 µg/m ³	Gravimetric or Beta Attenuation	12.0 µg/m ³	15 µg/m ³		
Carbon Monoxide (CO)	1 Hour	20 ppm (23 mg/m ³)	Non-Dispersive Infrared Photometry (NDIR)	35 ppm (40 mg/m ³)	—	Non-Dispersive Infrared Photometry (NDIR)	
	8 Hour	9.0 ppm (10 mg/m ³)		9 ppm (10 mg/m ³)	-		
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m ³)		-	1001		
Nitrogen	1 Hour	0.18 ppm (339 µg/m ³)	Gas Phase Chemiluminescence	100 ppb (188 µg/m ³)	-	Gas Phase Chemiluminescence	
(NO ₂) ¹⁰	Annual Arithmetic Mean	0.030 ppm (57 µg/m ³)		0.053 ppm (100 µg/m ³)	Same as Primary Standard		
Sulfur Dioxide (SO ₂) ¹¹	1 Hour	0.25 ppm (655 µg/m ³)	Ultraviolet Fluorescence	75 ppb (196 µg/m ³)	-	Ultraviolet Flourescence; Spectrophotometry (Pararosaniline Method)	
	3 Hour	_		1	0.5 ppm (1300 µg/m ³)		
	24 Hour	0.04 ppm (105 µg/m ³)		0.14 ppm (for certain areas) ¹¹	1		
	Annual Arithmetic Mean			0.030 ppm (for certain areas) ¹¹	-		
	30 Day Average	1.5 µg/m ³	Atomic Absorption	-	-		
Lead ^{12,13}	Calendar Quarter	-		1.5 μg/m ³ (for certain areas) ¹²	Same as Primary Standard	High Volume Sampler and Atomic Absorption	
	Rolling 3-Month Average	I		0.15 µg/m ³			
Visibility Reducing Particles ¹⁴	8 Hour	See footnote 14	Beta Attenuation and Transmittance through Filter Tape	No			
Sulfates	24 Hour	25 µg/m ³	Ion Chromatography	National			
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m ³)	Ultraviolet Fluorescence	Standards			
Vinyl Chloride ¹²	24 Hour	0.01 ppm (26 µg/m ³)	Gas Chromatography				
See footnotes on next page							

Table 4.3-1 Ambient Air Quality Standards

For more information please call ARB-PIO at (916) 322-2990

California Air Resources Board (5/4/16)



Table 4.3-1 Ambient Air Quality Standards (Cont'd)

- California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, and
 particulate matter (PM10, PM2.5, and visibility reducing particles), are values that are not to be exceeded. All others are not to be
 equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the
 California Code of Regulations.
- 2. National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM10, the 24 hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m³ is equal to or less than one. For PM2.5, the 24 hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the U.S. EPA for further clarification and current national policies.
- 3. Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.
- Any equivalent measurement method which can be shown to the satisfaction of the ARB to give equivalent results at or near the level of the air quality standard may be used.
- 5. National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.
- 6. National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.
- 7. Reference method as described by the U.S. EPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the U.S. EPA.
- 8. On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.
- 9. On December 14, 2012, the national annual PM2.5 primary standard was lowered from 15 µg/m³ to 12.0 µg/m³. The existing national 24-hour PM2.5 standards (primary and secondary) were retained at 35 µg/m³, as was the annual secondary standard of 15 µg/m³. The existing 24-hour PM10 standards (primary and secondary) of 150 µg/m³ also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.
- 10. To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national 1-hour standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.
- 11. On June 2, 2010, a new 1-hour SO₂ standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO₂ national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.

Note that the 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.

- 12. The ARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.
- 13. The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard (1.5 µg/m³ as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.
- 14. In 1989, the ARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.

For more information please call ARB-PIO at (916) 322-2990

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(Urban Crossroads, 2023a, Table 2-2)



will take to improve air quality. Once nonattainment areas meet the standards and additional redesignation requirements, the EPA will designate the area as a maintenance area. (Urban Crossroads, 2023a, p. 19)

F. <u>Regional Air Quality</u>

Air pollution contributes to a wide variety of adverse health effects. The EPA has established NAAQS for six of the most common air pollutants: CO, Pb, O₃, PM₁₀, PM_{2.5}, NO₂, and SO₂, which are known as criteria pollutants. The SCAQMD monitors levels of various criteria pollutants at 37 permanent monitoring stations and five single-pollutant source Pb air monitoring sites throughout the air district. On January 5, 2021, CARB posted the 2020 amendments to the state and national area designations. Table 4.3-2, *Attainment Status of Criteria Pollutants in the SCAB*, summarizes the attainment designations for the SCAB. Appendix 2.1 to the Project's AQIA (*Technical Appendix B1*) provides geographic representation of the State and federal attainment status for applicable criteria pollutants within the SCAB. (Urban Crossroads, 2023a, p. 22)

Criteria Pollutant	State Designation	Federal Designation	
O3 – 1-hour standard	Nonattainment		
O3 – 8-hour standard	Nonattainment	Nonattainment	
PM10	Nonattainment	Attainment	
PM _{2.5}	Nonattainment	Nonattainment	
со	Attainment	Unclassifiable/Attainment	
NO ₂	Attainment	Unclassifiable/Attainment	
SO ₂	Attainment	Unclassifiable/Attainment	
Pb ¹	Attainment	Unclassifiable/Attainment	

Table 4.3-2 Attainment Status of Criteria Pollutants in the SCAB

Note: See Appendix 2.1 to the Project's AQIA (*Technical Appendix* B1) for a detailed map of State/National Area Designations within the SCAB.

"--"= The national 1-hour O3 standard was revoked effective June 15, 2005.

(Urban Crossroads, 2023a, Table 2-3)

G. Local Air Quality

The SCAQMD has designated general forecast areas and air monitoring areas (referred to as Source Receptor Areas [SRAs]) throughout the district in order to provide Southern California residents about the air quality conditions. The Project site is located within the Perris Valley area (SRA 24). The Perris Valley monitoring station is located approximately 3.0 miles south of the Project site and reports air quality statistics for O₃ and PM₁₀. As the Perris Valley monitoring station does not provide data for CO, NO₂, or PM_{2.5}, the next nearest monitoring stations will be utilized. Data for CO and NO₂ was obtained from the Elsinore Valley monitoring station, located in SRA 25, approximately 10.5 miles southwest of the Project site. The nearest station for PM_{2.5} data was obtained from the Metropolitan Riverside County monitoring station which is located approximately 14.8 miles northwest of the Project site in SRA 23. It should be noted that data from Elsinore


Valley and Metropolitan Riverside County monitoring stations were utilized in lieu of the Perris Valley monitoring station only in instances where data was not available. (Urban Crossroads, 2023a, p. 22)

The most recent three years of data available is shown on Table 4.3-3, *Project Area Air Quality Monitoring Summary (2018-2020)*, which identifies the number of days ambient air quality standards were exceeded for the study area, which is considered to be representative of the local air quality at the Project site. Data for O₃, CO, NO₂, PM₁₀, and PM_{2.5} for 2018 through 2020 was obtained from the SCAQMD Air Quality Data Tables. Additionally, data for SO₂ has been omitted as attainment is regularly met in the SCAB and few monitoring stations measure SO₂ concentrations. (Urban Crossroads, 2023a, pp. 22-23)

Pollutant	Standard	Year				
Foliatant	Standard	2018	2019	2020		
O ₃						
Maximum Federal 1-Hour Concentration (ppm)		0.117	0.118	0.125		
Maximum Federal 8-Hour Concentration (ppm)		0.103	0.095	0.106		
Number of Days Exceeding State 1-Hour Standard	> 0.09 ppm	31	26	34		
Number of Days Exceeding State/Federal 8-Hour Standard	> 0.070 ppm	67	64	74		
со						
Maximum Federal 1-Hour Concentration	> 35 ppm	1.1	1.6	0.9		
Maximum Federal 8-Hour Concentration	> 20 ppm	0.8	0.7	0.7		
NO ₂						
Maximum Federal 1-Hour Concentration	> 0.100 ppm	0.041	0.038	0.044		
Annual Federal Standard Design Value		0.009	0.007	0.007		
PM10						
Maximum Federal 24-Hour Concentration (µg/m³)	$> 150 \ \mu g/m^{3}$	64	97	77		
Annual Federal Arithmetic Mean (µg/m³)		29.7	25.3	35.9		
Number of Days Exceeding Federal 24-Hour Standard	> 150 µg/m ³	0	0	0		
Number of Days Exceeding State 24-Hour Standard	> 50 µg/m ³	3	4	6		
PM _{2.5}						
Maximum Federal 24-Hour Concentration (µg/m³)	> 35 µg/m³	50.70	46.70	41.00		
Annual Federal Arithmetic Mean (µg/m³)	> 12 µg/m ³	12.41	11.13	12.63		
Number of Days Exceeding Federal 24-Hour Standard	> 35 µg/m³	2	4	4		

Table 4.3-3 Project Area Air Quality Monitoring Summary (2018-2020)

ppm= Parts per Million

 $\mu g/m^3 = Microgram per Cubic Meter$

Source: Data for O₃, CO, NO₂, PM₁₀, and PM_{2.5} was obtained from SCAQMD Air Quality Data Tables.

(Urban Crossroads, 2023a, Table 2-4)



H. <u>Regional Air Quality Improvement</u>

The Project is within the jurisdiction of the SCAQMD. In 1976, California adopted the Lewis Air Quality Management Act which created SCAQMD from a voluntary association of air pollution control districts in Los Angeles, Orange, Riverside, and San Bernardino counties. The geographic area of which SCAQMD consists of is known as the SCAB. SCAQMD develops comprehensive plans and regulatory programs for the region to attain federal standards by dates specified in federal law. The agency is also responsible for meeting state standards by the earliest date achievable, using reasonably available control measures. SCAQMD rule development through the 1970s and 1980s resulted in dramatic improvement in SCAB air quality. Nearly all control programs developed through the early 1990s relied on (i) the development and application of cleaner technology; (ii) add-on emission controls, and (iii) uniform CEQA review throughout the SCAB. Industrial emission sources have been significantly reduced by this approach and vehicular emissions have been reduced by technologies implemented at the state level by CARB. (Urban Crossroads, 2023a, p. 27)

SCAQMD created air quality management plans (AQMPs) which represent a regional blueprint for achieving healthful air on behalf of the 16 million residents of the SCAB. The 2012 AQMP states, "the remarkable historical improvement in air quality since the 1970s is the direct result of Southern California's comprehensive, multiyear strategy of reducing air pollution from all sources as outlined in its AQMPs." (Urban Crossroads, 2023a, p. 27)

Emissions of O₃, NO_X, VOC, and CO have been decreasing in the SCAB since 1975 and are projected to continue to decrease beyond 2020. These decreases result primarily from motor vehicle controls and reductions in evaporative emissions. Although vehicle miles traveled (VMT) in the SCAB continue to increase, NO_X and VOC levels are decreasing because of the mandated controls on motor vehicles and the replacement of older polluting vehicles with lower-emitting vehicles. NO_X emissions from electric utilities have also decreased due to use of cleaner fuels and renewable energy. O₃ contour maps show that the number of days exceeding the 8-hour NAAQS has generally decreased between 1980 and 2019. For 2019, there was an overall decrease in exceedance days compared with the 1980 period. However, as shown on Figure 4.3-1, *SCAB O₃ Trend*, O₃ levels have increased in the past three years due to higher temperatures and stagnant weather conditions. Notwithstanding, O₃ levels in the SCAB have decreased substantially over the last 30 years with the current maximum measured concentrations being approximately one-third of concentrations within the late 1970's. (Urban Crossroads, 2023a, pp. 27-28)

The overall trends of PM_{10} and $PM_{2.5}$ levels in the air (not emissions) show an overall improvement since 1975. Direct emissions of PM_{10} have remained somewhat constant in the SCAB and direct emissions of $PM_{2.5}$ have decreased slightly since 1975. Area wide sources (fugitive dust from roads, dust from construction, and other sources) contribute the greatest amount of direct particulate matter emissions. (Urban Crossroads, 2023a, p. 28)





As with other pollutants, the most recent PM_{10} statistics show an overall improvement as illustrated in Figure 4.3-2, *SCAB Average 24-Hour Concentration PM*₁₀ *Trend (Based on Federal Standard)*, and Figure 4.3-3, *SCAB Annual Average Concentration PM*₁₀ *Trend (Based on State Standard)*. During the period for which data are available, the 24-hour national annual average concentration for PM₁₀ decreased by approximately 46%, from 103.7 microgram per cubic meter (µg/m³) in 1988 to 55.5 µg/m³ in 2020. Although the values are below the federal standard, it should be noted that there are days within the year where the concentrations would exceed the threshold. The 24-hour state annual average for emissions for PM₁₀, have decreased by approximately 64%, from 93.9 µg/m³ in 1989 to 33.9 µg/m³ in 2020. Although data in the late 1990's show some variability, this is probably due to the advances in meteorological science rather than a change in emissions. Similar to the ambient concentrations, the calculated number of days above the 24-hour PM₁₀ standards has also shown an overall drop. (Urban Crossroads, 2023a, pp. 28-29)

Figure 4.3-4, *SCAB 24-Hour Average Concentration* $PM_{2.5}$ *Trend (Based on Federal Standard)*, and Figure 4.3-5, *SCAB Annual Average Concentration* $PM_{2.5}$ *Trend (Based on State Standard)*, shows the most recent 24-hour average $PM_{2.5}$ concentrations in the SCAB from 1999 through 2020. Overall, the national and state annual average concentrations have decreased by almost 50% and 31% respectively. It should be noted that the SCAB is currently designated as nonattainment for the state and federal $PM_{2.5}$ standards. (Urban Crossroads, 2023a, p. 30)

⁽Urban Crossroads, 2023a, Table 2-5)







Source: 2020 CARB, iADAM: Top Four Summary: PM10 24-Hour Averages (1988-2020)

¹Some years have been omitted from the table as insufficient data (or no) data has been reported. Years with reported value of "0" have also been omitted.

(Urban Crossroads, 2023a, Table 2-6)



Figure 4.3-3 SCAB Annual Average Concentration PM₁₀ Trend (Based on State Standard)

Source: 2020 CARB, iADAM: Top Four Summary: PM10 24-Hour Averages (1988-2020)

¹ Some years have been omitted from the table as insufficient data (or no) data has been reported. Years with reported value of "0" have also been omitted.

(Urban Crossroads, 2023a, Table 2-7)







Source: 2020 CARB, iADAM: Top Four Summary: PM25 24-Hour Averages (1999-2020)

¹ Some years have been omitted from the table as insufficient data (or no) data has been reported. Years with reported value of "0" have also been omitted.

(Urban Crossroads, 2023a, Table 2-8)



Figure 4.3-5 SCAB Annual Average Concentration PM_{2.5} Trend (Based on State Standard)

¹Some years have been omitted from the table as insufficient data (or no) data has been reported. Years with reported value of "0" have also been omitted.

(Urban Crossroads, 2023a, Table 2-9)

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While the 2012 AQMP PM_{10} attainment demonstration and the 2015 associated supplemental SIP submission indicated that attainment of the 24-hour standard was predicted to occur by the end of 2015, it could not anticipate the effect of the ongoing drought on the measured $PM_{2.5}$. (Urban Crossroads, 2023a, p. 31)

The 2006 to 2010 base period used for the 2012 attainment demonstration had near-normal rainfall. While the trend of PM_{2.5}-equivalent emission reductions continued through 2015, the severe drought conditions contributed to the PM_{2.5} increases observed after 2012. As a result of the disrupted progress toward attainment of the federal 24-hour PM_{2.5} standard, SCAQMD submitted a request and the EPA approved, in January 2016, a "bump up" to the nonattainment classification from "moderate" to "serious," with a new attainment deadline as soon as practicable, but not beyond December 31, 2019. As of March 14, 2019, the EPA approved portions of a SIP revision submitted by California to address CAA requirements for the 2006 24-hour PM_{2.5} NAAQS in the Los Angeles-SCAB Serious PM_{2.5} nonattainment area. The EPA also approved 2017 and 2019 motor vehicle emissions budgets for transportation conformity purposes and inter-pollutant trading ratios for use in transportation conformity analyses. (Urban Crossroads, 2023a, p. 31)

In August 2022 the SCAQMD released the draft 2022 AQMP and the public comment period closed on October 18, 2022. The SCAQMD Governing Board adopted the draft 2022 AQMP at its December 2, 2022, meeting. The draft 2022 AQMP requires CARB's adoption before submittal for U.S. EPA's final approval, which is expected to occur sometime in 2023. The 2022 AQMP continues to evaluate current integrated strategies and control measures to meet the NAAQS, particularly the EPA's strengthened ozone standard. These approaches include the use of incentive programs, recognizing existing co-benefit programs from other sectors, and developing a strategy with fair-share reductions at the federal, State, and local levels. Similar to the 2016 AQMP, the 2022 AQMP incorporates scientific and technological information and planning assumptions, including the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS) and updated emission inventory methodologies for various source categories (Urban Crossroads, 2023a, p. 31)

The most recent CO concentrations in the SCAB are shown in Figure 4.3-6, *SCAB 8-Hour Average Concentration CO Trend*. CO concentrations in the SCAB have decreased markedly – a total decrease of more about 80% in the peak 8-hour concentration from 1986 to 2012. It should be noted 2012 is the most recent year where 8-hour CO averages and related statistics are available in the SCAB. The number of exceedance days has also declined. The entire SCAB is now designated as attainment for both the state and national CO standards. Ongoing reductions from motor vehicle control programs should continue the downward trend in ambient CO concentrations. (Urban Crossroads, 2023a, p. 31)

Part of the control process of the SCAQMD's duty to greatly improve the air quality in the SCAB is the uniform CEQA review procedures required by SCAQMD's CEQA Air Quality Handbook (1993) (1993 CEQA Handbook). The single threshold of significance used to assess Project direct and cumulative impacts has in fact "worked" as evidenced by the track record of the air quality in the SCAB dramatically improving over the course of the past decades. As stated by the SCAQMD, the District's thresholds of significance are based on factual and scientific data and are therefore appropriate thresholds of significance to use for the proposed Project. (Urban Crossroads, 2023a, p. 32)



Figure 4.3-6 SCAB 8-Hour Average Concentration CO Trend

The most recent NO₂ data for the SCAB is shown in Figure 4.3-7, *SCAB 1-Hour Average NO₂ Concentration Trend (Based on Federal Standard)*, and Figure 4.3-8, *SCAB 1-Hour Average NO₂ Concentration Trend (Based on State Standard)*. Over the last 50 years, NO₂ values have decreased significantly; the peak 1-hour national and state averages for 2020 is approximately 80% lower than what it was during 1963. The SCAB attained the State 1-hour NO₂ standard in 1994, bringing the entire state into attainment. A new state annual average standard of 0.030 ppm was adopted by CARB in February 2007. The new standard is just barely exceeded in the SCAQMD. NO₂ is formed from NO_X emissions, which also contribute to O₃. As a result, the majority of the future emission control measures would be implemented as part of the overall O₃ control strategy. Many of these control measures would target mobile sources, which account for more than three-quarters of California's NO_X emissions. These measures are expected to bring the SCAQMD into attainment of the state annual average standard. (Urban Crossroads, 2023a, p. 32)

I. <u>Toxic Air Contaminants (TAC) Trends</u>

In 1984, as a result of public concern for exposure to airborne carcinogens, CARB adopted regulations to reduce the amount of Toxic Air Contaminants (TAC) emissions resulting from mobile and area sources, such as cars, trucks, stationary products, and consumer products. According to the Ambient and Emission Trends of Toxic Air Contaminants in California journal article that was prepared for CARB, results show that between 1990 and 2012, ambient concentration and emission trends for the seven TACs responsible for most of the

Source: 2020 CARB, iADAM: Top Four Summary: CO 8-Hour Averages (1986-2012) ¹ The most recent year where 8-hour concentration data is available is 2012.

⁽Urban Crossroads, 2023a, Table 2-10)







Source: 2020 CARB, iADAM: Top Four Summary: CO 1-Hour Averages (1963-2020)

(Urban Crossroads, 2023a, Table 2-11)



Figure 4.3-8 SCAB 1-Hour Average NO₂ Concentration Trend (Based on State Standard)

Source: 2020 CARB, iADAM: Top Four Summary: CO 1-Hour Averages (1963-2020)

(Urban Crossroads, 2023a, Table 2-12)

known cancer risk associated with airborne exposure in California have declined significantly (between 1990 and 2012). The seven TACs studied include those that are derived from mobile sources: diesel particulate

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matter (DPM), benzene (C₆H₆), and 1,3-butadiene (C₄H₆); those that are derived from stationary sources: perchloroethylene (C₂Cl₄) and hexavalent chromium (Cr(VI)); and those derived from photochemical reactions of emitted VOCs: formaldehyde (CH₂O) and acetaldehyde (C₂H₄O)¹. The decline in ambient concentration and emission trends of these TACs are a result of various regulations CARB has implemented to address cancer risk. (Urban Crossroads, 2023a, pp. 33-34)

Mobile Source TACs

CARB introduced two programs that aimed at reducing mobile emissions for light and medium duty vehicles through vehicle emissions controls and cleaner fuel. In California, light-duty vehicles sold after 1996 are equipped with California's second-generation On-Board Diagnostic (OBD-II) system. The OBD-II system monitors virtually every component that can affect the emission performance of the vehicle to ensure that the vehicle remains as clean as possible over its entire life and assists repair technicians in diagnosing and fixing problems with the computerized engine controls. If a problem is detected, the OBD-II system illuminates a warning lamp on the vehicle instrument panel to alert the driver. This warning lamp typically contains the phrase "Check Engine" or "Service Engine Soon." The system will also store important information about the detected malfunction so that a repair technician can accurately find and fix the problem. CARB has recently developed similar OBD requirements for heavy-duty vehicles over 14,000 pounds (lbs). CARB's phase II Reformulated Gasoline Regulation (RFG-2), adopted in 1996, also led to a reduction of mobile source emissions. Through such regulations, benzene levels declined 88% from 1990-2012. 1,3-Butadiene concentrations also declined 85% from 1990-2012 as a result of the use of reformulated gasoline and motor vehicle regulations. (Urban Crossroads, 2023a, p. 34)

In 2000, CARB's Diesel Risk Reduction Plan (DRRP) recommended the replacement and retrofit of dieselfueled engines and the use of ultra-low-sulfur (<15 ppm) diesel fuel. As a result of these measures, DPM concentrations have declined 68% since 2000, even though the state's population increased 31% and the amount of diesel vehicles miles traveled increased 81%, as shown on Figure 4.3-9, *DPM and Diesel Vehicle Miles Trend*. With the implementation of these diesel-related control regulations, CARB expects a DPM decline of 71% for 2000-2020. (Urban Crossroads, 2023a, p. 34)

Diesel Regulations

CARB and the Ports of Los Angeles and Long Beach (POLA and POLB) have adopted several iterations of regulations for diesel trucks that are aimed at reducing DPM. More specifically, CARB Drayage Truck Regulation, CARB statewide On-road Truck and Bus Regulation, and the Ports of Los Angeles and Long Beach Clean Truck Program (CTP) require accelerated implementation of "clean trucks" into the statewide truck fleet. In other words, older more polluting trucks will be replaced with newer, cleaner trucks as a function of these regulatory requirements. (Urban Crossroads, 2023a, p. 35)

¹ It should be noted that ambient DPM concentrations are not measured directly. Rather, a surrogate method using the coefficient of haze (COH) and elemental carbon (EC) is used to estimate DPM concentrations.





Figure 4.3-9 DPM and Diesel Vehicle Miles Trend

(Urban Crossroads, 2023a, Exhibit 2-A)

Moreover, the average statewide DPM emissions for Heavy Duty Trucks (HDT), in terms of grams of DPM generated per mile traveled, would dramatically be reduced due to the aforementioned regulatory requirements. Diesel emissions identified in this analysis would therefore overstate future DPM emissions since not all the regulatory requirements are reflected in the modeling. (Urban Crossroads, 2023a, p. 35)

Cancer Risk Trends

Based on information available from CARB, overall cancer risk throughout the SCAB has had a declining trend since 1990. In 1998, following an exhaustive 10-year scientific assessment process, CARB identified particulate matter from diesel-fueled engines as a toxic air contaminant. The SCAQMD initiated a comprehensive urban toxic air pollution study called the Multiple Air Toxics Exposure Study (MATES). DPM accounts for more than 70% of the cancer risk. (Urban Crossroads, 2023a, p. 35)

In January 2018, as part of the overall effort to reduce air toxics exposure in the SCAB, SCAQMD began conducting the MATES V Program. MATES V field measurements were conducted at ten fixed sites (the same sites selected for MATES III and IV) to assess trends in air toxics levels. MATES V also included measurements of ultrafine particles (UFP) and black carbon (BC) concentrations, which can be compared to the UFP levels measured in MATES IV. The final report for the MATES V study was published August 2021. In addition to new measurements and updated modeling results, several key updates were implemented in MATES V. First, MATES V estimates cancer risks by taking into account multiple exposure pathways, which includes inhalation and non-inhalation pathways. This approach is consistent with how cancer risks are



estimated in SCAQMD's programs such as permitting, Air Toxics Hot Spots (AB2588), and CEQA. Previous MATES studies quantified the cancer risks based on the inhalation pathway only. Second, along with cancer risk estimates, MATES V includes information on the chronic non-cancer risks from inhalation and non-inhalation pathways for the first time. Cancer risks and chronic non-cancer risks from MATES II through IV measurements have been re-examined using current Office of Environmental Health Hazard Assessment (OEHHA) and CalEPA risk assessment methodologies and modern statistical methods to examine the trends over time. (Urban Crossroads, 2023a, p. 36)

MATES-V calculated cancer risks based on monitoring data collected at ten fixed sites within the SCAB. None of the fixed monitoring sites are within the local area of the Project site. However, MATES-V has extrapolated the excess cancer risk levels throughout the SCAB by modeling the specific grids. The Project is located within a quadrant of the geographic grid of the MATES-V model which predicted a cancer risk of 293 in one million for the area containing the Project site. DPM is included in this cancer risk along with all other TAC sources. As in previous MATES iterations, DPM is the largest contributor to overall air toxics cancer risk. However, the average levels of DPM in MATES V are 53% lower at the 10 monitoring sites compared to MATES IV. Cumulative Project generated TACs are limited to DPM. (Urban Crossroads, 2023a, p. 36)

J. <u>Existing Project Site Project Conditions</u>

The southern portion of the Project site is currently occupied by residential uses. The estimated operationsource emissions from the existing development are summarized in Table 4.3-4, *Emissions from Existing Development*. Detailed operation model outputs are presented in Appendix 3.1 of the Project's AQIQ (*Technical Appendix B1*). (Urban Crossroads, 2023a, p. 41)

Courses.	Emissions (<u>lbs</u> /day)						
Source	voc	NOx	со	SOx	PM10	PM _{2.5}	
Summer							
Mobile Source	0.12	0.12	1.09	0.00	0.09	0.02	
Area Source	0.93	0.06	1.70	0.00	0.21	0.21	
Energy Source	0.00	0.03	0.01	0.00	0.00	0.00	
Total Maximum Daily Emissions	1.05	0.21	2.80	0.00	0.30	0.23	
		Winter					
Mobile Source	0.12	0.13	0.91	0.00	0.09	0.02	
Area Source	0.92	0.06	1.53	0.00	0.21	0.21	
Energy Source	0.00	0.03	0.01	0.00	0.00	0.00	
Total Maximum Daily Emissions	1.04	0.22	2.45	0.00	0.30	0.23	

Table 4.3-4	Emissions from Existing Development
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Source: CalEEMod existing operational-source emissions are presented in Appendix 3.1.

(Urban Crossroads, 2023a, Table 3-1)



K. <u>Sensitive Receptors</u>

Receptors in the Project study area are described below and shown on Figure 4.3-10, *Sensitive Receptors Locations – Construction*, and Figure 4.3-11, *Sensitive Receptors Locations – Operation*. Localized air quality impacts were evaluated at sensitive receptor land uses nearest the Project site. Consistent with the Project's Noise Impact Analysis ("NIA"; EIR *Technical Appendix J*), all distances are measured from the Project site boundary to the outdoor living areas (e.g., backyards) or at the building facade, whichever is closer to the Project site. The nearest residential receptors are located to the west of the Project site. (Urban Crossroads, 2023a, pp. 54-55)

- R1: Location R1 represents the existing residence at 19971 Patterson Avenue, approximately 208 feet north of the Project site and approximately 127 feet north of Project construction activities.
 R1 is placed in the private outdoor living areas (backyard) facing the Project site.
- R2: Location R2 represents the existing residence at 20050 Patterson Avenue, approximately 155 feet east of the Project site and approximately 111 feet west of Project construction activities.
 R2 is placed in the private outdoor living areas (backyard) facing the Project site.
- R3: Location R3 represents the existing residence at 20210 Patterson Avenue, approximately 140 feet east of the Project site and approximately 86 feet east of Project construction activities. R3 is placed in the private outdoor living areas (backyard) facing the Project site.
- R4: Location R4 represents the existing residence at 20281 Patterson Avenue, approximately 185 feet south of the Project site and approximately 141 feet south of Project construction activities. R4 is placed in the private outdoor living areas (backyard) facing the Project site.
- R5: Location R5 represents the existing residence at 23246 Sunny Canyon Street located immediately adjacent to the southwestern portion of the site boundary. The private outdoor living area at R5 is considered to have a zero (0.0) foot separation from Project construction activities.
- R6: Location R6 represents the existing residence at 23249 Norrisgrove Avenue located immediately adjacent to the northwestern portion of the site boundary. The private outdoor living area at R6 is considered to have a zero (0.0) foot separation from Project construction activities.
- R7: Location R7 represents an industrial use approximately 256 feet northeast of the Project site and approximately 114 feet north of Project construction activities.
- R8: Location R8 represents the Small Wonder Family Childcare, located approximately 182 feet west of the Project site and 182 feet from Project construction activities.

The SCAQMD recommends that the nearest sensitive receptor be considered when determining the Project's potential to cause an individual a cumulatively significant impact. The nearest land use where an individual could remain for 24 hours to the Project site has been used to determine localized construction and operational air quality impacts for emissions of PM₁₀ and PM_{2.5} (since PM₁₀ and PM_{2.5} thresholds are based on a 24-hour





Sensitive Receptors Locations - Construction

S





Sensitive Receptors Locations - Operation

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averaging time). The nearest receptors used for evaluation of localized impacts of PM_{10} and $PM_{2.5}$ are the existing residences at 23246 Sunny Canyon Street and 23249 Norrisgrove Avenue, represented by R5 and R6, adjacent to the Project site (less than 10 meters) west of the Project site. (Urban Crossroads, 2023a, p. 55)

Consistent with SCAQMD's Localized Significance Threshold (LST) Methodology, the nearest commercial/industrial use to the Project site is used to determine construction and operational LST air impacts for emissions of NO_X and CO as the averaging periods for these pollutants are shorter (8 hours or less) and it is reasonable to assumed that an individual could be present at these sites for periods of one to 8 hours. As there are no commercial/industrial uses located at a closer distance than the existing residential homes at 23246 Sunny Canyon Street and 23249 Norrisgrove Avenue, these same receptors will be used for evaluation of localized of NO_X and CO impacts. It should be noted that the *LST Methodology* explicitly states that "It is possible that a project may have receptors closer than 25 meters. Projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters." As such a 25-meter receptor distance will be used for evaluation of localized PM₁₀, PM_{2.5}, NO_X, and CO. (Urban Crossroads, 2023a, p. 55)

4.3.2 APPLICABLE REGULATORY REQUIREMENTS

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

A. <u>Federal Regulations</u>

1. Federal Clean Air Act

The Clean Air Act (CAA; 42 U.S.C. § 7401 et seq.) is the comprehensive federal law that regulates air emissions from stationary and mobile sources. Among other things, this law authorizes Environmental Protection Agency (EPA) to establish NAAQS to protect public health and public welfare and to regulate emissions of hazardous air pollutants, which include O₃, CO, NO_x, SO₂, PM₁₀, PM_{2.5}, and lead. (EPA, 2022a)

One of the goals of the CAA was to set and achieve NAAQS in every state by 1975 in order to address the public health and welfare risks posed by certain widespread air pollutants. The setting of these pollutant standards was coupled with directing the states to develop SIPs, applicable to appropriate industrial sources in the State, in order to achieve these standards. The CAA was amended in 1977 and 1990 primarily to set new goals (dates) for achieving attainment of NAAQS since many areas of the country had failed to meet the deadlines. (EPA, 2022a)

The sections of the federal CAA most directly applicable to the development of the Project site include Title I (Non-Attainment Provisions) and Title II (Mobile Source Provisions). Title I provisions address the urban air pollution problems of O_3 (smog), CO, and PM_{10} . Specifically, it clarifies how areas are designated and redesignated "attainment." It also allows EPA to define the boundaries of "nonattainment" areas: geographical areas whose air quality does not meet federal air quality standards designed to protect public health (EPA, 2022b). Mobile source emissions are regulated in accordance with the CAA Title II provisions. These standards are intended to reduce tailpipe emissions of hydrocarbons, CO, and NO_X on a phased-in basis that began in



model year 1994. Automobile manufacturers also are required to reduce vehicle emissions resulting from the evaporation of gasoline during refueling. These provisions further require the use of cleaner burning gasoline and other cleaner burning fuels such as methanol and natural gas. (EPA, 2022c)

Section 112 of the CAA addresses emissions of hazardous air pollutants. Prior to 1990, the CAA established a risk-based program under which only a few standards were developed. The 1990 CAA Amendments revised Section 112 to first require issuance of technology-based standards for major sources and certain area sources. "Major sources" are defined as a stationary source or group of stationary sources that emit or have the potential to emit 10 tons per year or more of a hazardous air pollutant or 25 tons per year or more of a combination of hazardous air pollutants. An "area source" is any stationary source that is not a major source. (EPA, 2022a)

For major sources, Section 112 requires that EPA establish emission standards that require the maximum degree of reduction in emissions of hazardous air pollutants. These emission standards are commonly referred to as "maximum achievable control technology" or "MACT" standards. Eight years after the technology-based MACT standards are issued for a source category, EPA is required to review those standards to determine whether any residual risk exists for that source category and, if necessary, revise the standards to address such risk. (EPA, 2022a)

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) are stationary source standards for hazardous air pollutants (HAPs). HAPs are those pollutants that are known or suspected to cause cancer or other serious health effects, such as reproductive effects or birth defects, or adverse environmental effects. The EPA develops national enforcement initiatives that focus on significant environmental risks and noncompliance patterns. For fiscal years 2014 to 2016, the Cutting Hazardous Air Pollutants National Initiatives Strategy focuses on categories of sources that emit HAPs. (EPA, 2020d)

Sources subject to NESHAP are required to perform an initial performance test to demonstrate compliance. To demonstrate continuous compliance, sources are generally required to monitor control device operating parameters which are established during the initial performance test. Sources may also be required to install and operate continuous emission monitors to demonstrate compliance. Consistent with EPA's Clean Air Act Stationary Source Compliance Monitoring Strategy, NESHAP sources that meet the CAA definition of "major source" generally receive a full compliance evaluation by the State or regional office at least once every two years. (EPA, 2020d)

B. <u>State Regulations</u>

1. California Clean Air Act (CCAA)

The California Clean Air Act (CCAA) establishes numerous requirements for district plans to attain State ambient air quality standards for criteria air contaminants. The CCAA mandates achievement of the maximum degree of emissions reductions possible from vehicular and other mobile sources in order to attain the State's ambient air quality standards, the CAAQS, by the earliest practical date. The CARB established the CAAQS for all pollutants for which the federal government has NAAQS and, in addition, established standards for



sulfates, visibility, hydrogen sulfide, and vinyl chloride. Generally, the CAAQS are more stringent than the NAAQS. For districts with serious air pollution, its attainment plan should include the following: no net increase in emissions from new and modified stationary sources; and best available retrofit technology for existing sources. (SCAQMD, n.d.)

2. Air Toxic Hot Spots Act

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

3. Air Quality Management Planning

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

4. California Air Resources Board Rules

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

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



5. South Coast Air Quality Management District Rules

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

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

6. Truck & Bus Regulation

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

7. Advanced Clean Truck Regulation

In June 2020, CARB adopted a new rule requiring truck manufacturers to transition from diesel trucks and vans to electric zero-emission trucks beginning in 2024. By 2045, every new truck sold in California will be required to be zero-emission. Manufacturers who certify Class 2b-8 chassis or complete vehicles with combustion engines would be required to sell zero-emission trucks as an increasing percentage of their annual California sales from 2024 to 2035. By 2035, zero-emission truck/chassis sales would need to be 55% of Class 2b - 3 truck sales, 75% of Class 4 - 8 straight truck sales, and 40% of truck tractor sales. CARB reports that as of 2020, most commercially-available models of zero-emission vans, trucks, and buses operate less than 100 miles per day. Commercial availability of electric-powered long-haul trucks is very limited. However, as technology advances over the next 20 years, zero-emission trucks will become suitable for more applications, and several truck manufacturers have announced plans to introduce market-ready zero-emission trucks in the future. (CARB, 2021)

8. Senate Bill 535 (SB 535) – Disadvantaged Communities

Senate Bill 535 ("SB 535"; De León, Chapter 830, 2012) recognizes the potential vulnerability of low-income and disadvantaged communities to poor air quality. Disadvantaged communities in California are specifically



targeted for investment of proceeds from the State's cap-and-trade program. These investments are aimed at improving public health, quality of life, and economic opportunity in California's most burdened communities while at the same time reducing pollution that causes climate change. Authorized by the California Global Warming Solutions Act of 2006 (Assembly Bill 32 (AB 32)), the State's cap-and-trade program is one of several strategies that California uses to reduce greenhouse gas (GHG) emissions that cause climate change. The funds must be used for programs that further reduce emissions of GHGs. SB 535 requires that 25% of the proceeds from the Greenhouse Gas Reduction Fund go to projects that provide a benefit to disadvantaged communities. The CalEPA is charged with the duty to identify disadvantaged communities. CalEPA bases its identification of these communities on geographic, socioeconomic, public health, and environmental hazard criteria (Health and Safety Code, section 39711, subsection (a)). In this capacity, CalEPA currently defines a disadvantaged community, from an environmental hazard and socioeconomic standpoint, as a community that scores within the top 25% of the census tracts, as analyzed by the California Communities Environmental Health Screening Tool Version 3.0 (CalEnviroScreen). (OEHHA, 2022)

9. Senate Bill 1000 (SB 1000) – Environmental Justice in Local Land Use Planning

In an effort to address the inequitable distribution of pollution and associated health effects in low-income communities and communities of color, the Legislature passed, and Governor Brown signed, Senate Bill 1000 (SB 1000) in 2016, requiring local governments to identify environmental justice communities (called "disadvantaged communities") in their jurisdictions and address environmental justice in their general plans. This new law has several purposes, including to facilitate transparency and public engagement in local governments' planning and decision-making processes, reduce harmful pollutants and the associated health risks in environmental justice communities, and promote equitable access to health-inducing benefits, such as healthy food options, housing, public facilities, and recreation. SB 1000 requires environmental justice elements to identify objectives and policies to reduce unique or compounded health risks in disadvantaged communities. Generally, environmental justice elements will include policies to reduce the community's exposure to pollution through air quality improvement. SB 1000 affirms the need to integrate environmental justice principles into the planning process to prioritize improvements and programs that address the needs of disadvantaged communities. (OAG, n.d.) The County of Riverside incorporated environmental justice polices into the General Plan Healthy Communities Element in September 2021. The environmental justice policies apply to the Environmental Justice Communities identified in the Land Use Element Figure LU-4.1. The Project site is within an Environmental Justice Community boundary.

10. Assembly Bill 617 (AB 617)

Assembly Bill 617 (AB 617) was enacted into law in 2017, and relates to criteria air pollutants and toxic air contaminants from sources other than vehicles. In response to AB 617, the CARB established the Community Air Protection Program (CAPP). CAPP's focus is to reduce exposure in communities most impacted by air pollution. Communities around the State are working together to develop and implement new strategies to measure air pollution and reduce health impacts. This first-of-its-kind Statewide effort includes community air monitoring and community emissions reduction programs. In addition, the Legislature appropriated funding to support early actions to address localized air pollution through targeted incentive funding to deploy cleaner technologies in these communities, as well as grants to support community participation in the AB 617 process.



AB 617 also includes new requirements for accelerated retrofit of pollution controls on industrial sources, increased penalty fees, and greater transparency and availability of air quality and emissions data, which will help advance air pollution control efforts throughout the State. This effort provides an opportunity to continue to enhance air quality planning efforts and better integrate community, regional, and State level programs to provide clean air. (CARB, n.d.)

C. <u>Local Regulations</u>

1. Riverside County General Plan Air Quality Element

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

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

AQ 1.4: Coordinate with the SCAQMD and [Mojave Desert Air Quality Management District (MDAQMD)] to ensure that all elements of air quality plans regarding reduction of air pollutant emissions are being enforced.

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

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

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

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

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

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

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

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



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

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

4.3.3 BASIS FOR DETERMINING SIGNIFICANCE

A. <u>Thresholds of Significance</u>

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

- Would the project conflict with or obstruct implementation of the applicable air quality plan?
- Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?
- Would the project expose sensitive receptors to substantial pollutant concentrations?
- Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

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

- a. Conflict with or obstruct implementation of the applicable air quality plan;
- b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard;
- *c. Expose sensitive receptors, which are located within one (1) mile of the project site, to substantial pollutant concentrations; or*
- *d.* Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

The significance thresholds set forth in Riverside County's Environmental Assessment Checklist were used to evaluate the significance of the proposed Project's impacts due to air quality emissions. Riverside County also has chosen to apply SCAQMD significance thresholds, as presented in SCAQMD's CEQA Air Quality Significance Thresholds (April 2019), to evaluate the Project's air quality impacts against the above thresholds.



Accordingly, Threshold a., which addresses Section III.a of Appendix G to the State CEQA Guidelines, evaluates whether the proposed Project would conflict with SCAQMD's 2022 AQMP, which addresses State and federal requirements under the CAA. A conflict with the AQMP standards and requirements would inhibit the SCAQMD's ability to achieve State and federal standards for air quality.

Threshold b. addresses Section III.b of Appendix G to the CEQA Guidelines, and emissions generated by a development project would be significant under Threshold b. if emissions are projected to exceed the Regional Thresholds established by the SCAQMD for criteria pollutants.

Threshold c. addresses Section III.c of Appendix G to the State CEQA Guidelines. Under this threshold, impacts would be potentially significant if emissions are projected to exceed the LSTs established by the State of California and the SCAQMD for criteria pollutants, if the Project would cause or contribute to CO "Hot Spots," or if the Project were to result in cancer or health hazard impacts that exceed the SCAQMD thresholds of significance.

Threshold d. evaluates Section III.d of Appendix G of the State CEQA Guidelines. SCAQMD Rule 402 ("Nuisance") and California Health & Safety Code, Division 26, Part 4, Chapter 3, Section 41700 prohibit the emission of any material which causes nuisance to a considerable number of persons or endangers the comfort, health, or safety of the public, including odors. The potential to violate Rule 402 or § 41700 is used herein as a basis to consider a project's odors or other emissions to be significant and require feasible mitigation measures.

B. <u>Regional Thresholds</u>

As noted above, the SCAQMD has developed Regional Thresholds of significance for other regulated pollutants, as summarized in Table 4.3-5, *Maximum Daily Regional Emissions Thresholds*. The SCAQMD's CEQA Air Quality Significance Thresholds (April 2019) indicate that any projects in the SCAB with daily emissions that exceed any of the indicated thresholds should be considered as having an individually and cumulatively-considerable significant air quality impact. (Urban Crossroads, 2023a, p. 43)

Pollutant	Regional Construction Threshold	Regional Operational Thresholds
NOx	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM ₁₀	150 lbs/day	150 lbs/day
PM _{2.5}	55 lbs/day	55 lbs/day
SOx	150 lbs/day	150 lbs/day
со	550 lbs/day	550 lbs/day
Pb	3 lbs/day	3 lbs/day

Table 4.3-5 Maximum Daily Regiona	I Emissions Thresholds
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lbs/day = Pounds Per Day

(Urban Crossroads, 2023a, Table 4-1)



C. Localized Thresholds

1. Localized Thresholds for Construction Activity

As described in further detail in Subsection 4.6 of the Project's AQIA (*Technical Appendix B1*), up to 5 acres can be disturbed per day during Project demolition, site preparation, and grading activities. For the purposes of analysis, and as a conservative measure, the SCAQMD look-up tables of 5 acres are used to determine LSTs for site preparation and grading. The LST lookup tables can be used as a conservative measure to show that even if the daily emissions from all Project construction activities were emitted on a 5-acre site (and therefore concentrated over a smaller area, resulting in greater site adjacent concentrations), and the level of emissions are below the SCAQMD look-up tables for a 5-acre site, then a more detailed evaluation is not necessary. The thresholds presented in Table 4.3-6, *Maximum Daily Localized Emissions Thresholds (Construction)*, were calculated by interpolating the threshold values for the Project's disturbed acreage. (Urban Crossroads, 2023a, pp. 53, 58)

Construction Activity	Construction Localized Thresholds						
Construction Activity	NOx	со	PM10	PM _{2.5}			
Demolition	170 lbs/day	883 lbs/day	7 lbs/day	4 lbs/day			
Site Preparation	270 lbs/day	1,577 lbs/day	13 lbs/day	8 lbs/day			
Grading	237 lbs/day	1,346 lbs/day	11 lbs/day	7 lbs/day			

 Table 4.3-6
 Maximum Daily Localized Emissions Thresholds (Construction)

Source: Localized Thresholds presented in this table are based on the SCAQMD Final LST Methodology, July 2008 (Urban Crossroads, 2023a, Table 4-11)

2. Localized Thresholds for Project Operations

The LST Methodology provides look-up tables for sites with an area with daily disturbance of 5 acres or less. For projects that exceed 5 acres, the 5-acre LST look-up tables can be used as a screening tool to determine whether pollutants require additional detailed analysis. This approach is conservative as it assumes that all onsite emissions associated with the Project would occur within a concentrated 5-acre area. This screening method would therefore over-predict potential localized impacts, because by assuming that on-site operational activities are occurring over a smaller area, the resulting concentrations of air pollutants are more highly concentrated once they reach the smaller site boundary than they would be for activities if they were spread out over a larger surface area. On a larger site, the same amount of air pollutants generated would disperse over a larger surface area and would result in a lower concentration once emissions reach the project-site boundary. As such, the threshold values presented in Table 4.3-7, *Maximum Daily Localized Operational Emissions Thresholds*, are from the look-up tables for a 5-acre site during operations, which are used as a screening tool to determine if further detailed analysis is required. (Urban Crossroads, 2023a, p. 59)



Table 4.3-7 Maximum Daily Localized Operational Emissions Thresholds

Operational Localized Thresholds						
NOx CO PM10 PM2.5						
270 lbs/day	1,577 lbs/day	4 lbs/day	2 lbs/day			

Source: Localized Thresholds presented in this table are based on the SCAQMD Final LST Methodology, July 2008

(Urban Crossroads, 2023a, Table 4-13)

3. Localized Thresholds for CO Emissions

Based on the SCAQMD's CEQA Air Quality Handbook (1993), a project's localized CO emissions impacts would be significant if they exceed the following California standards for localized CO concentrations (Urban Crossroads, 2023a, p. 60):

- 1-hour CO standard of 20.0 ppm
- 8-hour CO standard of 9.0 ppm

D. <u>Toxic Air Contaminant Thresholds</u>

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

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

E. <u>Methodology</u>

1. California Emissions Estimator Model (CalEEMod)

Land uses such as the Project affect air quality through construction-source and operational-source emissions. In May 2022, the California Air Pollution Control Officers Association (CAPCOA) in conjunction with other California air district, including SCAQMD, released the latest version of CalEEMod version 2022.1. The purpose of this model is to calculate construction-source and operational-source criteria pollutant (VOCs, NO_X, SO_X, CO, PM₁₀, and PM_{2.5}) and GHG emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved from mitigation measures. Accordingly, the latest version of CalEEMod has been used for this Project to determine construction and operational air quality emissions. Output from the



model runs for both construction and operational activity are provided in Appendices 4.1 through 4.3 of the Project's AQIA (*Technical Appendix B1*). (Urban Crossroads, 2023a, p. 44)

2. Construction Emissions

Refer to Subsection 4.4 of the Project's AQIA (*Technical Appendix B1*) for a discussion of construction activities, construction duration, and construction equipment assumed as inputs in the analysis of the Project's construction-related air quality impacts. (Urban Crossroads, 2023a, pp. 40-43)

3. Operational Emissions

Refer to Subsection 4.5 of the Project's AQIA (*Technical Appendix B1*) for a discussion of operational emissions sources, mobile-source emission sources, and on-site equipment-related sources that were assumed as inputs in the analysis of the Project's operational-related air quality impacts. (Urban Crossroads, 2023a, pp. 44-47)

4. Modeling Inputs for Mobile Source Health Risk Assessment

The Project's HRA (*Technical Appendix B2*) was prepared based on SCAQMD guidelines to produce conservative estimates of risk posed by Project-related DPM emissions. Refer to Subsections 2.2 through 2.6 of the Project's HRA for a discussion of methodology used to evaluate on- and off-site Project-related truck activity, exposure quantification, carcinogenic chemical risks, and non-carcinogenic exposures. (Urban Crossroads, 2023b, pp. 12-23)

4.3.4 IMPACT ANALYSIS

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

The Project site is located with the SCAB, which is characterized by relatively poor air quality. The SCAQMD has jurisdiction over an approximately 10,743 square-mile area consisting of the four-county Basin and the Los Angeles County and Riverside County portions of what use to be referred to as the Southeast Desert Air Basin. In these areas, the SCAQMD is principally responsible for air pollution control, and work directly with the SCAG, county transportation commissions, local governments, as well as State and federal agencies to reduce emissions from stationary, mobile, and indirect sources to meet state and federal ambient air quality standards. (Urban Crossroads, 2023a, p. 63)

Currently, these State and federal air quality standards are exceeded in most parts of the SCAB. In response, the SCAQMD has adopted a series of AQMPs to meet the state and federal ambient air quality standards. AQMPs are updated regularly in order to more effectively reduce emissions, accommodate growth, and to minimize any negative fiscal impacts of air pollution control on the economy. (Urban Crossroads, 2023a, p. 63)

In December 2022, the SCAQMD released the Final 2022 AQMP (2022 AQMP). The 2022 AQMP continues to evaluate current integrated strategies and control measures to meet the NAAQS, as well as explore new and



innovative methods to reach its goals. Some of these approaches include utilizing incentive programs, recognizing existing co-benefit programs from other sectors, and developing a strategy with fair-share reductions at the federal, State, and local levels. Similar to the 2016 AQMP, the 2022 AQMP incorporates scientific and technological information and planning assumptions, including the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS), a planning document that supports the integration of land use and transportation to help the region meet the federal CAA requirements. The Project's consistency with the AQMP will be determined using the 2022 AQMP as discussed below.

Criteria for determining consistency with the AQMP are defined in Chapter 12, Section 12.2 and Section 12.3 of the 1993 CEQA Handbook. These indicators are discussed below:

• **Consistency Criterion No. 1:** The proposed 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 violations that Consistency Criterion No. 1 refers to are the CAAQS and NAAQS. CAAQS and NAAQS violations would occur if Regional Thresholds or LSTs were exceeded.

Construction Impacts – Consistency Criterion No. 1

Consistency Criterion No. 1 refers to violations of the CAAQS and NAAQS. CAAQS and NAAQS violations would occur if localized or regional significance thresholds were exceeded. As indicated under the discussion and analysis of Thresholds b. and c., Project's construction emissions would not exceed the applicable LST thresholds for construction activity, but VOC emissions would exceed the applicable regional threshold. Therefore, impacts would be potentially significant. (Urban Crossroads, 2023a, p. 63)

Operational Impacts – Consistency Criterion No.1

As indicated under the discussion and analysis of Thresholds b. and c., the Project's operational emissions would not exceed the applicable Regional Thresholds or LST thresholds for operational activity. Therefore, the Project would not conflict with the AQMP according to this criterion. (Urban Crossroads, 2023a, p. 64)

Conclusion – Consistency Criterion No. 1

On the basis of the preceding discussion, the Project is determined to be inconsistent with the first criterion.

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

The 2022 AQMP demonstrates that the applicable ambient air quality standards can be achieved within the timeframes required under federal law. Growth projections from local general plans adopted by cities in the district are provided to the SCAG, which develops regional growth forecasts, which are then used to develop future air quality forecasts for the AQMP. Development consistent with the growth projections in the Riverside County General Plan is considered to be consistent with the AQMP. (Urban Crossroads, 2023a, p. 64)



Construction Impacts – Consistency Criterion No. 2

Peak day emissions generated by construction activities are largely independent of land use assignments, but rather are a function of development scope and maximum area of disturbance. Irrespective of the site's land use designation, development of the site to its maximum potential would likely occur, with disturbance of the entire site occurring during construction activities. As such, when considering that emissions thresholds for VOC would be exceeded, the Project would potentially conflict with the AQMP according to this criterion. (Urban Crossroads, 2023a, p. 64)

Operational Impacts – Consistency Criterion No. 2

The Project site is located within an unincorporated portion of the County of Riverside. As per the General Plan, the unincorporated portions of the County are divided into 19 area plans. These area plans provide more detailed land use and policy direction regarding local issues such as land use, circulation, open space, and other topical areas. Per the General Plan, the Project site is located within the Mead Valley Area Plan and is designated for "Medium Density Residential (MDR)" uses. The MDR designation allows for sing-family detached residences on large parcels of 0.5 to 1 acre. Limited agriculture and animal keeping is permitted; however, intensive animal keeping is discouraged. (Urban Crossroads, 2023a, p. 60)

As previously stated, the proposed Project would consist of the development of a 591,203 s.f. warehouse building and the establishment of three single-family residential lots, although no homes are proposed to be built on the lots. The Project's proposed land use is not consistent with the property's existing General Plan land use designation, and the Project would require a General Plan Amendment. However, since the Project's operational regional and localized emissions would not exceed the thresholds of significance, the Project would not cause an exceedance of an air quality violation. On this basis, the Project's operations are determined to be consistent with the second criterion even though the Project entails a General Plan Amendment. (Urban Crossroads, 2023a, pp. 64-65)

Conclusion – Consistency Criterion No. 2

On the basis of the preceding discussion, the Project is determined to be inconsistent with the second criterion due to significant construction-related VOC emissions.

AQMP Consistency Conclusion

Prior to mitigation, the Project would have the potential to result in or cause NAAQS or CAAQS violations due to emissions of VOCs during construction. Although the Project would not be consistent with the site land use and zoning designations, Project construction and operational-source emissions would not exceed the Regional Thresholds or LSTs. Notwithstanding, due to the Project's construction-related emissions, prior to mitigation the Project would be inconsistent with and has the potential to obstruct implementation of the SCAQMD 2022 AQMP. This is evaluated as a significant impact for which mitigation would be required.



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

<u>Construction Emissions</u>

Construction activities associated with the Project would result in emissions of VOCs, NO_X, SO_X, CO, PM₁₀, and PM_{2.5}. Construction-related emissions are expected from the following construction activities: site preparation, grading, building construction, paving, and architectural coating. Refer to Subsection 4.4 of the Project's AQIA (*Technical Appendix B1*) for a description of the modeling inputs used to estimate the Project's construction-related emissions. (Urban Crossroads, 2023a, pp. 44-47)

CalEEMod calculates maximum daily emissions for summer and winter periods. As such, the estimated maximum daily construction emissions without mitigation for both summer and winter periods are summarized in Table 4.3-8, *Project Construction Missions Summary (Without Mitigation)*. Detailed construction model outputs are presented in Appendix 4.1 to the Project's AQIA (*Technical Appendix B1*). Under the assumed scenarios, emissions resulting from Project construction activities would exceed the criteria pollutant thresholds established by the SCAQMD for emissions of VOC. As such, the Project's construction activities have the potential to result in a cumulatively-considerable net increase of a criteria pollutant (i.e., VOCs) for which the Project region is non-attainment under an applicable federal or State ambient air quality standard (i.e., ozone). Project impacts during construction would be potentially significant prior to mitigation. (Urban Crossroads, 2023a, p. 47)

Veer	Emissions (lbs/day)							
Tear	VOC	NOx	со	SOx	PM10	PM _{2.5}		
Summer								
2024	2.31	23.70	52.90	0.07	4.25	1.34		
2025	89.00	33.90	69.50	0.08	5.43	1.81		
		Winter						
2024	2.23	24.90	47.90	0.07	8.16	3.83		
2025	2.06	23.70	46.70	0.07	4.25	1.30		
Maximum Daily Emissions	89.00	33.90	69.50	0.08	8.16	3.83		
SCAQMD Regional Threshold	75	100	550	150	150	55		
Threshold Exceeded?	YES	NO	NO	NO	NO	NO		

 Table 4.3-8
 Project Construction Missions Summary (Without Mitigation)

Source: CalEEMod construction-source (unmitigated) emissions are presented in Appendix 4.1.

(Urban Crossroads, 2023a, Table 4-5)



Operational Emissions

Operational activities associated with the Project would result in emissions of VOCs, NO_X, SO_X, CO, PM₁₀, and PM_{2.5}. Operational emissions would be expected from the following primary sources: area source emissions, energy source emissions, mobile source emissions, and on-site cargo handling equipment emissions. Refer to Subsection 4.5 of the Project's AQIA (*Technical Appendix B1*) for a description of modeling inputs and assumptions used to calculate the Project's operational emissions. (Urban Crossroads, 2023a, pp. 48-50)

CalEEMod utilizes summer and winter EMFAC2021 emission factors in order to derive vehicle emissions associated with Project operational activities, which vary by season. The estimated operational-source emissions are summarized in Table 4.3-9, *Summary of Peak Operational Emissions (Without Mitigation)*. Detailed operation model outputs for the Project are presented in Appendices 4.2 and 4.3 to the Project's AQIA (*Technical Appendix B1*). As shown in Table 4.3-9, the Project's daily regional emission from on-going operations would not exceed any of the thresholds of significance. As such, Project operational-related regional emissions would not result in a cumulatively-considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or State ambient air quality standard, and impacts would be less than significant. (Urban Crossroads, 2023a, p. 51)

Source	Emissions (lbs/day)					
Source	voc	NOx	со	SOx	PM10	PM2.5
	S	ummer				
Mobile Source	4.61	20.88	60.36	0.28	7.31	1.67
Area Source	18.60	0.25	25.83	0.00	0.03	0.05
Energy Source	0.00	0.02	0.01	0.00	0.00	0.00
Project Maximum Daily Emissions	23.21	21.15	86.20	0.28	7.34	1.72
Existing	1.05	0.21	2.80	0.00	0.30	0.23
Total Maximum Daily Emissions	22.16	20.94	83.40	0.28	7.04	1.49
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO
		Winter				
Mobile Source	4.39	21.99	49.94	0.27	7.31	1.67
Area Source	14.39	0.03	0.01	0.00	0.00	0.00
Energy Source	0.00	0.02	0.01	0.00	0.00	0.00
Project Maximum Daily Emissions	18.78	22.04	49.96	0.27	7.31	1.67
Existing	1.04	0.22	2.45	0.00	0.30	0.23
Total Maximum Daily Emissions	17.74	21.82	47.51	0.27	7.01	1.44
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

able 4.3-9	Summary of Peak Operational Emissions	s (Without Mitigation))
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Source: CalEEMod operational-source emissions are presented in Appendices 4.2 and 4.3.

(Urban Crossroads, 2023a, Table 4-9)



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

During both construction and operation, the Project has the potential to expose nearby sensitive receptors to substantial pollutant concentrations. The following provides an analysis based on the applicable LSTs established by the State of California and SCAQMD, an analysis of the Project's potential to result in or contribute to CO "hot spots," and an analysis of the Project's potential to result in cancer risks and non-cancer health hazards.

<u>Construction-Source Emissions LST Analysis</u>

Table 4.3-10, *Project Localized Construction Emissions (Without Mitigation)*, identifies the localized impacts at the nearest receptor location in the vicinity of the Project. Without mitigation, localized construction emissions would not exceed the applicable SCAQMD LSTs for emissions of any criteria pollutant. On this basis, Project-related construction emissions would not expose sensitive receptors to substantial pollutant concentrations, and impacts would therefore be less than significant. (Urban Crossroads, 2023a, p. 58)

Construction	Voor	Sconaria	Emissions (lbs/day)				
Activity	Tear	Scenario	NOx	со	PM10	PM2.5	
		Summer	n/a	n/a	n/a	n/a	
		Winter	24.00	36.30	1.14	0.76	
Demolition	2024	Maximum Daily Emissions	24.00	36.30	1.14	0.76	
		SCAQMD Localized Threshold	170	883	7	1.14 0.76 7 4 NO NO n/a n/a 7.78 3.73 7.78 3.73	
		Threshold Exceeded?	NO	NO	NO	NO	
		Summer	n/a	n/a	n/a	n/a	
		Winter	21.90	41.60	7.78	3.73	
Site	2024	Maximum Daily Emissions	21.90	41.60	7.78	3.73	
rieparation		SCAQMD Localized Threshold	270	1,577	13	8	
		Threshold Exceeded?	NO	NO	NO	NO	
		Summer	20.00	36.20	2.93	1.23	
Grading		Winter	20.00	36.20	2.93	1.23	
	2024	Maximum Daily Emissions	20.00	36.20	2.93	PM2.5 n/a 0.76 0.76 4 NO n/a 3.73 3.73 3.73 8 NO 1.23 1.23 1.23 1.23 7 NO	
		SCAQMD Localized Threshold	237	1,346	11	7	
		Threshold Exceeded?	NO	NO	NO	NO	

(Urban Crossroads, 2023a, Table 4-12)

Operational-Source Localized Emissions

As previously stated, LSTs for a 5-acre site during operations are used as a screening tool to determine if further detailed analysis is required. As shown in Table 4.3-11, *Localized Significance Summary of Operations*, Project operational emissions would not expose sensitive receptors to substantial pollutant concentrations, and impacts would be less than significant. (Urban Crossroads, 2023a, p. 60)

Scenario	Emissions (lbs/day)			
	NOx	со	PM10	PM2.5
Summer	4.05	36.48	0.36	0.13
Winter	4.04	11.21	0.33	0.08
Maximum Daily Emissions	4.05	36.48	0.36	0.13
SCAQMD Localized Threshold	270	1,577	4	2
Threshold Exceeded?	NO	NO	NO	NO

Table 4.3-11 Localized Significance Summary of Operations

(Urban Crossroads, 2023a, Table 4-14)

<u>CO "Hot Spot" Analysis</u>

An adverse CO concentration, known as a "hot spot," would occur if an exceedance of the State one-hour standard of 20 ppm or the eight-hour standard of 9 ppm were to occur. At the time the 1993 Handbook was prepared, the SCAB was designated non-attainment under the California AAQS and National AAQS for CO. (Urban Crossroads, 2023a, p. 60)

It has long been recognized that CO hot spots are caused by vehicular emissions, primarily when idling at congested intersections. In response, vehicle emissions standards have become increasingly stringent in the last 20 years. Currently, the allowable CO emissions standard in California is a maximum of 3.4 grams/mile for passenger cars (there are requirements for certain vehicles that are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of increasingly sophisticated and efficient emissions control technologies, CO concentration in the SCAB is now designated as attainment. (Urban Crossroads, 2023a, pp. 60-61)

To establish a more accurate record of baseline CO concentrations affecting the SCAB, a CO "hot spot" analysis was conducted in 2003 for four busy intersections in Los Angeles at the peak morning and afternoon time periods. This "hot spot" analysis did not predict any violation of CO standards, as shown on Table 4-15 of the Project's AQIA (*Technical Appendix B1*). (Urban Crossroads, 2023a, p. 61)

Based on the SCAQMD's 2003 AQMP and the 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan), peak CO concentrations in the SCAB were a result of unusual meteorological and topographical conditions and not a result of traffic volumes and congestion at a particular intersection. As evidence of this, for example, 8.4 ppm 8-hr CO concentration measured at the Long Beach Blvd. and Imperial Hwy. intersection



(highest CO generating intersection within the "hot spot" analysis), only 0.7 ppm was attributable to the traffic volumes and congestion at this intersection; the remaining 7.7 ppm were due to the ambient air measurements at the time the 2003 AQMP was prepared. In contrast, an adverse CO concentration, known as a "hot spot", would occur if an exceedance of the state one-hour standard of 20 parts per million (ppm) or the eight-hour standard of 9 ppm were to occur. (Urban Crossroads, 2023a, p. 61)

The ambient 1-hr and 8-hr CO concentration within the Project study area is estimated to be 0.9 ppm and 0.7 ppm, respectively (data from Elsinore Valley station for 2020). Therefore, even if the traffic volumes for the proposed Project were double or even triple of the traffic volumes generated at the Long Beach Blvd. and Imperial Hwy. intersection, coupled with the on-going improvements in ambient air quality, the Project would not be capable of resulting in a CO "hot spot" at any study area intersections. (Urban Crossroads, 2023a, p. 61)

Similar considerations are also employed by other air districts when evaluating potential CO concentration impacts. More specifically, the Bay Area Air Quality Management District (BAAQMD) concludes that under existing and future vehicle emission rates, a given project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour (vph) – or 24,000 vph where vertical and/or horizontal air does not mix – in order to generate a significant CO impact. (Urban Crossroads, 2023a, p. 61)

The 2003 AQMP, as shown in Table 4-16 of the Project's AQIA (*Technical Appendix B1*), estimated that the 1-hour concentration for this intersection was 4.6 ppm; this indicates that, should the daily traffic volume increase four times to 400,000 vehicles per day, CO concentrations (4.6 ppm x 4 = 18.4 ppm) would still not likely exceed the most stringent 1-hour CO standard (20.0 ppm). (Urban Crossroads, 2023a, p. 62)

As shown in Table 4-17 of the Project's AQIA (*Technical Appendix B1*), the intersection of I-215 Northbound (NB) Ramps and Ramona Expressway would have the highest AM and PM traffic volumes of 6,396 vph and 7,328 vph, respectively. As such, total traffic volumes at the intersections considered are less than the traffic volumes identified in the 2003 AQMP. The Project considered herein would not produce the volume of traffic required to generate a CO "hot spot" either in the context of the 2003 Los Angeles hot spot study or based on representative BAAQMD CO threshold considerations. As such, the Project would not cause or contribute to any CO "hot spots." Therefore, Project-related operational emissions of CO would not expose sensitive receptors to substantial pollutant concentrations, and impacts would be less than significant. (Urban Crossroads, 2023a, p. 62)

Project-Related DPM Source Cancer and Non-Cancer Risks

A Project-specific HRA was prepared for the Project based on SCAQMD guidelines to produce conservative estimates of risk posed by exposure to DPM. The Project's HRA is included as *Technical Appendix B2* to this EIR. Refer to Section 2 of the Project's HRA for a discussion of the recommended methodology, emissions estimation, exposure quantification, carcinogenic chemical risk, and non-carcinogenic exposure used as inputs to the analysis. Nearby sensitive receptors evaluated as part of the HRA are described above in subsection 4.3.1K and are depicted on Figure 4.3-10 and Figure 4.3-11. Provided below is a summary of the results of the



HRA for the Maximally Exposed Individual Receptor (MEIR), Maximally Exposed Individual Worker (MEIW), and Maximally Exposed Individual School Child (MEISC).

Construction

The land use with the greatest potential exposure to Project construction-source DPM emissions is Location R5 which is located immediately adjacent to the west of the Project site at an existing residence located at 23246 Sunny Canyon Street. R5 is placed in the private outdoor living areas (backyard) facing the Project site. At the MEIR, the maximum incremental cancer risk attributable to Project construction-source DPM emissions is estimated at 1.41 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable threshold of 1.0. As such, the Project would not cause a significant human health or cancer risk to adjacent land uses as a result of Project construction activity. All other receptors during construction activity would experience less risk than what is identified for this location. (Urban Crossroads, 2023a, p. 24)

Residential Exposure Scenario

The residential land use with the greatest potential exposure to Project operational-source DPM emissions is Location R6 which is located adjacent to the west of the Project site at an existing residence located at 23249 Norrisgrove Drive. R6 is placed in the private outdoor living areas (backyard) facing the Project site. At the MEIR, the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 0.98 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Because all other modeled residential receptors are exposed to lesser concentrations and are located at a greater distance from the Project site and primary truck route than the MEIR analyzed herein, and TACs generally dissipates with distance from the source, all other residential receptors in the vicinity of the Project site would be exposed to less emissions and therefore less risk than the MEIR identified herein. As such, the Project will not cause a significant human health or cancer risk to nearby residences, and impacts would less than significant. (Urban Crossroads, 2023a, p. 24)

Worker Exposure Scenario

The worker receptor land use with the greatest potential exposure to Project operational-source DPM emissions is Location R7, which represents the adjacent potential worker receptor approximately 256 feet northeast of the Project site. At the MEIW, the maximum incremental cancer risk impact is 0.07 in one million which is less than the SCAQMD's threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Because all other modeled worker receptors are located at a greater distance than the MEIW analyzed herein, and DPM dissipates with distance from the source, all other worker receptors in the vicinity of the Project would be exposed to less emissions and therefore less risk than the MEIW identified herein. As such, the Project will not cause a significant human health or cancer risk to adjacent workers, and impacts would be less than significant. (Urban Crossroads, 2023a, pp. 24-25)



School Child Exposure Scenario

The nearest school is Small Wonder Family Childcare, located approximately 182 feet west of the Project site at Location R8. At the MEISC, the maximum incremental cancer risk impact attributable to the Project is calculated to be 0.09 in one million, which is less than the significance threshold of 10 in one million. At this same location, non-cancer risks attributable to the Project were calculated to be <0.01, which would not exceed the applicable significance threshold of 1.0. All other school receptors would be exposed to lower concentrations of TACs and therefore less risk than the MEISC identified herein. As such, the Project will not cause a significant human health or cancer risk to nearby school children and impacts would less than significant. (Urban Crossroads, 2023a, p. 25)

Community Health

Most local agencies, including the County of Riverside, lack the data to do their own assessment of potential health impacts from criteria air pollutant emissions, as would be required to establish customized, locally-specific thresholds of significance based on potential health impacts from an individual development project. The use of national or "generic" data to fill the gap of missing local data would not yield accurate results because such data does not capture local air patterns, local background conditions, or local population characteristics, all of which play a role in how a population experiences air pollution. Because it is impracticable to accurately isolate the exact cause of a human disease (for example, the role a particular air pollutant plays compared to the role of other allergens and genetics in causing asthma), existing scientific tools cannot accurately estimate health impacts of the Project's air emissions without undue speculation. Instead, readers are directed to the Project's air quality impact analysis above, which provides extensive information concerning the quantifiable and non-quantifiable health risks related to the Project's construction and long-term operation. (Urban Crossroads, 2023a, p. 66)

Notwithstanding, the Project's AQIA (*Technical Appendix B1*) does evaluate the proposed Project's localized impact to air quality for emissions of CO, NO_X, PM₁₀, and PM_{2.5} by comparing the proposed project's on-site emissions to the SCAQMD's applicable LST thresholds. The LST analysis above determined that the Project would not result in emissions exceeding SCAQMD's LSTs. Therefore, the proposed Project would not be expected to exceed the most stringent applicable federal or state ambient air quality standards for emissions of CO, NO_X, PM₁₀, and PM_{2.5}. (Urban Crossroads, 2023a, p. 66)

As the Project's emissions would comply with federal, State, and local air quality standards, the proposed Project's emissions are not sufficiently high enough to use a regional modeling program to correlate health effects on a basin-wide level, and would not provide a reliable indicator of health effects if modeled. (Urban Crossroads, 2023a, p. 66)

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

Land use generally associated with odor complaints include: agricultural uses (livestock and farming), wastewater treatment plants, food processing plants, chemical plants, composting operations, refineries,



landfills, dairies, and fiberglass molding facilities. The proposed Project does not contain land uses typically associated with emitting objectionable odors. (Urban Crossroads, 2023a, p. 66)

Potential odor sources associated with the proposed Project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities, and the temporary storage of typical solid waste (refuse) associated with the proposed Project's long-term operational uses. (Urban Crossroads, 2023a, pp. 66-67)

Standard construction requirements would minimize odor impacts from construction. The Project would be subject to standard construction requirements, including the use of low-VOC architectural coatings as required by SCAQMD Rule 113, *Table of Standards*; compliance with low sulfur fuel requirements pursuant to SCAQMD Rule 431.2, *Low Sulfur Fuel;* and compliance with SCAQMD Rule 402, *Nuisance*, which requires that a person shall not discharge air contaminants or other materials that would cause health or safety hazards to any considerable number of persons or the public. Compliance with these standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and therefore would be less than significant. (Urban Crossroads, 2023a, p. 67)

Potential sources of operational odors generated by the Project would include disposal of miscellaneous commercial refuse and the use of diesel equipment. It is expected that Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with Riverside County's solid waste regulations, thereby precluding substantial generation of odors due to temporary holding of refuse on site. The proposed Project also would be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, odors associated with the proposed Project operations would not adversely affect a substantial number of people, and Project impacts during long-term operations would be less than significant. (Urban Crossroads, 2023a, p. 67)

4.3.5 CUMULATIVE IMPACT ANALYSIS

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

As discussed under the analysis of Threshold a., prior to mitigation, the Project would have the potential to result in or cause NAAQS or CAAQS violations due to emissions of VOCs during construction. Although the Project would not be consistent with the site land use and zoning designations, Project construction and operational-source emissions would not exceed the Regional Thresholds or LSTs. Notwithstanding, due to the Project's construction-related emissions, prior to mitigation the Project would be inconsistent with and has the



potential to obstruct implementation of the SCAQMD 2016 AQMP. Other cumulative developments within the region similarly have the potential to conflict with the SCAQMD 2016 AQMP. Accordingly, prior to mitigation, the Project's potential conflict with the SCAQMD 2016 AQMP represents a significant impact on a cumulatively-considerable basis.

As previously shown in Table 4.3-2, the CAAQS designate the Project region as nonattainment for O₃, PM₁₀, and PM_{2.5}, while the NAAQS designates the Project region as nonattainment for O₃ and PM_{2.5}. The SCAQMD has published a report on how to address cumulative impacts from air pollution: *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution*. In this report the SCAQMD clearly states (Page D-3):

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

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

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

The Project-specific evaluation of emissions presented under the analysis of Threshold b. demonstrates that the Project's operational regional emissions of criteria pollutants would be below the SCAQMD Regional Thresholds (refer to Table 4.3-9). However, and as previously shown in Table 4.3-8, the Project's construction-related emissions would exceed the SCAQMD Regional Threshold for VOCs. Therefore, prior to mitigation the Project would result in a cumulatively-considerable net increase of a criteria pollutant (i.e., VOCs) for which the Project region is non-attainment under an applicable federal or State ambient air quality standard (i.e., ozone), resulting in a cumulatively-considerable impact.


As indicated under the analysis of Threshold c., the Project's localized emissions during construction and longterm operation would be below the applicable SCAQMD LSTs for emissions of criteria pollutants and would not expose sensitive receptors to substantial pollutant concentrations (refer to Table 4.3-10 and Table 4.3-11). Additionally, the analysis under Threshold c. provides substantial evidence that the proposed Project would not cause or contribute to any CO "hot spots." Based on a Project-specific HRA (*Technical Appendix B2*), and as also discussed under the analysis of Threshold c., the Project would not expose the MEIR, MEIW, or MEISC to cancer risks exceeding the SCAQMD significance threshold of 10 in one million or non-cancer health risks exceeding the applicable significance threshold of 1.0. Thus, Project-related localized air quality emissions would not expose nearby sensitive receptors to substantial pollutant concentrations and impacts would be lessthan-cumulatively considerable.

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

4.3.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

<u>Threshold a.: Significant Direct and Cumulatively-Considerable Impact</u>. Prior to mitigation, the Project would have the potential to result in or cause NAAQS or CAAQS violations due to emissions of VOCs during construction. Although the Project would not be consistent with the site land use and zoning designations, Project construction and operational-source emissions would not exceed the Regional Thresholds or LSTs. Notwithstanding, due to the Project's construction-related emissions, prior to mitigation the Project would be inconsistent with and has the potential to obstruct implementation of the SCAQMD 2016 AQMP. This is evaluated as a significant impact for which mitigation would be required.

<u>Threshold b.: Significant Direct and Cumulatively-Considerable Impact</u>. As indicated in Table 4.3-9, Project operational-related regional emissions would not exceed any of the SCAQMD Regional Thresholds for criteria pollutants. As such, Project regional operational-related emissions would not result in a cumulatively-considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or State ambient air quality standard, and impacts would be less than significant. However, as indicated in Table 4.3-8, Project construction-related regional emission would exceed the SCAQMD Regional Thresholds for VOC emissions. Therefore, prior to mitigation the Project's construction-related emissions would result in a cumulatively-considerable net increase of a criteria pollutant (i.e., VOCs) for which the Project region is non-attainment under an applicable federal or State ambient and applicable federal or State and the scale of a criteria pollutant (i.e., VOCs) for which the Project region is non-attainment under an applicable federal or state ambient and applicable federal or State ambient are applicable net increase of a criteria pollutant (i.e., VOCs) for which the Project region is non-attainment under an applicable federal or State ambient air quality standard (i.e., ozone), resulting in a significant impact.

<u>Threshold c.: Less-than-Significant Impact</u>. As indicated in Table 4.3-10 and Table 4.3-11, Project-related construction and long-term operational emissions would not exceed the SCAQMD LSTs for any criteria pollutant. Additionally, the Project considered herein would not produce the volume of traffic required to generate a CO "hot spot" either in the context of the 2003 Los Angeles hot spot study or based on representative



BAAQMD CO threshold considerations. In addition, based on a Project-specific HRA (*Technical Appendix B2*), the Project would not expose the MEIR, MEIW, or MEISC to cancer risks exceeding the SCAQMD significance threshold of 10 in one million or non-cancer health risks exceeding the applicable significance threshold of 1.0. Therefore, the Project would not expose sensitive receptors, which are located within one (1) mile of the Project site, to substantial pollutant concentrations, and impacts would be less than significant.

<u>Threshold d.: Less-than-Significant Impact</u>. The Project does not propose land uses typically associated with emitting objectionable odors. Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and is thus considered less than significant. Additionally, it is expected that Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with Riverside County's solid waste regulations. The proposed Project also would be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, odors associated with the proposed Project construction and operations would be less than significant and no mitigation is required.

4.3.7 COUNTY REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

Applicable County Regulations and Design Requirements

The following are regulations and design requirements that apply to the proposed Project and that reduce or preclude air pollution. Although compliance with mandatory regulatory requirements does not technically meet CEQA's definition for mitigation, they are specified herein as requirements for the Project.

- The Project is required to comply with the provisions of South Coast Air Quality Management District Rule 403, "Fugitive Dust" by implementing the following dust control measures during construction activities, such as earth-moving activities, grading, and equipment travel on unpaved roads. Prior to grading permit issuance, Riverside County shall verify that the following notes are included on the grading plan. Project contractors shall be required to ensure compliance with the notes and permit periodic inspection of the construction site by Riverside County staff or its designee to confirm compliance. These notes also shall be specified in bid documents issued to prospective construction contractors.
 - All clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 miles per hour (mph) per SCAQMD guidelines in order to limit fugitive dust emissions.
 - The contractor shall ensure that all disturbed unpaved roads and disturbed areas within the Project are watered at least three (3) times daily during dry weather. Watering, with complete coverage of disturbed areas, shall occur at least three times a day, preferably in the midmorning, afternoon, and after work is done for the day.
 - The contractor shall ensure that traffic speeds on unpaved roads and Project site areas are reduced to 15 mph or less.



- The Project is required to comply with the provisions of South Coast Air Quality Management District Rule 113, *Table of Standards*, by requiring that all architectural coatings must consist of low VOCs (i.e., VOCs of less than 50 grams per liter [g/L]) unless otherwise specified in the SCAQMD Table of Standards.
- The Project is required to comply with applicable SCAQMD rules for construction activities on the Project site. In addition to the SCAQMD requirements listed above, additional SCAQMD rules that are currently applicable during construction activity for this Project include but are not limited to: Rule 1403 (Asbestos); Rule 431.2 (Low Sulfur Fuel); and Rule 1186 / 1186.1 (Street Sweepers).
- The Project is required to comply with the provisions of SCAQMD Rule 402, "Nuisance" which requires that a person shall not discharge air contaminants or other materials that would cause health or safety hazards to any considerable number of persons or the public.

Mitigation

MM 4.3-1 As a condition of building permit(s), architectural coatings shall consist of "Super-Compliant" low VOC paints which have been reformulated to exceed the regulatory VOC limits put forth by SCAQMD's Rule 1113. Super-Compliant low VOC paints shall be no more than 10 grams per liter (g/L) of VOC. Alternatively, the applicant may utilize tilt-up concrete buildings that do not require the use of architectural coatings. This requirement shall be included in the building permit conditions of approval and shall be noted in bid documents issued to prospective construction contractors. Construction contractors shall maintain records demonstrating compliance with these requirements, and shall make such records available for inspection by Riverside County upon request.

4.3.1 SIGNIFICANCE OF IMPACTS AFTER MITIGATION

<u>Threshold a.: Less-than-Significant Impact with Mitigation Incorporated</u>. As shown in Table 4.3-12, *Project Construction Emissions (With Mitigation)*, implementation of Mitigation measure MM 4.3-1 would reduce the Project's construction-related emissions of VOCs to below the SCAQMD Regional Threshold for this pollutant. Accordingly, with implementation of the required mitigation the Project would not conflict with or obstruct implementation of the SCAQMD 2016 AQMP. Thus, with implementation of the required mitigation the Project would not conflict with or obstruct implementation of the applicable air quality plan, and impacts would be reduced to less-than-significant levels.

<u>Threshold b.: Less-than-Significant Impact with Mitigation Incorporated</u>. As shown in Table 4.3-12, *Project Construction Emissions (With Mitigation)*, implementation of Mitigation measure MM 4.3-1 would reduce the Project's construction-related emissions of VOCs to below the SCAQMD Regional Threshold for this pollutant. Accordingly, with implementation of the required mitigation, the Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard, and impacts would be reduced to less-than-significant levels.



Veer	Emissions (lbs/day)					
Tear	VOC	NOx	со	SOx	PM10	PM _{2.5}
		Summer				
2024	2.31	23.70	52.90	0.07	4.25	1.34
2025	25.70	33.90	69.50	0.08	5.43	1.81
	Winter					
2024	2.23	24.90	47.90	0.07	8.16	3.83
2025	2.06	23.70	46.70	0.07	4.25	1.30
Maximum Daily Emissions	25.70	33.90	69.50	0.08	8.16	3.83
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

Table 4.3-12 Project Construction Emissions (With Mitigation)

Source: CalEEMod construction-source (mitigated) emissions are presented in Appendix 4.1.

(Urban Crossroads, 2023a, Table 4-6)



4.4 **BIOLOGICAL RESOURCES**

The analysis in this Subsection is based in part on information provided in the report titled, "Biological Technical Report for the Rider Street and Patterson Avenue Project (PPT220004)" (herein, "BTR"), prepared by Glenn Lukos Associates, Inc. (herein, "GLA"), dated August 14, 2023, and included as *Technical Appendix C1* to this EIR (GLA, 2023a). The Project's BTR also incorporates information from a site-specific jurisdictional delineation conducted by GLA, entitled, "Jurisdictional Delineation for the Rider Street and Patterson Avenue Project, Located in the Community of Mead Valley, Riverside County, California," dated December 9, 2022, and included as *Technical Appendix C2* (GLA, 2022). In addition, the information in this section is based in part on a site-specific technical report prepared by GLA, entitled, "Determination of Biologically Equivalent or Superior Preservation (DBESP) Analysis for Impacts to MSHCP Riparian/Riverine Areas, Rider Street and Patterson Avenue Project," dated August 14, 2023, and included as *Technical Appendix C3* (GLA, 2023b). Refer to Section 7.0, *References*, for a complete list of these and other reference sources.

4.4.1 EXISTING CONDITIONS

Under existing conditions, the Project site and the Project's off-site disturbance area consists of vacant land that supports developed lands, disturbed buckwheat scrub, ruderal/disturbed lands, and southern willow scrub. The residential areas within the southern portion of the site were initially installed in the late 1960s. The Project site's central area was previously impacted in the early 1990s as part of a planned housing development that was not built. The perimeter of the Project site is mowed and/or disked on a regular basis for weed abatement and fire protection. Elevations on the Project site range from approximately 1,531 to 1,578 feet above mean sea level (amsl), with the site sloping downwards from the southwest to the northeast. Four ephemeral drainage features exist in the Project's impact area. These drainage features are formed by urban runoff which drain upland areas and do not support a relatively permanent flow of water. (GLA, 2023a, pp. 22-23)

A. <u>Vegetation Communities</u>

1. Summary of Vegetation Communities

GLA conducted site visits to map the existing vegetation communities that occur on the Project site and in the Project's off-site disturbance area. Figure 4.4-1, *Vegetation Communities Map*, depicts the site's existing vegetation communities. Vegetation communities, along with the corresponding acreage for those located within the Mead Valley Area Plan of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Criteria Cell 2432 and for those located outside of the Criteria Area, are summarized in Table 4.4-1, *Summary of Vegetation/Land Use Types for the Project Site,* and described below.

- **Developed/Ornamental**: The Project's disturbance area supports 11.45 acres (7.67 acres on site and 3.78 acres off site) of developed lands with ornamental vegetation consisting of residential housing in the southern portion of the Project site, and developed areas associated with Patterson Avenue and Rider Street along the northern and eastern edges of the Project site. The dominant plant species is blue gum (*Eucalyptus globulus*). Other species include blue elderberry (*Sambucus nigricans*), Jerusalem thorn (*Parkinsonia aculeata*), and Peruvian pepper tree (*Schinus molle*). (GLA, 2023a, p. 23)
- **Disturbed Buckwheat Scrub**: The Project site supports a total of 7.74 acres of disturbed buckwheat scrub centrally located in the lower elevations of the Project site. All 7.74 acres of this vegetation



community occur on the site. The dominant plant species is California buckwheat (*Eriogonum fasciculatum*). Other species include brittlebush (*Encelia farinosa*) and California sagebrush (*Artemisia californica*). (GLA, 2023a, p. 23)

Vegetation/Land Use Type	On site - Within Criteria Cell 2432(Acres)	Off site - Within Criteria Cell 2432 (Acres)	On site - Outside the Criteria Area (Acres)	Off site - Outside the Criteria Area (Acres)	Totals (Acres)
Developed/Ornamental	7.67	1.62	-	2.17	11.45
Disturbed /Buckwheat Scrub	7.74	-	-	-	7.74
Ruderal/Disturbed	25.33	0.38	-	0.41	26.12
Southern Willow Scrub	0.13	-	-	-	0.13
Total	40.87	2.00	0.00	2.58	45.45*

Table 4.4-1 Summary of Vegetation/Land Use Types for the Project Site

*Rounding error to total site acreage.

(GLA, 2023a, Table 4-1 and Table 4-2)

- Ruderal/Disturbed: The majority of the Project's disturbance area, approximately 26.12 acres (25.33 acres on site and 0.79-acre off site), is dominated by ruderal/disturbed land. Dominant plant species observed include foxtail barley (*Hordeum murinum*), red brome (*Bromus madritensis* ssp. *rubens*), ripgut brome (*Bromus diandrus*), slim oat (*Avena barbata*), stinknet (*Oncosiphon piluliferum*), and summer mustard (*Hirschfeldia incana*). Other species detected include annual burweed (*Ambrosia acanthicarpa*), California cottonrose (*Logfia filaginoides*), castor bean (*Ricinus communis*), coastal heron's bill (*Erodium cicutarium*), common fiddleneck (*Amsinckia intermedia*), common Mediterranean grass (*Schismus barbatus*), common sandaster (*Corethrogyne filaginifolia*), common sunflower (*Helianthus annuus*), coyote brush (*Baccharis pilularis*), doveweed (*Croton setiger*), goldfield (*Lasthenia californica*), Jerusalem thorn, London rocket (*Sisymbrium irio*), mulefat (*Baccharis salicifolia*), reeruvian pepper tree, Russian thistle (*Salsola tragus*), sagebrush combseed (*Pectocarya linearis*), sand pygmy weed (*Crassula connata*), telegraph weed (*Heterotheca grandiflora*), tree tobacco (*Nicotiana glauca*), valley popcorn (*Plagiobothrys canescens*), and vinegarweed (*Trichostema lanceolatum*). The four ephemeral drainages on site occur within this vegetation type. (GLA, 2023a, pp. 23-24)
- Southern Willow Scrub: The Project site supports approximately 0.13-acre of southern willow scrub, all of which is on site, consists of a narrow strip of vegetation associated with Drainage A where it originates at the terminus of Norrisgrove Drive in the northwestern portion of the site. The dominant plant species in this area is narrowleaf willow (*Salix exigua*). Other species within this area include black willow (*Salix gooddingii*) and mulefat. (GLA, 2023a, p. 24)



2. Special-Status Vegetation Communities

The California Natural Diversity Database (CNDDB) identifies the following seven special-status vegetation communities for the Steele Peak and surrounding quadrangle maps: Canyon Live Oak Ravine Forest, Southern California Arroyo Chub/Santa Ana Sucker Stream, Southern Coast Live Oak Riparian Forest, Southern Cottonwood Willow Riparian Forest, Southern Riparian Forest, Southern Sycamore Alder Riparian Woodland, and Southern Willow Scrub. The Project site contains approximately 0.13-acre of Southern Willow Scrub. The Project site does not contain any other special-status vegetation communities. (GLA, 2023a, p. 24)

3. Special-Status Plants

Table 4-3 of the Project's BTR (*Technical Appendix C1*) provides a list of special-status plants that were evaluated by GLA for the Project site through general biological surveys, habitat assessments, and focused surveys. Species were evaluated based on the following factors: 1) species with a California Rare Plant Rank (CRPR) identified by the CNDDB and California Native Plant Society (CNPS) as occurring (either currently or historically) on or in the vicinity of the Project site, 2) applicable Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) survey areas, and 3) any other special-status plants that are known to occur within the vicinity of the Project site, or for which potentially suitable habitat occurs within the site. No special-status plants were detected at the Project site. (GLA, 2023a, p. 24)

B. <u>Wildlife Species</u>

1. Special-Status Animals Observed within the Project Site

Table 4-4 of the Project's BTR (*Technical Appendix* C1) provides a list of special-status animals evaluated by GLA for the Project site through general biological surveys, habitat assessments, and focused surveys. Species were evaluated based on the following factors, including: 1) species identified by the CNDDB as occurring (either currently or historically) on or in the vicinity of the Project site, 2) applicable MSHCP survey areas, and 3) any other special-status animals that are known to occur within the vicinity of the Project site, for which potentially suitable habitat occurs on the site. One special-status wildlife species, the yellow warbler (*Dendroica petechia*) was observed within the Project site but was not nesting, as discussed below. (GLA, 2023a, p. 31)

<u>Yellow Warbler</u>

One special-status bird species, the yellow warbler (*Dendroica petechia*), was detected foraging within the Project site but was not nesting. The yellow warbler is designated as a CDFW California Species of Special Concern when nesting, although the Project site does not contain suitable nesting habitat for this species. Yellow warblers nest from northern Alaska eastward to Newfoundland and southward to northern Baja California and Georgia. The species migrates throughout much of North America and winters from Southern California, Arizona and the Gulf Coast southward to central South America. Yellow warblers in Southern California breed in lowland and foothill riparian woodlands dominated by cottonwoods, alders, or willows and other small trees and shrubs typical of low, open-canopy riparian woodland. The yellow warbler is found at elevations from 330 to 8,900 feet within riparian habitat and at higher elevations along watercourses with riparian growth. (GLA, 2023a, p. 37)



Though this species was detected within the developed/ornamental portions of the Project site, the yellow warbler only is considered a special-status species when it is nesting at a project site. The Project site contains only foraging habitat for this species and does not contain any suitable nesting habitat. Thus, while the yellow warbler was observed foraging on site, this species was not using the site in a manner to be considered potentially impacted as a special-status species. (GLA, 2023a, p. 37)

2. Special-Status Wildlife Species Not Observed but with a Potential to Occur at the Project Site

Loggerhead Shrike

Loggerhead Shrike (*Lanius ludovicianus*) is designated as a CDFW Species of Special Concern when nesting and is a covered species under the MSHCP (without additional survey or conservation requirements). The loggerhead shrike is known to forage over open ground within areas of short vegetation, pastures with fence rows, old orchards, mowed roadsides, cemeteries, golf courses, riparian areas, open woodland, agricultural fields, desert washes, desert scrub, grassland, broken chaparral and beach with scattered shrubs. (GLA, 2023a, p. 38)

The Project site supports approximately 33.86 acres of potential foraging habitat for the loggerhead shrike (disturbed buckwheat scrub, ruderal/disturbed) but does not support suitable nesting habitat. Additionally, the loggerhead shrike was not detected during GLA's biological surveys. (GLA, 2023a, p. 38)

<u>Swainson's Hawk</u>

Swainson's Hawk (*Buteo swainsonii*) is listed as Threatened by the state and is also designated as a CDFW Species of Special Concern for nesting. Swainson's Hawk is also a covered species under the MSHCP without additional survey or conservation requirements. The Swainson's hawk does not breed in western Riverside County but does migrate through as a transient in the spring and fall and may occasionally winter within the area. (GLA, 2023a, p. 38)

The Project site supports approximately 26.12 acres of potential foraging habitat (ruderal/disturbed). The Swainson's hawk was not detected during GLA's biological surveys. (GLA, 2023a, p. 38)

<u>White-tailed Kite</u>

White-tailed Kite (*Elanus leucurus*) is designated as a California Fully Protected Species by CDFW and is a covered species under the MSHCP without additional survey or conservation requirements. The white-tailed kite inhabits low elevation, open grasslands, savannah-like habitats, agricultural areas, wetlands, and oak woodlands. Riparian areas adjacent to open areas are used for nesting. Substantial groves of dense, broadleafed deciduous trees are used for nesting and roosting. (GLA, 2023a, p. 38)

The white-tailed kite was not detected during GLA's biological surveys; however, the Project site supports approximately 26.12 acres of potential foraging habitat (ruderal/disturbed). The site does not support suitable nesting habitat. As a covered species, the MSHCP allows for the loss of habitat for white-tailed kites; however, the MSHCP does not allow for the direct harm of Fully Protected Species, including the white-tailed kite.



Given that the site does not contain suitable nesting habitat, it is not expected that the Project would result in direct harm to a white-tailed kite. (GLA, 2023a, p. 38)

Los Angeles Pocket Mouse

Los Angeles Pocket Mouse (*Perognathus longimembris brevinasus*) is designated as a CDFW Species of Special Concern and is a covered species under the MSHCP with special survey requirements. However, the Project site does not occur within a mammal survey area for Los Angeles pocket mouse and therefore surveys are not required for the pocket mouse. Avoidance/mitigation would not be required for the loss of habitat, if present. The habitat of the Los Angeles pocket mouse has never been specifically defined, although research indicates that the subspecies inhabits open ground of fine sandy composition and may utilize these soil types for burrowing. This species may be restricted to lower elevation grassland and coastal sage scrub. Vegetation associations likely are important for the Los Angeles pocket mouse, and it likely prefers sparsely vegetated habitats. However, soil characteristics probably also must be appropriate for a site to support the Los Angeles pocket mouse. Nonetheless, the habitat associated with the Los Angeles pocket mouse includes non-native grassland, Riversidean sage scrub, Riversidean alluvial fan sage scrub, chaparral and redshank chaparral. (GLA, 2023a, pp. 38-39)

Although the Project site is disturbed and no burrows or evidence of occupation was detected, the Project site contains an estimated 26.12 acres of potential habitat for the Los Angeles pocket mouse (ruderal/disturbed) and therefore, the pocket mouse may be present. (GLA, 2023a, pp. 38-39)

Stephen's Kangaroo Rat

Stephens' Kangaroo Rat (SKR) (*Dipodomys stephensi*) is a federally Threatened species and a state Threatened species. The SKR has a relatively small geographic range (about 1,108 sq. miles) for a mammal species and is restricted to Riverside County and adjacent northern-central San Diego County. The SKR is found almost exclusively in open grasslands or sparse shrublands with cover of less than 50 percent during the summer. (GLA, 2023a, p. 39)

Although the Project site is disturbed and no burrows or evidence of occupation was detected, the Project site contains an estimated 26.12 acres of potential habitat for the SKR (ruderal/disturbed) and therefore, the SKR may be present. The Project site is located within the Fee Area Boundary of the SKR Habitat Conservation Plan (HCP). Focused surveys for SKR are not required within the Fee Area, regardless of habitat suitability. Take authorization for SKR is covered through the HCP. (GLA, 2023a, p. 39)

3. Special-Status Wildlife Species Confirmed Absent Through Focused Surveys at the Project Site

Burrowing Owl - Confirmed Absent

Burrowing Owl (*Athene cunicularia*) is designated as a CDFW Species of Special Concern. The burrowing owl is a covered species not adequately conserved under the MSHCP, which means that projects located within the burrowing owl survey area may have to evaluate avoidance measures if burrowing owls are present. The burrowing owl occurs in shortgrass prairies, grasslands, lowland scrub, agricultural lands (particularly rangelands), prairies, coastal dunes, desert floors, and some artificial, open areas as a year-long resident. They



require large open expanses of sparsely vegetated areas on gently rolling or level terrain with an abundance of active small mammal burrows. As a critical habitat feature need, they require the use of rodent or other burrows for roosting and nesting cover. (GLA, 2023a, pp. 39-40)

The burrowing owl was not detected in the Project site during focused burrowing owl surveys conducted by GLA. GLA did not observe burrowing owls, or evidence of burrowing owls (e.g., cast pellets, preened feathers, or whitewash clustered at a burrow). Although no burrowing owls were present during the survey, approximately 33.86 acres of Project site (ruderal/disturbed, disturbed buckwheat scrub) has the potential to support the burrowing owl. (GLA, 2023a, pp. 39-40)

Fairy Shrimp – Confirmed Absent

On February 14 and May 5, 2022, GLA surveyed the Project site for riparian/riverine areas and vernal pool/seasonal pool habitat, including features with the potential to support fairy shrimp. GLA biologists evaluated the topography of the site, including whether the site contained depressional features/topography with the potential to become inundated; whether the site contained soils associated with vernal/seasonal pools; and whether the site supported plants that suggested areas of localized ponding. (GLA, 2023a, p. 10) No vernal pools or other seasonal pools (natural or artificial) are present within the Project site, including any features with the potential to support fairy shrimp. Historical aerial photography from March 2011 shows two ponded areas in the southern portion of the site. However, the ponding is not seen on other aerial imagery dating from 2006 to 2023. Additionally, the Project site is highly disturbed from past grading and stockpiling of debris. The ponded areas seen on the March 2011 aerial consist of construction scrapes from past disturbance. Ponding rarely occurs following very heavy precipitation that saturates the sandy loam soils to the extent that water cannot drain, such as in March 2011, but these areas do not typically exhibit hydrology sufficient to support fairy shrimp and do not constitute vernal pools or other features suitable for fairy shrimp. (GLA, 2023a, p. 40)

4. Raptor Foraging and Nesting Habitat

Southern California holds a diversity of birds of prey (raptors), and many of these species are in decline. For most of the declining species, foraging requirements include extensive open, undisturbed, or lightly disturbed areas, especially grasslands. This type of habitat has declined severely in the region, affecting many species, but especially raptors. A few species, such as red-tailed hawk (*Buteo jamaicensis*) and American kestrel (*Falco sparverius*), are somewhat adaptable to low-level human disturbance and can be readily observed adjacent to neighborhoods and other types of development. These species still require appropriate foraging habitat and low levels of disturbance in vicinity of nesting sites. (GLA, 2023a, p. 40)

Many of the raptors that would be expected to forage and nest within Western Riverside County are covered species under the MSHCP, with the MSHCP providing the necessary conservation to offset project impacts to foraging and/or nesting habitats. Some common raptor species (e.g., American kestrel and red-tailed hawk) are not covered by the MSHCP but are expected to be conserved with implementation of the MSHCP due to the parallel habitat needs with those raptors covered under the MSHCP. It is important to understand that the MSHCP does not provide Migratory Bird Treaty Act (MBTA) or California Fish and Game Code (CFGC) take for raptors covered under the MSHCP. (GLA, 2023a, p. 40)



The Project site provides foraging habitat for raptors, including several special-status raptors. Specifically, there is potential for Swainson's hawk, northern harrier, and white-tailed kite to forage on the Project site. During the general and focused biological surveys, GLA detected red-tailed hawk within the Project site. The Project site is surrounded by low density residential and undeveloped lands to the north, south, and east, by industrial warehouse development to the southeast, and by single-family residential development to the west. Small mammal burrows including California ground squirrel burrows were detected within the Project site. Lizard and snake species were detected during surveys within the disturbed buckwheat scrub. The majority of the perimeter of the site is routinely mowed and/or disked for weed abatement. The Project site provides a total of 33.86 acres of potential foraging habitat for raptors. The Project site does not support potential nesting habitat for these species on site. (GLA, 2023a, pp. 40-41)

5. Nesting Bird Habitat

The Project site contains trees, shrubs, and ground cover that provide suitable habitat for nesting native birds. Mortality of native birds (including eggs) is prohibited under the MBTA and CFGC. Common bird species observed on the Project site included American crow (*Corvus brachyrhynchos*), Anna's hummingbird (*Calypte anna*), barn swallow (*Hirundo rustica*), black phoebe (*Sayornis nigricans*), bushtit (*Psaltriparus minimus*), California towhee (*Melozone crissalis*), Costa's hummingbird (*Calypte costae*), Eurasian collared-dove (*Streptopelia decaocto*), European starling (*Sturnus vulgaris*), great egret (*Ardea alba*), hooded oriole (*Icterus cucullatus*), house finch (*Haemorhous mexicanus*), house sparrow (*Passer domesticus*), house wren (*Troglodytes aedon*), lesser goldfinch (*Spinus psaltria*), mourning dove (*Zenaida macroura*), northern mockingbird (*Mimus polyglottos*), red-tailed hawk (*Buteo jamaicensis*), Say's phoebe (*Sayornis saya*), western kingbird (*Sayornis verticalis*), western meadowlark (*Sturnella neglecta*), white-crowned sparrow (*Zonotrichia leucophrys*), yellow warbler (*Setophaga petechia*), and yellow-rumped warbler (*Setophaga coronata*). (GLA, 2023a, p. 41)

6. Critical Habitat

Critical habitat designations by the USFWS were researched to determine if the Project site is located within USFWS critical habitat. The Project site does not occur within a USFWS-designated critical habitat area for federally endangered or threatened species. (GLA, 2023a, p. 42)

C. Jurisdictional Resources

A jurisdictional delineation survey was conducted by GLA and is included as *Technical Appendix C2*. Provided below is a summary of the results of the jurisdictional delineation. Figure 4.4-2, *Jurisdictional Delineation Map (RWQCB)* and Figure 4.4-3, *Jurisdictional Delineation Map (CDFW)*, depict the location and extent of mapped RWQCB and CDFW jurisdictional areas on site and within the Project's off-site improvement areas. As previously mentioned, four ephemeral drainages and one roadside ditch were identified during the survey. These drainage features are described below.

• **Drainage A**. Drainage A originates at the northwestern portion of the Project site where the adjacent residential development to the west, specifically Norrisgrove Drive, currently ends. Runoff from the development accumulates at the end of Norrisgrove Drive and flows onto the Project site. Drainage A is bisected by numerous dirt roads, flows in an easterly direction, and terminates at the northeastern



corner of the Project site. Vegetation associated with the upstream reach of Drainage A includes southern willow scrub, a riparian habitat that consists primarily of sandbar willow (*Salix exigua*). Other plant species in the riparian area include mulefat (*Baccharis salicifolia*) and black willow (*Salix gooddingii*). Upland vegetation associated with Drainage A consists primarily of California buckwheat (*Eriogonum fasciculatum*) with some brittlebush (*Encelia farinosa*) and California sagebrush (*Artemisia californica*). (GLA, 2022, p. 10)

- Drainage B. Drainage B originates near the southwestern portion of the Project site where the adjacent residential development to the west, specifically Sunny Canyon Street, currently ends. Runoff from the development accumulates at the end of Sunny Canyon Street and flows onto the Project site. Drainage B is bisected by numerous dirt roads, flows in a northeasterly direction, and terminates at a shallow impoundment on site. Vegetation associated with Drainage B consists of upland species, primarily California buckwheat (*Eriogonum fasciculatum*), summer mustard (*Hirschfeldia incana*), ripgut (*Bromus diandrus*), and stinknet (*Oncosiphon piluliferum*). Other species include red brome (*Bromus madritensis* ssp. *rubens*), common fiddleneck (*Amsinckia intermedia*) and coastal heron's bill (*Erodium cicutarium*). (GLA, 2022, p. 10)
- **Drainage** C. Drainage C originates on site near the southwestern portion of the Project site and is generally associated with runoff from the adjacent dirt roads. It flows in a northeasterly direction and terminates at a shallow impoundment on site. Vegetation associated with Drainage C is upland and similar to the vegetation listed above for Drainage B. (GLA, 2022, p. 11)
- **Drainage D**. Drainage D originates on site near the southwestern portion of the Project site and is generally associated with runoff from the adjacent dirt road. It flows in a northeasterly direction and terminates at a shallow impoundment on site. Vegetation associated with Drainage D is upland and similar to the vegetation listed above for Drainage B. (GLA, 2022, p. 11)
- **Roadside Ditch**. The Roadside Ditch originates at the southeastern corner of Rider Street and Patterson Avenue, is associated with runoff from Rider Street, and flows in an easterly direction along the southern edge of Rider Street. Vegetation associated with the Roadside Ditch consists of non-native grasses with overhanging Peruvian pepper trees (*Schinus molle*). (GLA, 2022, p. 11)

1. United States Army Corps of Engineers (USACE) Jurisdiction

Drainages identified on the Project site consist of ephemeral features that terminate on site and do not connect to any downstream jurisdictional waters. Drainages A and B originate on site directly as a result of runoff from the adjacent residential development. Drainages C and D originate on site and are associated with runoff from adjacent dirt roads. As such, the drainage features within the Project site are isolated and would not be subject to USACE jurisdiction. Additionally, the Roadside Ditch located along Rider Street would not be regulated by the USACE, as roadside ditches excavated wholly in and draining only uplands that do not carry a relatively permanent flow of water would not be subject to USACE jurisdiction. (GLA, 2022, p. 11)



2. Regional Water Quality Control Board (RWQCB) Jurisdiction

RWQCB jurisdiction within the Project site totals approximately 0.14-acre (2,880 linear feet), none of which consists of State wetlands, as summarized in Table 4.4-2, *RWQCB Jurisdictional Resources*. Resources subject to RWQCB jurisdiction on site include the following: (GLA, 2022, p. 12)

- Drainage A supports an ordinary high-water mark (OHWM) ranging in width from one to three feet and is evidenced by sediment sorting, sandy depositions, and a decrease in vegetation.
- Drainage B supports an OHWM of one foot and is evidenced by sandy depositions and sediment sorting.
- Drainage C supports an OHWM ranging in width from one to two feet and is evidenced by sediment sorting.
- Drainage D supports an OHWM ranging in width from two to three feet and is evidenced by natural lines impressed on the banks and sediment sorting.
- The Roadside Ditch located along Rider Street supports an OHWM ranging in width from three to five feet and is evidenced by natural lines impressed on the banks, sediment sorting, gravelly depositions, and a lack of vegetation.

Drainage Name	Regional Board Non-Wetland Waters (acres)	Regional Board Jurisdictional Wetlands (acres)	Total Regional Board Jurisdiction (acres)	Length (linear feet)
Drainage A	0.05	0	0.05	1,302
Drainage B	0.02	0	0.02	529
Drainage C	0.01	0	0.01	353
Drainage D	0.01	0	0.01	221
Roadside Ditch	0.04	0	0.04	475
Total	0.14	0	0.14	2,880

Table 4.4-2 RWQCB Jurisdictional Resources

(GLA, 2022, Table 1)

Drainages A through D and the Roadside Ditch are ephemeral features that would be regulated by the RWQCB as non-wetland waters of the State, as summarized in Table 4.4-2. (GLA, 2022, p. 12)

3. California Department of Fish and Wildlife (CDFW) Jurisdiction

CDFW jurisdiction associated with the Project site totals approximately 0.35-acre, of which approximately 0.22-acre consists of non-riparian stream, and approximately 0.13-acre consists of riparian habitat, as summarized in Table 4.4-3, *CDFW Jurisdictional Resources*. A total of 2,880 linear feet of ephemeral drainage is present, of which 274 linear feet consists of riparian habitat. Resources subject to CDFW jurisdiction on site include the following: (GLA, 2023a, p. 43)

• Drainage A supports a bed and bank ranging in width from one to four feet.



- Drainage B supports a bed and bank of one foot.
- Drainage C supports a bed and bank ranging in width from one to two feet.
- Drainage D supports a bed and bank ranging in width from two to seven feet.
- The Roadside Ditch located along Rider Street supports a bed and bank ranging in width from eight to 15 feet.

Drainage Name	CDFW Non- riparian Stream (acres)	CDFW Riparian Habitat (acres)	Total Potential CDFW Jurisdiction (acres)	Length (linear feet)
Drainage A	0.04	0.13	0.17	1028
Drainage B	0.02	0	0.02	529
Drainage C	0.01	0	0.01	353
Drainage D	0.02	0	0.02	221
Roadside Ditch	0.13	0	0.13	475
Total	0.22	0.13	0.35	2,880

Table 4.4-3	CDFW Jurisdictional Reso	ources

(GLA, 2022, p. 13)

Drainages A through D and the Roadside Ditch have the potential to support aquatic resources that would be regulated as streams and associated riparian habitat by the CDFW, as summarized in Table 4.4-3. (GLA, 2022, p. 13)

4. MSHCP Riparian/Riverine/Vernal Pool Resources

Vegetation communities associated with riparian systems and vernal pools are depleted natural vegetation communities because, similar to coastal sage scrub, they have declined throughout Southern California during past decades. In addition, they support a large variety of special-status wildlife species. Most species associated with riparian/riverine habitats are covered species under the MSHCP. The MSHCP has specific policies and procedures regarding the evaluation and conservation of riparian/riverine resources (including riparian vegetation) and vernal pools because it supports MSHCP covered species. Thus, the MSHCP classification of riparian/riverine includes both riparian (depleted natural vegetation communities) as well as ephemeral drainages that are natural in origin but may lack riparian vegetation. (GLA, 2023a, pp. 43-44)

The riparian/riverine jurisdiction is identical to that of CDFW jurisdiction, totaling 0.35-acre of riparian/riverine areas including 2,880 linear feet of ephemeral streambed. Approximately 0.13-acre (274 linear feet) of the total 0.35-acre supports riparian vegetation (southern willow scrub), and approximately 0.22-acre supports upland vegetation types (disturbed buckwheat scrub and ruderal/disturbed). As shown on Table 4-7 of the BTR, the entirety of Drainages A, B, C and D occur within MSHCP Criteria Cell 2432 while the roadside ditch is located outside of the Criteria Area. (GLA, 2023a, p. 44)

No vernal pools or other seasonal pools were documented at the Project site or in the Project's off-site disturbance area, including any resources with the potential to support fairy shrimp. The Project site soil mapping shows the site contains sandy loam soils which are generally not associated with vernal pools. Further,



observations of the soils on site showed a lack of clay soil components. Additionally, no plants were observed on the Project site that are associated with vernal pools or similar habitats that experience prolonged inundation. Furthermore, as discussed previously, the Project site and the Project's off-site disturbance area do not have the potential to support listed species of fairy shrimp. (GLA, 2023a, p. 44)

The Project site and Project's off-site disturbance area do not support suitable potential habitat for birds associated with riparian habitats such as the least Bell's vireo, southwestern willow flycatcher, and western yellow-billed cuckoo. The limited riparian vegetation found on site is too small and isolated to provide nesting habitat for these species. The least Bell's vireo requires riparian corridors with a diversity of vegetative height, which is not present on site. The small and isolated nature of the riparian on site, as well as the ephemeral nature of the associated streambed, precludes the presence of the southwestern willow flycatcher and western yellow-billed cuckoo which both require standing or running water and dense patches of riparian habitat. (GLA, 2023a, p. 44)

5. Regional Connectivity/Wildlife Movement Linkages, Corridors and Nursery Sites

Habitat linkages are areas which provide a connection between two or more other habitat areas that are often larger or superior in quality to the linkage. Such linkage sites can be quite small or constricted, but can be vital to the long-term health of connected habitats. Corridors are similar to linkages but provide specific opportunities for individual animals to disperse or migrate between areas. Adequate cover and tolerably low levels of disturbance are common requirements for corridors. Habitat in corridors may be quite different than that in the connected areas, but if used by the wildlife species of interest, the corridor will still function as desired. (GLA, 2023a, p. 41)

Corridors are similar to linkages but provide specific opportunities for individual animals to disperse or migrate between areas, generally extensive but otherwise partially or wholly separated regions. Adequate cover and tolerably low levels of disturbance are common requirements for corridors. Habitat in corridors may be quite different than that in the connected areas, but if used by the wildlife species of interest, the corridor will still function as desired. (GLA, 2023a, p. 41)

Wildlife nurseries are sites where wildlife concentrate for hatching and/or raising young, such as rookeries, spawning areas, and bat colonies. Nurseries are important to both special-status species as well as commonly occurring species. (GLA, 2023a, p. 42)

The Project site has historically been disturbed and is surrounded by low density residential and undeveloped lands to the north, south, and east, by industrial warehouse development to the southeast, and by single-family residential development to the west. The Project site and the Project site's off-site disturbance area do not occur within an existing or proposed Core, Linkage, or Constrained Linkage as identified by the MSHCP. The Project site is located within the northernmost portion of Cell Group B, and areas described for conservation by the MSHCP consists of the southern 70 to 80% of the Cell Group. Although the Project site is not part of a significant regional wildlife movement corridor. (GLA, 2023a, p. 42)



4.4.2 APPLICABLE REGULATORY REQUIREMENTS

The following is a brief description of the federal, State, and local environmental laws and related regulations governing the protection of biological resources.

A. <u>Federal Regulations</u>

1. Federal Endangered Species Act (FESA)

The purpose of the Federal Endangered Species Act (FESA) is to protect and recover imperiled species and the ecosystems upon which they depend. It is administered by the USFWS and the U.S. Department of Commerce Department's National Marine Fisheries Service (NMFS). The USFWS has primary responsibility for terrestrial and freshwater organisms, while the responsibilities of NMFS are mainly marine wildlife such as whales and anadromous fish such as salmon. Under the FESA, species may be listed as either endangered or threatened. "Endangered" means a species is in danger of extinction throughout all or a significant portion of its range. "Threatened" means a species is likely to become endangered within the foreseeable future. All species of plants and animals, except pest insects, are eligible for listing as endangered or threatened. (USFWS, 2017)

The FESA makes it unlawful for a person to take a listed animal without a permit. Take is defined as "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect or attempt to engage in any such conduct." Through regulations, the term "harm" is defined as "an act which actually kills or injures wildlife. Such an act may include significant habitat modification or degradation where it actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding, or sheltering." Listed plants are not protected from take, although it is illegal to collect or maliciously harm them on federal land. Protection from commercial trade and the effects of federal actions do apply for plants. (USFWS, 2017)

Section (§) 7 of the FESA requires federal agencies to use their legal authorities to promote the conservation purposes of the FESA and to consult with the USFWS and NMFS, as appropriate, to ensure that effects of actions they authorize, fund, or carry out are not likely to jeopardize the continued existence of listed species. During consultation, the "action" agency receives a "biological opinion" or concurrence letter addressing the proposed action. In the relatively few cases in which the USFWS or NMFS makes a jeopardy determination, the agency offers "reasonable and prudent alternatives" about how the proposed action could be modified to avoid jeopardy. It is extremely rare that a project ends up being withdrawn or terminated because of jeopardy to a listed species. (USFWS, 2017)

§ 10 of the FESA may be used by landowners including private citizens, corporations, tribes, states, and counties who want to develop property inhabited by listed species. Landowners may receive a permit to take such species incidental to otherwise legal activities, provided they have developed an approved HCP. HCPs include an assessment of the likely impacts on the species from the proposed action, the steps that the permit holder will take to avoid, minimize, and mitigate the impacts, and the funding available to carry out the steps. HCPs may benefit not only landowners, but also species by securing and managing important habitat and by addressing economic development with a focus on species conservation. (USFWS, 2017)



2. Clean Water Act Section 401

Clean Water Act (CWA) § 401 water quality certification provides states and authorized tribes with an effective tool to help protect water quality, by providing them an opportunity to address the aquatic resource impacts of federally issued permits and licenses. Under § 401, a federal agency cannot issue a permit or license for an activity that may result in a discharge to waters of the U.S. until the state or tribe where the discharge would originate has granted or waived § 401 certification. The central feature of CWA § 401 is the state or tribe's ability to grant, grant with conditions, deny, or waive certification. Granting certification, with or without conditions, allows the federal permit or license to be issued consistent with any conditions of the permit or license to be issued without state or tribal comment. States and tribes make their decisions to deny, certify, or condition permits or licenses based in part on the proposed project's compliance with U.S. Environmental Protection Agency (EPA)-approved water quality standards. In addition, states and tribes consider whether the activity leading to the discharge will comply with any applicable effluent limitations guidelines, new source performance standards, toxic pollutant restrictions, and other appropriate requirements of state or tribal law. (EPA, 2022e)

Many states and tribes rely on § 401 certification to ensure that discharges of dredge or fill material into a water of the U.S. do not cause unacceptable environmental impacts and, more generally, as their primary regulatory tool for protecting wetlands and other aquatic resources. However, § 401 is limited in scope and application to situations involving federally-permitted or licensed activities that may result in a discharge to a water of the U.S. If a federal permit or license is not required, or would authorize impacts only to waters that are not waters of the U.S., the activity is not subject to CWA § 401. (EPA, 2022e)

3. Clean Water Act Section 404

CWA § 404 establishes a program to regulate the discharge of dredged or fill material into waters of the U.S., including wetlands. Wetlands subject to CWA § 404 are defined as "areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas." Activities in waters of the U.S. regulated under this program include fill for development, water resource projects (such as dams and levees), infrastructure development (such as highways and airports), and mining projects. § 404 requires a permit before dredged or fill material may be discharged into waters of the U.S., unless the activity is exempt from § 404 regulation (e.g. certain farming and forestry activities). (EPA, n.d.)

The basic premise of the program is that no discharge of dredged or fill material may be permitted if: (1) a practicable alternative exists that is less damaging to the aquatic environment; or (2) the nation's waters would be significantly degraded. Applications for permits must, to the extent practicable: (1) demonstrate steps have been taken to avoid wetland impacts; (2) demonstrate that potential impacts on wetlands have been minimized; and (3) provide compensation for any remaining unavoidable impacts. Proposed activities are regulated through a permit review process. (EPA, n.d.)

An individual permit is required for potentially significant impacts. Individual permits are reviewed by the USACE, which evaluates applications under a public interest review, as well as the environmental criteria set



forth in the CWA § 404(b)(1) Guidelines. However, for most discharges that will have only minimal adverse effects, a general permit may be suitable. General permits are issued on a nationwide, regional, or State basis for particular categories of activities. The general permit process eliminates individual review and allows certain activities to proceed with little or no delay, provided that the general or specific conditions for the general permit are met. States also have a role in § 404 decisions, through state program general permits, water quality certification, or program assumption. (EPA, n.d.)

4. Executive Order 11990 – Protection of Wetlands

The purpose of Executive Order (EO) 11990 is to "minimize the destruction, loss or degradation of wetlands and to preserve and enhance the natural and beneficial values of wetlands." To meet these objectives, EO 11990 requires federal agencies, in planning their actions, to consider alternatives to wetland sites and limit potential damage if an activity affecting a wetland cannot be avoided. EO 119990 applies to:

- Acquisition, management, and disposition of federal lands and facilities construction and improvement projects which are undertaken, financed, or assisted by federal agencies;
- Federal activities and programs affecting land use, including but not limited to water and related land resources planning, regulation, and licensing activities. (FEMA, 2022b)

The procedures require the determination of whether or not the proposed project will be in or will affect wetlands. If so, a wetlands assessment must be prepared that describes the alternatives considered. The procedures include a requirement for public review of assessments. (FEMA, 2022b)

5. Migratory Bird Treaty Act (16 USC § 703-712)

The Migratory Bird Treaty Act (MBTA) of 1918 makes it illegal for anyone to take, possess, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid permit issued pursuant to federal regulations. The migratory bird species protected by the MBTA are listed in Title 50 Code of Federal Regulations (CFR) 10.13. The USFWS has statutory authority and responsibility for enforcing the MBTA (16 U.S.C. 703-712). The MBTA implements Conventions between the U.S. and four countries (Canada, Mexico, Japan, and Russia) for the protection of migratory birds. (USFWS, n.d.)

B. <u>State Regulations</u>

1. California Endangered Species Act (CESA)

The California Endangered Species Act (CESA) states that all native species of fishes, amphibians, reptiles, birds, mammals, invertebrates, and plants, and their habitats, threatened with extinction and those experiencing a significant decline which, if not halted, would lead to a threatened or endangered designation, will be protected or preserved. The CDFW works with interested persons, agencies, and organizations to protect and preserve such sensitive resources and their habitats. The CESA prohibits the take of any species of wildlife designated by the California Fish and Game Commission as endangered, threatened, or candidate species. CDFW may authorize the take of any such species if certain conditions are met. (CDFW, n.d.)



§ 2081 subdivision (b) of the CFGC allows CDFW to authorize take of species listed as endangered, threatened, candidate, or a rare plant, if that take is incidental to otherwise lawful activities and if certain conditions are met. These authorizations are commonly referred to as incidental take permits (ITPs). (CDFW, n.d.)

If a species is listed by both the FESA and CESA, CFGC § 2080.1 allows an applicant who has obtained a federal incidental take statement (federal § 7 consultation) or a federal ITP (federal § 10(a)(1)(B)) to request that the director of CDFW find the federal documents consistent with CESA. If the federal documents are found to be consistent with CESA, a consistency determination is issued, and no further authorization or approval is necessary under the CESA. (CDFW, n.d.)

A Safe Harbor Agreement (SHA) authorizes incidental take of a species listed as endangered, threatened, candidate, or a rare plant, if implementation of the agreement is reasonably expected to provide a net conservation benefit to the species, among other provisions. SHAs are intended to encourage landowners to voluntarily manage their lands to benefit CESA-listed species. California SHAs are analogous to the federal safe harbor agreement program and CDFW has the authority to issue a consistency determination based on a federal safe harbor agreement. (CDFW, n.d.)

2. Natural Community Conservation Planning (NCCP) Act

CDFW's Natural Community Conservation Planning (NCCP) Act takes a broad-based ecosystem approach to planning for the protection and perpetuation of biological diversity. The NCCP program began in 1991 as a cooperative effort to protect habitats and species. It is broader in its orientation and objectives than the FESA and CESA, as these laws are designed to identify and protect individual species that have already declined in number significantly. (CDFW, n.d.)

An NCCP plan identifies and provides for the regional protection of plants, animals, and their habitats, while allowing compatible and appropriate economic activity. Working with landowners, environmental organizations, and other interested parties, a local agency oversees the numerous activities that compose the development of an NCCP plan. CDFW and the USFWS provide the necessary support, direction, and guidance to NCCP participants. (CDFW, n.d.)

There are currently 17 approved NCCP plans (including six subarea plans) and more than nine NCCP plans in various stages of planning (including two subarea plans), which together cover more than 8 million acres and will provide conservation for nearly 400 special status species and a wide diversity of natural community types throughout California. (CDFW, n.d.)

3. California Fish and Game Code, § 1600, et seq.

CFGC § 1602 requires an entity to notify CDFW prior to commencing any activity that may do one or more of the following: (1) substantially divert or obstruct the natural flow of any river, stream, or lake; (2) substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or (3) deposit debris, waste or other materials that could pass into any river, stream, or lake. The CFGC indicates that "any river, stream or lake" includes those that are episodic (they are dry for periods of time) as well as those that are perennial (they flow year-round). This includes ephemeral streams, desert washes, and watercourses



with a subsurface flow. It may also apply to work undertaken within the flood plain of a body of water. (CDFW, n.d.)

CDFW requires a Lake and Streambed Alteration (LSA) Agreement when it determines that the activity, as described in a complete LSA Notification, may substantially adversely affect existing fish or wildlife resources. An LSA Agreement includes measures necessary to protect existing fish and wildlife resources. CDFW may suggest ways to modify a project that would eliminate or reduce harmful impacts to fish and wildlife resources. Before issuing an LSA Agreement, CDFW must comply with the California Environmental Quality Act (CEQA). (CDFW, n.d.)

4. Native Plant Protection Act (NPPA) of 1977

The Native Plant Protection Act (NPPA) was enacted in 1977 and allows the Fish and Game Commission to designate plants as rare or endangered. There are 64 species, subspecies, and varieties of plants that are protected as rare under the NPPA. The NPPA prohibits take of endangered or rare native plants but includes some exceptions for agricultural and nursery operations; emergencies; and after properly notifying CDFW for vegetation removal from canals, roads, and other sites, changes in land use, and in certain other situations. (CDFW, n.d.)

5. Unlawful Take or Destruction of Nests or Eggs (CFGC §§ 3503.5-3513)

§ 3503.5 of the CFGC specifically protects birds of prey, stating: "It is unlawful to take, possess, or destroy any . . . [birds-of-prey] or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto." § 3513 of the CFGC duplicates the federal protection of migratory birds, stating: "It is unlawful to take or possess any migratory nongame bird as designated in the Migratory Bird Treaty Act or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the Migratory Bird Treaty Act." (CA Legislative Info, n.d.)

6. Porter-Cologne Water Quality Act

The Porter-Cologne Act is the principal law governing water quality regulation in California. It establishes a comprehensive program to protect water quality and the beneficial uses of water. The Porter-Cologne Act applies to surface waters, wetlands, and ground water and to both point and nonpoint sources of pollution. Pursuant to the Porter-Cologne Act (California Water Code (CWC) § 13000 et seq.), the policy of the State is as follows:

- That the quality of all the waters of the State shall be protected;
- That all activities and factors affecting the quality of water shall be regulated to attain the highest water quality within reason; and
- That the State must be prepared to exercise its full power and jurisdiction to protect the quality of water in the State from degradation. (SWRCB, 2014)

The Porter-Cologne Act established nine RWQCBs (based on hydrogeologic barriers) and the State Water Board, which are charged with implementing its provisions and which have primary responsibility for



protecting water quality in California. The State Water Board provides program guidance and oversight, allocates funds, and reviews decisions of the RWQCBs. In addition, the State Water Board allocates rights to the use of surface water. The RWQCBs have primary responsibility for individual permitting, inspection, and enforcement actions within each of nine hydrologic regions. The State Water Board and RWQCBs have numerous Non-Point Source (NPS)-related responsibilities, including monitoring and assessment, planning, financial assistance, and management. (SWRCB, 2014)

The Regional Water Boards regulate discharges under the Porter-Cologne Act primarily through issuance of National Pollutant Discharge Elimination System (NPDES) permits for point source discharges and waste discharge requirements (WDRs) for NPS discharges. Anyone discharging or proposing to discharge materials that could affect water quality (other than to a community sanitary sewer system regulated by an NPDES permit) must file a report of waste discharge. The SWRCB and the RWQCBs can make their own investigations or may require dischargers to carry out water quality investigations and report on water quality issues. The Porter-Cologne Act provides several options for enforcing WDRs and other orders, including cease and desist orders, cleanup and abatement orders, administrative civil liability orders, civil court actions, and criminal prosecutions. (SWRCB, 2014)

The Porter-Cologne Act also requires adoption of water quality control plans that contain the guiding policies of water pollution management in California. A number of statewide water quality control plans have been adopted by the State Water Board. In addition, regional water quality control plans (basin plans) have been adopted by each of the RWQCBs and get updated as necessary and practical. These plans identify the existing and potential beneficial uses of waters of the State and establish water quality objectives to protect these uses. The basin plans also contain implementation, surveillance, and monitoring plans. Statewide and regional water quality control plans include enforceable prohibitions against certain types of discharges, including those that may pertain to nonpoint sources. Portions of water quality control plans, the water quality objectives and beneficial use designations, are subject to review by the EPA, when approved they become water quality standards under the CWA. (SWRCB, 2014)

C. <u>Regional and Local Regulations</u>

1. Western Riverside County Multiple Species Habitat Conservation Plan

The continued loss of habitat to new development and the cumbersome process of environmental review and habitat mitigation on a project-by-project basis led to preparation of the Western Riverside County MSHCP. The MSHCP is a multi-jurisdictional accomplishment that provides a regional conservation solution to species and habitat issues. The primary intent of the Western Riverside County MSHCP is to provide for the conservation of a range of plants and animals within natural communities characteristic of western Riverside County and in return, provide take coverage and mitigation for projects throughout the plan area to avoid the cost and delays of mitigating biological impacts on a project-by-project basis. (Riverside County, 2015a, p. 4.8-49)

The MSHCP was adopted by Riverside County on June 17, 2003, and is a comprehensive, multijurisdictional HCP pursuant to \$ 10(a)(1)(B) of the FESA, as well as a NCCP pursuant to the CFGC. The USFWS issued a Biological Opinion and FESA \$ 10 permit for the MSHCP on June 22, 2004, and CDFW issued an NCCP Approval and Take Authorization on the same date. As long as adherence to the policies and requirements of



the MSHCP is maintained, participants in the MSHCP, which include Riverside County and 18 cities, are allowed to authorize 'incidental take' of covered plant and wildlife species. (Riverside County, 2015a, p. 4.8-49)

The MSHCP provides for the long-term survival of protected and sensitive species by designating a contiguous system of habitat to be added to existing public/quasi-public lands. The MSHCP includes an impact fee collected by the permittees and used in part to acquire these lands. Depending on the location of the private or public development project, certain biological studies are required for MSHCP compliance. These studies may identify the need for specific measures to avoid, minimize, and reduce impacts to covered species and their habitat. (Riverside County, 2015a, pp. 4.8-49 to 4.8-50)

The Western Riverside County MSHCP defines two distinct consistency processes for development projects based on their location within the MSHCP's coverage area, with separate processes for projects located outside of Criteria Areas and those within a Criteria Area. Criteria Areas consist of 160-acre 'cells' with identified conservation objectives. (Riverside County, 2015a, p. 4.8-50)

2. Stephens' Kangaroo Rat Habitat Conservation Plan (SKR HCP)

The SKR HCP was prepared under the direction of the Riverside County Habitat Conservation Agency (RCHCA) Board of Directors, in consultation with USFWS and CDFW. Riverside County is a member agency of the RCHCA. The 30-year SKR HCP was designed to acquire and permanently conserve, maintain, and fund the conservation, preservation, restoration, and enhancement of Stephens' kangaroo rat-occupied habitat. The SKR HCP covers approximately 534,000 acres within the member jurisdictions and includes an estimated 30,000 acres of occupied Stephens' kangaroo rat habitat. The SKR HCP requires members to preserve and manage 15,000 acres of occupied habitat in seven Core Reserves encompassing over 41,000 acres. (Riverside County, 2015a, p. 4.8-52)

On May 3, 1996, the USFWS issued a permit to the RCHCA to incidentally take the federally endangered Stephens' kangaroo rat (*Dipodomys stephensi*). Similarly, the CDFW issued a CESA Authorization for Implementation of the Stephens' kangaroo rat on May 6, 1996. To date, more than \$50 million has been dedicated to the establishment and management of a system of regional preserves designed to ensure the survival of SKR in the plan area. This effort resulted in the permanent conservation of approximately 50% of the SKR-occupied habitat remaining in the HCP area. Through direct funding and in-kind contributions, SKR habitat in the regional reserve system is managed to ensure its continuing ability to support the species. Core reserves were deemed complete in December of 2003. (Riverside County, 2015a, p. 4.8-52)

3. Riverside County Oak Tree Management Guidelines

In March 1993, Riverside County issued Oak Tree Management Guidelines to address the treatment of oak woodlands in areas where zoning and/or General Plan density restrictions allow the effective use of clustering. The guidelines are generally considered to be the most effective where minimum lot sizes are 2.5 acres or larger, or where oak woodlands are concentrated in a relatively small portion of a project site. The guidelines include recommendations for oak inventories, land use designs to cluster home sites in order to reduce impacts to oaks, and mitigation measures for oak conservation. (Riverside County, 2015a, p. 4.8-53)



4. Ordinance No. 559 – Regulating the Removal of Trees

Ordinance No. 559 regulates the removal of living native trees on parcels of property greater than one-half acre, with an elevation above 5,000 feet amsl within the unincorporated area of Riverside County without first obtaining a permit to do so. The purpose of the ordinance is to ensure that the timberlands of Riverside County are protected, and the ecological balance of such timberlands is preserved. (Riverside County, 2015a, p. 4.8-53)

4.4.3 BASIS FOR DETERMINING SIGNIFICANCE

Section IV of Appendix G to the CEQA Guidelines addresses typical adverse effects to biological resources, and includes the following threshold questions to evaluate a project's impacts to biological resources:

- Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?
- Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?
- Would the project have a substantial adverse effect on state or federally-protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?
- Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?
- Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

• Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? Significance thresholds are set forth in Riverside County's Environmental Assessment Checklist, are derived from Section IV of Appendix G to the CEQA Guidelines (listed above), and state that the proposed Project would have a significant impact to biological resources if construction and/or operation of the Project would:

- a. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or State conservation plan;
- b. Have a substantial adverse effect, either directly or through habitat modifications, on any endangered, or threatened species, as listed in Title 14 of the California Code of Regulations (Sections 670.2 or 670.5) or in Title 50, Code of Federal Regulations (Sections 17.11 or 17.12);



- c. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U. S. Wildlife Service;
- d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites;
- e. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local 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; or
- g. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

The significance thresholds set forth in Riverside County's Environmental Assessment Checklist were used to evaluate the significance of the proposed Project's impacts to biological resources.

4.4.4 IMPACT ANALYSIS

<u>Threshold a.</u>: Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state conservation plan?

The Project site is located within the Fee Area Boundary for the SKR HCP. Additionally, the Project area is subject to the Western Riverside County MSHCP. Project consistency with both plans is discussed below.

A. <u>Project Consistency with the SKR HCP</u>

The SKR HCP was prepared under the direction of the RCHCA Board of Directors in consultation with USFWS and CDFW. Riverside County is a member agency of the RCHCA. Although the Project site is disturbed and no burrows or evidence of occupation was detected, the Project site contains an estimated 26.12 acres of potential habitat for the SKR (ruderal/disturbed) and therefore, the SKR may be present. However, according to Figure S-1 of the SKR HCP, the Study Area is not located within or adjacent to any SKR core reserve areas. The Project site is located within the Fee Area Boundary of the SKR HCP; however, focused surveys for SKR are not required within the Fee Area, regardless of habitat suitability. Take authorization for SKR is covered through the HCP. Additionally, the Project Applicant would be required to contribute fees towards the establishment and long-term maintenance of the SKR HCP core reserve pursuant to Riverside County Ordinance No. 663. The Project would not conflict with any provisions of the SKR HCP; thus, a less-than-significant impact would occur. (GLA, 2023a, p. 39)



B. <u>Project Consistency with the MSHCP</u>

Provided below is an evaluation of the Project's consistency with MSHCP Reserve Assembly requirements, Section 6.1.2 (Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools), Section 6.1.3 (Protection of Narrow Endemic Plant Species), Section 6.1.4 (Guidelines Pertaining to the Urban/Wildlands Interface), and Section 6.3.2 (Additional Survey Needs and Procedures).

1. Project Relationship to MSHCP Reserve Assembly

The Project site is located within the Mead Valley Area Plan (MVAP) of the Western Riverside County MSHCP. The Project site is located within the northeastern quarter of MSHCP Criteria Area Cell 2432 within Cell Group B. The MSHCP Cell Criteria describes conservation for 70 to 80 percent of Cell Group B, focusing on the southern portion. The Project was subject to the MSHCP Habitat Acquisition and Negotiation Strategy (HANS) process, which resulted in a determination that no conservation is required on the Project site. The Project site represents approximately 15 percent of northeastern portion of the Cell Group, while the conservation criteria for Cell Group B is intended to focus on the southern portion of the Cell Group. As such, the Project site is not described for conservation as part of the MSHCP Reserve System by the MSHCP Cell Criteria. Therefore, the Project would not conflict with the MSHCP Reserve Assembly requirements, and impacts would be less than significant. (GLA, 2023a, p. 56)

2. Project Consistency with MSHCP Section 6.1.2 (Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools)

Pursuant to Volume I, Section 6.1.2 of the MSHCP, projects must consider alternatives providing for 100 percent avoidance of riparian/riverine areas. If avoidance is infeasible, then mitigation must be provided for the unavoidable impacts and a Determination of Biologically Equivalent or Superior Preservation (DBESP) is required. The Project would permanently remove 0.35-acre of riparian/riverine resources, including 0.13-acre of riparian vegetation located on site and 0.22-acre (consisting of 0.09-acre on site and 0.13-acre off site) of unvegetated riverine areas. All of the on site impacts (0.13-acre riparian and 0.09-acre riverine) are located in Criteria Cell 2432, and all off site impacts (0.13-acre riverine) are located outside the Criteria Area. A DBESP was prepared for the Project, and is included as *Technical Appendix C3* to this EIR. Regardless, prior to mitigation, Project impacts to 0.35-acre of riparian/riverine resources represent a potential conflict with the MSHCP. This is evaluated as a significant impact for which mitigation would be required. (GLA, 2023a, p. 51)

On February 14 and May 5, 2022, GLA surveyed the Project site and the Project's proposed off-site disturbance areas for riparian/riverine areas and vernal pool/seasonal pool habitat, (including features with the potential to support fairy shrimp habitat). No vernal pools or other seasonal pools (natural or artificial) are present, including features with the potential to support fairy shrimp. Historical aerial photography from March 2011 shows two ponded areas in the southern portion of the site. However, the ponding is not seen on other aerial imagery dating from 2006 to 2023. Additionally, the Project site is highly disturbed from past grading and stockpiling of debris. The ponded areas seen on the March 2011 aerial consist of construction scrapes from past disturbance. Ponding rarely occurs following very heavy precipitation that saturates the sandy loam soils to the extent that water cannot drain, such as in March 2011, but these areas do not typically exhibit hydrology sufficient to support fairy shrimp and do not constitute vernal pools or other features suitable for fairy shrimp.



(GLA, 2023a, p. 40) The Project site and the Project's off-site distburance areas also do not contain suitable habitat for fairy shrimp or for riparian birds with survey/conservation requirements (i.e., least Bell's vireo, southwestern willow flycatcher, and western yellow billed cuckoo). As such, no impacts to fairy shrimp or riparian birds with survey/conservation requirements would occur with implementation of the Project, and as such the Project would not conflict with Section 6.1.2 of the MSHCP with respect to vernal pools. (GLA, 2023a, p. 56)

3. Project Consistency with MSHCP Section 6.1.3 (Protection of Narrow Endemic Plant Species)

Volume I, Section 6.1.3 of the MSHCP requires that within identified Narrow Endemic Plant Species Survey Areas (NEPSSA), site-specific focused surveys for narrow endemic plants species are required for all public and private projects where appropriate soils and habitat are present. The Project site and the Project's off-site disturbance areas do not occur within identified NEPSSA. Therefore, focused surveys are not required by the MSHCP for any NEPSSA species. As such, the Project would not conflict with the provisions of MSHCP Section 6.1.3. (GLA, 2023a, pp. 56-57)

4. Project Consistency with MSHCP Section 6.1.4 (Guidelines Pertaining to the Urban/Wildlands Interface)

The MSHCP Urban/Wildlands Interface Guidelines (UWIG) presented in the MSHCP are intended to address indirect effects associated with developing areas in proximity to the MSHCP Conservation Area. As the MSHCP Conservation Area is assembled, development is expected to occur adjacent to the Conservation Area. Future development in proximity to the MSHCP Conservation Area may result in edge effects with the potential to adversely affect biological resources within the Conservation Area. To minimize such edge effects, the guidelines are required to be implemented in conjunction with review of individual public and private development projects in proximity to the MSHCP Conservation Area and address the following: drainage; toxics; lighting; noise; invasive species; barriers; and grading/land development. (GLA, 2023a, p. 57)

The Project site is not currently adjacent to the MSHCP Conservation Area; however, based on the Criteria for Cell Group B of the MVAP, it is possible that lands to the southwest of the Project could become part of the Conservation Area in the future. Therefore, the Project could have future adjacency or very close proximity to the Conservation Area. Provided below is an analysis of the Project's consistency with the various provisions of MSHCP Section 6.1.4. (GLA, 2023a, p. 57)

Drainage

Proposed projects in proximity to the MSHCP Conservation Area are required by the MSHCP to incorporate measures, including measures required through the National Pollutant Discharge Elimination System (NPDES) requirements, to ensure that the quantity and quality of runoff discharged to the MSHCP Conservation Area is not altered in an adverse way when compared with existing conditions. In particular, measures shall be put in place to avoid discharge of untreated surface runoff from developed and paved areas into the MSHCP Conservation Area. Stormwater systems are required be designed to prevent the release of toxins, chemicals, petroleum products, exotic plant materials or other elements that might degrade or harm biological resources or ecosystem processes within the MSHCP Conservation Area. This can be accomplished using a variety of



methods including natural detention basins, grass swales or mechanical trapping devices. Regular maintenance shall occur to ensure effective operations of runoff control systems. (GLA, 2023a, pp. 51-52)

As discussed in further detail in EIR Subsection 4.10, *Hydrology and Water Quality*, the Project would be required to comply with all applicable water quality regulations, including obtaining and complying with those conditions established in the WDRs and NPDES permits. Both of these permits require the treatment of all surface runoff from paved and developed areas, the implementation of applicable Best Management Practices (BMPs) during construction activities, and the installation and proper maintenance of structural BMPs to ensure adequate long-term treatment of water before entering into any stream course. Additionally, a Stormwater Pollution Prevention Plan (SWPPP) would be developed to address runoff and water quality during construction. Drainage on site would be directed to several on-site catch basins, which would then drain either northeasterly to a bioretention basin or southerly to an underground chamber installed beneath the building's southerly truck court, either of which would provide water quality treatment for all runoff generated on or tributary to the Project site. Therefore, the Project would be fully consistent with the MSHCP UWIGs related to drainage. (GLA, 2023a, p. 52)

Toxics

Land uses proposed in proximity to the MSHCP Conservation Area that use chemicals or generate bioproducts that are potentially toxic or may adversely affect wildlife species, habitat or water quality are required to incorporate measures to ensure that application of such chemicals does not result in discharge to the MSHCP Conservation Area. Measures such as those employed to address drainage issues would be implemented, as described above. The proposed Project also would implement a SWPPP that will address runoff during construction. Drainage on site would be directed to several on-site catch basins, which would then drain either northeasterly to a bioretention basin or southerly to an underground chamber installed beneath the building's southerly truck court, either of which would provide water quality treatment for all runoff generated on or tributary to the Project site and would remove any potential toxics from site runoff. Accordingly, the Project would be fully consistent with the MSHCP UWIGs related to toxics. (GLA, 2023a, p. 52)

Lighting

Night lighting is required to be directed away from the MSHCP Conservation Area to protect species from direct night lighting. If night lighting is required during construction, shielding is required to be incorporated to ensure ambient lighting in the MSHCP Conservation Area is not increased. The Project site is not currently adjacent to the MSHCP Conservation Area, but lands diagonally to the southwest have potential for future inclusion into the Conservation Area.

There is a potential that construction activities associated with the Project may require nighttime lighting during construction activities, particularly during nighttime concrete pouring activities. Thus, during Project construction activities the Project has the potential to conflict with the lighting provisions of the MSHCP in the event that lands to the southwest have been incorporated into the MSHCP Conservation Area, resulting in a potentially significant near-term impact.

Under long-term operating conditions, future development on site would be subject to compliance with Riverside County Ordinance No. 915 (Regulating Outdoor Lighting). In particular, Section 5 of Riverside



County Ordinance No. 915 requires that "[a]ll outdoor luminaires in shall [*sic*] be located, adequately shielded, and directed such that no direct light falls outside the parcel of origin, or onto the public right-of-way." All future building permit applications would be required to comply with Riverside County Ordinance No. 915, which would ensure that long-term operational lighting does not adversely affect the MSHCP Conservation Area. As such, under long-term conditions the Project would not conflict with the lighting provisions of the MSHCP Section 6.1.4.

Noise

The MSHCP requires that proposed noise-generating land uses affecting the MSHCP Conservation Area shall incorporate setbacks, berms, or walls to minimize the effects of noise on MSHCP Conservation Area resources pursuant to applicable rules, regulations, and guidelines related to land use noise standards. For planning purposes, wildlife within the MSHCP Conservation Area should not be subject to noise that would exceed residential noise standards. (GLA, 2023a, p. 52)

The proposed Project is not currently located adjacent to the MSHCP Conservation Area, but as previously noted lands diagonally to the southwest have potential for future inclusion into the Conservation Area. As discussed in detail in EIR Subsection 4.13, *Noise*, construction and long-term operation of the Project would not expose the nearby residential uses to noise levels exceeding the County's noise level standards. Because the potential future MSHCP Conservation Area to the southwest is located further from the Project site than the existing residential uses, it can be concluded that the Project also would not expose the potential future MSHCP Conservation Area to noise levels exceeding residential standards. Therefore, the Project would not conflict with the noise provisions of MSHCP Section 6.1.4.

Invasive Species

MSHCP Section 6.1.4 requires that landscape plans for the residential, commercial, and mixed development avoid the use of invasive species for the portions of the development areas adjacent to MSHCP Conservation Areas, including invasive, non-native plant species listed in Volume I, Table 6-2, *Plants That Should Be Avoided Adjacent to the MSHCP Conservation Area,* of the MSHCP. (GLA, 2023a, p. 53)

The proposed Project is not currently located adjacent to the MSHCP Conservation Area, but lands diagonally to the southwest have the potential for future inclusion into the Conservation Area. Based on the Project's conceptual landscape plan, the Project landscaping will not include any species listed in Table 6-2 of the MSHCP. (GLA, 2023a, p. 53) Accordingly, the Project would not conflict with the invasive species provisions of MSHCP Section 6.1.4.

Barriers

Proposed land uses adjacent to the MSHCP Conservation Area are required by the MSHCP to incorporate barriers, where appropriate, in individual project designs to minimize unauthorized public access, domestic animal predation, illegal trespass or dumping in the MSHCP Conservation Area. (GLA, 2023a, p. 53)

The proposed Project's warehouse development is not currently located adjacent to the MSHCP Conservation Area, but lands diagonally to the southwest have potential for future inclusion into the Conservation Area.



However, the Project site would be separated from this potential future conservation area by proposed improvements to Walnut Street along the site's southern boundary. Additionally, a 4-foot-high vinal fence would occur along the trails proposed to parallel Walnut Street. A retaining wall also would occur along Walnut Street. These measures would ensure that the Project accommodates adequate barriers to prevent access to potential future MSHCP Conservation Areas. As such, the Project would not conflict with the barriers provisions of MSHCP Section 6.1.4. (GLA, 2023a, p. 53)

Grading/Land Development

The MSHCP states that manufactured slopes associated with development shall not extend into the MSHCP Conservation Area. Grading from the Project would not extend into the areas with potential for future inclusion into the MSHCP Conservation Area. Therefore, the Project would not conflict with the grading/land development provisions of MSHCP Section 6.1.4. (GLA, 2023a, p. 53)

5. Project Consistency with MSHCP Section 6.3.2 (Additional Survey Needs and Procedures)

Volume I, Section 6.3.2 of the MSHCP identifies that in addition to the Narrow Endemic Plant Species addressed in Section 6.1.3 of the MSHCP, additional surveys may be needed for other certain plant and animal species in conjunction with MSHCP implementation in order to achieve full coverage for these species. Within areas of suitable habitat, focused surveys are required if a project site occurs within a designated CAPSSA, or special animal species survey area (i.e., burrowing owl, amphibians, and mammals). The Project site does not occur within the amphibian or mammal survey areas, or within the CAPSSA, but is within the burrowing owl survey area. (GLA, 2023a, p. 57)

Focused burrowing owl surveys were conducted for the proposed Study Area, and no burrowing owls were detected. Additionally, no evidence of burrowing owls such as cast pellets, preened feathers, or whitewash clustered at a burrow were observed by the GLA biologist. GLA confirmed during the survey that. However, there is potential for the Project site to become occupied by the burrowing owl prior to the commencement of construction activities on site. If burrowing owls are present, the Project could result in impacts to the burrowing owl, which would be in conflict with MSHCP Section 6.3.2. This is evaluated as a significant impact for which mitigation would be required in the form of pre-construction burrowing owl surveys. (GLA, 2023a, pp. 40, 57)

6. Project Consistency with MSHCP Section 7.3.5 (Covered Roads)

Section 7.3.5 of the MSHCP addresses planned roads within the Criteria Area, also referred to as "Covered Roads." Planned roadways are defined as either existing facilities that require improvements (i.e., widening) or as new facilities to be constructed as identified as part of County's General Plan Circulation Element. The Project proposes to improve sections of two roadways identified as "Covered Roads" that are partially with Criteria Cells, including Rider Street and Patterson Avenue.

Rider Street has a maximum allowable width of 118 feet and Patterson Avenue has maximum allowable width of 110 feet. Nearly all of the Rider Street alignment is located outside of Criteria Cells, and approximately half of the Patterson Avenue alignment is located outside of Criteria Cells. Improvements to Rider Street and



Patterson Avenue associated with the Project would not exceed the maximum allowable width as further discussed below.

Rider Street

The Project proposes to improve approximately 3,268 linear feet of Rider Street; of which approximately 1,424 linear feet is in the Criteria Area (Cell 2432) in terms of length; however, only a portion of the width of Rider Street is within Cell 2432. Rider Street is identified as a "major road" in the General Plan Circulation Element, with a 118-foot ROW, and therefore the MSHCP allowable covered width for permanent impacts for Rider Street within the Criteria Area is 118 feet, encompassing all road elements, including the road shoulder. However, Rider Street straddles the Criteria Area boundary such that only a portion of the width of the road is within Cell 2432.

Improvements to Rider Street would occur along the Project site's frontage to include the construction of additional roadway surface (the width of which varies), curb and gutter, a five-foot-wide curb-separated sidewalk, and streetscape landscaping. The total width of the ultimate street section ranges from 80 feet to 106 feet, and the Project's maximum width of improvements would be 73 feet. Lane restriping also would occur on Rider Street to the east and to the west of the Project site.

Patterson Avenue

The Project proposes to improve approximately 1,374 linear feet of Patterson Avenue; of which approximately 1,330 linear feet is in the Criteria Area (Cell 2432) in terms of length; however, only a portion of the width of Patterson Avenue is within Cell 2432. Patterson Avenue is identified as a "secondary road" in the General Plan Circulation Element, with a 100-foot ROW, and therefore the MSHCP allowable covered width for permanent impacts for Patterson Avenue within the Criteria Area is 100 feet, encompassing all road elements, including the road shoulder. However, Patterson Avenue straddles the Criteria Area boundary such that only a portion of the width of the road is within Cell 2432.

Improvements proposed along the Project site's frontage with Patterson Avenue would include the installation of additional roadway surface (the width of which varies), and the construction of curb and gutter, a six-foot-wide curb-adjacent sidewalk, and streetscape landscaping. A 10-foot-wide community trail with split rail fence would be installed to the west of the sidewalk outside of the public right-of-way. The total width of the ultimate street section is 86 feet and the Project's maximum width of improvements would be 66 feet.

7. MSHCP Consistency Conclusion Summary

As indicated in the preceding analysis, the Project would not conflict with the MSHCP Reserve Assembly requirements, as the Project site is not targeted for conservation pursuant to the conservation criteria for Cell Group B and the Project's approved HANS determination. Additionally, the Project would not conflict with the MSHCP Section 7.3.5 pertaining to covered roads. Although the Project would not conflict with MSHCP Section 6.1.2 pertaining to vernal pools, the Project would permanently remove 0.35-acre of MSHCP Section 6.1.2 Riparian/Riverine resources, including 0.13-acre of riparian vegetation and 0.22-acre of unvegetated riverine areas. Thus, prior to mitigation, the Project's anticipated impacts to MSHCP Section 6.1.2 Riparian/Riverine areas would represent a potentially significant impact. The Project would be consistent with



MSHCP Section 6.1.3 (Protection of Narrow Endemic Plant Species). Although the Project largely would be consistent with the requirements of MSHCP Section 6.1.4 (Guidelines Pertaining to the Urban/Wildlands Interface), there is a potential that construction activities associated with the Project may require nighttime lighting during construction activities, particularly during nighttime concrete pouring activities. Thus, during Project construction activities the Project has the potential to conflict with the lighting provisions of the MSHCP Section 6.1.4 in the event that lands to the southwest have been incorporated into the MSHCP Conservation Area, resulting in a potentially significant near-term impact. The Project has the potential to conflict with MSHCP Section 6.3.2 related to the burrowing owl, if the Project site were to become occupied prior to commencement of construction activities; thus, prior to mitigation, the Project would result in a potentially significant impact due to a potential to conflict with MSHCP Section 6.3.2 (Additional Survey Needs and Procedures) with respect to the burrowing owl.

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

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

The following discussion examines the potential impacts to plant and wildlife resources that would occur as a result of the proposed Project.

A. <u>Impacts to Special-Status Plants</u>

No special status plant species as outlined in Table 4-3 of the Project's BTR were observed at the Project site. (GLA, 2023a, p. 46) Accordingly, the Project would result in no impacts to special-status plants.

B. Impacts to Special-Status Wildlife

1. Impacts to Listed Species

The proposed Project would remove habitat with the potential to be occupied by the SKR, which is listed as Federal Endangered and State Threatened. An estimated 26.12 acres of potential habitat for SKR occurs within the Project site. No potential SKR burrows or evidence of occupation (including burrows, scat, tail drags, or dust baths) were detected on the Project site. Impacts to SKR occupied habitat could be a potentially significant impact; however, the Project site occurs within the SKR Fee Assessment Area of the SKR HCP. Any impacts to the SKR would be covered under the SKR HCP with payment of the fee pursuant to Riverside County Ordinance No. 663, which also would reduce any significant impacts to the SKR to a less-than-significant level. (GLA, 2023a, p. 47)



2. Impacts to Non-Listed Species

In addition, the proposed Project would remove habitat with the potential to support the following MSHCP Covered Species: 1) Birds: burrowing owl, loggerhead shrike, white-tailed kite, and yellow warbler; and 2) Mammals: Los Angeles pocket mouse. (GLA, 2023a, p. 47)

Burrowing Owl

As discussed under the analysis of Threshold a., the Project site is within the burrowing owl survey area and approximately 33.86 acres of the Project site has the potential to support the burrowing owl. Burrowing owls were confirmed absent during focused surveys conducted by GLA in 2022. No evidence of burrowing owls such as cast pellets, preened feathers, or whitewash clustered at a burrow were observed by the GLA biologist. However, there is potential for the Project site to become occupied by the burrowing owl prior to the commencement of construction activities on site. This is evaluated as a potentially significant impact of the Project for which mitigation would be required. (GLA, 2023a, pp. 40, 47)

Other Non-Listed Species

The loss of habitat with the potential to support the loggerhead shrike (foraging role only), white-tailed kite (foraging role only), yellow warbler, and Los Angeles pocket mouse would be less than significant. This is based on the limited amount of potential habitat to be affected relative to the range of each species and, with some of the species, the context of use (e.g., non-nesting status of the shrike and kite). Regardless, as these species are designated as MSHCP Covered Species, the loss of habitat would be covered through compliance with the MSHCP, including the payment of MSHCP development fees pursuant to Riverside County Ordinance No. 810. (GLA, 2023a, p. 47)

The Project site provides foraging habitat for raptors, including several special-status raptors. As described previously, there is potential for Swainson's hawk, northern harrier, and white-tailed kite to forage on the Project site. A total of 33.86 acres of potential foraging habitat is present for raptors. The Project site does not support potential nesting habitat for these species on site. Regardless, the Project has the potential to impact active bird nests for other species of birds if vegetation is removed during the nesting season (February 1 to September 15). (GLA, 2023a, pp. 40-41, 49)

Although impacts to native birds are prohibited by MBTA and similar provisions of CFGC, impacts to native birds by the proposed Project would not be a significant impact under CEQA. The native birds with potential to nest on the Project site would be those that are extremely common to the region and highly adapted to human landscapes (e.g., mourning dove, killdeer). The number of individuals potentially affected by the Project would not significantly affect regional or local populations of such species. Regardless, the potential loss of active nests is prohibited by the MBTA and CFGC, and Project impacts to nesting birds therefore represents a potentially significant impact for which mitigation would be required. (GLA, 2023a, p. 49)

<u>Vernal Pools</u>

The Project site does not contain vernal pools and does not contain suitable habitat for fairy shrimp or for riparian birds with survey/conservation requirements (i.e., least Bell's vireo, southwestern willow flycatcher



and western yellow billed cuckoo). Accordingly, no impacts to vernal pools or associated wildlife species would occur with implementation of the Project. (GLA, 2023a, p. 56)

<u>Threshold d.</u>: Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

The Project site does not contain habitat that would support wildlife nursery sites, and therefore the Project would not impact native wildlife nursery sites. (GLA, 2023a, p. 48)

The Project site has historically been disturbed and is surrounded by low density residential and undeveloped lands to the north, south, and east, by industrial warehouse development to the southeast, and by single-family residential development to the west. The Project site does not occur within an existing or proposed Core, Linkage, or Constrained Linkage as identified by the MSHCP. The Project site is located within the northernmost portion of Cell Group B, and areas described for conservation by the MSHCP consists of the southern 70 to 80% of the Cell Group. Although the Project site may provide for the local movement of wildlife, including small and medium-sized mammals, the Project site is not part of a significant regional wildlife movement corridor as identified by the MSHCP. (GLA, 2023a, p. 42)

Accordingly, the Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites, and impacts would therefore be less than significant. (GLA, 2023a, p. 48)

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

The proposed Project would permanently impact approximately 45.45 acres (40.88 acres on site and 4.57 acres off site) of lands through grading, including areas of remedial grading that would not be restored to pre-Project conditions. Approximately 42.87 acres of the Project site is located in Criteria Cell 2432, and 2.58 acres of the Project site is located outside of the Criteria Area. Permanent impacts include approximately 11.45 acres (7.67 acres on site and 3.78 acres off site) of developed/ornamental areas; 7.74 acres of disturbed buckwheat scrub (all of which is on site); 26.12 acres (25.33 acres on site and 0.79-acre off site) of ruderal/disturbed lands; and 0.13-acre of southern willow scrub (all of which is on site). Table 4.4-1, *Summary of Vegetation/Land Use Types for the Project S*ite, provides a summary of impacts to vegetation/land use types. One sensitive vegetation/land use types are not considered to comprise sensitive vegetation communities. Specifically, the Project would result in impacts to approximately 0.13-acre of southern willow scrub, which is considered to comprise vegetated riparian habitat. Project for which mitigation would be required. (GLA, 2023a, p. 48)



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

The Project site does not contain any State- or federally-protected wetlands, therefore, no impacts to wetlands would occur with implementation of the Project. (GLA, 2023a, p. 48)

The Project would result in permanent impacts to 0.14-acre (2,880 linear feet) of RWQCB jurisdiction, none of which consist of jurisdictional wetlands, and 0.35-acre of CDFW/MSHCP jurisdiction (2,880 linear feet), of which 0.13-acre consists of vegetated riparian habitat, as shown in Table 4.4-5, *Summary of Project Impacts to RWQCB Jurisdiction*, and Table 4.4-6, *Summary of Project Impacts to CDFW/MSHCP Jurisdiction*. A total of 2,880 linear feet of ephemeral drainage will be permanently disturbed.

Drainage Name	Regional Board Non- Wetland Waters Impacts (acres)	Regional Board Jurisdictional Wetlands Impacts (acres)	Total Regional Board Jurisdiction Impacts (acres)	Length (linear feet)
Drainage A	0.05	0	0.05	1302
Drainage B	0.02	0	0.02	529
Drainage C	0.01	0	0.01	353
Drainage D	0.01	0	0.01	221
Roadside Ditch	0.04	0	0.04	475
Total	0.14	0	0.14	2,880

Table 4.4-4 Summary of Project Impacts to RWQCB Jurisdiction

(GLA, 2023a, Table 5-3)

Table 4.4-5 Summary of Project Impacts to CDFW/MSHCP Jurisdiction

Drainage Name	CDFW Non- riparian Stream Impacts (acres)	CDFW Riparian Habitat Impacts (acres)	Total Potential CDFW Jurisdiction Impacts (acres)	Length (linear feet)
Drainage A	0.04	0.13	0.17	1855
Drainage B	0.02	0	0.02	529
Drainage C	0.01	0	0.01	353
Drainage D	0.02	0	0.02	221
Roadside Ditch	0.13	0	0.13	475
Total	0.22	0.13	0.35	2,880

(GLA, 2023a, Table 5-4)



The features that would be impacted by the Project would support water flow only during and shortly after rainfall. The non-riparian features do not provide habitat to plant or wildlife species beyond what the adjacent uplands provide. The riparian area on site, while providing habitat to some plant or wildlife species, is small and isolated. Although removal of these features trigger CWA Section 401 and CFGC Section 1602 permitting/authorizations, the removal of 0.35-acre of State waters consisting of shallow, ephemeral drainages, and including 0.13-acre of riparian habitat, would not significantly impact water resources or associated biological resources in the vicinity or at a regional level. Regardless, the loss of jurisdictional areas on site would require permits from the Regional Board and CDFW. As such, Project impacts to 0.14-acre of RWQCB jurisdiction, none of which consist of jurisdictional wetlands, and 0.35-acre of CDFW/MSHCP jurisdiction, represents a significant impact of the proposed Project for which mitigation would be required.

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

Aside from the SKR HCP and the MSHCP, which are addressed under the analysis of Threshold a., the only other local policies or ordinances protecting biological resources are the Riverside County Oak Tree Management Guidelines and Riverside County Ordinance No. 559 (Regulating the Removal of Trees). As previously shown in Table 4.4-1, the Project site and off-site improvement areas do not contain any oak trees or vegetation communities containing oak trees. As such, the Project has no potential to result in a conflict with the County's Oak Tree Management Guidelines. Additionally, Riverside County Ordinance No. 559 applies to properties located above 5,000 feet amsl in elevation, while the maximum elevation at the Project site is approximately 1,578 feet amsl; thus, Riverside County Ordinance No. 559 is not applicable to the proposed Project. Accordingly, and aside from potential impacts due to a conflict with the MSHCP (as addressed under the analysis of Threshold a.), the Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, and no impact would occur.

4.4.5 CUMULATIVE IMPACT ANALYSIS

The cumulative impact analysis considers development of the Project in conjunction with other development projects located within the purview of the Western Riverside County MSHCP. This study area for cumulatively-considerable impacts to biological resources is appropriate because the MSHCP encompasses a large area surrounding the Project site, and provides for the long-term protection of sensitive plant, animal, and plant communities throughout the MSHCP area. Additionally, most cumulative development projects within the Project vicinity would be subject to the provisions of the MSHCP, and the general range of habitats, species, climate, etc. are fairly consistent throughout the MSHCP plan area.

The primary effects of the proposed Project, when considered with the build out of long-range plans in the geographic area covered by the Western Riverside County MSHCP, would be the cumulative loss habitat for sensitive species. With respect to special-status species, although the habitat offered on the Project site consists primarily of disturbed and developed land and thus is generally of lesser quality than habitat that is found in designated MSHCP Criteria Cells within the geographic area covered by the Western Riverside County MSHCP, it still provides open spaces for foraging, refuge, nesting, and areas that can be used for species reproduction.



Anticipated cumulative impacts to biological resources are addressed within the Western Riverside County MSHCP cumulative study area. The Western Riverside County MSHCP, as currently adopted, addresses 146 "Covered Species" that represent a broad range of habitats and geographical areas within Western Riverside County, including threatened and endangered species and regionally- or locally-sensitive species that have specific habitat requirements and conservation and management needs. The Western Riverside County MSHCP addresses biological impacts for take of Covered Species within the MSHCP area. Impacts to Covered Species and establishment and implementation of a regional conservation strategy and other measures included in the Western Riverside County MSHCP address the federal, state, and local mitigation requirements for these species and their habitats. Specifically, Section 4.4 of the Western Riverside County MSHCP states that:

"The MSHCP was specifically designed to cover a large geographical area so that it would protect numerous endangered species and habitats throughout the region. It is the projected cumulative effect of future development that has required the preparation and implementation of the MSHCP to protect multiple habitats and multiple endangered species."

It goes on to state that:

"The LDMF [Local Development Mitigation Fee] is to be charged throughout the Plan Area to all future development within the western part of the County and the Cities in order to provide a coordinated conservation area and implementation program that will facilitate the preservation of biological diversity, as well as maintain the region's quality of life."

The reason for the imposition of the Mitigation Fee over the entire region is that the loss of habitat for endangered species is a regional issue resulting from the cumulative effect of continuing development throughout all of the jurisdictions in Western Riverside County. Finally, Section 5.1 of the Western Riverside County MSHCP states that:

"It is anticipated that new development in the Plan Area will fund not only the mitigation of the impacts associated with its proportionate share of regional development, but also the impacts associated with the future development of more than 332,000 residential units and commercial and industrial development projected to be built in the Plan Area over the next 25 years."

As the construction of buildings, infrastructure, and all alterations of the land within areas that are outside of the Criteria Area are permitted under the Western Riverside County MSHCP (see MSHCP Section 2.3.7.1), cumulative impacts to biological resources with the exception of MSHCP non-covered species would be less than significant on a cumulative basis provided that the terms of the MSHCP are fully implemented (MSHCP Final EIR/EIS, Section 4.4.1.6).

As indicated under the analysis of Threshold a., with mandatory payment of fees pursuant to Riverside County Ordinance No. 663, the Project would not conflict with the SKR HCP. Other cumulative developments within the SKR HCP area similarly would be required to contribute fees pursuant to the SKR HCP; thus, cumulativelyconsiderable impacts due to a conflict with the SKR HCP would not occur. The Project site is not targeted for conservation by the MSHCP based on the Conservation Criteria described for Cell Group B, and thus


cumulatively-considerable impacts due to a conflict with the MSHCP Reserve Assembly requirements would not occur. The Project would not conflict with the MSHCP Section 7.3.5 pertaining to covered roads and thus cumulatively-considerable impacts due to a conflict with MSHCP Section 7.3.5 would not occur. However, prior to mitigation, the Project would conflict with MSHCP Section 6.1.2 due to permanent impacts to 0.35acre of riparian/riverine resources, although the Project would not result in any conflicts with Section 6.1.2 due to impacts to fairy shrimp or riparian birds. The Project would not conflict with MSHCP Section 6.1.3, and thus the Project would not result in any cumulatively-considerable impacts to narrow endemic plant species. Although the Project largely would comply with the UWIGs pursuant to MSHCP Section 6.1.4, during nighttime Project construction activities the Project has the potential to conflict with the lighting provisions of the MSHCP in the event that lands to the southwest have been incorporated into the MSHCP Conservation Area, resulting in a potentially significant near-term impact. The Project also has the potential to conflict with MSHCP Section 6.3.2 related to the burrowing owl, if the Project site were to become occupied prior to commencement of construction activities. As other cumulative developments within the region similarly have the potential to result in conflicts with the MSHCP, the Project's impacts due to a conflict with the above-described provisions of the MSHCP would be cumulatively considerable prior to mitigation.

As discussed under the analysis of Thresholds b. and c., the Project would not result in any cumulativelyconsiderable impacts to special-status plants because no special-status plants occur on site. Both the Project and other cumulative developments would be required to contribute fees pursuant to the SKR HCP, which would ensure that cumulatively-considerable impacts to the SKR would be less than significant. Although burrowing owl was confirmed absent from the Project site during focused surveys conducted by GLA in 2022, there is nonetheless the potential that the Project site could become occupied by the burrowing owl prior to the commencement of construction activities. As other cumulative developments within the region similarly have the potential to result in impacts to the burrowing owl, the Project's potential impacts to the burrowing owl would be cumulatively considerable. Although Project impacts due to the loss of habitat for the loggerhead shrike (foraging role only), white-tailed kite (foraging role only), yellow warbler, and Los Angeles pocket mouse would be less than significant with mandatory payment of MSHCP fees pursuant to Riverside County Ordinance No. 810, the Project has the potential to result in impacts to nesting birds regulated by the MBTA and CFGC. As other cumulative developments similarly have the potential to result in impacts to nesting birds, Project impacts would be cumulatively considerable prior to mitigation. The Project would not impact any vernal pools; thus, cumulatively-considerable impacts to vernal pools and associated plant and animal species would be less than significant.

As discussed under the analysis of Threshold d., the Project site does not contain habitat that would support wildlife nursery sites, and therefore cumulatively-considerable impacts native wildlife nursery sites would not occur. In addition, the Project site has historically been disturbed and is surrounded by low density residential and undeveloped lands to the north, south, and east, by industrial warehouse development to the southeast, and by single-family residential development to the west. Although the Project site may provide for the local movement of wildlife, including small and medium-sized mammals, the Project site is not part of a significant regional wildlife movement corridor as identified by the MSHCP. Accordingly, cumulatively-considerable impacts to wildlife movement corridors would not occur with implementation of the Project.

As indicated under the analysis of Threshold e., the proposed Project would permanently impact approximately 45.45 acres of lands through grading, including areas of remedial grading that would not be restored to pre-



Project conditions. Permanent impacts include approximately 11.45 acres (7.67 acres on site and 3.78 acres off site) of developed/ornamental areas; 7.74 acres of disturbed buckwheat scrub (all of which is on site); 26.12 acres (25.33 on site and 0.79-acre off site) of ruderal/disturbed lands; and 0.13-acre of southern willow scrub (all of which is on site). One sensitive vegetation community, southern willow scrub, would be impacted by the Project, while the remaining vegetation/land use types are not considered to comprise sensitive vegetation communities. As other cumulative developments within the region similarly have the potential to impact riparian habitat, Project impacts to 0.13-acre of southern willow scrub represents a cumulatively-considerable impact of the proposed Project for which mitigation would be required.

The Project would result in permanent impacts to 0.14-acre of RWQCB jurisdiction, none of which consist of jurisdictional wetlands, and 0.35-acre of CDFW/MSHCP jurisdiction, of which 0.13-acre consists of vegetated riparian habitat. As other cumulative developments within the region similarly would have the potential to result in impacts to jurisdictional areas regulated by the RWQCB and/or CDFW/MSHCP, Project impacts to 0.14-acre of RWQCB jurisdiction and 0.35-acre of CDFW/MSHCP jurisdiction represents a cumulatively-considerable impact for which mitigation would be required.

As indicated under the analysis of Threshold g., aside from the SKR HCP and MSHCP (which are addressed under the analysis of Threshold a.), the only other local policies or ordinances protecting biological resources are the Riverside County Oak Tree Management Guidelines, Riverside County Ordinance No. 499, and Riverside County Ordinance No. 559 (Regulating the Removal of Trees). However, the Project site does not contain any oak trees that would be subject to the County's Oak Tree Management Guidelines, and Riverside County Ordinance No. 559 applies only to properties located above 5,000 feet amsl. Accordingly, Project impacts due to a conflict with local policies or ordinances protecting biological resources would be less-than-cumulatively considerable.

4.4.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

<u>Threshold a.: Significant Direct and Cumulatively-Considerable Impact</u>. The proposed Project would not conflict with the SKR HCP, with the mandatory payment of fees pursuant to Riverside County Ordinance No. 663. The Project would not result in a conflict with the MSHCP Reserve Assembly requirements or those requirements pertaining to covered roads. However, prior to mitigation, the Project would conflict with MSHCP Section 6.1.2 due to permanent impacts to 0.35-acre of riparian/riverine resources, although the Project would not result in any conflicts with Section 6.1.2 due to impacts to fairy shrimp or riparian birds. Although the Project largely would comply with the UWIGs pursuant to MSHCP Section 6.1.4, during nighttime Project construction activities the Project has the potential to conflict with the lighting provisions of the MSHCP in the event that lands to the southwest have been incorporated into the MSHCP Conservation Area, resulting in a potentially significant near-term impact. The Project also has the potential to conflict with MSHCP Section 6.3.2 related to the burrowing owl, if the Project site were to become occupied prior to commencement of construction activities.

<u>Thresholds b. and c.: Significant Direct and Cumulatively-Considerable Impact</u>. The Project would not result in any impacts to special status plants because no special-status plants occur on site. Although burrowing owl was confirmed absent from the Project site during focused surveys conducted by GLA in 2022, there is nonetheless the potential that the Project site could become occupied by the burrowing owl prior to the



commencement of construction activities; thus, prior to mitigation, the Project's impacts to burrowing owl would be potentially significant. Although Project impacts due to the loss of habitat for the loggerhead shrike (foraging role only), white-tailed kite (foraging role only), yellow warbler, and Los Angeles pocket mouse would be less than significant with mandatory payment of MSHCP fees pursuant to Riverside County Ordinance No. 810, the Project has the potential to result in impacts to nesting birds regulated by the MBTA and CFGC, resulting in a potentially significant impact. The Project would not result in any impacts to vernal pools or species associated with vernal pools.

<u>Threshold d.: Less-than-Significant Impact</u>. The Project site does not contain habitat that would support wildlife nursery sites, and therefore cumulatively-considerable impacts native wildlife nursery sites would not occur. In addition, the Project site has historically been disturbed and is surrounded by low density residential and undeveloped lands to the north, south, and east, by industrial warehouse development to the southeast, and by single-family residential development to the west. Although the Project site is not part of a significant regional wildlife movement corridor as identified by the MSHCP. Therefore, the Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife nursery sites, and impacts would be less than significant.

<u>Threshold e.: Significant Direct and Cumulatively-Considerable Impact</u>. The proposed Project would permanently impact approximately 45.45 acres of lands through grading, including areas of remedial grading that would not be restored to pre-Project conditions. Permanent impacts include approximately 11.45 acres (7.67 acres on site and 3.78 acres off site) of developed/ornamental areas; 7.74 acres of disturbed buckwheat scrub (all of which is on site); 26.12 acres (25.33 on site and 0.79-acre off site) of ruderal/disturbed lands; and 0.13-acre of southern willow scrub (all of which is on site). One sensitive vegetation community, southern willow scrub, would be impacted by the Project, while the remaining vegetation/land use types are not considered to comprise sensitive vegetation communities. Specifically, the Project would result in impacts to approximately 0.13-acre of southern willow scrub, which is considered to comprise vegetated riparian habitat. Project impacts to 0.13-acre of southern willow scrub therefore represents a significant impact of the proposed Project for which mitigation would be required.

<u>Threshold f.: Significant Direct and Cumulatively-Considerable Impact</u>. As indicated in EIR Table 4.4-2 and Table 4.4-3, implementation of the proposed Project would result in a total of 0.14-acre of RWQCB jurisdictional area and 0.35-acre of CDFW/MSHCP jurisdictional areas, of which 0.13-acre consists of vegetated riparian habitat. Although removal of these features trigger CWA Section 401 and CFGC Section 1602 permitting/authorizations, the removal of 0.35-acre of State waters consisting of shallow, ephemeral drainages, and including 0.13-acre of riparian habitat, would not significantly impact water resources or associated biological resources in the vicinity or at a regional level. Regardless, the loss of jurisdictional areas on site would require permits from the Regional Board and CDFW. As such, Project impacts to 0.14-acre of RWQCB jurisdiction, none of which consist of jurisdictional wetlands, and 0.35-acre of CDFW/MSHCP jurisdiction, represents a significant impact of the proposed Project for which mitigation would be required.

<u>Threshold g.: No Impact</u>. Aside from the SKR HCP and MSHCP, which are addressed under the analysis of Threshold a., the only other local policies or ordinances protecting biological resources are the Riverside

County Oak Tree Management Guidelines and Riverside County Ordinance No. 559 (Regulating the Removal of Trees). The Project site does not contain any oak trees subject to the Riverside County Oak Tree Management Guidelines. Additionally, the Project site does not occur at an elevation exceeding 5,000 feet amsl; thus, Riverside County Ordinance No. 559 is not applicable to the proposed Project. Therefore, and aside from potential impacts due to a conflict with the MSHCP (as addressed under the analysis of Threshold a.), the Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, and no impact would occur.

4.4.7 COUNTY REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

Applicable County Regulations and Design Requirements

The following are regulations and design requirements that apply to the proposed Project and that reduce or preclude biological impacts. Although compliance with mandatory regulatory requirements does not technically meet CEQA's definition for mitigation, they are specified herein as requirements for the Project.

- Prior to issuance of grading permits, the Project Applicant shall make payment of Western Riverside County MSHCP fees pursuant to Riverside County Ordinance No. 810, *Establishing an Interim Open Space Mitigation Fee.*
- Prior to issuance of grading permits, the Project Applicant shall make payment of fees pursuant to the Stephen's Kangaroo Rat Habitat Conservation Plan and Riverside County Ordinance No. 663, *Establishing the Riverside County Stephens' Kangaroo Rat Habitat Conservation Plan and Setting Mitigation Fees.*
- Prior to issuance of grading permits or other permits authorizing ground-disturbing activities in jurisdictional areas, the Project Applicant shall provide Riverside County with copies of the Project's approved Waste Discharge Order pursuant to Section 13260 of the California Water Code from the Santa Ana Regional Water Quality Control Board (RWQCB), and an approved 1602 Streambed Alteration Agreement (SAA) from the California Department of Fish and Wildlife (CDFW) to authorize impacts to 0.14-acre of RWQCB jurisdictional area and 0.35-acre of CDFW/MSHCP jurisdictional areas

Mitigation Measures

MM 4.4-1 Prior to issuance of grading permits, the Project Applicant shall provide evidence (e.g., receipts) to Riverside County demonstrating that permanent impacts to 0.14-acre of Reginal Water Quality Control Board (RWQCB) jurisdiction and permanent impacts to 0.35-acre (2,880 linear feet) of California Department of Fish and Wildlife (CDFW)/Multiple Species Habitat Conservation Plan (MSHCP) jurisdiction, of which 0.13-acre consists of vegetated riparian habitat, have been mitigated at a minimum 2:1 mitigation-to-impact ratio, including a minimum of 1:1 establishment, through the purchase of rehabilitation, re-establishment, and/or establishment mitigation credits at an approved mitigation bank or in-lieu fee program within the San Jacinto River and/or Santa Ana River Watershed.



- MM 4.4-2 Prior to approval of grading or building permits that allow for nighttime construction activities, Riverside County shall condition such permits to require that any lighting elements used in conjunction with nighttime construction activities shall be shielded and directed away from open space areas to the southwest of the Project site. This requirement also shall be included as a note on the grading or building plans. The Project's construction contractor shall permit inspection by Riverside County staff to verify compliance with this requirement.
- MM 4.4-3 In accordance with Multiple Species Habitat Conservation Plan (MSHCP) Objective 6, prior to issuance of grading permits or other permits authorizing ground disturbance or discing, the Project Applicant shall retain a qualified biologist to perform a burrowing owl survey at all potentially suitable habitat sites within the Project's limits of disturbance within 30 days prior to commencement of any ground-disturbing activities at the Project site, as discussed below.
 - Pre-Construction Survey: The pre-construction survey shall be performed by a qualified biologist that will survey the site for the presence/absence of burrowing owls within 30 days prior to commencement of ground-disturbing activities at the Project site. If burrowing owls are detected on-site during the pre-construction survey, the owls shall be relocated/excluded from the site outside of the breeding season following accepted protocols, and subject to the approval of the Western Riverside County Regional Conservation Authority (RCA) and Wildlife Agencies (i.e., California Department of Fish and Wildlife (CDFW) and/or U.S. Fish and Wildlife Service (USFWS)).
 - Burrowing Owl Management Plan: In the event that burrowing owl is determined to be present, or in the event that an assumption is made that the burrowing owl occurs on site, a burrowing owl management plan shall be prepared and implemented in coordination with the Western Riverside County Regional Conservation Authority (RCA) and California Department of Fish and Wildlife (CDFW) that shall detail the relocation of owls from the Project site, passively and/or actively. If additional site visits determine the species is absent, then the pre-construction survey (as discussed above) shall instead be implemented.

A copy of the results of the pre-construction survey (and all additional surveys), as well as copies of the Burrowing Owl Management Plan, if required, shall be provided to the Riverside County Planning Department for review and approval (in the case of the Burrowing Owl Management Plan) prior to any vegetation clearing and ground-disturbing activities.

MM 4.4-4 As a condition of grubbing and grading permits, vegetation clearing shall be conducted outside of the bird nesting season (February 1 to August 31) to the extent feasible. If avoidance of the nesting season is not feasible, a nesting bird survey shall be conducted by a qualified biologist within no more than 72 hours of such scheduled disturbance, to determine the presence of nests or nesting birds. If active nests are identified, the biologist shall establish appropriate buffers around the vegetation (typically 500 feet for raptors and sensitive species, 300 feet for nonraptors/non-sensitive species). All work within these buffers shall be halted until the nesting effort is finished (i.e., the juveniles are surviving independent from the nest). The biologist



shall review and verify compliance with these nesting boundaries and shall verify the nesting effort has finished. Work may resume within the buffer area when no other active nests are found. Alternatively, a qualified biologist may determine that construction can be permitted within the buffer areas and would develop a monitoring plan to prevent any impacts while the nest continues to be active (eggs, chicks, etc.). Upon completion of the survey and any follow-up construction avoidance management, a report shall be prepared and submitted to Riverside County for mitigation monitoring compliance record keeping. If vegetation removal is not completed within 72 hours of a negative survey during nesting season, the nesting survey must be repeated to confirm the absence of nesting birds.

4.4.8 SIGNIFICANCE OF IMPACTS AFTER MITIGATION

Threshold a.: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.4-1 would ensure that permanent impacts to 0.14-acre of RWQCB jurisdiction and 0.35-acre of CDFW jurisdiction (2,880 linear feet) of CDFW/MSHCP jurisdiction, of which 0.13-acre consists of vegetated riparian habitat, are mitigated at a minimum 2:1 ratio, thereby ensuring Project consistency with MSHCP Section 6.1.2. Implementation of Mitigation Measure MM 4.4-2 would ensure that any nighttime lighting during construction activities are directed away from the potential future MSHCP Conservation Area to the southwest, thereby ensuring Project consistency with MSHCP Section 6.1.4. Implementation of Mitigation Measure MM 4.4-3 would ensure that pre-construction surveys for the burrowing owl are conducted prior to ground-disturbing activities, in accordance with MSHCP Objective 6 for the burrowing owl, and that a burrowing owl management plan is prepared and implemented in order to address the relocation of owls from the Project site, passively and/or actively. Implementation of the required mitigation, the proposed Project would be fully consistent with the MSHCP, and impacts would be reduced to less-than-significant levels.

<u>Thresholds b. and c.: Less-than-Significant Impact with Mitigation Incorporated</u>. Implementation of Mitigation Measure MM 4.4-3 would ensure that pre-construction surveys for the burrowing owl are conducted prior to ground-disturbing activities, in accordance with MSHCP Objective 6 for the burrowing owl, and that a burrowing owl management plan is prepared and implemented in order to address the relocation of owls from the Project site, passively and/or actively. Implementation of the required mitigation would reduce Project impacts to the burrowing owl to less-than-significant levels. Implementation of Mitigation Measure MM 4.4-4 would ensure pre-construction nesting surveys are conducted prior to commencement of construction activities, and further requires appropriate avoidance of any active nests that may be identified, and would reduce the Project's potential impacts to nesting birds to less-than significant levels.

<u>Threshold e.: Less-than-Significant Impact with Mitigation Incorporated</u>. Implementation of Mitigation Measure MM 4.4-1 would ensure that permanent impacts to 0.14-acre of RWQCB jurisdiction and 0.35-acre of CDFW jurisdiction (2,880 linear feet) of CDFW/MSHCP jurisdiction, of which 0.13-acre consists of vegetated riparian habitat, are mitigated at a minimum 2:1 ratio. With implementation of the required mitigation, the Project's impacts to riparian habitat would be reduced to less-than-significant levels.

<u>Threshold f.: Less-than-Significant Impact with Mitigation Incorporated</u>. Implementation of Mitigation Measure MM 4.4-1 would ensure that permanent impacts to 0.14-acre of RWQCB jurisdiction and 0.35-acre



of CDFW jurisdiction (2,880 linear feet) of CDFW/MSHCP jurisdiction are mitigated at a minimum 2:1 ratio. The mitigation also would ensure consistency with the requirements of the Project's required resource agency permits, which include a CWA Section 1602 Streambed Alteration Agreement from the CDFW and a Waste Discharge Order from the RWQCB. With implementation of the required mitigation, the Project's impacts to jurisdictional waters would be reduced to less-than-significant levels.





to

Scale

4.4 Biological Resources

Figure 4.4-1

Vegetation Communities Map





Source(s): Glenn Lukos Associates (08-14-2023)



Lead Agency: Riverside County

4.4 Biological Resources

Figure 4.4-2

Jurisdictional Delineation Map (RWQCB)







4.4 Biological Resources

Figure 4.4-3

Jurisdictional Delineation Map (CDFW)





4.4 Biological Resources

MSHCP Criteria Area Cell Groups





4.4 Biological Resources

Figure 4.4-5

MSHCP Section 6.1.2 Riparian/Riverine Impact Map



4.5 CULTURAL RESOURCES

The analysis in this Subsection 4.5 is based on a site-specific Cultural Resources Assessment (herein, "CRA") prepared by BFSA Environmental Services (BFSA), entitled, "A Phase I Cultural Resources Assessment for the Rider and Patterson Project," dated November 17, 2022, and included as *Technical Appendix D* to this EIR (BFSA, 2022a). All references used in this subsection are included in EIR Section 7.0, *References*. It should be noted that confidential information has been redacted from *Technical Appendix D* for purposes of public review. In addition, much of the written and oral communication between Native American tribes, unincorporated Riverside County, and BFSA is considered confidential in respect to places that have traditional tribal cultural significance (Gov. Code § 65352.4), and although relied upon in part to inform the preparation of this EIR subsection, those communications are treated as confidential and are not available for public review. Under existing law, environmental documents must not include information about the location of archaeological sites or sacred lands or any other information that is exempt from public disclosure pursuant to the Public Records Act (CCR § 15120(d)).

4.5.1 EXISTING CONDITIONS

A. <u>Cultural Setting</u>

1. Prehistoric Context

The three general cultural periods represented in Riverside County include the Paleo Indian, Archaic Period Milling Stone Horizon, and the Late Prehistoric Takic groups. The following analysis of the cultural history of Riverside County references the San Dieguito Complex, Encinitas Tradition, Milling Stone Horizon, La Jolla Complex, Pauma Complex, and San Luis Rey Complex, as these culture sequences have been used to describe archaeological manifestations in the region. The Late Prehistoric component was primarily represented by the Cahuilla, Gabrielino, and Luiseño Indians. Reference will be made to the geological framework that divides the archaeologically-based culture chronology of the area into four segments: the late Pleistocene (20,000 to 10,000 years before the present [YBP]), the early Holocene (10,000 to 6,650 YBP), the middle Holocene (6,650 to 3,350 YBP), and the late Holocene (3,350 to 200 YBP). (BFSA, 2022a, pp. 2.0-6 - 2.0-7)

The cultural prehistory of southern California has been summarized into numerous chronologies. Although the beginning and ending dates of different cultural horizons vary regionally, the general framework of the prehistory of western Riverside County can be divided into the following primary periods.

<u>Paleo Indian Period (Late Pleistocene: 11,500 to circa 9,000 YBP)</u>

The environment during the late Pleistocene was cool and moist, which allowed for glaciation in the mountains and the formation of deep, pluvial lakes in the deserts and basin lands. By the end of the late Pleistocene, however, the climate became warmer, which caused glaciers to melt, sea levels to rise, greater coastal erosion, large lakes to recede and evaporate, extinction of Pleistocene megafauna, and major vegetation changes. The coastal shoreline at 10,000 YBP, depending upon the particular area of the coast, was near the 30-meter isobath, or two to six kilometers further west than its present location. Paleo Indians were likely attracted to multiple habitat types, including mountains, marshlands, estuaries, and lakeshores. They presumably used a more



generalized hunting, gathering, and collecting adaptation utilizing a variety of resources including birds, mollusks, and large and small mammals. (BFSA, 2022a, p. 2.0-7)

Archaic Period (Early and Middle Holocene: circa 9,000 to 1,300 YBP):

Archaeological data indicates that between 9,000 and 8,000 YBP, a widespread complex was established in the southern California region, primarily along the coast. This complex is locally known as the La Jolla Complex, which is regionally associated with the Encinitas Tradition and shares cultural components with the widespread Milling Stone Horizon. The coastal expression of this complex appeared in southern California coastal areas and focused upon coastal resources and the development of deeply stratified shell middens that were primarily located around bays and lagoons. The older sites associated with this expression are located at Topanga Canyon, Newport Bay, Agua Hedionda Lagoon, and some of the Channel Islands. Radiocarbon dates from sites attributed to this complex span a period of over 7,000 years in this region, beginning over 9,000 YBP. (BFSA, 2022a, p. 2.0-7)

The Encinitas Tradition is best recognized for its pattern of large coastal sites characterized by shell middens, grinding tools that are closely associated with the marine resources of the area, cobble-based tools, and flexed human burials. While ground stone tools and scrapers are the most recognized tool types, coastal Encinitas Tradition sites also contain numerous utilized flakes, which may have been used to pry open shellfish. Artifact assemblages at coastal sites indicate a subsistence pattern focused upon shellfish collection and nearshore fishing. This suggests an incipient maritime adaptation with regional similarities to more northern sites of the same period. Other artifacts associated with Encinitas Tradition sites include stone bowls, doughnut stones, discoidals, stone balls, and stone, bone, and shell beads. (BFSA, 2022a, pp. 2.0-7 - 2.0-8)

The coastal lagoons in southern California supported large Milling Stone Horizon populations circa 6,000 YBP, as is shown by numerous radiocarbon dates from the many sites adjacent to the lagoons. The ensuing millennia were not stable environmentally, and by 3,000 YBP, many of the coastal sites in central San Diego County had been abandoned. The abandonment of the area is usually attributed to the sedimentation of coastal lagoons and the resulting deterioration of fish and mollusk habitat. This is a well-documented situation at Batiquitos Lagoon, where over a two-thousand-year period, dominant mollusk species occurring in archaeological middens shift from deep-water mollusks (*Argopecten sp.*) to species tolerant of tidal flat conditions (*Chione sp.*), indicating water depth and temperature changes. (BFSA, 2022a, p. 2.0-8)

This situation likely occurred for other small drainages (Buena Vista, Agua Hedionda, San Marcos, and Escondido creeks) along the central San Diego coast where low flow rates did not produce sufficient discharge to flush the lagoons they fed (Buena Vista, Agua Hedionda, Batiquitos, and San Elijo lagoons). Drainages along the northern and southern San Diego coastline were larger and flushed the coastal hydrological features they fed, keeping them open to the ocean and allowing for continued human exploitation. Peñasquitos Lagoon exhibits dates as late as 2,355 YBP and San Diego Bay showed continuous occupation until the close of the Milling Stone Horizon. Additionally, data from several drainages in Camp Pendleton indicate a continued occupation of shell midden sites until the close of the period, indicating that coastal sites were not entirely abandoned during this time. (BFSA, 2022a, p. 2.0-8)

By 5,000 YBP, an inland expression of the La Jolla Complex is evident in the archaeological record, exhibiting influences from the Campbell Tradition from the north. These inland Milling Stone Horizon sites have been



termed "Pauma Complex." Pauma Complex sites share a predominance of grinding implements (manos and metates), lack mollusk remains, have greater tool variety (including atlatl dart points, quarry-based tools, and crescentics), and seem to express a more sedentary lifestyle with a subsistence economy based upon the use of a broad variety of terrestrial resources. Although originally viewed as a separate culture from the coastal La Jolla Complex, it appears that these inland sites may be part of a subsistence and settlement system utilized by the coastal peoples. Evidence suggests that these inland sites may represent seasonal components within an annual subsistence round by La Jolla Complex populations. Including both coastal and inland sites of this time period in discussions of the Encinitas Tradition provides a more complete appraisal of the settlement and subsistence system exhibited by this cultural complex. (BFSA, 2022a, pp. 2.0-8 - 2.0-9)

Refer to subsection 2.3.3 of EIR *Technical Appendix D* for a complete description of the Archaic Period.

Late Prehistoric Period (Late Holocene: 1,300 YBP to 1790)

Many Luiseño hold the world view that as a population they were created in southern California. Archaeological and anthropological data suggests that at approximately 1,350 YBP, Takic-speaking groups from the Great Basin region moved into Riverside County, marking the transition to the Late Prehistoric Period. An analysis of the Takic expansion by Sutton indicates that inland southern California was occupied by "proto-Yuman" populations before 1,000 YBP. The comprehensive, multi-phase model offered by Sutton employs linguistic, ethnographic, archaeological, and biological data to solidify a reasonable argument for population replacement of Takic groups to the north by Penutians. As a result, it is believed that Takic expansion occurred starting around 3,500 YBP moving toward southern California, with the Gabrielino language diffusing south into neighboring Yuman (Hokan) groups around 1,500 to 1,000 YBP, possibly resulting in the Luiseño dialect. (BFSA, 2022a, p. 2.0-10)

The final Takic expansion would not have occurred until about 1,000 YBP, resulting in Vanyume, Serrano, Cahuilla, and Cupeño dialects. The model suggests that the Luiseño did not simply replace Hokan speakers, but were rather a northern San Diego County/southern Riverside County Yuman population who adopted the Takic language. This period is characterized by higher population densities and elaborations in social, political, and technological systems. Economic systems diversified and intensified during this period with the continued elaboration of trade networks, the use of shell-bead currency, and the appearance of more labor-intensive, yet effective, technological innovations. Technological developments during this period included the introduction of the bow and arrow between A.D. 400 and 600 and the introduction of ceramics. Atlatl darts were replaced by smaller arrow darts, including Cottonwood series points. Other hallmarks of the Late Prehistoric Period include extensive trade networks as far-reaching as the Colorado River Basin and cremation of the dead. (BFSA, 2022a, p. 2.0-10)

<u>Protohistoric Period (Late Holocene: 1790 to Present)</u>

Ethnohistoric and ethnographic evidence indicates that three Takic-speaking groups occupied portions of Riverside County: the Cahuilla, the Gabrielino, and the Luiseño. The geographic boundaries between these groups in pre- and proto-historic times are difficult to place, but the Project is located well within the borders of ethnographic Luiseño territory. This group was a seasonal hunting and gathering people with cultural elements that were very distinct from Archaic Period peoples. These distinctions include cremation of the dead, the use of the bow and arrow, and exploitation of the acorn as a main food staple. Along the coast, the Luiseño



made use of available marine resources by fishing and collecting mollusks for food. Seasonally available terrestrial resources, including acorns and game, were also sources of nourishment for Luiseño groups. Elaborate kinship and clan systems between the Luiseño and other groups facilitated a wide-reaching trade network that included trade of Obsidian Butte obsidian and other resources from the eastern deserts, as well as steatite from the Channel Islands. (BFSA, 2022a, pp. 2.0-10 - 2.0-11)

The primary settlements of Late Prehistoric Luiseño Indians in the San Jacinto Plain were represented by Ivah and Soboba near Soboba Springs, Jusipah near the town of San Jacinto, Ararah in Webster's Canyon en route to Idyllwild, Pahsitha near Big Springs Ranch southeast of Hemet, and Corova in Castillo Canyon. These locations share features such as the availability of food and water resources. Features of this land use include petroglyphs and pictographs, as well as widespread milling, which is evident in bedrock and portable implements. Groups in the vicinity of the Project, neighboring the Luiseño, include the Cahuilla and the Gabrielino. Ethnographic data for the three groups is presented in subsection 2.3.5 of the Project's CRA (*Technical Appendix D*). (BFSA, 2022a, p. 2.0-11)

2. Ethnohistoric Period (1769 – Present)

Traditionally, the history of the state of California has been divided into three general periods: the Spanish Period (1769 to 1821), the Mexican Period (1822 to 1846), and the American Period (1848 to present). The American Period is often further subdivided into additional phases: the nineteenth century (1848 to 1900), the early twentieth century (1900 to 1950), and the Modern Period (1950 to present). (BFSA, 2022a, p. 2.0-17)

European exploration along the coast of California began in 1542 with the landing of Juan Rodriguez Cabrillo and his men at San Diego Bay. Sixty years after the Cabrillo expeditions, an expedition under Sebastian Viscaíno made an extensive and thorough exploration of the Pacific coast. The historic background of the Project area began with the Spanish colonization of Alta California. The first Spanish colonizing expedition reached southern California in 1769 with the intention of converting and civilizing the indigenous populations, as well as expanding the knowledge of and access to new resources in the region. As a result, by the late eighteenth century, a large portion of southern California was overseen by Mission San Luis Rey (San Diego County), Mission San Juan Capistrano (Orange County), and Mission San Gabriel (Los Angeles County), who began colonizing the region and surrounding areas. (BFSA, 2022a, p. 2.0-18)

Up until this time, the only known way to feasibly travel from Sonora to Alta California was by sea. In 1774, Juan Bautista de Anza, an army captain at Tubac, requested and was given permission by the governor of the Mexican State of Sonora to establish an overland route from Sonora to Monterey. In doing so, Juan Bautista de Anza passed through Riverside County and described the area in writing for the first time. In 1797, Father Presidente Lausen (of Mission San Diego de Alcalá), Father Norberto de Santiago, and Corporal Pedro Lisalde (of Mission San Juan Capistrano) led an expedition through southwestern Riverside County in search of a new mission site to establish a presence between San Diego and San Juan Capistrano. Their efforts ultimately resulted in the establishment of Mission San Luis Rey in Oceanside. (BFSA, 2022a, p. 2.0-18)

These early colonization efforts were followed by the establishment of estancias at Puente (circa 1816) and San Bernardino (circa 1819) near Guachama. These efforts were soon mirrored by the Spaniards from Mission San Luis Rey, who in turn established a presence in what is now Lake Elsinore, Temecula, and Murrieta. The indigenous groups who occupied these lands were recruited by missionaries, converted, and put to work in the



missions. Throughout this period, the Native American populations were decimated by introduced diseases, a drastic shift in diet resulting in poor nutrition, and social conflicts due to the introduction of an entirely new social order. (BFSA, 2022a, p. 2.0-19)

Mexico achieved independence from Spain in 1822 and became a federal republic in 1824. As a result, both Baja and Alta California became classified as territories. Shortly thereafter, the Mexican Republic sought to grant large tracts of private land to its citizens to begin to encourage immigration to California and to establish its presence in the region. Part of the establishment of power and control included the desecularization of the missions circa 1832. These same missions were located on some of the most fertile land in California and were considered highly valuable. The resulting land grants, known as "ranchos," covered expansive portions of California and by 1846, more than 600 land grants had been issued by the Mexican government. Rancho Jurupa was the first rancho to be established and was issued to Juan Bandini in 1838. Although Bandini primarily resided in San Diego, Rancho Jurupa was located in what is now Riverside County. (BFSA, 2022a, p. 2.0-19)

The treatment of Native Americans grew worse during the Rancho Period. Most of the Native Americans were forced off their land or put to work on the now privately-owned ranchos, most often as slave labor. In light of the brutal ranchos, Native Americans had become dependent upon the mission system and Native American culture had been disrupted to the point where they could no longer rely upon prehistoric subsistence and social patterns. Not only does this illustrate how dependent the Native Americans had become upon the missionaries, but it also indicates a marked contrast in the way the Spanish treated the Native Americans compared to the Mexican and United States ranchers. Spanish colonialism (missions) was based upon utilizing human resources while integrating them into their society. The Mexican and American ranchers did not accept Native Americans into their social order and used them specifically for the extraction of labor, resources, and profit. Rather than being incorporated, they were either subjugated or exterminated. (BFSA, 2022a, pp. 2.0-19 - 2.0-20)

By 1846, tensions between the United States and Mexico had escalated to the point of war. In order to reach a peaceful agreement, the Treaty of Guadalupe Hidalgo was put into effect in 1848, which resulted in the annexation of California to the United States. Once California opened to the United States, waves of settlers moved in searching for gold mines, business opportunities, political opportunities, religious freedom, and adventure. By 1850, California had become a state and was eventually divided into 27 separate counties. While a much larger population was now settling in California, this was primarily in the central valley, San Francisco, and the Gold Rush region of the Sierra Nevada mountain range. During this time, southern California grew at a much slower pace than northern California and was still dominated by the cattle industry that was established during the earlier rancho period. (BFSA, 2022a, p. 2.0-20)

During the same decade, circa 1852, the Native Americans of southern Riverside County, including the Luiseño and the Cahuilla, thought they had signed a treaty resulting in their ownership of all lands from Temecula to Aguanga east to the desert, including the San Jacinto Valley and the San Gorgonio Pass. The Temecula Treaty also included food and clothing provisions for the Native Americans. However, Congress never ratified these treaties, and the promise of one large reservation was rescinded. (BFSA, 2022a, p. 2.0-20)



With the completion of the Southern Pacific Railroad in 1869, southern California saw its first major population expansion. The population boom continued circa 1874 with the completion of connections between the Southern Pacific Railroad in Sacramento to the transcontinental Central Pacific Railroad in Los Angeles. The population influx brought farmers, land speculators, and prospective developers to the region. As the Jurupa area became more and more populated, circa 1870, Judge John Wesley North and a group of associates founded the city of Riverside on part of the former rancho. (BFSA, 2022a, p. 2.0-20)

Although the first orange trees were planted in Riverside County circa 1871, it was not until a few years later when a small number of Brazilian navel orange trees were established that the citrus industry truly began in the region. At the close of 1882, an estimated half a million citrus trees were present in California, with nearly half of that population in Riverside County. Population growth and 1880s tax revenue from the booming citrus industry prompted the official formation of Riverside County in 1893 out of portions of what was once San Bernardino County. (BFSA, 2022a, pp. 2.0-20 - 2.0-21)

Shortly thereafter, with the start of World War I, the United States began to develop a military presence in Riverside County with the construction of March Air Reserve Base. During World War II, Camp Haan and Camp Anza were constructed in what is now the current location of the National Veteran's Cemetery. In the decades that followed, populations spread throughout the county into Lake Elsinore, Corona, Norco, Murrieta, and Wildomar. However, a significant portion of the county remained largely agricultural well into the 1970s. Following the 1970s, Riverside saw a period of dramatic population increase as the result of new development, more than doubling the population of the county with a population of over 1.3 million residents. (BFSA, 2022a, p. 2.0-21)

3. General History of the Val Verde Region

The Project is located within an area traditionally known as Val Verde, which has historically been associated with the nearby city of Perris. In 1881, the California Southern Railroad laid the tracks for the transcontinental route of the Santa Fe Railway through what was referred to at that time as the San Jacinto Plains. The railroad was completed in 1882, which allowed hundreds of settlers to begin homesteading, mostly in Pinacate to the south. (BFSA, 2022a, p. 2.0-21)

The Rancho San Jacinto Nuevo y Portrero land grant was granted to Miguel Pedrorena by Mexican Governor Pío Pico in 1846. After Pedrorena's death in 1850, the land grant passed to his heirs under the guardianship of T.W. Sutherland. While still part of San Diego County, Rancho San Jacinto Nuevo y Portrero was patented to Sutherland in 1883. In 1885, the citizens of Pinacate created a more conveniently located station along the railroad route, and in 1886, the town site of Perris was established. (BFSA, 2022a, p. 2.0-21)

The Val Verde Tract was platted in 1893 about five miles northwest of Perris. The community briefly flourished due to the establishment of a railway siding and station. The area was dominated by agricultural properties focused upon grain, grapes, potatoes, melons, alfalfa, and green vegetables. The community had a post office between 1894 and 1904, and again from 1918 through 1930. The post office was discontinued twice, and mail was forwarded to Perris. (BFSA, 2022a, p. 2.0-21)

A portion of the Colorado River Aqueduct was constructed in the community in 1939 to conduct water from the river to nearby Lake Mathews. The alignment of the aqueduct within Val Verde was named the Val Verde



Cut and the Val Verde Tunnel. The Val Verde Cut was the only portion of the aqueduct that was unlined, running for approximately one mile. Due to the aqueduct and availability of water in the region, the Val Verde community continued to be dominated by agriculture throughout the twentieth century. (BFSA, 2022a, pp. 2.0-21 - 2.0-22)

B. <u>Research Methods</u>

The archaeological program for the proposed Project consisted of a records search, an intensive pedestrian survey and preparation of a technical study. The Project's CRA conforms to the Riverside County Cultural Resource Guidelines. Statutory requirements of the California Environmental Quality Act (CEQA) and subsequent legislation (CEQA Guidelines Section 15064.5) were followed in evaluating the significance of cultural resources.

1. Records Search

The archaeological records search for the Project and surrounding area within a one-mile radius was provided by the Eastern Information Center (EIC) on February 7, 2022. (BFSA, 2022a, p. 3.0-1) Historic sources reviewed included the National Register of Historic Places Index; the Office of Historic Preservation (OHP), Archaeological Determinations of Eligibility; The OHP, Built Environment Resource Directory; USGS topographic maps and historic aerial photographs dating between 1938 and 2018. (BFSA, 2022a, p. 4.0-1)

2. Field Survey

An intensive pedestrian reconnaissance was conducted on January 27 and October 5, 2022. The survey employed a series of parallel survey transects, spaced at approximately 10 meter intervals, to locate archaeological sites within the Project. The entire Project was covered by the survey process and photographs were taken to document site conditions during the survey. The survey resulted in the identification of two historic residences, which were recorded as sites Temp-1 and Temp-2 with the EIC. (BFSA, 2022a, p. 3.0-1)

3. Native American Consultation

The analysis of nearby site components and artifacts did not indicate Native American religious, ritual, or other special activities at this location. BFSA requested a review of the Sacred Lands File (SLF) by the California Native American Heritage Commission (NAHC) on November 10, 2021 to determine if any recorded Native American sacred sites or locations of religious or ceremonial importance are present within one mile of the Project. A response was received from the NAHC on December 27, 2021 that indicated the presence of sacred sites/locations of religious or ceremonial importance within the search radius. In accordance with the recommendations of the NAHC, BFSA contacted all Native American tribes listed in the NAHC response letter two weeks before the pedestrian survey was conducted, including the Pechanga Band of Luiseño Mission Indians, as specifically requested by the NAHC. (BFSA, 2022a, pp. 3.0-1 - 3.0-2)

C. <u>Results and Findings</u>

1. Records Search

EIC records identified 191 cultural resources within one mile of the Project, none of which are located within the Project site. These resources include 131 bedrock milling sites, two bedrock milling sites with associated



cairn/rock features, 26 bedrock milling sites with associated lithic scatters, one lithic scatter, six prehistoric isolates, one prehistoric bedrock milling site with an associated lithic scatter and a historic trash scatter, two prehistoric bedrock milling sites with historic trash scatters, railway tracks, a railroad grade, historic machinery, a diner, three residences, the alignment of the Colorado River Aqueduct, a historic well/cistern, a historic well/cistern and foundations, four foundation sites, one foundation and landscaping, one standpipe, five trash scatters, and one historic isolate. (BFSA, 2022a, p. 4.0-1)

Prehistoric sites were the most commonly identified resource during the records search. These resources tend to be situated within the bedrock-laden foothills to the west and southwest. The closest mapped resource is P-33-017924, a single bedrock milling feature located approximately 41 meters south of the Project site. The records search also indicates that 42 cultural resource studies have been conducted within a one-mile radius of the Project, one of which overlaps the Project site. The previous study consisted of a Phase I study of the Project area and directly addressed the current Project parcels; this study did not identify any resources within the Project site. (BFSA, 2022a, p. 4.0-1)

No historic resources were identified within the boundaries of the Project as a result of the review. The historic USGS maps and aerial photographs show that the Project site has historically been utilized for agriculture. A residential property first appears within the southeast corner of the Project at 20111 Patterson Avenue in 1962. In 1964, an additional residence had been constructed within the southwest corner of the Project at 23330 Walnut Street. The rural residential properties in the southern portion of the Project appear to have remained relatively unchanged through 1978. By 1985, an additional structure had been constructed at 23330 Walnut Street. Few changes are visible on the Project site until sometime between 2004 and 2005, when the vacant portion of the Project site was impacted by grading. The purpose of the land modification is not clear as it does not appear to be associated with any specific development. An additional residential property within the southern portion of the property was constructed at 20117 Patterson Avenue between 2004 and 2005. (BFSA, 2022a, pp. 4.0-1 - 4.0-2)

The records search and literature review suggest that the general vicinity of the Project site is sensitive for cultural resources. Prehistoric resources are the most abundant site type identified within one mile of the Project site and tend to be situated near permanent water sources and bedrock outcroppings within the foothills to the west and southwest. The Project site is situated within a flat valley setting, primarily surrounded by historic resources associated with the agricultural development of the area. The Project site sits at the base of a high frequency of granitic outcrops directly to the south and southwest. Therefore, the Project site has the potential to contain both historic and prehistoric resources. (BFSA, 2022a, p. 4.0-2)

2. Field Survey Results

Principal Investigator Brian F. Smith directed the pedestrian surveys of the Project on January 27, 2022 and October 5, 2022, with the assistance of Senior Field Archaeologist Clarence Hoff. In addition, Armando Lerma, a representative from the Pechanga Band of Luiseño Mission Indians, and Frankie Morrero, a representative from the Soboba Band of Luiseño Indians, voluntarily participated in the survey of the Project site. In general, the Project site topography was noted as relatively flat and heavily modified. Evidence of machine-fractured granite was visible across most of the Project site. During the survey, ground visibility was characterized as moderate to good due to past development, residential structures, and limited vegetation (more than 70 percent). Dirt mounds, ripped granitic outcrops, and piles of broken bedrock were identified, which indicate a



high level of previous disturbance across the Project site. The survey did not identify any prehistoric sites; however, the residences at 23330 Walnut Street and 20111 Patterson Avenue identified during the survey were recorded as sites Temp-1 and Temp-2. According to the notices of completion, the residence at 23330 Walnut Street (Temp-1) was constructed in 1962 and the residence at 20111 Patterson Avenue (Temp-2) was constructed in 1964. (BFSA, 2022a, pp. 4.0-2 - 4.0-3)

3. Native American Participation

BFSA requested a review of the SLF by the NAHC on November 10, 2021 to determine if any recorded Native American sacred sites or locations of religious or ceremonial importance are present in the Project area. A response was received from the NAHC on December 27, 2021, indicating the presence of sacred sites/locations of religious or ceremonial importance within the search radius. In addition, the NAHC provided a referral list of additional Native American representatives in the region who may also have such information. In accordance with NAHC recommendations, BFSA then contacted all Native American consultants listed, prior to conducting the field survey. The following tribes responded:

- The Augustine Band of Cahuilla Indians, who stated they are unaware of any cultural resources that may be affected by the proposed Project;
- The Cahuilla Band of Indians, who stated that the Project is located within the Cahuilla traditional land use area and requested a tribal monitor be present for all ground-disturbing activities; and
- The Quechan Tribe of the Fort Yuma Reservation, who deferred to other more local tribes.

Additionally, Armando Lerma from the Pechanga Band of Luiseño Mission Indians and Frankie Morrero from the Soboba Band of Luiseño Indians participated in the field survey conducted by BFSA on January 27, 2022 and October 5, 2022. (BFSA, 2022a, p. 4.0-2)

4.5.2 APPLICABLE REGULATORY REQUIREMENTS

The following is a brief description of the federal, State, and local environmental laws and related regulations governing the protection of cultural resources.

A. <u>Federal Regulations</u>

1. National Register of Historic Places (NRHP)

The National Register of Historic Places (NRHP) is the official list of the Nation's historic places worthy of preservation. Authorized by the National Historic Preservation Act (NHPA) of 1966, the National Park Service (NPS) NRHP is part of a national program to coordinate and support public and private efforts to identify, evaluate, and protect America's historic and archaeological resources. (NPS, 2022a)

To be considered eligible, a property must meet the National Register Criteria for Evaluation. This involves examining the property's age, integrity, and significance, as follows:

• Age and Integrity. Is the property old enough to be considered historic (generally at least 50 years old) and does it still look much the way it did in the past?



• Significance. Is the property associated with events, activities, or developments that were important in the past? With the lives of people who were important in the past? With significant architectural history, landscape history, or engineering achievements? Does it have the potential to yield information through archaeological investigation about our past? (NPS, 2022a)

Nominations can be submitted to a State Historic Preservation Office (SHPO) from property owners, historical societies, preservation organizations, governmental agencies, and other individuals or groups. The SHPO notifies affected property owners and local governments and solicits public comment. If the owner (or a majority of owners for a district nomination) objects, the property cannot be listed but may be forwarded to the NPS for a Determination of Eligibility (DOE). Listing in the NRHP provides formal recognition of a property's historical, architectural, or archaeological significance based on national standards used by every state. (NPS, 2022a)

Under Federal Law, the listing of a property in the National Register places no restrictions on what a nonfederal owner may do with their property up to and including destruction, unless the property is involved in a project that receives Federal assistance, usually funding or licensing/permitting. National Register listing does not lead to public acquisition or require public access. (NPS, 2022a)

2. National Historic Landmarks Program

National Historic Landmarks (NHLs) are nationally significant historic places designated by the Secretary of the Interior because they possess exceptional value or quality in illustrating or interpreting the heritage of the United States. Today, over 2,600 historic places bear this national distinction. Working with citizens throughout the nation, the NHL Program draws upon the expertise of NPS staff who guide the nomination process for new Landmarks and provide assistance to existing Landmarks. (NPS, n.d.)

3. American Indian Religious Freedom Act

The American Indian Religious Freedom Act (AIRFA) requires each executive branch agency with statutory or administrative responsibility for the management of federal lands, to the extent practicable, permitted by law, and not clearly inconsistent with essential agency functions, to accommodate access to and ceremonial use of Indian sacred sites by Indian religious practitioners and avoid adversely affecting the physical integrity of such sacred sites. Where appropriate, agencies are also required to maintain the confidentiality of sacred sites. Each executive branch agency with statutory or administrative responsibility for the management of federal lands are required to implement procedures to ensure reasonable notice is provided of proposed actions or land management policies that may restrict future access to or ceremonial use of, or adversely affect the physical integrity of, sacred sites. (NOAA, n.d.)

4. Federal Antiquities Act

The Antiquities Act is the first law to establish that archaeological sites on public lands are important public resources. It obligates federal agencies that manage the public lands to preserve for present and future generations the historic, scientific, commemorative, and cultural values of the archaeological and historic sites and structures on these lands. It also authorizes the President to protect landmarks, structures, and objects of historic or scientific interest by designating them as National Monuments. (NPS, 2022b)



B. <u>State Regulations</u>

1. California Administrative Code, Title 14, Section 4308

Section 4308, *Archaeological Features*, of Title 14 of the California Administrative Code provides that: "No person shall remove, injure, disfigure, deface, or destroy any object of archaeological, or historical interest or value." (NPS, n.d.)

2. California Code of Regulations Title 14, Section 1427

California Code of Regulations Title 14, Section 1427 provides that: "No person shall collect or remove any object or thing of archaeological or historical interest or value, nor shall any person injure, disfigure, deface or destroy the physical site, location or context in which the object or thing of archaeological or historical interest or value is found." (NAHC, n.d.)

3. California Register of Historical Resources (CRHR)

The State Historical Resources Commission has designed this program for use by state and local agencies, private groups, and citizens to identify, evaluate, register, and protect California's historical resources. The California Register of Historical Resources (CRHR) is the authoritative guide to the state's significant historical and archaeological resources. The CRHR program encourages public recognition and protection of resources of architectural, historical, archaeological, and cultural significance; identifies historical resources for state and local planning purposes; determines eligibility for state historic preservation grant funding; and affords certain protections under CEQA. (OHP, n.d.)

In order for a resource to be included on the CRHR, the resources must meet one of the following criteria:

- Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States (Criterion 1);
- Associated with the lives of persons important to local, California or national history (Criterion 2);
- Embodies the distinctive characteristics of a type, period, region, or method of construction or represents the work of a master or possesses high artistic values (Criterion 3); or
- Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation (Criterion 4). (OHP, n.d.)

For resources included on the CRHR, environmental review may be required under CEQA if a property is threatened by a project. Additionally, local building inspectors must grant code alternatives provided under the State Historical Building Code. Further, the local assessor may enter into contract with property owner for property tax reduction pursuant to the Mills Act, enacted in 1972. A property owner also may place his or her own plaque or marker at the site of the resource. (OHP, n.d.)

Consent of owner is not required, but a resource cannot be listed over an owner's objections. The State Historical Resources Commission (SHRC) can, however, formally determine a property eligible for the CRHR if the resource owner objects. (OHP, n.d.)



4. Traditional Tribal Cultural Places Act [Senate Bill 18 (SB 18)]

Senate Bill 18 (SB 18) requires local (city and county) governments to consult with California Native American tribes to aid in the protection of traditional tribal cultural places through local land use planning. SB 18 also requires the Governor's Office of Planning and Research (OPR) to include in the General Plan Guidelines advice to local governments for how to conduct these consultations. (OPR, 2005)

The intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places. The purpose of involving tribes at these early planning stages is to allow consideration of cultural places in the context of broad local land use policy, before individual site-specific, project-level land use decisions are made by a local government. (OPR, 2005)

SB 18 requires local governments to consult with tribes prior to making certain planning decisions and to provide notice to tribes at certain key points in the planning process. These consultation and notice requirements apply to adoption and amendment of both general plans (defined in Government Code Section (§) 65300 et seq.) and specific plans (defined in Government Code § 65450 et seq.). Although SB 18 does not specifically mention consultation or notice requirements for adoption or amendment of specific plans, existing state planning law requires local governments to use the same processes for adoption and amendment of specific plans (see Government Code § 65453). Therefore, where SB 18 requires consultation and/or notice for a general plan adoption or amendment, the requirement extends also to a specific plan adoption or amendment. (OPR, 2005)

5. Assembly Bill 52 (AB 52)

California Assembly Bill 52 (AB 52) (2014) Chapter 532 amended Section 5097.94 of, and added Sections 21073, 21074, 21080.3.1, 21080.3.2, 21802.3, 21083.09, 21084.2 and 21084.3 to the California Public Resources Code, relating to Native Americans. AB 52 was approved on September 25, 2014. By including tribal cultural resources early in the CEQA process, the legislature intended to ensure that local and Tribal governments, public agencies, and project proponents would have information available early in the project planning process to identify and address potential adverse impacts to tribal cultural resources. By taking this proactive approach, the legislature also intended to reduce the potential for delay and conflicts in the environmental review process. (OPR, 2017a)

The Public Resources Code (PRC) now establishes that "[a] project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment." (PRC § 21084.2.) To help determine whether a project may have such an effect, the PRC requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project. That consultation must take place prior to the determination of whether a negative declaration, mitigated negative declaration, or environmental impact report is required for a project. (PRC § 21080.3.1.) (OPR, 2017a)

If a lead agency determines that a project may cause a substantial adverse change to tribal cultural resources, the lead agency must consider measures to mitigate that impact. PRC § 20184.3 (b)(2) provides examples of mitigation measures that lead agencies may consider to avoid or minimize impacts to tribal cultural resources.



These rules apply to projects that have a notice of preparation for an environmental impact report or negative declaration or mitigated negative declaration filed on or after July 1, 2015. (OPR, 2017a)

PRC § 21074 defines "tribal cultural resources." In brief, in order to be considered a tribal cultural resource, a resource must be either:

- listed, or determined to be eligible for listing, on the national, state, or local register of historic resources, or
- a resource that the lead agency chooses, in its discretion, to treat as a tribal cultural resource. (OPR, 2017a)

In the latter instance, the lead agency must determine that the resource meets the criteria for listing in the state register of historic resources. In applying those criteria, a lead agency must consider the value of the resource to the tribe. (OPR, 2017a)

6. State Health and Safety Code

California Health and Safety Code (HSC) § 7050.5(b) requires that excavation and disturbance activities must cease "In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery..." until the coroner can determine regarding the circumstances, manner, and cause of any death. The coroner is then required to make recommendations concerning the treatment and disposition of the human remains. Further, this section of the code makes it a misdemeanor to intentionally disturb, mutilate or remove interred human remains. HSC § 7051 specifies that the removal of human remains from "internment or a place of storage while awaiting internment" with the intent to sell them or to dissect them with "malice or wantonness" is a public offense punishable by imprisonment in a state prison. Lastly, HSC §§ 8010-8011 establish the California Native American Graves Protection and Repatriation Act stresses that "all California Indian human remains and cultural items are to be treated with dignity and respect." It encourages voluntary disclosure and return of remains and cultural items by publicly funded agencies and museums in California. It also outlines the need for aiding California Indian tribes, including non-federally recognized tribes, in filing repatriation claims. (CA Legislative Info, n.d.)

California HSC, § 5097.98 states that whenever the NAHC receives notification of a discovery of Native American human remains pursuant to HSC subdivision (c) of § 7050.5, it shall immediately notify those persons that are the most likely descendants. The descendants may inspect the site and make recommendations to the landowner as to the treatment of the human remains. The landowner shall ensure that the immediate vicinity around the remains is not damaged or disturbed by further development activity until coordination has occurred with the descendants regarding their recommendations for treatment, taking into account the possibility of multiple human remains. The descendants shall complete their inspection and make recommendations within 48 hours of being granted access to the site. (CA Legislative Info, n.d.)

7. California Code of Regulations (CCR) Section 15064.5

The California Code of Regulations (CCR), Title 14, Chapter 3, § 15064.5 (the State CEQA Guidelines) establishes the procedure for determining the significance of impacts to archaeological and historical resources,



as well as classifying the type of resource. Cultural resources are aspects of the environment that require identification and assessment for potential significance. The evaluation of cultural resources under CEQA is based upon the definitions of resources provided in CEQA Guidelines § 15064.5, as follows: (OPR, 2022)

- A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code § 5024.1, Title 14 CCR, Section 4850 et seq.).
- A resource included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
- Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code § 5024.1, Title 14 CCR, Section 4852) including the following:
 - Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
 - Is associated with the lives of persons important in our past;
 - Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
 - *Has yielded, or may be likely to yield, information important in prehistory or history.*
- The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code sections 5020.1(j) or 5024.1.

C. <u>Local Regulations</u>

1. Ordinance No. 578 - Establishment of Historic Preservation Districts

This ordinance is intended to facilitate the preservation of areas deemed historically important to the County of Riverside. The ordinance specifies that a Historic Preservation District may be established if the Riverside County Board of Supervisors adopts a resolution that includes the boundaries of the Historic Preservation District and finds that the proposed Historic Preservation District is in conformity with the Cultural and Paleontological section of the Multipurpose Open Space Element of the Riverside County General Plan. It



must also find that, for the county, state or nation: the area exemplifies or reflects significant aspects of the cultural, political, economic or social history; the area is identified with historic personages or with important events in history; or, that the area embodies the distinguishing characteristics of a significant architectural period which is inherently valuable for the study of architecture unique to the history of the county, state or nation. (Riverside County, 2015a, p. 4.9-25)

Under this ordinance, no building or structure within the boundaries of an adopted Historic Preservation District can be constructed or altered, except in strict compliance with the plans approved in conjunction with the issuance of a Historic District Alteration Permit by the Riverside County Planning Director. The ordinance also outlines how such certificates are to be reviewed and processed in order to preserve the "historical significance and related construction theme" of the Historic District. (Riverside County, 2015a, p. 4.9-26)

2. Riverside County Historical Commission

The Riverside County Historical Commission was established in 2005 to advise the Riverside County Board of Supervisors on historical preservation matters. It is tasked with working to discover and identify persons, events and places of historical importance within Riverside County, and to make recommendations relating to the preservation of appropriate historic sites and structures. To accomplish this, the Commission established criteria and procedures to identify and recognize historic landmarks in Riverside County. These criteria should be used when reviewing a potentially historically or culturally significant site that could be affected by the proposed development. Such resources are noted in the countywide list provided in Table 4.9-A of Riverside County EIR No. 521. (Riverside County, 2015a, p. 4.9-26)

3. Riverside County Planning Department Procedures

The Riverside County Archeologist reviews all proposed land use projects subject to CEQA and not otherwise deemed categorically exempt. The Riverside County Archeologist reviews various internal databases for information that might pertain to the age of any buildings found on site, grading permits, ground disturbance activities and building permits. Where buildings are 45 years or older, the project applicant is required to perform an architectural history evaluation to assess potential historic value as part of a Phase I Cultural Resources study. When the study is completed, and if historic-period resources were identified during a survey, a copy of the report is to be transmitted to the Riverside County Historic Preservation Officer (CHPO) for review and comment. The CHPO sends relevant comments back to the Riverside County Archeologist. (Riverside County, 2015a, p. 4.9-26)

Vacant parcels within areas known to have prehistoric or historic resources trigger a Phase I Cultural Resources study. Similarly, any parcels with environmental, geomorphological or vegetative features known to increase the likelihood of cultural resources being present trigger a Phase I Cultural Resources study. Such studies are required to follow the reporting formula found on the Riverside County Planning Department's website which mirror the recommendations published by the SHPO in 1987. (Riverside County, 2015a, p. 4.9-26)

The Riverside County Archeologist reviews all Phase I Cultural Resources studies for completeness and reasonable conclusions based on current industry standards in archeology. The Phase I study serves to advise the Riverside County Archeologist on matters relating to any identified prehistoric or historic resources, provide the requisite information to complete the project-related CEQA analysis and guide the Riverside



County Archeologist in determining which land use conditions of approval and/or mitigation measures apply to the proposed project. (Riverside County, 2015a, p. 4.9-26)

Copies of the studies are provided to tribes, upon their request, as a confidential document. If a proposed project is subject to the requirements of the Traditional Tribal Places Act (commonly referred to as Senate Bill 18), a Phase 1 study is forwarded to tribes who request it as part of consultation under SB 18. Typically, official tribal consultations are scheduled after the report has been sent to the tribe(s) to maximize consultation efforts. (Riverside County, 2015a, p. 4.9-26)

4.5.3 BASIS FOR DETERMINING SIGNIFICANCE

Section V of Appendix G to the State CEQA Guidelines addresses typical adverse effects to cultural resources, and includes the following threshold questions to evaluate the Project's impacts on cultural resources.

- Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?
- Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?
- Would the Project disturb any human remains, including those interred outside of dedicated cemeteries?

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

- a. Alter or destroy an historic site;
- b. Cause a substantial adverse change in the significance of a historical resource as defined in California Code of Regulations, § 15064.5;
- c. Alter or destroy an archaeological site;
- d. Cause a substantial adverse change in the significance of an archaeological resource, pursuant to California Code of Regulations, § 15064.5;
- e. Disturb any human remains, including those interred outside of formal cemeteries.

The significance thresholds set forth in the Riverside County's Environmental Assessment Checklist form, as modified by the 2018 updates to the State CEQA Guidelines, were used to evaluate the significance of the proposed Project's impacts on cultural resources.



4.5.4 IMPACT ANALYSIS

Threshold a: Would the Project alter or destroy an historic site?

<u>Threshold b</u>: Would the Project cause a substantial adverse change in the significance of a historical resource as defined in California Code of Regulations, § 15064.5?

As discussed in subsection 4.5.1.C.2, implementation of the Project would impact two historic buildings, referred to as Temp-1 (located at 23330 Walnut Street) and Temp-2 (located at 20111 Patterson Avenue). These two buildings, which are single-family residences, meet the age threshold which requires historic structure evaluations to determine eligibility for listing in the CRHR. Upon further evaluation, it was determined that neither residence is considered historically or architecturally significant under any CEQA criteria as described in the below discussion. (BFSA, 2022a, p. 4.0-44)

Neither Temp-1 nor Temp-2 could be associated with any specific historic event nor could either be associated with the lives of any important persons in our past and therefore, do not meet CRHR Criteria 1 or 2. Additionally, Temp-1 and Temp-2 cannot be considered examples of the modern movement, do not exhibit quality of design, and do not retain integrity of setting and workmanship, therefore, the residences are not eligible for designation under CRHR Criterion 3. Lastly, neither Temp-1 nor Temp-2 is associated with any significant persons or events and neither was constructed using unique or innovative methods of construction, and they likely cannot yield any additional information about the history of Riverside County or the state of California. Therefore, Temp-1 and Temp-2 are not eligible for designation under CRHR. Impacts to these reasons, Temp-1 and Temp-2 have been evaluated as ineligible for listing on the CRHR. Impacts to these buildings are considered not significant, and no mitigation measures are required for any future alterations or planned demolition of the buildings. (BFSA, 2022a, pp. 4.0-41 - 4.0-44)

No additional known historic sites were identified at the Project site. Accordingly, the Project has no potential to alter or destroy any known historic sites or known historical resources as defined in California Code of Regulations, § 15064.5. However, there is a potential that historical resources may be uncovered during onor off-site grading or ground-disturbing activities. (BFSA, 2022a, p. 5.0-1) This is evaluated as a potentially significant impact for which mitigation would be required.

<u>Threshold c:</u> Would the Project alter or destroy an archaeological site?

<u>Threshold d</u>: Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to California Code of Regulations, § 15064.5?

As previously indicated, there were no prehistoric archaeological resources identified on the Project site. (BFSA, 2022a, pp. 4.0-1) As such, the Project would not result in any impacts to known archaeological sites or cause a substantial adverse change in the significance of an archaeological resource. Although impacts to known archaeological resources on the Project site would be less than significant, given the presence of previously-identified archaeological resources within the Project vicinity, there is a potential for the Project site to contain unidentified surface or subsurface archaeological resources. Therefore, Project impacts to previously-undiscovered archaeological resources that may occur at the Project site would be significant prior to mitigation.



Threshold e: Would the Project disturb any human remains, including those interred outside of formal cemeteries?

The Project site does not contain a cemetery and no known cemeteries are located within the immediate site vicinity. (Google Earth, 2022) Field surveys conducted on the Project site by BFSA did not identify the presence of any human remains and no human remains are known to exist beneath the surface of the site. Nevertheless, the remote potential exists that human remains may be unearthed during grading and excavation activities associated with Project construction.

If human remains are unearthed during Project construction, the construction contractor would be required by law to comply with California HSC, § 7050.5, "Disturbance of Human Remains." According to § 7050.5(b) and (c), if human remains are discovered, the County Coroner must be contacted and if the Coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, the Coroner is required to contact the NAHC by telephone within 24 hours. Pursuant to California PRC § 5097.98, whenever the NAHC receives notification of a discovery of Native American human remains from a county coroner, the NAHC is required to immediately notify those persons it believes to be most likely descended from the deceased Native American. The descendants may, with the permission of the owner of the land, or his or her authorized representative, inspect the site of the discovery of the Native American human remains and may recommend to the owner or the person responsible for the excavation work means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods. The descendants shall complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. According to PRC § 5097.94(k), the NAHC is authorized to mediate disputes arising between landowners and known descendants relating to the treatment and disposition of Native American human burials, skeletal remains, and items associated with Native American burials.

With mandatory compliance to California HSC § 7050.5 and California PRC § 5097.98during Project construction activities (i.e., grading), a less-than-significant impact would occur.

4.5.5 CUMULATIVE IMPACT ANALYSIS

This cumulative impact analysis considers development of the proposed Project in conjunction with other development projects and planned development within western Riverside County. This study area was selected for evaluation because it encompasses a broad region with similar geological, biological, and climatic conditions.

As noted above under Thresholds a. and b., the Project has no potential to alter or destroy any known historic sites or known historical resources as defined in CCR, § 15064.5. However, there is a possibility that previously-undiscovered subsurface historical resources may be impacted by development of the Project as proposed. Other developments envisioned with buildout of the Riverside County General Plan and the general plans of cities within the County also have the potential to result in impacts to historical sites or resources, including sites or resources that may be buried beneath the ground surface. As such, the Project's potential impacts to previously-undiscovered historical resources on the Project site would be cumulatively considerable prior to mitigation.



As discussed under the analysis of Thresholds c. and d., the Project's CRA (*Technical Appendix D*) did not identify any potentially significant archaeological resources or sites within the Project. As such, the Project would not result in any cumulatively-considerable impacts to previously identified archaeological resources or sites. However, there is a possibility that previously-undiscovered subsurface archaeological resources may be impacted by development of the Project as proposed. Other cumulative developments resulting from buildout of the Riverside County General Plan and the general plans of cities within the County also have the potential to result in impacts to archaeological sites or resources, including sites or resources that may be buried beneath the ground surface. As such, the Project's potential impacts to previously-undiscovered archaeological sites or resources would be cumulatively considerable prior to mitigation.

As discussed under Threshold e., the Project and cumulative projects that involve ground-disturbing activities would be subject to compliance with the provisions of California HSC § 7050.5 as well as PRC § 5097 et. seq., which specify the requirements to be followed in the unlikely event that human remains are uncovered during constructiont. With compliance to these mandatory requirements, the Project's potential impacts associated with the unanticipated discovery of human remains would be less than cumulatively considerable.

4.5.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

<u>Thresholds a. & b.: Significant Direct and Cumulatively-Considerable Impact</u>. Although implementation of the Project would impact two historic-age buildings, neither building is considered historically or architecturally significant and have been determined ineligible CRHR listing. No other potential historic resources were identified within the Project site or off-site improvement areas. However, there is a potential for previously-undiscovered historical resources to occur beneath the surface of areas planned for physical impact (i.e., grading) as part of the Project. Potential impacts to previously-undiscovered historical resources would be significant on both a direct and cumulatively-considerable basis prior to mitigation.

<u>Threshold c. & d.: Significant Direct and Cumulatively-Considerable Impact</u>. Based on the results of the Project's CRA, the Project site does not contain any known archaeological sites or resources. As such, the Project would not result in any impacts to previously-identified archaeological sites or resources. Notwithstanding, there is a possibility that previously-undiscovered subsurface archaeological resources may be impacted by development of the Project as proposed. Therefore, Project impacts to previously-undiscovered archaeological resources would be significant prior to mitigation.

<u>Threshold e.: Less-than-Significant Impact</u>. The Project site does not contain a cemetery and no known cemeteries are located within the immediate site vicinity. The Project Applicant would be required to comply with the applicable provisions of California HSC § 7050.5 and California PRC § 5097 et. seq., in the unlikely event that buried human remains are encountered during construction. Compliance with these mandatory requirements would reduce potential impacts to less than significant.

4.5.7 APPLICABLE REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

Applicable Regulations and Design Requirements

The following are regulations and design requirements that apply to the proposed Project and that reduce or preclude impacts to cultural resources. Although compliance with mandatory regulatory requirements does not technically meet CEQA's definition for mitigation, they are specified herein as requirements for the Project.



- Unless otherwise required by law, the site of any reburial of Native American human remains or associated grave goods shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act. The Coroner, pursuant to the specific exemption set forth in California Government Code Section 6254 (r), parties, and Lead Agencies, will be asked to withhold public disclosure information related to such reburial, pursuant to the specific exemption set forth in California Government Code 6254 (r).
- In the event that human remains are encountered during ground-disturbing construction activities on site or within the Project's off-site improvement areas, compliance with California Health and Safety Code § 7050.5 and Public Resources Code § 5097 et. seq. shall be required. State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the Riverside County Coroner has made the necessary findings as to origin. Further, pursuant to Public Resource Code Section 5097.98(b) remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. The County Coroner shall determine that no investigation of the cause of death is required, and determine if the remains are of Native American origin. In the event that the remains are determined to be of Native American origin, the Native American Heritage Commission (NAHC) shall be contacted within the period specified by law (24 hours). Subsequently, the Native American Heritage Commission shall identify the "Most Likely Descendant." The Most Likely Descendant shall then make recommendations and engage in consultation concerning the treatment of the remains as provided in Public Resources Code Section 5097.98. If the NAHC is unable to identify a Most Likely Descendant, or if the Most Likely Descendant failed to make a recommendation within 48 hours after being notified by the NAHC, or the Project Applicant rejects the recommendation of the Most Likely Descendent, the Project Applicant shall rebury the Native American human remains and associated grave goods on the property in a location not subject to further ground disturbance. Evidence of compliance with this mitigation measure, if human remains are found, shall be provided to Riverside County upon the completion of a treatment plan and final report detailing the significance and treatment finding.

Mitigation

- MM 4.5-1 **Native American Monitor:** Prior to the issuance of grading permits, the Developer/Permit Applicant shall enter into an agreement with the consulting tribe(s) for a Native American Monitor. The Native American Monitor(s), shall be on-site during all initial ground disturbing activities and excavation of the southern portion of the Project site including clearing, grubbing, tree removals, grading and trenching. In conjunction with the Archaeological Monitor(s), the Native American Monitor(s) have the authority to temporarily divert, redirect, or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources. The Developer/Permit Applicant shall submit a fully executed copy of the agreement to the County Archaeologist to ensure compliance with this requirement. Upon verification, the Archaeologist shall clear this condition. This agreement shall not modify any condition of approval or mitigation measure.
- MM 4.5-2 **Project Archaeologist and CRMP:** Prior the issuance of a grading permit, the Developer/Permit Applicant shall provide evidence to the County of Riverside Planning



Department that a County certified professional archaeologist ("Project Archaeologist") has been contracted to implement a Cultural Resource Monitoring Program (CRMP). A CRMP shall be developed that addresses the details of all activities and provides procedures that must be followed in order to reduce the impacts to cultural and historic resources to a level that is less than significant, as well as address potential impacts to undiscovered buried archaeological resources associated with the Project. A fully executed copy of the contract and a wet-signed copy of the Monitoring Plan shall be provided to the County Archaeologist to ensure compliance. Working directly under the Project Archaeologist, an adequate number of qualified Archaeological Monitors shall be present to ensure that all earth moving activities are observed and shall be on-site during all grading activities for areas to be monitored including off-site improvements. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections will be determined by the Project Archaeologist.

- MM 4.5-3 Unanticipated Resources: A cultural resource, for this condition, is defined as being a feature and/or three or more artifacts in close association with each other. If during ground disturbance activities, unanticipated cultural resources are discovered, the following procedures shall be followed: All ground disturbance activities within 100 feet of the discovered cultural resource shall be halted and the applicant shall call the County Archaeologist immediately upon discovery of the cultural resource. A meeting shall be convened between the developer, the Native American tribal representative (or other appropriate ethnic/cultural group representative), and the County Archaeologist to discuss the significance of the find. At the meeting with the aforementioned parties, a decision is to be made, with the concurrence of the County Archaeologist, as to the appropriate treatment (documentation, recovery, avoidance, etc.) for the cultural resource. Resource evaluations shall be limited to nondestructive analysis. Further ground disturbance shall not resume within the area of the discovery until the appropriate treatment has been accomplished.
- MM 4.5-4 Artifact Disposition: Prior to the grading permit final inspection, the landowner(s) shall relinquish ownership of all cultural resources that are unearthed on the Project property during any ground-disturbing activities, including previous investigations and/or Phase III data recovery. All historic archeological materials revered during the archaeological investigations, including collections made during an earlier project such as testing of archaeological sites that took place years ago, shall be curated at the Western Science Center, a Riverside County curation facility that meets State Resources Department office of Historic Preservation Guidelines for the Curation of Archaeological Resources ensuring access and use pursuant to the Guidelines. For prehistoric resources, one of the following treatments shall be applied:
 - a. Reburial of the resources on the Project property. The measures for reburial shall include, at least, the following: Measures to protect the reburial area from any future impacts. Reburial shall not occur until all required cataloging, analysis and studies have been completed on the cultural resources, with an exception that sacred items, burial goods and Native American human remains are excluded. Any reburial processes shall be culturally appropriate. Listing of contents and location of the reburial shall be included in the



confidential Phase IV Report. The Phase IV Report shall be filed with the County under a confidential cover and not subject to a Public Records Request.

- b. If reburial is not agreed upon by the Consulting Tribes, then the resources shall be curated at a culturally appropriate manner at the Western Science Center, a Riverside County curation facility that meets State Resources Department Office of Historic Preservation Guidelines for the Curation of Archaeological Resources ensuring access and use pursuant to the Guidelines. The collection and associated records, including title, shall be transferred and are to be accompanied by payment of the fees necessary for permanent curation. Evidence of curation in the form of a letter from the curation facility stating that subject archaeological materials have been received and that all fees have been paid, shall be provided by the landowner to the County. There shall be no destructive or invasive testing on sacred items, burial goods and Native American human remains.
- MM 4.5-5 **Final Phase IV Report**: Prior to the grading permit final inspection, a Phase IV Cultural Resources Monitoring Report shall be submitted that complies with the Riverside County Planning Department's requirements for such reports for all ground disturbing activities associated with the grading permit. The report shall follow the County of Riverside Planning Department Cultural Resources (Archaeological) Investigations Standard Scopes of Work posted on the TLMA website. The report shall include results of any feature relocation or residue analysis required as well as evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting and evidence that any artifacts have been treated in accordance to the procedures stipulated in the Cultural Resources Program (CRMP)

4.5.8 SIGNIFICANCE OF IMPACTS AFTER MITIGATION

<u>Thresholds a. and b.: Less-than-Significant Impact with Mitigation</u>. Implementation of Mitigation Measures mm 4.5-2 through MM 4.5-5 would ensure that any historical resources identified on the Project site during ground-disturbing activities are appropriately treated, including if necessary curation of the historical artifact(s) to an appropriate curation facility or as directed by the County Archaeologist. Implementation of the required mitigation would ensure that any potential impacts to subsurface historical sites or resources would be reduced to less-than-significant levels.

<u>Thresholds c. and d.: Less-than-Significant Impact with Mitigation.</u> Implementation of Mitigation Measures MM 4.5-1 through MM 4.5-5 would ensure that any archaeological sites or resources identified on the Project site during ground-disturbing activities are appropriately treated as directed by the Project Archaeologist, County Archaeologist, and Native American Monitor. Implementation of the required mitigation would reduce the Project's potential impacts to subsurface archaeological sites or resources to below a level of significance.



4.6 ENERGY

The Subsection 4.6 is based in part on the information contained in the Project's Energy Analysis Report ("Energy Analysis"), titled "Rider & Patterson Business Center (PPT220004) Energy Analysis," dated February 15, 2023, and appended to this EIR as *Technical Appendix E* (Urban Crossroads, 2023c). Refer to Section 7.0, *References*, for a complete list of reference sources.

4.6.1 EXISTING CONDITIONS

A. <u>Overview</u>

The most recent data for California's estimated total energy consumption and natural gas consumption is from 2020, released by the United States (U.S.) Energy Information Administration's (EIA) California State Profile and Energy Estimates in 2021 and included the following consumption estimates (Urban Crossroads, 2023c, p. 13)

- As of 2020, approximately 6,923 trillion British Thermal Unit (BTU) of energy was consumed
- As of 2020, approximately 524 million barrels of petroleum
- As of 2020, approximately 2,075 billion cubic feet of natural gas
- As of 2020, approximately 1 million short tons of coal

The California Energy Commission's (CEC) Transportation Energy Demand Forecast 2018-2030 was released in order to support the 2017 Integrated Energy Policy Report. The Transportation Energy Demand Forecast 2018-2030 lays out graphs and data supporting projections of California's future transportation energy demand. The projected inputs consider expected variable changes in fuel prices, income, population, and other variables. Predictions regarding fuel demand included (Urban Crossroads, 2023c, p. 13):

- Gasoline demand in the transportation sector is expected to decline from approximately 15.8 billion gallons in 2017 to between 12.3 billion and 12.7 billion gallons in 2030.
- Diesel demand in the transportation sector is expected to rise, increasing from approximately 3.7 billion diesel gallons in 2015 to approximately 4.7 billion in 2030.
- Data from the Department of Energy states that approximately 3.9 billion gallons of diesel fuel were consumed in 2019.

The most recent data provided by the EIA for energy use in California by demand sector is from 2020 and is reported as follows (Urban Crossroads, 2023c, p. 13):

- Approximately 34.0% transportation;
- Approximately 24.6% industrial;
- Approximately 21.8% residential; and
- Approximately 19.6% commercial.



In 2021, total system electric generation for California was 277,764 gigawatt hours (GWh). California's massive electricity in-state generation system generated approximately 194,127 GWh which accounted for approximately 70% of the electricity it uses; the rest was imported from the Pacific Northwest (12%) and the U.S. Southwest (18%). Natural gas is the main source for electricity generation at 47% of the total in-state electric generation system power as shown in Table 4.6-1, *Total Electricity System Power (California 2021)*. (Urban Crossroads, 2023c, p. 13)

Fuel Type	California In-State Generation (GWh)	% of California In- State Generation	Northwest Imports (GWh)	Southwest Imports (GWh)	Total Imports (GWh)	% of Imports	Total California Energy Mix	Total California Power Mix
Coal	303	0.2%	181	7,788	7,969	9.5%	8,272	3.0%
Natural Gas	97,431	50.2%	45	7,880	7,925	9.5%	105,356	379.0%
Oil	37	0.0%	-	-	-	0.0%	37	0.0%
Other (Waste Heat/Petroleum Coke)	382	0.2%	68	15	83	0.1%	465	0.2%
Nuclear	16,477	8.5%	524	8,756	9,281	11.1%	25,758	9.3%
Large Hydro	12,036	6.2%	12,042	1,578	13,620	16.3%	25,656	9.2%
Unspecified	-	0.0%	8,156	10,731	18,887	22.6%	18,887	6.8%
Total Thermal and Non-Renewables	126,666	65.2%	21,017	36,748	57,764	6910.0%	184,431	66.4%
Biomass	5,381	2.8%	864	26	890	1.1%	6,271	2.3%
Geothermal	11,116	5.7%	192	1,906	2,098	2.5%	13,214	4.8%
Small Hydro	2,531	1.3%	304	1	304	0.4%	2,835	1.0%
Solar	33,260	17.1%	220	5,979	6,199	7.4%	39,458	14.2%
Wind	15,173	7.8%	9,976	6,405	16,381	19.6%	31,555	11.4%
Total Renewables	67,461	34.8%	11,555	14,317	25,872	3090.0%	93,333	33.6%
SYSTEM TOTALS	194,127	100.0%	32,572	51,064	83,636	100.0%	277,764	100.0%

Table 4 6-1	Total Electricity	System Power	(California	2021)
		System I Ower		2021)

Source: CECs 2021 Total System Electric Generation

(Urban Crossroads, 2023c, Table 2-1)

An updated summary of, and context for energy consumption and energy demands within the State is presented in "U.S. Energy Information Administration, California State Profile and Energy Estimates, Quick Facts" excerpted below (Urban Crossroads, 2023c, p. 15):

- In 2021, California was the seventh-largest producer of crude oil among the 50 states, and, as of January 2021, it ranked third in crude oil refining capacity.
- California is the largest consumer of jet fuel and second-largest consumer of motor gasoline among the 50 states and, the state accounted for 15% of the nation's jet fuel consumption and 10% of motor gasoline consumption in 2020.


- In 2019, California was the second-largest total energy consumer among the states, but its per capita energy consumption was less than in all other states except Rhode Island, due in part to its mild climate and its energy efficiency programs.
- In 2021, California was the nation's top producer of electricity from solar, geothermal, and biomass energy. The state was fourth in the nation in conventional hydroelectric power generation, down from second in 2019, in part because of drought and increased water demand.
- In 2021, California was the fourth-largest electricity producer in the nation, but the state was also the nation's second-largest consumer of electricity, and in 2020, it received about 30% of its electricity supply from generating facilities outside of California, including imports from Mexico.

As indicated above, California is one of the nation's leading energy-producing states, and California's per capita energy use is among the nation's most efficient. (Urban Crossroads, 2023c, p. 15)

B. <u>Electricity</u>

The Southern California region's electricity reliability has been of concern for the past several years due to the planned retirement of aging facilities that depend upon once-through cooling technologies, as well as the June 2013 retirement of the San Onofre Nuclear Generating Station (San Onofre). While the once-through cooling phase-out has been ongoing since the May 2010 adoption of the State Water Resources Control Board's once-through cooling policy, the retirement of San Onofre complicated the situation. California Independent Service Operator (ISO) studies revealed the extent to which the South Coast Air Basin (SCAB) and the San Diego Air Basin (SDAB) region were vulnerable to low-voltage and post-transient voltage instability concerns. A preliminary plan to address these issues was detailed in the 2013 Integrative Energy Policy Report (IEPR) after a collaborative process with other energy agencies, utilities, and air districts. Similarly, the subsequent 2021 IEPR's provides information and policy recommendations on advancing a clean, reliable, and affordable energy system. (Urban Crossroads, 2023c, p. 15)

California's electricity industry is an organization of traditional utilities, private generating companies, and State agencies, each with a variety of roles and responsibilities to ensure that electrical power is provided to consumers. The California ISO is a nonprofit public benefit corporation and is the impartial operator of the State's wholesale power grid and is charged with maintaining grid reliability, and to direct uninterrupted electrical energy supplies to California's homes and communities. While utilities still own transmission assets, the ISO routes electrical power along these assets, maximizing the use of the transmission system and its power generation resources. The ISO matches buyers and sellers of electricity to ensure that enough power is available to meet demand. To these ends, every five minutes the ISO forecasts electrical demands, accounts for operating reserves, and assigns the lowest cost power plant unit to meet demands while ensuring adequate system transmission capacities and capabilities. (Urban Crossroads, 2023c, pp. 15-16)

Part of the ISO's charge is to plan and coordinate grid enhancements to ensure that electrical power is provided to California consumers. To this end, utilities file annual transmission expansion/modification plans to accommodate the State's growing electrical needs. The ISO reviews and either approves or denies the proposed additions. In addition, and perhaps most importantly, the ISO works with other areas in the western United



States electrical grid to ensure that adequate power supplies are available to the State. In this manner, continuing reliable and affordable electrical power is assured to existing and new consumers throughout the State. (Urban Crossroads, 2023c, p. 16)

Electricity currently is provided to the Project site by Southern California Edison (SCE). SCE provides electric power to more than 15 million persons in 15 counties and in 180 incorporated cities, within a service area encompassing approximately 50,000 square miles. Based on SCE's 2018 Power Content Label Mix, SCE derives electricity from varied energy resources including: fossil fuels, hydroelectric generators, nuclear power plants, geothermal power plants, solar power generation, and wind farms. SCE also purchases from independent power producers and utilities, including out-of-state suppliers. (Urban Crossroads, 2023c, p. 16)

Table 4.6-2, *SCE 2020 Power Content Mix*, identifies SCE's specific proportional shares of electricity sources in 2020. As indicated in Table 4.6-2, the 2020 SCE Power Mix has renewable energy at 30.9% of the overall energy resources. Geothermal resources are at 5.5%, wind power is at 9.4%, large hydroelectric sources are at 3.3%, solar energy is at 15.1%, and coal is at 0%. (Urban Crossroads, 2023c, p. 16)

Energy Resources	2020 SCE Power Mix
Eligible Renewable	30.9%
Biomass & Waste	0.1%
Geothermal	5.5%
Eligible Hydroelectric	0.8%
Solar	15.1%
Wind	9.4%
Coal	0.0%
Large Hydroelectric	3.3%
Natural Gas	15.2%
Nuclear	8.4%
Other	0.3%
Unspecified Sources of power*	42.0%
Total	100%

Table 4.6-2SCE 2020 Power Content Mix

 "Unspecified sources of power" means electricity from transactions that are not traceable to specific generation sources

(Urban Crossroads, 2023c, Table 2-2)



C. <u>Natural Gas</u>

The following summary of natural gas customers and volumes, supplies, delivery of supplies, storage, service options, and operations is excerpted from information provided by the California Public Utilities Commission (CPUC) (Urban Crossroads, 2023c, pp. 17-20).

"The CPUC regulates natural gas utility service for approximately 10.8 million customers that receive natural gas from Pacific Gas and Electric (PG&E), Southern California Gas (SoCalGas), San Diego Gas & Electric (SDG&E), Southwest Gas, and several smaller natural gas utilities. The CPUC also regulates independent storage operators: Lodi Gas Storage, Wild Goose Storage, Central Valley Storage and Gill Ranch Storage.

California's natural gas utilities provide service to over 11 million gas meters. SoCalGas and PG&E provide service to about 5.9 million and 4.3 million customers, respectively, while SDG&E provides service to over 800, 000 customers. In 2018, California gas utilities forecasted that they would deliver about 4740 million cubic feet per day (MMcfd) of gas to their customers, on average, under normal weather conditions.

The overwhelming majority of natural gas utility customers in California are residential and small commercials customers, referred to as "core" customers. Larger volume gas customers, like electric generators and industrial customers, are called "noncore" customers. Although very small in number relative to core customers, noncore customers consume about 65% of the natural gas delivered by the state's natural gas utilities, while core customers consume about 35%.

A significant amount of gas (about 19%, or 1131 MMcfd, of the total forecasted California consumption in 2018) is also directly delivered to some California large volume consumers, without being transported over the regulated utility pipeline system. Those customers, referred to as "bypass" customers, take service directly from interstate pipelines or directly from California producers.

SDG&E and Southwest Gas' southern division are wholesale customers of SoCalGas, i.e., they receive deliveries of gas from SoCalGas and in turn deliver that gas to their own customers. (Southwest Gas also provides natural gas distribution service in the Lake Tahoe area.) Similarly, West Coast Gas, a small gas utility, is a wholesale customer of PG&E. Some other wholesale customers are municipalities like the cities of Palo Alto, Long Beach, and Vernon, which are not regulated by the CPUC.

Natural gas from out-of-state production basins is delivered into California via the interstate natural gas pipeline system. The major interstate pipelines that deliver out-of-state natural gas to California gas utilities are Gas Transmission Northwest Pipeline, Kern River Pipeline, Transwestern Pipeline, El Paso Pipeline, Ruby Pipeline, Mojave Pipeline, and Tuscarora. Another pipeline, the North Baja - Baja Norte Pipeline takes gas off the El Paso Pipeline at the California/Arizona border and delivers that gas through California into Mexico. While the Federal Energy Regulatory Commission (FERC) regulates the transportation of natural gas on the interstate pipelines, and authorizes rates for that

service, the California Public Utilities Commission may participate in FERC regulatory proceedings to represent the interests of California natural gas consumers.

The gas transported to California gas utilities via the interstate pipelines, as well as some of the California-produced gas, is delivered into the PG&E and SoCalGas intrastate natural gas transmission pipelines systems (commonly referred to as California's "backbone" pipeline system). Natural gas on the utilities' backbone pipeline systems is then delivered to the local transmission and distribution pipeline systems, or to natural gas storage fields. Some large volume noncore customers take natural gas delivery directly off the high-pressure backbone and local transmission pipeline systems, while core customers and other noncore customers take delivery off the utilities' distribution pipeline systems. The state's natural gas utilities operate over 100,000 miles of transmission and distribution pipelines, and thousands more miles of service lines.

Bypass customers take most of their deliveries directly off the Kern/Mojave pipeline system, but they also take a significant amount of gas from California production.

PG&E and SoCalGas own and operate several natural gas storage fields that are located within their service territories in northern and southern California, respectively. These storage fields, and four independently owned storage utilities - Lodi Gas Storage, Wild Goose Storage, Central Valley Storage, and Gill Ranch Storage - help meet peak seasonal and daily natural gas demand and allow California natural gas customers to secure natural gas supplies more efficiently. PG&E is a 25% owner of the Gill Ranch Storage field. These storage fields provide a significant amount of infrastructure capacity to help meet California's natural gas requirements, and without these storage fields, California would need much more pipeline capacity in order to meet peak gas requirements

Prior to the late 1980s, California regulated utilities provided virtually all natural gas services to all their customers. Since then, the Commission has gradually restructured the California gas industry in order to give customers more options while assuring regulatory protections for those customers that wish to, or are required to, continue receiving utility-provided services.

The option to purchase natural gas from independent suppliers is one of the results of this restructuring process. Although the regulated utilities procure natural gas supplies for most core customers, core customers have the option to purchase natural gas from independent natural gas marketers, called "core transport agents" (CTA). Contact information for core transport agents can be found on the utilities' web sites. Noncore customers, on the other hand, make natural gas supply arrangements directly with producers or with marketers.

Another option resulting from the restructuring process occurred in 1993, when the Commission removed the utilities' storage service responsibility for noncore customers, along with the cost of this service from noncore customers' transportation rates. The Commission also encouraged the development of independent storage fields, and in subsequent years, all the independent storage fields in California were established. Noncore customers and marketers may now take storage service from

the utility or from an independent storage provider (if available), and pay for that service, or may opt to take no storage service at all. For core customers, the Commission assures that the utility has adequate storage capacity set aside to meet core requirements, and core customers pay for that service. In a 1997 decision, the Commission adopted PG&E's "Gas Accord", which unbundled PG&E's backbone transmission costs from noncore transportation rates. This decision gave customers and marketers the opportunity to obtain pipeline capacity rights on PG&E's backbone transmission pipeline system, if desired, and pay for that service at rates authorized by the Commission. The Gas Accord also required PG&E to set aside a certain amount of backbone transmission capacity in order to deliver gas to its core customers. Subsequent Commission decisions modified and extended the initial terms of the Gas Accord. The "Gas Accord" framework is still in place today for PG&E's backbone and storage rates and services and is now simply referred to as PG&E Gas Transmission and Storage (GT&S).

In a 2006 decision, the Commission adopted a similar gas transmission framework for Southern California, called the "firm access rights" system. SoCalGas and SDG&E implemented the firm access rights (FAR) system in 2008, and it is now referred to as the backbone transmission system (BTS) framework. As under the PG&E backbone transmission system, SoCalGas backbone transmission costs are unbundled from noncore transportation rates. Noncore customers and marketers may obtain, and pay for, firm backbone transmission capacity at various receipt points on the SoCalGas system. A certain amount of backbone transmission capacity is obtained for core customers to assure meeting their requirements.

Many if not most noncore customers now use a marketer to provide for several of the services formerly provided by the utility. That is, a noncore customer may simply arrange for a marketer to procure its supplies, and obtain any needed storage and backbone transmission capacity, in order to assure that it will receive its needed deliveries of natural gas supplies. Core customers still mainly rely on the utilities for procurement service, but they have the option to take procurement service from a CTA. Backbone transmission and storage capacity is either set aside or obtained for core customers in amounts to assure very high levels of service.

In order properly operate their natural gas transmission pipeline and storage systems, PG&E and SoCalGas must balance the amount of gas received into the pipeline system and delivered to customers or to storage fields. Some of these utilities' storage capacity is dedicated to this service, and under most circumstances, customers do not need to precisely match their deliveries with their consumption. However, when too much or too little gas is expected to be delivered into the utilities' systems, relative to the amount being consumed, the utilities require customers to more precisely match up their deliveries with their consumption. And, if customers do not meet certain delivery requirements, they could face financial penalties. The utilities do not profit from these financial penalties - the amounts are then returned to customers as a whole. If the utilities find that they are unable to deliver all the gas that is expected to be consumed, they may even call for a curtailment of some gas deliveries. These curtailments are typically required for just the largest, noncore customers. It has been many years since there has been a significant curtailment of core customers in California."



As indicated in the preceding discussions, natural gas is available from a variety of in-State and out-of-State sources and is provided throughout the state in response to market supply and demand. Complementing available natural gas resources, biogas may soon be available via existing delivery systems, thereby increasing the availability and reliability of resources in total. The CPUC oversees utility purchases and transmission of natural gas to ensure reliable and affordable natural gas deliveries to existing and new consumers throughout the State. (Urban Crossroads, 2023c, p. 20)

D. <u>Transportation Energy Resources</u>

The Department of Motor Vehicles (DMV) identified 36.2 million registered vehicles in California and those vehicles consume an estimated 17.2 billion gallons of fuel each year. Gasoline (and other vehicle fuels) are commercially provided commodities and would be available to the Project patrons and employees via commercial outlets. (Urban Crossroads, 2023c, p. 20)

California's on-road transportation system includes 396,616 lane miles, more than 26.6 million passenger vehicles and light trucks, and almost 9.0 million medium- and heavy-duty vehicles. While gasoline consumption has been declining since 2008 it is still by far the dominant fuel. California is the second-largest consumer of petroleum products, after Texas, and accounts for 10% of the nation's total consumption. The state is the largest U.S. consumer of motor gasoline and jet fuel, and 85% of the petroleum consumed in California is used in the transportation sector. (Urban Crossroads, 2023c, p. 21)

California accounts for less than 1% of total U.S. natural gas reserves and production. As with crude oil, California's natural gas production has experienced a gradual decline since 1985. In 2019, about 37% of the natural gas delivered to consumers went to the state's industrial sector, and about 28% was delivered to the electric power sector. Natural gas fueled more than two-fifths of the state's utility-scale electricity generation in 2019. The residential sector, where two-thirds of California households use natural gas for home heating, accounted for 22% of natural gas deliveries. The commercial sector received 12% of the deliveries to end users and the transportation sector consumed the remaining 1%. (Urban Crossroads, 2023c, p. 21)

E. <u>Project Existing Operational Energy Demands</u>

The southern portion of the Project site is currently occupied by residential uses. The estimated transportation energy demands from existing development are summarized in Table 4.6-3, *Total Project-generated Traffic Annual Fuel Consumption (All Vehicles)*, and the estimated facility energy demands from the existing development are summarized in Table 4.6-4, *Existing Annual Operational Energy Demand Summary*, and based on historic utility bills. (Urban Crossroads, 2023c, p. 27)

Table 4.6-3	Total Project-generated	Traffic Annual Fuel	Consumption	(All Vehicles)
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Vehicle Type	Annual VMT	Estimated Annual Fuel Consumption (gallons)		
EXISTING (ALL VEHICLES)	112,538	7,547		
	1)			

(Urban Crossroads, 2023c, Table 4-1)



Table 4.6-4	Existing Annual Operational Energy Demand Summary
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Land Use	Natural Gas Demand (kBTU/year)	Electricity Demand (kWh/year)	
TOTAL EXISTING ENERGY DEMAND	106,693	28,018	

kBTU – kilo-British Thermal Units

(Urban Crossroads, 2023c, Table 4-2)

4.6.2 APPLICABLE REGULATORY REQUIREMENTS

The following is a brief description of the federal, State, and local environmental laws and related regulations related to energy use and conservation.

A. <u>Federal Regulations</u>

1. Intermodal Surface Transportation Efficiency Act (ISTEA)

The Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA) promoted the development of intermodal transportation systems to maximize mobility as well as address national and local interests in air quality and energy. ISTEA contained factors that Metropolitan Planning Organizations (MPOs) were to address in developing transportation plans and programs, including some energy-related factors. To meet the new ISTEA requirements, MPOs adopted explicit policies defining the social, economic, energy, and environmental values guiding transportation decisions. The applicable MPO for the City of Lake Elsinore is the Southern California Association of Governments (SCAG). SCAG's 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS, also referred to as "Connect SoCal") is the applicable planning document for the area. (FHWA, n.d.)

2. The Transportation Equity Act for the 21st Century (TEA-21)

TEA-21 was signed into law in 1998 and builds upon the initiatives established in the ISTEA legislation, discussed above. TEA-21 authorizes highway, highway safety, transit, and other efficient surface transportation programs. TEA-21 continues the program structure established for highways and transit under ISTEA, such as flexibility in the use of funds, emphasis on measures to improve the environment, and focus on a strong planning process as the foundation of good transportation decisions. TEA-21 also provides for investment in research and its application to maximize the performance of the transportation system through, for example, deployment of Intelligent Transportation Systems, to help improve operations and management of transportation systems and vehicle safety. (Urban Crossroads, 2023c, p. 22)

B. <u>State Regulations</u>

1. Senate Bill 1389 (SB 1389) - Integrated Energy Policy Report

Senate Bill 1389 (SB 1839; Bowen, Chapter 568, Statutes of 2002) requires the CEC to prepare a biennial integrated energy policy report that assesses major energy trends and issues facing California's electricity, natural gas, and transportation fuel sectors and provides policy recommendations to conserve resources; protect the environment; ensure reliable, secure, and diverse energy supplies; enhance the State's economy; and



protect public health and safety (Public Resources Code (PRC) § 25301a). The CEC prepares these assessments and associated policy recommendations every two years, with updates on alternate years, as part of the IEPR. (CEC, n.d.)

The 2021 IEPR was adopted February 2022, and continues to work towards improving electricity, natural gas, and transportation fuel energy use in California. The 2021 IEPR provides the results of the CEC's assessments of a variety of energy issues facing California. Many of these issues will require action if the state is to meet its climate, energy, air quality, and other environmental goals while maintaining reliability and controlling costs. Additionally, the 2021 IEPR provides the results of the CEC's assessments of a variety of energy issues facing California. Many of these issues will require action if the state of energy issues facing California. Many of the results of the CEC's assessments of a variety of energy issues facing California. Many of these issues will require action if the state is to meet its climate, energy, air quality, and other environmental goals while maintaining reliability and controlling costs. (CEC, n.d.)

2. California Code Title 24, Part 6, Energy Efficiency Standards

California Code Title 24, Part 6 (also referred to as the California Energy Code) was promulgated by the CEC in 1978 in response to a legislative mandate to create uniform building codes to reduce California's energy consumption. To these ends, the California Energy Code provides energy efficiency standards for residential and nonresidential buildings. California's building efficiency standards are updated on an approximately three-year cycle, with the most recent approved update consisting of the 2022 California Green Building Code Standards that will be effective on January 1, 2023. (CEC, n.d.)

3. California Renewable Portfolio Standards (SB 1078)

The California Energy Commission (CEC) implements and administers portions of California's Renewables Portfolio Standard (RPS) under Senate Bill 1038, Senate Bill 1078, Senate Bill 1250, Senate Bill 107, Senate Bill X1-2, Senate Bill 350, and Senate Bill 1393. These laws set goals for retail sellers of electricity and local publicly owned electric utilities (POUs), collectively referred to as load-serving entities (LSEs), to increase the amount of renewable energy they procure until 50% of their retail sales are from eligible renewable energy resources by December 31, 2030. Under these laws, the Energy Commission is required to certify electrical generation facilities (hereafter referred to as facilities) as eligible renewable energy resources that may be used by LSEs to satisfy their RPS procurement requirements, develop an accounting system to verify LSEs' compliance with the RPS, and adopt regulations specifying procedures for the enforcement of RPS procurement requirements of POUs. (CEC, 2017)

4. Assembly Bill 1493 (AB 1493) – Pavley Fuel Efficiency Standards

In California, Assembly Bill 1493 (AB 1493) establishes fuel efficiency ratings for model year 2009-2016 passenger cars and light trucks. (CARB, n.d.)

5. Senate Bill 350 (SB 350) – Clean Energy and Pollution Reduction Act of 2015

In October 2015, the legislature approved and the Governor signed Senate Bill 350 (SB 350), which reaffirms California's commitment to reducing its Greenhouse Gas (GHG) emissions and addressing climate change.



Key provisions include an increase in the RPS, higher energy efficiency requirements for buildings, initial strategies towards a regional electricity grid, and improved infrastructure for electric vehicle charging stations. Specifically, SB 350 requires the following to reduce Statewide GHG emissions (Urban Crossroads, 2023c, p. 24):

- Increase the amount of electricity procured from renewable energy sources from 33% to 50% by 2030, with interim targets of 40% by 2024, and 25% by 2027.
- Double the energy efficiency in existing buildings by 2030. This target will be achieved through the California Public Utility Commission (CPUC), the CEC, and local publicly owned utilities.
- Reorganize the Independent System Operator (ISO) to develop more regional electrify transmission markets and to improve accessibility in these markets, which will facilitate the growth of renewable energy markets in the western United States (California Leginfo 2015).

C. <u>Local Regulations</u>

1. Riverside County Climate Action Plan (CAP)

Riverside County's most current Climate Action Plan, updated in November 2019 uses several methods to promote renewable energy and energy efficiency. The regulation most relevant to the project is R2-CE1: Clean Energy, which states:

• On-site renewable energy production (including but not limited to solar) shall apply to any tentative tract map, plot plan, or conditional use permit that proposes to add more than 75 new dwelling units of residential development or one or more new buildings totaling more than 100,000 gross square feet of commercial, office, industrial, or manufacturing development. Renewable energy production shall be onsite generation of at least 20 percent of energy demand for commercial, office, industrial or manufacturing development, meet or exceed 20 percent of energy demand for multi-family residential development, and meet or exceed 30 percent of energy demand for single-family residential development. (Riverside County, 2019, pp. 4-11 and 4-12)

4.6.3 BASIS FOR DETERMINING SIGNIFICANCE

Section VI of Appendix G to the California Environmental Quality Act (CEQA) Guidelines addresses typical adverse effects due to energy consumption, and includes the following threshold questions to evaluate a project's impacts on energy resources.

- Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?
- Would the project conflict with or obstruct a State or local plan for renewable energy or energy efficiency?

The following thresholds are derived directly from Section VI of Appendix G to the CEQA Guidelines and the County's Environmental Assessment form. The proposed Project would have a significant impact on energy resources if construction and/or operation of the Project would:

- a. Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?
- b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

4.6.4 IMPACT ANALYSIS

A. <u>Methodology for Calculating Project Energy Demands</u>

Information from the CalEEMod Version 2022.1 outputs for the Project's Air Quality Impact Analysis ("AQIA"; *Technical Appendix B1*) was utilized in the analysis, detailing Project-related construction equipment, transportation energy demands, and facility energy demand. (Urban Crossroads, 2023c, p. 29)

In May 2022, the SCAQMD, in conjunction with the California Air Pollution Control Officers Association (CAPCOA) and other California air districts, released the latest version of the CalEEMod Version 2022.1. The purpose of this model is to calculate construction-source and operational-source criteria pollutants and GHG emissions from direct and indirect sources as well as energy usage. Outputs from the annual construction model runs are provided in Appendices 5.1 through 5.2 to the Project's Energy Analysis (*Technical Appendix E*) for annual operational emissions. (Urban Crossroads, 2023c, p. 29)

On May 2, 2022, the EPA approved the 2021 version of the EMissions FACtor model (EMFAC2021) web database for use in State Implementation Plan and transportation conformity analyses. EMFAC2021 is a mathematical model that was developed to calculate emission rates, fuel consumption, VMT from motor vehicles that operate on highways, freeways, and local roads in California and is commonly used by the CARB to project changes in future emissions from on-road mobile sources. The Project's Energy Analysis (*Technical Appendix E*) utilizes the different fuel types for each vehicle class from the annual EMFAC2021 emission inventory in order to derive the average vehicle fuel economy which is then used to determine the estimated annual fuel consumption associated with vehicle usage during Project construction and operational activities. For purposes of analysis, the 2024 and 2025 analysis years were utilized to determine the average vehicle fuel economy used throughout the duration of the Project. Outputs from the EMFAC2021 model run is provided in Appendix 5.3 to the Project's Energy Analysis. (Urban Crossroads, 2023c, pp. 29-30)

<u>Threshold a.</u>: Would the Project result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?

- A. <u>Construction Energy Demands</u>
- 1. Construction Power Cost and Electricity Usage



The focus within this subsection is the energy implications of the construction process, specifically the power cost from on-site electricity consumption during construction of the proposed Project.

Construction is expected to commence in February 2024 and would last through August 2025. The construction schedule utilized in the analysis, which was previously shown in EIR Table 3-1, represents a "worst-case" analysis scenario. The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet as required per CEQA Guidelines. (Urban Crossroads, 2023c, p. 30)

Based on the 2022 National Construction Estimator, the typical power coast per 1,000 sf of construction per construction per month of \$2.41. The proposed Project includes the development of 591,203 s.f. warehouse and associated parking area, and three residential lots. Based on Table 4.6-5, *Construction Power Cost*, the total power cost of the on-site electricity usage during the construction of the Project is estimated to be approximately \$69,600.42. (Urban Crossroads, 2023c, p. 30)

Land Use	Land Use Power Cost (per 1,000 SF of Siz construction per (1,000 month)		Construction Duration (months)	Project Construction Power Cost	
High-Cube Fulfillment Warehouse	\$2.41	591.203	18	\$25,646.39	
Single Family Housing	\$2.41	3.900	18	\$169.18	
Landscape	\$2.41	224.769	18	\$9,750.48	
Parking	\$2.41	58.968	18	\$2,558.03	
Other Asphalt Surfaces	\$2.41	725.596	18	\$31,476.34	
	\$69,600.42				

Table 4.6-5	Construction	Power Cost

(Urban Crossroads, 2023c, Table 5-2)

The SCE's general service rate schedule were used to determine the Project's electrical usage. As of October 1, 2022, SCE's general service rate is \$0.14 per kilowatt hours (kWh) of electricity for industrial services. As shown on Table 4.6-6, *Construction Electricity Usage*, the total electricity usage from on-site Project construction related activities is estimated to be approximately 497,146 kWh. (Urban Crossroads, 2023c, p. 31)



Land Use	Cost per kWh	Project Construction Electricity Usage (kWh)
High-Cube Fulfillment Warehouse	\$0.14	183,188
Single Family Housing	\$0.14	1,208
Landscape	\$0.14	69,646
Parking	\$0.14	18,272
Other Asphalt Surfaces	\$0.14	224,831
CONSTRUCTIO	497,146	

(Urban Crossroads, 2023c, Table 5-3)

2. Construction Equipment Fuel Estimates

A summary of construction equipment assumptions by phase was previously presented in EIR Table 3-2. Consistent with industry standards and typical construction practices, it is assumed that each piece of equipment would operate up to a total of eight (8) hours per day, or more than two-thirds of the period during which construction activities are allowed pursuant to Riverside County Ordinance No. 847. In accordance with the County of Riverside Good Neighbor Policy for Logistics and Warehouse/Distribution uses, it was assumed that equipment rated 50 or less horsepower would meet at least CARB Tier 3 emissions standards, and equipment rated more than 50 horsepower would meet at least CARB Tier 4 Interim emissions standards. (Urban Crossroads, 2023c, pp. 31-32)

Project construction activity timeline estimates, construction equipment schedules, equipment power ratings, load factors, and associated fuel consumption estimates are presented in Table 4.6-7, *Construction Equipment Fuel Consumption Estimates*¹. The aggregate fuel consumption rate for all equipment is estimated at 18.5 horsepower hour per gallon (hp-hr-gal.), obtained from CARB 2018 Emissions Factors Tables and cited fuel consumption rate factors presented in Table D-24 of the Moyer guidelines. For the purposes of this analysis, the calculations are based on all construction equipment being diesel-powered, which is consistent with industry standards. (Urban Crossroads, 2023c, p. 32)

Diesel fuel would be supplied by existing commercial fuel providers serving the Project area and region. As presented in Table 4.6-7, Project construction activities would consume an estimated 105,890 gallons of diesel fuel. Project construction would represent a "single-event" diesel fuel demand and would not require ongoing or permanent commitment of diesel fuel resources for this purpose. (Urban Crossroads, 2023c, p. 34)

¹ Based on Appendix A of the CalEEMod User's Guide, Construction consists of several types of off-road equipment. Since the majority of the off-road construction equipment used for construction projects are diesel fueled, CalEEMod assumes all of the equipment operates on diesel fuel.

Construction Activity	Duration (Days)	Equipment	HP Rating	Quantity	Usage Hours	Load Factor	HP- hrs/day	Total Fuel Consumption
		Concrete/Industrial Saws	33	2	8	0.73	385	208
Demolition	10	Excavators	36	6	8	0.38	657	355
		Rubber Tired Dozers	367	4	8	0.40	4,698	2,539
Site Proparation	20	Rubber Tired Dozers	367	4	8	0.40	4,698	5,078
Site Preparation	20	Crawler Tractors	87	6	8	0.43	1,796	1,941
		Excavators	36	2	8	0.38	219	887
		Graders	148	1	8	0.41	485	1,968
Grading	75	Rubber Tired Dozers	367	1	8	0.40	1,174	4,761
		Scrapers	423	2	8	0.48	3,249	13,170
		Crawler Tractors	87	2	8	0.43	599	2,427
		Cranes	367	2	8	0.29	1,703	26,694
		Forklifts	82	5	8	0.20	656	10,283
Building Construction	290	Generator Sets	14	2	8	0.74	166	2,598
		Welders	46	2	8	0.45	331	5,192
		Crawler Tractors	87	5	8	0.43	1,496	23,457
		Pavers	81	2	8	0.42	544	1,618
Paving	55	Paving Equipment	89	2	8	0.36	513	1,524
		Rollers	36	2	8	0.38	219	651
Architectural Coating	35	Air Compressors	pressors 37		8	0.48	284	538
CONSTRUCTION FUEL DEMAND (GALLONS DIESEL FUEL) 105,890								105,890

 Table 4.6-7
 Construction Equipment Fuel Consumption Estimates

(Urban Crossroads, 2023c, Table 5-5)

3. Construction Trips and Vehicle Miles Travelled (VMT)

Construction generates on-road vehicle emissions from vehicle usage for workers, vendors, and haul truck commuting to and from the site. The number of workers and vendor trips are presented below in Table 4.6-8, *Construction Trips and VMT*. It should be noted that for vendor trips, specifically, CalEEMod only assigns vendor trips to the Building Construction phase. Vendor trips would likely occur during all phases of construction. As such, the CalEEMod defaults for vendor trips have been adjusted based on a ratio of the total vendor trips to the number of days of each subphase of activity. (Urban Crossroads, 2023c, p. 34)

4. Construction Worker Fuel Estimates

With respect to estimated VMT for the Project, the construction worker trips (personal vehicles used by workers commuting to the Project from home) would generate an estimated 1,439,393 VMT during the 18 months of construction. Based on CalEEMod methodology, it is assumed that 50% of all construction worker trips are from light-duty-auto vehicles (LDA), 25% are from light-duty-trucks (LDT1²), and 25% are from

² Vehicles under the LDT1 category have a gross vehicle weight rating (GVWR) of less than 6,000 lbs. and equivalent test weight (ETW) of less than or equal to 3,750 lbs.

light-duty-trucks (LDT2³). Data regarding Project related construction worker trips were based on CalEEMod defaults utilized within the Project's AQIA (*Technical Appendix B1*). (Urban Crossroads, 2023c, p. 34)

Construction Activity	Worker Trips Per Day	Vendor Trips Per Day	Hauling Trips Per Day	
Demolition	30	3	7	
Site Preparation	25	5	0	
Grading	20	19	0	
Building Construction	249	71	0	
Paving	15	0	0	
Architectural Coating	50	0	0	

 Table 4.6-8
 Construction Trips and VMT

(Urban Crossroads, 2023c, Table 5-6)

Vehicle fuel efficiencies for LDA, LDT1, and LDT2 were estimated using information generated within the 2021 version of the EMFAC developed by CARB. EMFAC2021 is a mathematical model that was developed to calculate emission rates, fuel consumption, and VMT from motor vehicles that operate on highways, freeways, and local roads in California and is commonly used by the CARB to project changes in future emissions from on-road mobile sources. EMFAC2021 was run for the LDA, LDT1, and LDT2 vehicle class within the California sub-area for the 2024 and 2025 calendar years. Data from EMFAC2021 is shown in Appendix 5.3 to the Project's Energy Analysis (*Technical Appendix E*). (Urban Crossroads, 2023c, pp. 34-35)

Table 4.6-9, *Construction Worker Fuel Consumption Estimates*, provides an estimated annual fuel consumption resulting from LDAs, LDT1, and LDT2 related to the Project construction worker trips. As shown, it is estimated that 51,374 gallons of fuel would be consumed related to construction worker trips during full construction of the Project. It should be noted that construction worker trips would represent a "single-event" gasoline fuel demand and would not require ongoing or permanent commitment of fuel resources for this purpose. (Urban Crossroads, 2023c, p. 36)

5. Construction Vendor/Hauling Fuel Estimates

With respect to estimated VMT, the construction vendor trips (vehicles that deliver materials to the site during construction) would generate an estimated 213,308 VMT along area roadways for the Project over the duration of the construction activity. It is assumed that 50% of all vendor trips are from medium-heavy duty trucks (MHD), 50% of all vendor trips are from heavy-heavy duty trucks (HHD), and 100% of all hauling trips are HHDs. These assumptions are consistent with the CalEEMod defaults utilized within the within the Project's AQIA (EIR *Technical Appendix B2*). Vehicle fuel efficiencies for MHDs and HHDs were estimated using

³ Vehicles under the LDT2 category have a GVWR of less than 6,000 lbs. and ETW between 3,751 lbs. and 5,750 lbs.



Year	Construction Activity	Duration (Days)	Worker Trips/Day	Trip Length (miles)	VMT	Average Vehicle Fuel Economy (mpg)	Estimated Fuel Consumption (gallons)	
	LDA							
	Demolition	10	15	18.5	2,775	31.51	88	
	Site Preparation	20	13	18.5	4,810	31.51	153	
	Grading	75	10	18.5	13,875	31.51	440	
	Building Construction	134	125	18.5	309,875	31.51	9,835	
				LDT1				
	Demolition	10	8	18.5	1,480	24.62	60	
2024	Site Preparation	20	7	18.5	2,590	24.62	105	
	Grading	75	5	18.5	6,938	24.62	282	
	Building Construction	134	63	18.5	156,177	24.62	6,343	
	LDT2							
	Demolition	10	8	18.5	1,480	24.57	60	
	Site Preparation	20	7	18.5	2,590	24.57	105	
	Grading	75	5	18.5	6,938	24.57	282	
	Building Construction	134	63	18.5	156,177	24.57	6,356	
	LDA							
	Building Construction	156	125	18.5	360,750	32.49	11,103	
	Paving	55	8	18.5	8,140	32.49	251	
	Architectural Coating	35	25	18.5	16,188	32.49	498	
	LDT1							
2025	Building Construction	156	63	18.5	181,818	25.14	7,232	
2025	Paving	55	4	18.5	4,070	25.14	162	
	Architectural Coating	35	13	18.5	8,418	25.14	335	
				LDT2				
	Building Construction	156	63	18.5	181,818	25.29	7,189	
	Paving	55	4	18.5	4,070	25.29	161	
	Architectural Coating	35	13	18.5	8,418	25.29	333	
		т	DTAL CONST	RUCTION V	VORKER FUEL	CONSUMPTION	51,374	

Table 4.6-9 Construction Worker Fuel Consumption Estimates

(Urban Crossroads, 2023c, Table 5-7)



information generated within EMFAC2021. EMFAC2021 was run for the MHD and HHD vehicle classes within the California sub-area for the 2024 and 2025 calendar years. Data from EMFAC2021 is shown in Appendix 5.3 to the Project's Energy Analysis (*Technical Appendix E*). (Urban Crossroads, 2023c, p. 36)

Table 4.6-10, *Construction Vendor Fuel Consumption Estimates*, shows the estimated fuel economy of MHD and HHDs accessing the Project site. As shown, it is estimated that 32,345 gallons of fuel will be consumed related to construction vendor trips during full construction of the Project. It should be noted that Project construction vendor trips would represent a "single-event" diesel fuel demand and would not require on-going or permanent commitment of diesel fuel resources for this purpose. (Urban Crossroads, 2023c, p. 37)

Year	Construction Activity	Duration (Days)	Vendor/ Hauling Trips/Day	Trip Length (miles)	VMT	Average Vehicle Fuel Economy (mpg)	Estimated Fuel Consumption (gallons)	
	MHD							
2024	Demolition	10	2	10.2	204	8.47	24	
	Site Preparation	20	3	10.2	612	8.47	72	
	Grading	75	10	10.2	7,650	8.47	903	
	Building Construction	134	36	10.2	49,205	8.47	5,807	
	HHD (Vendor)							
	Demolition	10	2	10.2	204	6.12	33	
	Site Preparation	20	3	10.2	612	6.12	100	
	Grading	75	10	10.2	7,650	6.12	1,250	
	Building Construction	134	36	10.2	49,205	6.12	8,039	
	HHD (Hauling)							
	Demolition	10	7	20	1,400	6.12	229	
2025	MHD							
	Building Construction	156	36	10.2	57,283	8.58	6,676	
	HHD (Vendor)							
	Building Construction	156	36	10.2	57,283	6.22	9,213	
TOTAL CONSTRUCTION VENDOR/HAULING FUEL CONSUMPTION						32,345		

Table 4.6-10 Construction Vendor Fuel Consumption Estimates

(Urban Crossroads, 2023c, Table 5-8)

6. Construction Energy Efficiency/Conservation Measures

Starting in 2014, CARB adopted the nation's first regulation aimed at cleaning up off-road construction equipment such as bulldozers, graders, and backhoes. These requirements ensure fleets gradually turnover the oldest and dirtiest equipment to newer, cleaner models and prevent fleets from adding older, dirtier equipment.



As such, the equipment used for Project construction would conform to CARB regulations and California emissions standards. It should also be noted that there are no unusual Project characteristics or construction processes that would require the use of equipment that would be more energy intensive than is used for comparable activities; or equipment that would not conform to current emissions standards (and related fuel efficiencies). Equipment employed in construction of the Project would therefore not result in inefficient wasteful, or unnecessary consumption of fuel. (Urban Crossroads, 2023c, p. 37)

Construction contractors would be required to comply with applicable CARB regulation regarding retrofitting, repowering, or replacement of diesel off-road construction equipment. Additionally, CARB has adopted the Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other Toxic Air Contaminants. Compliance with anti-idling and emissions regulations would result in a more efficient use of construction-related energy and the minimization or elimination of wasteful or unnecessary consumption of energy. Idling restrictions and the use of newer engines and equipment would result in less fuel combustion and energy consumption. (Urban Crossroads, 2023c, p. 37)

Additional construction-source energy efficiencies would occur due to required California regulations and best available control measures (BACM). For example, CCR Title 13, Motor Vehicles, section 2449(d)(3) Idling, limits idling times of construction vehicles to no more than five minutes, thereby precluding unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. Section 2449(d)(3) requires that grading plans shall reference the requirement that a sign shall be posted on-site stating that construction workers need to shut off engines at or before five minutes of idling." In this manner, construction equipment operators are required to be informed that engines are to be turned off at or prior to five minutes of idling. Enforcement of idling limitations is realized through periodic site inspections conducted by County building officials, and/or in response to citizen complaints. (Urban Crossroads, 2023c, p. 37)

A full analysis related to the energy needed to form construction materials is not included in this analysis due to a lack of detailed Project-specific information on construction materials. At this time, an analysis of the energy needed to create Project-related construction materials would be extremely speculative and thus has not been prepared. (Urban Crossroads, 2023c, p. 37)

In general, construction processes promote conservation and efficient use of energy by reducing raw materials demands, with related reduction in energy demands associated with raw materials extraction, transportation, processing, and refinement. Use of materials in bulk reduces energy demands associated with preparation and transport of construction materials as well as the transport and disposal of construction waste and solid waste in general, with corollary reduced demands on area landfill capacities and energy consumed by waste transport and landfill operations. (Urban Crossroads, 2023c, pp. 37-38)

B. <u>Operational Energy Demands</u>

Energy consumption in support of or related to Project operations would include transportation energy demands (energy consumed by passenger car and truck vehicles accessing the Project site) and facilities energy demands (energy consumed by building operations and site maintenance activities).



1. Transportation Energy Demands

Energy that would be consumed by Project-generated traffic is a function of total VMT and estimated vehicle fuel economies of vehicles accessing the Project site. The VMT per vehicle class can be determined by evaluated in the vehicle fleet mix and the total VMT. As with worker and vendors trips, operational vehicle fuel efficiencies were estimated using information generated within EMFAC2021 developed by CARB. EMFAC2021 was run for the Riverside County sub-area for the 2025 calendar year. Data from EMFAC2021 is shown in Appendix 5.3 of the Project's Energy Analysis (*Technical Appendix E*). (Urban Crossroads, 2023c, p. 38)

The estimated transportation energy demands are summarized in Table 4.6-11, *Total Project-Generated Traffic Annual Fuel Consumption*. It should be noted that the existing development demands were subtracted from the Project demands to determine the net transportation energy demands from the proposed Project. As shown in Table 4.6-11, the Project would result in a net increase of 5,865,841 annual VMT and an estimated net increase annual fuel consumption of 369,399 gallons of fuel. (Urban Crossroads, 2023c, p. 39)

Vehicle Type	Average Vehicle Fuel Economy (mpg)	Annual VMT	Estimated Annual Fuel Consumption (gallons)	
LDA	32.49	2,470,823	76,047	
LDT1	25.14	233,438	9,285	
LDT2	25.29	1,004,133	39,704	
MDV	20.32	687,830	33,851	
LHDT1	16.52	124,637	7,545	
LHDT2	15.75	35,419	2,249	
MHDT	8.58	158,660	18,490	
HHDT	6.22	1,163,153	187,074	
OBUS	6.50	505	78	
UBUS	4.54	1,136	250	
MCY	41.89	98,511	2,352	
SBUS	6.42	103	16	
MH	5.82	32	5	
	TOTAL (ALL VEHICLES)	5,978,379	376,946	
	EXISTING (ALL VEHICLES)	112,538	7,547	
N	ET (PROPOSED – EXISTING)	5,865,841	369,399	

Table 4.6-11 Total Project-Generated Traffic Annual Fuel Consumption

(Urban Crossroads, 2023c, Table 5-9)



2. On-site Cargo Handling Equipment Fuel Demands

It is common for industrial buildings to require the operation of exterior cargo handling equipment in the building's truck court areas. In accordance with the County of Riverside Good Neighbor Policy for Logistics and Warehouse/Distribution uses, it is assumed that all on-site cargo handling equipment would be electrically powered. (Urban Crossroads, 2023c, p. 39)

3. Facility Energy Demands

Project building operations activities would result in the consumption of natural gas and electricity. Natural gas would be supplied to the Project by SoCalGas; electricity would be supplied to the Project by SCE. Annual natural gas and electricity demands of the Project are summarized in Table 4.6-12, *Project Annual Operational Energy Demand Summary*. It should be noted that the existing development demands were subtracted from the Project demands to determine the net facility energy demands from the proposed Project. As summarized on Table 4.6-12, the Project would result in a net decrease of 35,564 kBTU/year of natural gas and a net increase of 2,763,098 kWh/year of electricity. (Urban Crossroads, 2023c, p. 39)

Land Use	Natural Gas Demand (kBTU/year)	Electricity Demand (kWh/year)	
High-Cube Fulfillment Warehouse	0	2,720,924	
Single Family Housing	71,129	18,678	
Landscape	0	0	
Parking	0	51,514	
Other Asphalt Surfaces	0	0	
TOTAL PROJECT ENERGY DEMAND	71,129	2,791,116	
EXISTING ENERGY DEMAND	106,693	28,018	
NET PROJECT ENERGY DEMAND	-35,564	2,763,098	

 Table 4.6-12
 Project Annual Operational Energy Demand Summary

(Urban Crossroads, 2023c, Table 5-10)

4. Operational Energy Efficiency/Conservation Measures

Energy efficiency/energy conservation attributes of the Project would be complemented by increasingly stringent state and federal regulatory actions addressing vehicle fuel economies and vehicle emissions standards; and enhanced building/utilities energy efficiencies mandated under California building codes (e.g., Title 24, Part 11, California Green Building Standards Code). (Urban Crossroads, 2023c, p. 39)

Project annual fuel consumption estimates presented previously in Table 4.6-11 represent likely potential maximums that would occur for the Project. Under subsequent future conditions, average fuel economies of vehicles accessing the Project site can be expected to improve as older, less fuel-efficient vehicles are removed



from circulation, and in response to fuel economy and emissions standards imposed on newer vehicle entering the circulation system. (Urban Crossroads, 2023c, p. 40)

Enhanced fuel economies realized pursuant to federal and state regulatory actions, and related transition of vehicles to alternative energy sources (e.g., electricity, natural gas, biofuels, hydrogen cells) would likely decrease future gasoline fuel demands per VMT within the region, acting to reduce regional vehicle energy demands. (Urban Crossroads, 2023c, p. 40)

C. <u>Conclusion</u>

As supported by the preceding analyses, Project construction and operations would not result in the inefficient, wasteful, or unnecessary consumption of energy. Further, the energy demands of the Project can be accommodated within the context of available resources and energy delivery systems. Future building permit applications associated with the Project would be required to comply with the applicable Title 24 standards. As such, energy consumed by the Project's operation is calculated to be comparable to, or less than, energy consumed by other older warehouse uses of similar scale and intensity that are constructed and operating in California. Additionally, the Project's proximity to the Interstate freeway system would reduce VMT and therefore decrease reliance on fossil fuels. On this basis, the Project would not result in the inefficient, wasteful, or unnecessary consumption of energy. The Project would therefore not cause or result in the need for additional energy producing or transmission facilities. The Project would not engage in wasteful or inefficient uses of energy and aims to achieve energy conservations goals within the State of California. Therefore, the Project would not result in the wasteful, inefficient, or unnecessary consumption of energy resources, and impacts would be less than significant.

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

A summary of the Project's consistency with applicable regulations and requirements is provided below.

Consistency with Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA)

Transportation and access to the Project site is provided by the local and regional roadway systems. The Project would not interfere with, nor otherwise obstruct intermodal transportation plans or projects that may be realized pursuant to the ISTEA because SCAG is not planning for intermodal facilities on or through the Project site. (Urban Crossroads, 2023c, p. 44)

Consistency with The Transportation Equity Act for the 21st Century (TEA-21)

The Project site is located along major transportation corridors with proximate access to the Interstate freeway system. The site selected for the Project facilitates access, acts to reduce vehicle miles traveled, takes advantage of existing infrastructure systems, and promotes land use compatibilities through collocation of similar uses. The Project supports the strong planning processes emphasized under TEA-21. The Project is therefore consistent with, and would not otherwise interfere with, nor obstruct implementation of TEA-21. (Urban Crossroads, 2023c, p. 44)



Consistency with 2019 Integrated Energy Policy Report (IEPR)

Electricity would be provided to the Project by SCE. SCE's Clean Power and Electrification Pathway (CPEP) white paper builds on existing state programs and policies. As such, the Project is consistent with, and would not otherwise interfere with, nor obstruct implementation the goals presented in the 2021 IEPR. Additionally, the Project will comply with the applicable Title 24 standards which would ensure that the Project energy demands would not be inefficient, wasteful, or otherwise unnecessary. As such, development of the proposed Project would support the goals presented in the 2021 IEPR. (Urban Crossroads, 2023c, pp. 44-45)

Consistency with State of California Energy Plan

The Project site is located along major transportation corridors with proximate access to the Interstate freeway system. The site selected for the Project facilitates access and takes advantage of existing infrastructure systems. The Project therefore supports urban design and planning processes identified under the State of California Energy Plan, is consistent with, and would not otherwise interfere with or obstruct, implementation of the State of California Energy Plan. (Urban Crossroads, 2023c, p. 45)

Consistency with California Code Title 24, Part 6, Energy Efficiency Standards

The 2022 version of Title 24 was adopted by the CEC and will become effective on January 1, 2023. As the Project building construction is anticipated in 2024, it is presumed that the Project would be required to comply with the Title 24 standards in place at that time. Therefore, the Project would not result in a significant impact on energy resources. (Urban Crossroads, 2023c, p. 45)

Consistency with California Code Title 24, Part 11, CALGreen

As previously stated, CCR, Title 24, Part 11: CALGreen is a comprehensive and uniform regulatory code for all residential, commercial, and school buildings that went in effect on January 1, 2009, and is administered by the California Building Standards Commission. CALGreen is updated on a regular basis, with the most recent approved update consisting of the 2022 California Green Building Code Standards that were published on July 1, 2022 and became effective on January 1, 2023. The Project would be required to comply with the applicable standards in place at the time plan check submittals are made. (Urban Crossroads, 2023c, p. 45)

Consistency with AB 1493

AB 1493 is not applicable to the Project as it is a statewide measure establishing vehicle emissions standards. No feature of the Project would interfere with implementation of the requirements under AB 1493. (Urban Crossroads, 2023c, p. 45)

Consistency with Renewable Portfolio Standard (RPS)

California's RPS is not applicable to the Project as it is a statewide measure that establishes a renewable energy mix. No feature of the Project would interfere with implementation of the requirements under RPS. (Urban Crossroads, 2023c, p. 45)



Consistency with SB 350

The proposed Project would use energy from SCE, which have committed to diversify their portfolio of energy sources by increasing energy from wind and solar sources. No feature of the Project would interfere with implementation of SB 350. Additionally, the Project would be designed and constructed to implement the energy efficiency measures for new industrial developments and would include several measures designed to reduce energy consumption. (Urban Crossroads, 2023c, p. 45)

Conclusion

As indicated in the preceding analysis, the Project would not conflict with or obstruct a federal or State plan for renewable energy or energy efficiency. Thus, impacts would be less than significant.

4.6.5 CUMULATIVE IMPACT ANALYSIS

As indicated under the analysis of Threshold a., there are no components of the proposed Project that would result in the wasteful, inefficient, or unnecessary consumption of energy resources. Although it is possible other cumulative developments could result in the wasteful, inefficient, or unnecessary consumption of energy resources, the Project's projected energy demand during operations would be less-than-cumulatively considerable with mandatory compliance with applicable regulations.

As indicated under the analysis of Threshold b., the Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. As such, the Project has no potential to result in cumulatively-considerable impacts due to a conflict with or obstruction of such plans.

4.6.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

<u>Threshold a.: Less-than-Significant Impact</u>. Project construction and operations would not result in the inefficient, wasteful, or unnecessary consumption of energy. Further, the energy demands of the Project can be accommodated within the context of available resources and energy delivery systems. The Project would therefore not cause or result in the need for additional energy producing or transmission facilities. The Project would not engage in wasteful or inefficient uses of energy and aims to achieve energy conservations goals within the State of California. As such, Project impacts due to wasteful, inefficient, or unnecessary consumption of energy resources would be less than significant requiring no mitigation.

<u>Threshold b.: Less-than-Significant Impact</u>. Energy consumed by the Project's operation is calculated to be comparable to, or less than, energy consumed by other warehouse projects of similar scale and intensity that are operating in California, as the Project would be subject to current regulatory requirements. Based on the analysis presented herein, the Project would not conflict with or obstruct a federal or State plan for renewable energy or energy efficiency, and impacts would be less than significant.



4.6.7 COUNTY REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

Applicable County Regulations and Design Requirements

The following are regulations and design requirements that apply to the proposed Project and that reduce or preclude energy consumption. Although compliance with mandatory regulatory requirements does not technically meet CEQA's definition for mitigation, they are specified herein as requirements for the Project.

- Pavley Fuel Efficiency Standards (AB1493). Establishes fuel efficiency ratings for new vehicles.
- Renewable Portfolio Standards (SB 100). Increases California's RPS requirement to 50% renewable resources target by December 31, 2026, and to achieve a 60% target by December 31, 2030. SB 100 also requires that retail sellers and local publicly owned electric utilities procure a minimum quantity of electricity products from eligible renewable energy resources so that the total kilowatt hours (kWh) of those products sold to their retail end-use customers achieve 44% of retail sales by December 31, 2024, 52% by December 31, 2027, and 60% by December 31, 2030. In addition to targets under AB 32 and SB 32, Executive Order B-55-18 establishes a carbon neutrality goal for the state of California by 2045; and sets a goal to maintain net negative emissions thereafter. The Executive Order directs the California Natural Resources Agency (CNRA), California Environmental Protection Agency (CalEPA), the California Department of Food and Agriculture (CDFA), and CARB to include sequestration targets in the Natural and Working Lands Climate Change Implementation Plan consistent with the carbon neutrality goal.
- CCR Title 13, Motor Vehicles, Section 2449(d)(3), *Idling*. Grading plans shall reference the requirement that a sign shall be posted on-site stating that construction workers need to shut off engines at or before five minutes of idling.

Mitigation

Project impacts due to energy consumption would be less than significant; therefore, mitigation measures are not required.



4.7 GEOLOGY AND SOILS

This Subsection 4.7 assesses the existing surface and subsurface geologic conditions and features of the Project site and determines the potential for impacts associated with these features. The analysis in this subsection is based, in part, on information from the report titled, "Geotechnical Investigation, Proposed Warehouse, SWC Rider Street and Patterson Avenue," prepared by Southern California Geotechnical (herein, "SCG"), dated March 23, 2022, and included as EIR *Technical Appendix F* (SCG, 2022).

4.7.1 EXISTING CONDITIONS

A. <u>Regional Geology</u>

The Project site is located in the Peninsular Ranges geomorphic province of California. The Peninsular Ranges province extends from the Los Angeles Basin southeast to Baja California and from the Pacific Ocean eastward to the Coachella Valley and Colorado Desert. The province consists of numerous northwest to southeast-trending mountain ranges and valleys that are geologically controlled by several major active faults. The Project site is located within and near the central part of the Perris block, which is bounded on the northeast by the San Jacinto fault zone, on the north by the Sierra Madre-Cucamonga fault zone, and on the west by the Elsinore Fault zone.

B. <u>Local Geology</u>

The Project site is predominantly underlain by early Pleistocene (Map Symbol Qvof) old alluvial valley deposits, which are described as predominantly composed of moderately indurated, slightly dissected, sandy alluvium, containing lesser silt, and clay-bearing alluvium. Based on the mapping of the geologic formations present near the Project site, it is anticipated that the near-surface older alluvium is underlain by Val Verde tonalite (Map Symbol Kvt) formation, which is described as gray-weathering, relatively homogeneous, massive to well-foliated, medium to coarse grained, hypautomorphic granular biotite-hornblende tonalite. The geologic conditions encountered at the site are consistent with the mapped geologic conditions. (SCG, 2022, p. 9)

Based on a field investigation and a review of previous studies conducted by SCG for the Project site, it was determined that the Project site has the following geotechnical conditions:

- <u>Topsoil/Root Mat</u>: A surficial layer of topsoil/root mat material was encountered as part of site borings. This material generally consists of loose silty fine sand with moderate organic content and abundant root fibers. This material was 6± inches in thickness at the boring location. (SCG, 2022, p. 7)
- <u>Younger Alluvium</u>: Native younger alluvium was encountered at borings located within the southern and southeastern portions of the site. Several borings encountered younger native alluvial soils at the ground surface, extending to depths of 8 to 12± feet below the existing ground surface. The younger alluvium encountered at these boring locations generally consists of loose to medium dense silty fine to medium sands and silty fine to coarse sands. (SCG, 2022, p. 7)

During the previous studies, native younger alluvium was encountered at the ground surface at several boring locations extending to depths of at least 5 to $20\pm$ feet below the existing site grades. The younger



alluvium encountered at these locations generally consists of very loose to medium dense silty fine sands with varying medium to coarse sand content. (SCG, 2022, p. 8)

• <u>Older Alluvium</u>: Older alluvium was encountered beneath the younger alluvium at one of the boring locations, and at the ground surface at all of the remaining boring locations, with the exception of one boring where bedrock was encountered at the ground surface. The older alluvial soils encountered at the boring locations generally consists of medium dense to dense silty fine to medium sands and fine to medium sandy silts with varying coarse sand content. Some of the older alluvial soils were observed to be weakly cemented. At most of the boring locations, the older alluvial soils extends to depths of 8 to 22± feet and are underlain by weathered bedrock materials. However, the older alluvial soils extend to at least the maximum depth explored of 30± feet at one of the boring locations. (SCG, 2022, p. 8)

During the previous studies conducted at the Project site, older alluvium was encountered at the ground surface at several boring locations and below the younger alluvium at one of the boring locations. The older alluvium encountered at these borings generally consists of medium dense to very dense silty fine sands with varying medium to coarse sand content. The near surface older alluvium at some of the borings contains occasional trace to little clay content. At one boring location a layer of dense clayey fine sand to hard fine sandy clay was encountered at depths of 12 to $17\pm$ feet. The older alluvium generally extends to the maximum depth explored at the boring locations, except where it is underlain by bedrock at depths of 3 to $27\pm$ feet below the existing site grades. (SCG, 2022, p. 8)

• <u>Bedrock</u>: Bedrock was encountered at one location beneath the younger alluvium at two boring locations, and beneath the older alluvial soils at all of the remaining borings, with the exception of one of the borings which was terminated at a depth of 30± feet in older alluvium. At the boring locations, bedrock materials were generally encountered between depths of 8 and 27± feet. Generally, the bedrock consists of gray brown to light gray brown, very dense, highly weathered tonalite. (SCG, 2022, p. 8)

Bedrock was encountered beneath the older alluvium at several boring locations during the current and previous site investigations. At these boring locations, bedrock materials were encountered between depths of 3 and $27\pm$ feet. Generally, the bedrock consists of gray brown to light gray brown, very dense, highly weathered tonalite. (SCG, 2022, p. 8)

C. <u>Site Topography</u>

The topography of the Project site slopes gently downwards from the southwest corner to the northeast corner of the site, with elevations on site ranging from approximately 1,602 feet above mean sea level (amsl) at the Project's southwest corner to approximately 1,533 feet amsl near the northeast corner of the property.

D. <u>Faulting and Seismicity</u>

Research of available maps indicates that the Project site is not located within an Alquist-Priolo Earthquake Fault Zone. Therefore, the possibility of significant fault rupture on the site is considered to be low. (SCG, 2022, p. 13)



E. <u>Groundwater</u>

Groundwater was not encountered at any of the borings conducted at the Project site by SCG. Based on the lack of any water within the borings, and the moisture contents of the recovered soil samples, the static groundwater table is considered to have existed at a depth in excess of $30\pm$ feet below existing site grades, at the time of the subsurface investigation. Recent water level data was obtained from the California Department of Water Resources website. The nearest monitoring well on record is located approximately $1.6\pm$ miles east of the Project site. Water level readings within this monitoring well indicate a high groundwater level of $72\pm$ feet below the ground surface in February 2015. (SCG, 2022, pp. 8-9)

F. <u>Liquefaction</u>

Liquefaction is the loss of strength in generally cohesionless, saturated soils when the pore-water pressure induced in the soil by a seismic event becomes equal to or exceeds the overburden pressure. The primary factors which influence the potential for liquefaction include groundwater table elevation, soil type and plasticity characteristics, relative density of the soil, initial confining pressure, and intensity and duration of ground shaking. The depth within which the occurrence of liquefaction may impact surface improvements is generally identified as the upper 50 feet below the existing ground surface. Liquefaction potential is greater in saturated, loose, poorly graded fine sands with a mean grain size in the range of 0.075 to 0.2 mm. Non-sensitive clayey (cohesive) soils which possess a plasticity index of at least 18 are generally not considered to be susceptible to liquefaction, nor are those soils which are above the historic static groundwater table. (SCG, 2022, p. 14)

According to Riverside County GIS, the Project site is located within a zone of "low" liquefaction susceptibility. Additionally, the subsurface exploration performed at the site by SCG identified conditions that are considered to be non-conducive to liquefaction, including near-surface soils consisting of older alluvium, relatively shallow, very dense tonalite bedrock, and the lack of a static groundwater table within the upper $30\pm$ feet. In addition, readily available groundwater data from the state groundwater data library website indicates that the static groundwater table has historically been present at depths of $72\pm$ feet or greater for the nearest State well to the Project site. (SCG, 2022, p. 14)

G. <u>Expansive Soils</u>

Laboratory testing performed on representative samples of the near surface soils indicates that these materials possess a very low expansion potential (Expansion Index [EI] = 1 to 18) (SCG, 2022, p. 15).

H. <u>Seiches</u>

A seiche is an underwater wave that oscillates through a body of water which may be triggered by earthquakes or landslides. In general, seiches are small (on the order of a few inches) and are present in larger lakes as a result of the depth, temperature, and contours of the body of water. Due to the lack of an on-site body of water, the potential for the Project site to be impacted by seiches is considered low. Additionally, according to Figure 5 of the Riverside County General Plan Safety Element, the Project site is not located within a dam inundation area, thereby indicating that the Project site is not subject to inundation by seiches (Riverside County, 2021a, Safety Element Figure 5).



I. Soil Types and Erosion Potential

Table 4.7-1, *On-Site Soils Summary*, provides a summary of the soil types present on the Project site and their associated rate of runoff and erosion susceptibility. As shown, approximately 29.6% of the Project site has a slow to medium rate of runoff and a slight to moderate susceptibility to erosion; 69.4% of the Project site has a medium rate of runoff and a moderate susceptibility to erosion; and 1.0% of the Project site has a rapid rate of runoff and a high susceptibility to erosion (USDA, 1971, pp. 33, 40, and 53-54; USDA, n.d.).

Map Symbol	Map Unit Name	Rate of Runoff	Erosion Susceptibility	Acres in AOI ^{1.2}	Percent of AOI ^{1, 2}
FcD2	Fallbrook rocky sandy loam, shallow, 8 to 15 percent slopes, eroded	Medium	Moderate	0.5	1.2%
HcC	Hanford coarse sandy loam, 2 to 8 percent slopes	Slow to Medium	Slight to Moderate	12.1	29.6%
RaB2	Ramona sandy loam, 2 to 5 percent slopes, eroded	Medium	Moderate	27.9	68.2%
RaD3	Ramona sandy loam, 8 to 15 percent slopes, severely eroded	Rapid	High	0.4	1.0%
	Totals:			40.9	100.0%

Table 4.7-1 On-Site Soils Summary

1. AOI = Area of Interest.

2. Values reflect rounding.

(USDA, 1971, pp. 33, 40, and 53-54; USDA, n.d.)

4.7.2 APPLICABLE REGULATORY REQUIREMENTS

The following is a brief description of the federal, State, and local environmental laws and related regulations governing issues related to geology and soils.

A. <u>Federal Regulations</u>

1. Clean Water Act

The Clean Water Act (CWA) establishes the basic structure for regulating discharges of pollutants into the waters of the United States and regulating quality standards for surface waters. The basis of the CWA was enacted in 1948 and was called the Federal Water Pollution Control Act, but the Act was substantially reorganized and expanded in 1972. "Clean Water Act" became the Act's common name with amendments in 1972. Under the CWA, the Environmental Protection Agency (EPA) has implemented pollution control programs such as setting wastewater standards for industry, and also has set water quality standards for all contaminants in surface waters. The CWA made it unlawful to discharge any pollutant from a point source into navigable waters, unless a permit was obtained. EPA's National Pollutant Discharge Elimination System (NPDES) permit program controls discharges. Point sources are discrete conveyances such as pipes or man-made ditches. Individual homes that are connected to a municipal system, use a septic system, or do not have a surface discharge do not need an NPDES permit; however, industrial, municipal, and other facilities must obtain permits if their discharges go directly to surface waters. (EPA, 2020e)



B. <u>State Regulations</u>

1. Alquist-Priolo Earthquake Fault Zoning Act (A-P Act)

The Alquist-Priolo Earthquake Fault Zoning Act (A-P Act) was passed in 1972 to mitigate the hazard of surface faulting to structures for human occupancy. The A-P Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The A-P Act only addresses the hazard of surface fault rupture and is not directed toward other earthquake hazards. (CA Legislative Info, n.d.)

The A-P Act requires the State Geologist to establish regulatory zones (known as Earthquake Fault Zones) around the surface traces of active faults and to issue appropriate maps. ["Earthquake Fault Zones" were called "Special Studies Zones" prior to January 1, 1994.] The maps are distributed to all affected cities, counties, and state agencies for their use in planning and controlling new or renewed construction. Local agencies must regulate most development projects within the zones. Projects include all land divisions and most structures for human occupancy. Single family wood-frame and steel-frame dwellings up to two stories not part of a development of four units or more are exempt. However, local agencies can be more restrictive than state law requires. (CA Legislative Info, n.d.)

Before a project can be permitted, cities and counties must require a geologic investigation to demonstrate that proposed buildings will not be constructed across active faults. An evaluation and written report of a specific site must be prepared by a licensed geologist. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back from the fault (generally 50 feet). (CA Legislative Info, n.d.)

2. Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act (SHMA) of 1990 (Public Resources Code (PRC), Chapter 7.8, § 2690-2699.6) directs the Department of Conservation, California Geological Survey to identify and map areas prone to liquefaction, earthquake-induced landslides, and amplified ground shaking. The purpose of the SHMA is to minimize loss of life and property through the identification, evaluation, and mitigation of seismic hazards. (CDC, n.d.)

Staff geologists in the Seismic Hazards Program gather existing geological, geophysical, and geotechnical data from numerous sources to produce the Seismic Hazard Zone Maps. They integrate and interpret these data regionally in order to evaluate the severity of the seismic hazards and designate as Zones of Required Investigation (ZORI) those areas prone to liquefaction and earthquake–induced landslides. Cities and counties are then required to use the Seismic Hazard Zone Maps in their land use planning and building permit processes. (CDC, n.d.)

The SHMA requires site-specific geotechnical investigations be conducted within the ZORI to identify and evaluate seismic hazards and formulate mitigation measures prior to permitting most developments designed for human occupancy. (CDC, n.d.)



3. Natural Hazards Disclosure Act

The Natural Hazards Disclosure Act, effective June 1, 1998 (as amended June 9, 1998), requires that sellers of real property and their agents provide prospective buyers with a "Natural Hazard Disclosure Statement" when the property being sold lies within one or more state-mapped hazard areas, including a Seismic Hazard Zone. (CA Legislative Info, n.d.)

The law requires the State Geologist to establish regulatory zones (Zones of Required Investigation) and to issue appropriate maps (Seismic Hazard Zone maps). These maps are distributed to all affected cities, counties, and state agencies for their use in planning and controlling construction and development. Single-family frame dwellings up to two stories not part of a development of four or more units are exempt from the state requirements. However, local agencies can be more restrictive than state law requires. (CA Legislative Info, n.d.)

Before a development permit can be issued or a subdivision approved, cities and counties must require a sitespecific investigation to determine whether a significant hazard exists at the site and, if so, recommend measures to reduce the risk to an acceptable level. The investigation must be performed by state-licensed engineering geologists and/or civil engineers. (CA Legislative Info, n.d.)

4. Essential Services Buildings Seismic Safety Act

In 1986, the California Legislature determined that buildings providing essential services should be capable of providing those services to the public after a disaster. Their intent in this regard was defined in legislation known as the Essential Services Buildings Seismic Safety Act of 1986 and includes requirements that such buildings shall be "…designed and constructed to minimize fire hazards and to resist…the forces generated by earthquakes, gravity, and winds." This enabling legislation can be found in the California Health and Safety Code (HSC), Chapter 2, § 16000 through 16022. In addition, the California Building Code defines how the intent of the act is to be implemented in Title 24, Part 1 of the California Building Standards Administrative Code, Chapter 4, Articles 1 through 3. (CAB, n.d.)

5. California Building Standards Code (Title 24)

California Code of Regulations (CCR) Title 24 is reserved for state regulations that govern the design and construction of buildings, associated facilities, and equipment. These regulations are also known as building standards (reference HSC) § 18909). HSC (state law) § 18902 gives CCR Title 24 the name California Building Standards Code (CBSC). (CBSC, 2022)

The CBSC in CCR Title 24 is published by the California Building Standards Commission and it applies to all building occupancies (see HSC §§ 18908 and 18938) throughout the State of California. Cities and counties are required by state law to enforce CCR Title 24 (reference HSC §§ 17958, 17960, 18938(b), and 18948). Cities and counties may adopt ordinances making more restrictive requirements than provided by CCR Title 24, because of local climatic, geological, or topographical conditions. Such adoptions and a finding of need statement must be filed with the California Building Standards Commission (Reference HSC §§ 17958, 7 and 18941.5). (CBSC, 2022)



6. Porter-Cologne Water Control Act

The Porter-Cologne Act is the principal law governing water quality regulation in California. It establishes a comprehensive program to protect water quality and the beneficial uses of water. The Porter-Cologne Act applies to surface waters, wetlands, and ground water and to both point and nonpoint sources of pollution. Pursuant to the Porter-Cologne Act (California Water Code § 13000 *et seq.*), the policy of the State is as follows:

- That the quality of all the waters of the State shall be protected;
- That all activities and factors affecting the quality of water shall be regulated to attain the highest water quality within reason; and
- That the State must be prepared to exercise its full power and jurisdiction to protect the quality of water in the State from degradation. (SWRCB, 2014)

The Porter-Cologne Act established nine Regional Water Boards (based on hydrogeologic barriers) and the State Water Board, which are charged with implementing its provisions and which have primary responsibility for protecting water quality in California. The State Water Board provides program guidance and oversight, allocates funds, and reviews Regional Water Boards decisions. In addition, the State Water Board allocates rights to the use of surface water. The Regional Water Boards have primary responsibility for individual permitting, inspection, and enforcement actions within each of nine hydrologic regions. The State Water Board and Regional Water Boards have numerous non-point source (NPS) related responsibilities, including monitoring and assessment, planning, financial assistance, and management.

The Regional Water Boards regulate discharges under the Porter-Cologne Act primarily through issuance of NPDES permits for point source discharges and waste discharge requirements (WDRs) for NPS discharges. Anyone discharging or proposing to discharge materials that could affect water quality (other than to a community sanitary sewer system regulated by an NPDES permit) must file a report of waste discharge. The Storm Water Resources Control Board (SWRCB) and the Regional Water Quality Control Boards (RWQCBs) can make their own investigations or may require dischargers to carry out water quality investigations and report on water quality issues. The Porter-Cologne Act provides several options for enforcing WDRs and other orders, including cease and desist orders, cleanup and abatement orders, administrative civil liability orders, civil court actions, and criminal prosecutions. (SWRCB, 2014)

The Porter-Cologne Act also implements many provisions of the Clean Water Act, such as the NPDES permitting program. The Porter-Cologne Act also requires adoption of water quality control plans that contain the guiding policies of water pollution management in California. In addition, regional water quality control plans (basin plans) have been adopted by each of the Regional Water Boards and get updated as necessary and practical. These plans identify the existing and potential beneficial uses of waters of the State and establish water quality objectives to protect these uses. The basin plans also contain implementation, surveillance, and monitoring plans. (SWRCB, 2014) The Project site is located in the Santa Ana River watershed, which is within the purview of the Santa Ana RWQCB. The Santa Ana River Basin Plan, as most recently updated in June 2019, is the governing water quality plan for the region.



7. California Public Resources Code (PRC)

PRC § 5097.5 states that "A person shall not knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands." (CCR, n.d.)

PRC § 30244 states that, "Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required." (CCR, n.d.)

C. <u>Local Regulations</u>

1. Riverside County Ordinance No. 457 - Riverside County Building and Fire Codes

Every three years, Riverside County's Building and Fire Codes are adapted from the CBSC (CCR Title 24), which includes both building and fire codes. These codes establish site-specific investigation requirements, construction standards, and inspection procedures to ensure that development authorized by Riverside County does not pose a threat to the health, safety, or welfare of the public. The CBSC contains minimum baseline standards to guard against unsafe development. Riverside County Ordinance No. 457 also adopts, in some cases with modification to a stricter standard, a number of California State's Title 24 codes (fire, building, plumbing, electrical, etc.). The Riverside County Department of Building and Safety provides technical expertise in reviewing and enforcing these codes. (Riverside County, 2015a, p. 4.12-25)

2. Riverside County Ordinance No. 547 – Implementation of the Alquist-Priolo Earthquake Fault Zoning Act

This ordinance establishes the policies and procedures used by Riverside County to implement the A-P Act. Among other things, it requires all projects proposed within an "earthquake fault zone," as shown on the maps prepared by the State Geologist to comply with the provisions of the A-P Act. It establishes regulations for construction, including for grading, slopes and compaction, erosion control, retaining wall design, and earthquake fault zone setbacks. (Riverside County, 2015a, p. 4.12-25)

3. Riverside County Ordinance No. 484 – Control of Blowing Dust

This ordinance establishes requirements for the control of blowing sand within county-designated "Agricultural Dust Control Areas." It defines activities that may contribute to wind erosion, identifies restrictions on activities within these areas, establishes penalties for violation of the ordinance, and identifies procedures necessary to obtain a valid permit. (Riverside County, 2015a, p. 4.12-25)

4.7.3 BASIS FOR DETERMINING SIGNIFICANCE

Section VII of Appendix G to the CEQA Guidelines addresses typical adverse effects due to geological conditions, and includes the following threshold questions to evaluate a project's impacts resulting from geologic or soil conditions:

- Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?
 - Strong seismic ground shaking?
 - Seismic-related ground failure, including liquefaction?
 - Landslides?
- Would the project result in substantial soil erosion or the loss of topsoil?
- Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?
- Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?
- Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?
- Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Significance thresholds are set forth in Riverside County's Environmental Assessment Checklist, as modified based on the 2018 updates to Section VII of Appendix G to the CEQA Guidelines (listed above), and indicate significant impacts would occur if the Project or any Project-related component would:

- a. Be subject to rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault;
- b. Be subject to seismic-related ground failure, including liquefaction;
- c. Be subject to strong seismic ground shaking;
- d. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, collapse, or rockfall hazards;
- e. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in ground subsidence;
- *f.* Be subject to geologic hazards, such as seiche, mudflow, or volcanic hazard;
- g. Change topography or ground surface relief features;

- *h.* Create cut or fill slopes greater than 2:1 or higher than 10 feet;
- *i.* Result in grading that affects or negates subsurface sewage disposal systems;
- *j. Result in substantial soil erosion or the loss of topsoil;*
- *k.* Be located on expansive soil, as defined in Section 1803.5.3 of the California Building Code (2022), creating substantial direct or indirect risks to life or property;
- *l.* Have soils incapable of adequately supporting use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water;
- m. Be impacted by or result in an increase in wind erosion and blow sand, either on or off site.

The significance thresholds set forth in Riverside County's Environmental Assessment Checklist, as modified by the 2018 updates to the CEQA Guidelines, were used to evaluate the significance of the proposed Project's impacts on geology and soils. Impacts to paleontological resources and unique geologic features are addressed separately in EIR Subsection 4.14, *Paleontological Resources*.

4.7.4 IMPACT ANALYSIS

<u>Threshold a.</u>: Would the Project be subject to rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

<u>Threshold c.</u>: Would the Project be subject to strong seismic ground shaking?

The Project site is not located in an Alquist-Priolo (A-P) earthquake fault zone. The nearest fault zone to the Project site is the Glen Ivy North Fault, located approximately 10.6 miles southwest of the Project site. The potential for surface fault rupture to occur at the site is considered low. Impacts due to rupture of a known earthquake would therefore be less than significant. (SCG, 2022, p. 13)

The Project site is located in a seismically active area of southern California and is expected to experience moderate to severe ground shaking during the lifetime of the Project. The risk is not considered substantially different than that of other similar properties in the southern California area. The Project is required to be constructed in accordance with the CBSC and the Riverside County Building Code. The CBSC and Riverside County Building Code have been designed to preclude significant adverse effects associated with strong seismic ground shaking. Additionally, the Project's Geotechnical Investigation (*Technical Appendix F*) includes site-specific recommendations to attenuate seismic-related hazards.

However, a significant impact could occur if the Project did not comply with the site-specific recommendations of the Project's Geotechnical Investigation (*Technical Appendix F*). The Project's Geotechnical Investigation includes recommendations that would reduce seismic risks to an "acceptable level" as defined by the California Code of Regulations. Accordingly, prior to mitigation implementing the geotechnical study recommendations, the proposed Project has the potential to expose people or structures to substantial adverse effects, including



loss, injury, or death, as a result of strong seismic ground shaking. This is considered a significant impact for which mitigation is required.

<u>Threshold b.</u>: Would the Project be subject to seismic-related ground failure, including liquefaction?

As previously discussed, according to Riverside County GIS, the Project site is located within a zone of "low" liquefaction susceptibility. Additionally, the subsurface exploration performed at the site by SCG identified conditions that are considered to be non-conducive to liquefaction, including near-surface soils consisting of older alluvium and relatively shallow, very dense tonalite bedrock, and the lack of a static groundwater table within the upper $30\pm$ feet. In addition, readily available groundwater data from the state groundwater data library website indicates that the static groundwater table has historically been present at depths of $72\pm$ feet or greater for the nearest state well to the Project site. Accordingly, the Project would not be subject to seismic-related ground failure, including liquefaction, and no impact would occur. (SCG, 2022, p. 14)

<u>Threshold d.</u>: Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, collapse, or rockfall hazards?

Landslide Hazards

The Project site and areas immediately surrounding the Project site do not contain steep slopes capable of producing landslide hazards that could affect development on the site. Although hillsides occur to the south, these existing hill forms exhibit an extensive amount of rock outcroppings, indicating a low hazard due to landslides. The Project design proposes a landscaped berm along the western Project site boundary, which would be constructed to Riverside County standards to ensure stability. Accordingly, impacts due to landslide hazards would be less than significant.

Lateral Spreading

Lateral spreading is a type of liquefaction-induced ground failure associated with the lateral displacement of surficial blocks of sediment resulting from liquefaction in a subsurface layer. Once liquefaction transforms the subsurface layer into a fluid mass, gravity plus the earthquake inertial forces may cause the mass to move downslope towards a free face (such as a river channel or an embankment). Lateral spreading may cause large horizontal displacements and such movement typically damages pipelines, utilities, bridges, and structures. Due to the low probability of liquefaction to occur on site, the potential for lateral spreading also is considered low. Nonetheless, impacts could occur if proposed grading activities are not conducted in accordance with the site-specific recommendations of the geotechnical study contained as *Technical Appendix F*. This is considered a potentially significant direct impact of the proposed Project for which mitigation would be required.

Collapse Hazards

Static settlement of the Project site would be induced by grading the site for development and by the proposed structural building loads. Impacts due to collapse hazards could occur if proposed grading activities are not conducted in accordance with the site-specific recommendations of the geotechnical study included as *Technical Appendix F* to this EIR. This is considered a potentially significant direct impact of the proposed Project for which mitigation would be required.



Rockfall Hazards

A rockfall is a fragment of rock, or block of rocks, that detaches from a vertical to sub-vertical cliff or bluff in a downward motion. Although there are large hill forms south of the Project site that contain rock outcroppings, the Project site is located approximately 0.2-mile north of these hills and the Project site is separated from this area by existing development and Walnut Street. Additionally, the base of these hills is only at a slightly higher elevation (i.e., approximately 100 feet) than the elevations at the Project site. Accordingly, due to distance and elevation of these hill forms, potential impacts to the Project site due to rockfall hazards would be less than significant, and the Project would have no potential to induce rockfall.

Threshold e.: Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in ground subsidence?

According to the Project's Geotechnical Report (*Technical Appendix F*), removal and recompaction of the near surface younger alluvium is estimated to result in an average shrinkage of 10 to 15 percent. Removal and recompaction of the near surface older alluvium is expected to result in an average shrinkage of up to 5 to 10 percent. Minor ground subsidence is expected to occur in the soils below the zone of removal, due to settlement and machinery working. The subsidence is estimated to be $0.1\pm$ feet. Accordingly, a significant impact could occur if proposed grading activities are not conducted in accordance with the site-specific recommendations of the Project's geotechnical study (*Technical Appendix F*). This is considered a potentially significant direct impact of the proposed Project for which mitigation would be required. (SCG, 2022, p. 16)

<u>Threshold f.</u>: Would the Project be subject to geologic hazards, such as seiche, mudflow, or volcanic hazard?

There are no volcanoes in the Project region; thus, no impacts due to volcanic hazards would occur.

A seiche is an underwater wave that oscillates through a body of water which may be triggered by earthquakes or landslides. In general, seiches are small (on the order of a few inches) and are present in larger lakes as a result of the depth, temperature, and contours of the body of water. Due to the lack of an on-site body of water or other bodies of water within close proximity to the site that have the potential to result in site inundation, the potential for the Project site to be impacted by seiches is considered low. Additionally, according to Figure 5 of the Riverside County General Plan Safety Element, the Project site is not located within a dam inundation area, thereby indicating that the Project site is not subject to inundation by seiches (Riverside County, 2021a, Safety Element Figure 5). As such, impacts due to seiches would be less than significant.

Although several existing hill forms occur to the south of the Project site, these hill forms contain rock outcroppings and limited surface soil, thereby indicating that the chance of mudflow hazards is low. Accordingly, impacts due to mudflow hazards would be less than significant.

<u>Threshold g.</u>: Would the Project change topography or ground surface relief features?

As discussed in EIR Section 3.0, the Project site would be graded in a manner that largely approximates the site's existing topographic conditions with the exception of the proposed landscaped berm in the western portion of the site. The Project would require a total of 257,950 cubic yards (cy) of cut and 257,950 cy of fill.



Earthwork activities are expected to balance on site and no import or export of soils would be required. Thus, the Project would not result in a substantial change in topography or ground surface relief features. The proposed berm would serve as a buffer and visual screen for the residential community to the west and would not lead to any secondary geology or soil impacts. Impacts would be less than significant.

<u>Threshold h.</u>: Would the Project create cut or fill slopes greater than 2:1 or higher than 10 feet?

None of the slopes proposed as part of the Project would exceed a gradient of 2:1 (horizontal:vertical). Large slopes proposed as part of the Project's grading plan include a proposed landscaped berm along the western Project boundary, which would measure up to approximately 36 feet in height, and slopes around the proposed bioretention basin, which would measure up to approximately 18 feet in height. A potentially significant impact could occur due to the proposed slopes higher than 10 feet if implementing development was to fail to incorporate the recommendations of the Project's Geotechnical Study (*Technical Appendix* F). This is considered a potentially significant impact for which mitigation would be required.

<u>Threshold i.</u>: Would the Project result in grading that affects or negates subsurface sewage disposal systems?

According to records available through Riverside County GIS, none of the existing residential uses in the southern portions of the Project site have permits on file for septic systems, indicating that all of the existing residences are served by existing Eastern Municipal Water District (EMWD) sewer facilities. As part of the Project, the existing residential units would be demolished. A proposed on-site 8-inch sewer lateral would connect to an existing sewer main located within Rider Street to serve the Project. Impacts associated with the Project's proposed sewer improvements are inherent to the Project's construction phase and are evaluated throughout this EIR accordingly. There are no impacts associated with the Project's proposed sewer improvements that have not already been evaluated, and where necessary, mitigated to the maximum feasible extent by this EIR. Accordingly, the Project would not result in grading that affects or negates subsurface sewage disposal systems, and impacts would be less than significant.

<u>Threshold j.</u>: Would the Project result in substantial soil erosion or the loss of topsoil? <u>Threshold m.</u>: Would the Project be impacted by or result in an increase in wind erosion and blow sand, either on or off site?

Implementation of the Project has the potential to result in soil erosion. The analysis below summarizes the likelihood of the Project to result in substantial soil erosion during temporary construction activities and long-term operation.

Construction-Related Impacts

Proposed grading and construction activities at the Project site would expose underlying soils and disturb surficial soils. Exposed soils would be subject to erosion during rainfall events or high winds due to the removal of stabilizing vegetation and exposure of these erodible materials to wind and water.


Pursuant to the requirements of the SWRCB, the Project Applicant is required to obtain a NPDES permit for construction activities, including proposed grading. The NPDES permit is required for all projects that include construction activities such as clearing, grading, and/or excavation that disturb at least one acre of total land area. The County's Municipal Separate Storm Sewer System (MS4) NPDES Permit requires the Project Applicant to prepare and submit to the County for approval a Project-specific Stormwater Pollution Prevention Plan (SWPPP). The SWPPP would identify a combination of erosion control and sediment control measure (i.e., Best Management Practices (BMPs)) to reduce or eliminate sediment discharge to surface water from stormwater and non-stormwater source discharges during construction.

In addition, proposed construction activities would be required to comply with South Coast Air Quality Management District (SCAQMD) Rule 403, which would reduce the amount of particulate matter in the air and minimize the potential for wind erosion. Rule 403 requires that certain construction practices be following that limit dust and dirt from leaving the construction site. For example, no dust is allowed to be tracked out of the site by more than 25 feet. In addition, proposed construction activities would be required to comply with applicable County ordinances (i.e., Ordinance Nos. 457 and 460) to protect and enhance the water quality of the County, which requires the Project Applicant to prepare an erosion control plan to be used during the rainy season. With mandatory compliance to the requirements noted in the Project's SWPPP, as well as mandatory compliance to applicable regulatory requirements including but not limited to SCAQMD Rule 403 and Riverside County Ordinance Nos. 457 and 460, the potential for water and/or wind erosion impacts during Project construction would be reduced to less-than-significant levels.

Long-Term Operational Impacts

Following construction, wind and water erosion on the Project site would be minimized, as the disturbed areas would be landscaped or covered with impervious surfaces, and drainage would be controlled through a storm drain system.

With implementation of the proposed Project, runoff generated on site would be conveyed to a series of onsite catch basins and storm drain lines. First flush runoff would be conveyed to proposed underground detention systems proposed within the Project's two proposed truck courts and within the eastern parking lot area. Discharge from the underground detention systems would be conveyed northerly via proposed private storm drains to the proposed bioretention basin in the northeast corner of the site for treatment, then further north via a proposed lateral to the extended Rider Street storm drain. (Thienes, 2022b, p. 7) The proposed bioretention basin would be effective in removing sediments from site runoff, and would preclude impacts due to soil erosion or the loss of topsoil. Impacts would be less than significant.

As discussed in detail in EIR Subsection 4.10, *Hydrology and Water Quality*, according to the Project's Hydrology Study (*Technical Appendix II*), the proposed on-site storm drain system would be sized during the Project's final design phase to sufficiently restrict proposed conditions flow rates to the existing condition discharge rate (Thienes, 2022a). Accordingly, because peak runoff would not increase under the proposed Project relative to existing conditions, implementation of the Project would not increase the risk of siltation or erosion in stormwater discharged from the Project site. In addition, a Water Quality Management Plan (WQMP) would be required in conjunction with future grading and building permits, which would identify post-construction measures to ensure on-going protection against erosion. Compliance with the WQMP would be required as a condition of approval for future implementing developments, and long-term maintenance of



on-site water quality features also would be required. Based on the foregoing, implementation of the Project would not significantly increase the risk of long-term wind or water erosion on- or off-site, and impacts would be less than significant.

<u>Threshold k.</u>: Would the Project be located on expansive soil, as defined in Section 1803.5.3 of the California Building Code (2022), creating substantial risks to life or property?

Laboratory testing performed on representative samples of the near surface soils indicates that these materials possess a very low expansion potential (Expansion Index = 1 to 18) (SCG, 2022, p. 15). Accordingly, the Project would not be located on expansive soil, as defined in Section 1803.5.3 of the California Building Code (2022), and would not create substantial risks to life or property; thus, no impact would occur.

<u>Threshold I.</u>: Would the Project have soils incapable of adequately supporting use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

Sewer service to the proposed Project would be provided by the EMWD, and no septic tanks or alternative wastewater disposal systems are proposed as part of the Project. Accordingly, no impact would occur.

4.7.5 CUMULATIVE IMPACT ANALYSIS

With the exception of erosion hazards, potential effects due to geology and soils are inherently restricted to the areas proposed for development and would not contribute to cumulative impacts associated with other existing, planned, or proposed development. That is, thresholds including fault rupture, seismic ground shaking, liquefaction, landslides, expansive soils, and other geologic hazards would involve effects to (and not from) the proposed development, and are specific to on-site conditions. Accordingly, addressing these potential hazards for the proposed development would involve using measures to conform to existing requirements, and/or site-specific design and construction efforts that have no relationship to, or impact on, off-site areas. Because of the site-specific nature of these potential hazards and the measures to address them, there would be no connection to similar potential issues or cumulative effects to or from other properties. Cumulatively-considerable impacts would be less than significant.

As discussed under Thresholds j. and m., during both near-term construction and long-term operation, measures would be incorporated into the Project's design to ensure that significant erosion hazards do not occur. Other developments within the cumulative study area would be required to comply with similar requirements, such as the need to obtain an NPDES permit and mandatory compliance with the resulting SWPPPs. All projects in the cumulative study area also would be required to demonstrate that measures have been incorporated to ensure that development does not result in substantial increases in the amount or rate of runoff under long-term operating conditions, which could in turn increase soil erosion. Further, all projects in the cumulative study area also would be required to comply ordinance Nos. 457 and 460, as well as SCAQMD Rule 403, which would preclude water- and wind-related erosion hazards during construction. Therefore, because the Project would result in less-than-significant erosion impacts, and because other projects within the cumulative study area would be subject to similar requirements to control erosion



hazards during construction and long-term operation, cumulatively-considerable impacts associated with wind and water erosion hazards are evaluated as less than significant.

4.7.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

<u>Thresholds a. and c.: Significant Direct Impact</u>. The potential for surface fault rupture to occur at the site is considered low. Impacts due to rupture of a known earthquake would therefore be less than significant. However, the Project site is located in a seismically active area of southern California and is expected to experience moderate to severe ground shaking during the lifetime of the Project. However, a significant impact could occur if the Project did not comply with the site-specific recommendations of the Project's Geotechnical Investigation (*Technical Appendix F*).

<u>Threshold b.: No Impact</u>. The Project site is located within a zone of "low" liquefaction susceptibility. The subsurface exploration performed at the site identified conditions that are considered to be non-conducive to liquefaction. Accordingly, the Project would not be subject to seismic-related ground failure, including liquefaction, and no impact would occur.

<u>Threshold d.: Significant Direct Impact</u>. Although hillsides occur approximately 0.2-mile to the south, they have low landslide hazard risk and rockfall risk to the Project site. Due to the low probability of liquefaction to occur on site, the potential for lateral spreading is also considered low. Impacts due to collapse hazards could occur if proposed grading activities are not conducted in accordance with the site-specific recommendations of the Project's geotechnical study.

<u>Threshold e.: Significant Direct Impact</u>. Subsidence at the Project site following development is estimated to be $0.1\pm$ feet. A significant impact could occur if proposed grading activities are not conducted in accordance with the site-specific recommendations of the Project's geotechnical study.

<u>Threshold f.: Less-than-Significant Impact</u>. There are no volcanoes in the Project region; thus, no impacts due to volcanic hazards would occur. Due to the lack of an on-site body of water or other bodies of water within close proximity to the site that have the potential to result in site inundation, the potential for the Project site to be impacted by seiches is considered low. As such, impacts due to seiches would be less than significant. Additionally, although several existing hill forms occur to the south of the Project site, these hill forms exhibit substantial amounts of rock outcroppings, thereby indicating that the chance of mudflow hazards is low. Accordingly, impacts due to mudflow hazards would be less than significant.

<u>Threshold g.: Less-than-Significant Impact</u>. The Project site would be graded in a manner that largely approximates the site's existing topographic conditions with exception of a proposed landscaped berm. Earthwork activities are expected to balance on site and no import or export of soils would be required. The Project would not result in a substantial change in topography or ground surface relief features, and impacts would be less than significant.

<u>Threshold h.: Significant Direct Impact</u>. Large slopes proposed as part of the Project's grading plan include a proposed landscaped berm along the western Project boundary, which would measure up to approximately 36 feet in height, and slopes around the proposed bioretention basin, which would measure up to approximately 18 feet in height. A potentially significant impact would occur due to the proposed slopes higher than 10 feet



if the Project was to fail to incorporate the recommendations of the Project's Geotechnical Study (*Technical Appendix* F).

<u>Threshold i.: Less-than-Significant Impact</u>. There are no septic systems on site under existing conditions. Impacts associated with the Project's proposed sewer improvements are inherent to the Project's construction phase and have been evaluated throughout this EIR accordingly. There are no impacts associated with the Project's proposed sewer improvements that have not already been evaluated, and where necessary, mitigated to the maximum feasible extent by this EIR. Accordingly, the Project would not result in grading that affects or negates subsurface sewage disposal systems, and impacts would be less than significant.

<u>Thresholds j. and m.: Less-than-Significant Impacts</u>. The Project would not result in substantial soil erosion or loss of topsoil. The Project Applicant would be required to obtain an NPDES permit for construction activities and adhere to a Stormwater Pollution Prevention Plan (SWPPP) as well as SCAQMD Rule 403 and Riverside County Ordinance Nos. 457 and 460. With mandatory compliance to these regulatory requirements, the potential for water and wind erosion impacts during construction would be less than significant. Following development, wind and water erosion on the Project site would be minimized, as the areas disturbed during construction would be landscaped or covered with impervious surfaces and drainage would be controlled through a storm drain system. Furthermore, the Project is required by law to implement a WQMP during operation, which would preclude substantial erosion impacts in the long-term. Impacts would be less than significant.

<u>Threshold k.: No Impact</u>. Laboratory testing performed on representative samples of the near surface soils indicates that these materials possess a very low expansion potential (Expansion Index = 1 to 18). Accordingly, the Project would not be located on expansive soil, as defined in Section 1803.5.3 of the California Building Code (2022), and would not create substantial risks to life or property; thus, no impact would occur.

<u>Threshold 1.: No Impact</u>. Sewer service to the proposed Project would be provided by the EMWD, and no septic tanks or alternative wastewater disposal systems are proposed as part of the Project. Accordingly, no impact would occur.

4.7.7 COUNTY REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

Applicable County Regulations and Design Requirements

The following are applicable regulations and design requirements that apply to the proposed Project and that reduce or preclude geology and soils impacts. Although compliance with mandatory regulatory requirements does not technically meet CEQA's definition for mitigation, they are specified herein as requirements for the Project.

• The Project is required to comply with County Ordinance No. 457, which requires that all projects comply with California Building Codes and the International Building Codes. These codes establish site-specific investigation requirements, construction standards, and inspection procedures to ensure that development does not pose a threat to the health, safety, and welfare of the public, and includes requirements related to erosion.



- The Project is required to comply with County Ordinance No. 460, which sets forth soil erosion control requirements and requires preparation and implementation of a wind erosion control plan.
- The Project is required to comply with the provisions of SCAQMD Rule 403 by addressing blowing dust from the Project's construction activities in accordance with the requirements of Rule 403.
- The Project is required to comply with the provisions of the Project's National Pollution Discharge Elimination System (NPDES) permit, and the Project's Storm Water Pollution Prevention Plan (SWPPP). Compliance with the NPDES permit and the SWPPP would identify and implement an effective combination of erosion control and sediment control measures (i.e., Best Management Practices) to reduce or eliminate discharge to surface water from stormwater and non-stormwater discharges.

Mitigation

MM 4.7-1 Prior to issuance of grading or building permits, the Riverside County Building and Safety Department shall verify that all of the recommendations given in Section 6.0 of the Project's March 23, 2022 "Geotechnical Investigation, Proposed Warehouse, SWC Rider Street and Patterson Avenue, Riverside County (Perris Area), California," prepared by Southern California Geotechnical and included as *Technical Appendix F* to the Project's EIR, are incorporated into the Project's grading and building plans and implemented by the construction contractors. These recommendations include but are not limited to: a) over-excavation in the southeast portion of the proposed building area and remedial grading across the site to remove organic soils and near-surface alluvium and near-surface bedrock and replacement with compacted structural fill; b) verification of acceptable soluble sulfate concentrations at the completion of building pad grading; c) verification of acceptable soil expansion indexes at the completion of building pad grading; d) use of a polyethylene encasement for ductile iron pipe; e) the periodic conduct of compaction tests by a geotechnical engineer over the course of the Project's grading operation; and f) building foundation design, floor slab design, building and retaining wall design, and pavement design per the requirements of applicable Building Codes and to the specifications of a licensed geotechnical engineer. Alternatively, the Project shall comply with the findings and recommendations of any geotechnical studies that may be required in association with future grading and/or building permits.

4.7.8 SIGNIFICANCE OF IMPACTS AFTER MITIGATION

<u>Thresholds a., c., and e.: Less-than-Significant Impact with Mitigation Incorporated</u>. Implementation of Mitigation Measure MM 4.7-1 would ensure that the Project's design professionals and construction contractors implement the recommendations of the Project's Geotechnical Investigation (*Technical Appendix* F) or the geotechnical investigations required as part of future grading and building permits, which in turn would ensure measures are implemented to address potential impacts due to the exposure of people or structures to adverse effects, including loss, injury, or death as a result of strong seismic ground shaking. Implementation of the required mitigation would ensure that impacts are reduced to less-than-significant levels.



<u>Threshold d.: Less-than-Significant Impact with Mitigation Incorporated</u>. Implementation of Mitigation Measure MM 4.7-1 would ensure that the Project's design professionals and construction contractors implement the recommendations of the Project's Geotechnical Investigation (*Technical Appendix F*) or the geotechnical investigations required as part of future grading and building permits, which in turn would ensure measures are implemented to address potential impacts due to lateral spreading and collapse hazards. Implementation of the required mitigation would ensure that impacts are reduced to less-than-significant levels.

<u>Threshold h.: Less-than-Significant Impact with Mitigation Incorporated</u>. Implementation of Mitigation Measure MM 4.7-1 would ensure that the Project's design professionals and construction contractors implement the recommendations of the Project's Geotechnical Investigation (*Technical Appendix F*) or the geotechnical investigations required as part of future grading and building permits, which in turn would ensure measures are implemented to address potential impacts due to proposed slopes exceeding 10 feet in height. Implementation of the required mitigation would ensure that impacts are reduced to less-than-significant levels.



4.8 GREENHOUSE GAS EMISSIONS

The analysis in this Subsection 4.8 is based in part on a greenhouse gas (GHG) analysis prepared for the Project by Urban Crossroads, Inc. (herein, Urban Crossroads), titled, "Rider & Patterson Business Center (PPT22004) Greenhouse Gas Analysis" (herein, "GHGA"), dated February 15, 2023, and included as EIR *Technical Appendix G* (Urban Crossroads, 2023d). Refer to Section 7.0, *References*, for a complete list of reference sources.

4.8.1 EXISTING CONDITIONS

A. Introduction to Global Climate Change

Global Climate Change (GCC) is defined as the change in average meteorological conditions on Earth with respect to temperature, precipitation, and storms. The majority of scientists believe that the climate shift taking place since the Industrial Revolution is occurring at a quicker rate and magnitude than in the past. Scientific evidence suggests that GCC is the result of increased concentrations of GHGs in the earth's atmosphere, including carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), fluorinated gases. The majority of scientists believe that this increased rate of climate change is the result of GHGs resulting from human activity and industrialization over the past 200 years. (Urban Crossroads, 2023d, p. 20)

An individual project like the proposed Project cannot generate enough GHG emissions to affect a discernible change in global climate. However, the proposed Project may participate in the potential for GCC by its incremental contribution of GHGs combined with the cumulative increase of all other sources of GHGs, which when taken together constitute potential influences on GCC. (Urban Crossroads, 2023d, p. 20)

GCC refers to the change in average meteorological conditions on the earth with respect to temperature, wind patterns, precipitation, and storms. Global temperatures are regulated by naturally occurring atmospheric gases such as water vapor, CO₂, N₂O, CH₄, hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). These particular gases are important due to their residence time (duration they stay) in the atmosphere, which ranges from 10 years to more than 100 years. These gases allow solar radiation into Earth's atmosphere, but prevent radiant heat from escaping, thus warming Earth's atmosphere. GCC can occur naturally as it has in the past with the previous ice ages. (Urban Crossroads, 2023d, p. 20)

Gases that trap heat in the atmosphere are often referred to as GHGs. GHGs are released into the atmosphere by both natural and anthropogenic activity. Without the natural GHG effect, Earth's average temperature would be approximately 61 degrees Fahrenheit (°F) cooler than it is currently. The cumulative accumulation of these gases in Earth's atmosphere is considered to be the cause for the observed increase in Earth's temperature. (Urban Crossroads, 2023d, p. 20)

B. <u>Greenhouse Gases</u>

1. Greenhouse Gases and Health Effects

GHGs trap heat in the atmosphere, creating a GHG effect that results in global warming and climate change. Many gases demonstrate these properties and are discussed below. For the purposes of analysis, emissions of



CO₂, CH₄, and N₂O were evaluated because these gases are the primary contributors to GCC from development projects. Although there are other substances such as fluorinated gases that also contribute to GCC, fluorinated gases were not evaluated as their sources are not well-defined and do not contain accepted emissions factors or methodology to accurately calculate these gases. (Urban Crossroads, 2023d, pp. 20-21)

□ <u>Water</u>

Water is the most abundant, important, and variable GHG in the atmosphere. Water vapor is not considered a pollutant; in the atmosphere it maintains a climate necessary for life. Changes in its concentration primarily are considered to be a result of climate feedbacks related to the warming of the atmosphere rather than a direct result of industrialization. Climate feedback is an indirect, or secondary, change, either positive or negative, that occurs within the climate system in response to a forcing mechanism. The feedback loop in which water is involved is critically important to projecting future climate change. (Urban Crossroads, 2023d, Table 2-1)

As the temperature of the atmosphere rises, more water is evaporated from ground storage (rivers, oceans, reservoirs, soil). Because the air is warmer, the relative humidity can be higher (in essence, the air is able to 'hold' more water when it is warmer), leading to more water vapor in the atmosphere. As a GHG, the higher concentration of water vapor is then able to absorb more thermal indirect energy radiated from the Earth, thus further warming the atmosphere. The warmer atmosphere can then hold more water vapor and so on. This is referred to as a "positive feedback loop." The extent to which this positive feedback loop will continue is unknown as there are also dynamics that hold the positive feedback loop in check. As an example, when water vapor increases in the atmosphere, more of it will eventually condense into clouds, which are more able to reflect incoming solar radiation (thus allowing less energy to reach the Earth's surface and heat it up). (Urban Crossroads, 2023d, Table 2-1)

The main source of water vapor is evaporation from the ocean (approximately 85%). Other sources include evaporation from other water bodies, sublimation (change from solid to gas) from sea ice and snow, and transpiration from plant leaves. (Urban Crossroads, 2023d, Table 2-1)

There are no known direct health effects related to water vapor at this time. It should be noted however that when some pollutants react with water vapor, the reaction forms a transport mechanism for some of these pollutants to enter the human body through water vapor. (Urban Crossroads, 2023d, Table 2-1)

$\Box \qquad \underline{\text{Carbon Dioxide (CO}_2)}$

 CO_2 is an odorless and colorless GHG. Since the industrial revolution began in the mid-1700s, the sort of human activity that increases GHG emissions has increased dramatically in scale and distribution. Data from the past 50 years suggests a corollary increase in levels and concentrations. Prior to the industrial revolution, CO_2 concentrations were fairly stable at 280 parts per million (ppm). Today, they are around 370 ppm, an increase of more than 30%. Left unchecked, the concentration of CO_2 in the atmosphere is projected to increase to a minimum of 540 ppm by the year 2100 as a direct result of anthropogenic sources. (Urban Crossroads, 2023d, Table 2-1)



 CO_2 is emitted from natural and man-made sources. Natural sources include the decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic sources include the burning of coal, oil, natural gas, and wood. CO_2 is naturally removed from the air by photosynthesis, dissolution into ocean water, transfer to soils and ice caps, and chemical weathering of carbonate rocks. (Urban Crossroads, 2023d, Table 2-1)

Outdoor levels of CO_2 are not high enough to result in negative health effects. According to the National Institute for Occupational Safety and Health (NIOSH), high concentrations of CO_2 can result in health effects such as headaches, dizziness, restlessness, difficulty breathing, sweating, increased heart rate, increased cardiac output, increased blood pressure, coma, asphyxia, and/or convulsions. While current concentrations of CO_2 in the Earth's atmosphere are estimated to be approximately 370 ppm, the actual reference exposure level (level at which adverse health effects typically occur) is at exposure levels of 5,000 ppm averaged over 10 hours in a 40-hour work week and short-term reference exposure levels of 30,000 ppm averaged over a 15-minute period. (Urban Crossroads, 2023d, Table 2-1)

$\Box \qquad \underline{\text{Methane (CH}_4)}$

Methane (CH₄) is an extremely effective absorber of radiation, although its atmospheric concentration is less than CO₂ and its lifetime in the atmosphere is brief (10-12 years) compared to other GHGs. CH₄ has both natural and anthropogenic sources. It is released as part of animal digestion and the biological processes in low oxygen environments, such as in swamplands or in rice production (at the roots of the plants). Over the last 50 years, human activities such as growing rice, raising cattle, using natural gas, and mining coal have added to the atmospheric concentration of CH₄. Other anthropocentric sources include fossil-fuel combustion and biomass burning. (Urban Crossroads, 2023d, Table 2-1)

CH₄ is extremely reactive with oxidizers, halogens, and other halogen-containing compounds. Exposure to high levels of CH₄ can cause asphyxiation, loss of consciousness, headache, dizziness, nausea, vomiting, weakness, loss of coordination, and an increased breathing rate. (Urban Crossroads, 2023d, Table 2-1)

$\Box \qquad \underline{\text{Nitrous Oxide (N}_2O)}$

Nitrous oxide (N₂O), also known as laughing gas, is a colorless GHG. Concentrations of N₂O also began to rise at the beginning of the industrial revolution. In 1998, the global concentration was 314 parts per billion (ppb). N₂O is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. It is used as an aerosol spray propellant (i.e., in whipped cream bottles), in potato chip bags to keep chips fresh, and in rocket engines and race cars. N₂O can be transported into the stratosphere, be deposited on Earth's surface, or be converted to other compounds by chemical reaction. (Urban Crossroads, 2023d, Table 2-1)



N₂O can cause dizziness, euphoria, and sometimes slight hallucinations. In small doses, it is considered harmless. However, in some cases, heavy and extended use can cause Olney's Lesions (brain damage). (Urban Crossroads, 2023d, Table 2-1)

<u>Chlorofluorocarbons (CFCs)</u>

Chlorofluorocarbons (CFCs) are gases formed synthetically by replacing all hydrogen atoms in CH₄ or ethane (C_2H_6) with chlorine and/or fluorine atoms. CFCs are nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (the level of air at Earth's surface). CFCs have no natural source but were first synthesized in 1928. They were used for refrigerants, aerosol propellants, and cleaning solvents. Due to the discovery that they are able to destroy stratospheric ozone, a global effort to halt their production was undertaken and was extremely successful, so much so that levels of the major CFCs are now remaining steady or declining. However, their long atmospheric lifetimes mean that some of CFCs will remain in the atmosphere for over 100 years. (Urban Crossroads, 2023d, Table 2-1)

In confined indoor locations, working with CFC-113 or other CFCs is thought to result in death by cardiac arrhythmia (heart frequency too high or too low) or asphyxiation. (Urban Crossroads, 2023d, Table 2-1)

Hydrofluorocarbons (HFCs)

Hydrofluorocarbons (HFCs) are synthetic, man-made chemicals that are used as a substitute for CFCs. Out of all the GHGs, they are one of three groups with the highest global warming potential (GWP, described below). The HFCs with the largest measured atmospheric abundances are (in order), fluoroform (CHF₃), 1,1,1,2-tetrafluoroethane (CH₂FCF), and 1,1-difluoroethane (CH₃CF₂). Prior to 1990, the only significant emissions were of CHF₃. CH₂FCF emissions are increasing due to its use as a refrigerant. HFCs are man-made for applications such as automobile air conditioners and refrigerants. No health effects are known to result from exposure to HFCs. (Urban Crossroads, 2023d, Table 2-1)

Perfluorocarbons (PFCs)

Perfluorocarbons (PFCs) have stable molecular structures and do not break down through chemical processes in the lower atmosphere. High-energy ultraviolet rays, which occur about 60 kilometers above Earth's surface, are able to destroy the compounds. Because of this, PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane (CF₄) and hexafluoroethane (C₂F₆). The United States Environmental Protection Agency (EPA) estimates that concentrations of CF₄ in the atmosphere are over 70 parts per trillion (ppt). The two main sources of PFCs are primary aluminum production and semiconductor manufacture. No health effects are known to result from exposure to PFCs. (Urban Crossroads, 2023d, Table 2-1)

$\Box \qquad \underline{Sulfur Hexafluoride (SF_6)}$

Sulfur Hexafluoride (SF₆) is an inorganic, odorless, colorless, nontoxic, nonflammable gas. It also has the highest GWP of any gas evaluated (23,900). The EPA indicates that concentrations in the 1990s were about 4 ppt. SF₆ is used for insulation in electric power transmission and distribution equipment, in the magnesium



industry, in semiconductor manufacturing, and as a tracer gas for leak detection. In high concentrations in confined areas, the gas presents the hazard of suffocation because it displaces the oxygen needed for breathing. (Urban Crossroads, 2023d, Table 2-1)

Nitrogen Trifluoride (NF₃)

Nitrogen Trifluoride (NF₃) is a colorless gas with a distinctly moldy odor. The World Resources Institute (WRI) indicates that NF₃ has a 100-year GWP of 17,200. NF₃ is used in industrial processes and is produced in the manufacturing of semiconductors, Liquid Crystal Display (LCD) panels, types of solar panels, and chemical lasers. Long-term or repeated exposure may affect the liver and kidneys and may cause fluorosis. (Urban Crossroads, 2023d, Table 2-1)

2. Potential Global Warming Effects

The potential health effects related directly to the emissions of CO₂, CH₄, and N₂O as they relate to development projects are still being debated in the scientific community. Their cumulative effects to GCC have the potential to cause adverse effects to human health. Increases in Earth's ambient temperatures would result in more intense heat waves, causing more heat-related deaths. Scientists also purport that higher ambient temperatures would increase disease survival rates and result in more widespread disease. Climate change will likely cause shifts in weather patterns, potentially resulting in devastating droughts and food shortages in some areas. Figure 4.8-1, *Global Warming Potential and Atmospheric Lifetime of Select GHGs*, presents the potential impacts of global warming. (Urban Crossroads, 2023d, p. 26)



Figure 4.8-1 Global Warming Potential and Atmospheric Lifetime of Select GHGs

⁽Urban Crossroads, 2023d, Exhibit 2-A)



3. Global Warming Potential (GWP)

GHGs have varying GWP values. GWP of a GHG indicates the amount of warming a gas causes over a given period of time and represents the potential of a gas to trap heat in the atmosphere. CO_2 is utilized as the reference gas for GWP, and thus has a GWP value of 1. CO_2 equivalent (CO_2e) is a term used for describing the difference between GHGs in a common unit. CO_2e signifies the amount of CO_2 which would have the equivalent GWP. (Urban Crossroads, 2023d, p. 27)

The atmospheric lifetime and GWP of selected GHGs are summarized at Table 4.8-1, *Global Warming Potential and Atmospheric Lifetime of Select GHGs*. As shown in Table 4.8-1, GWP for the Second Assessment report, the Intergovernmental Panel on Climate Change (IPCC)'s scientific and socio-economic assessment on climate change, range from 1 for CO_2 to 23,900 for SF₆ and GWP for the IPCC's 6th Assessment Report range from 1 for CO_2 to 25,200 for SF₆. (Urban Crossroads, 2023d, p. 27)

Gar	Atmospheric Lifetime	GWP (100-year time horizon)		
Gas	(years)	2 nd Assessment Report	6 th Assessment Report	
CO ₂	Multiple	1	1	
CH ₄	11.8	21	28	
N ₂ O	109	310	273	
HFC-23	228	11,700	14,600	
HFC-134a	14	1,300	1,526	
HFC-152a	1.6	140	164	
SF ₆	3,200	23,900	25,200	

 Table 4.8-1
 Global Warming Potential and Atmospheric Lifetime of Select GHGs

Source: IPCC Second Assessment Report, 1995 and IPCC Sixth Assessment Report, 2022 (Urban Crossroads, 2023d, Table 2-2)

C. <u>GHG Emission Inventories</u>

1. Global

Worldwide anthropogenic GHG emissions are tracked by the IPCC for industrialized nations (referred to as Annex I) and developing nations (referred to as Non-Annex I). Human GHG emissions data for Annex I nations are available through 2020. Based on the latest available data, the sum of these emissions totaled 28,026,643 gigagram (Gg) CO₂e¹ as summarized in Table 4.8-2, *Top GHG Producing Countries and the European Union*. (Urban Crossroads, 2023d, p. 27)

¹ The global emissions are the sum of Annex I and non-Annex I countries, without counting Land-Use, Land-Use Change and Forestry (LULUCF). For countries without 2020 data, the United Nations' Framework Convention on Climate Change (UNFCCC) data for the most recent year were used. The most recent GHG emissions for China and India are from 2014 and 2016, respectively.



Emitting Countries	GHG Emissions (Gg CO ₂ e)		
China	12,300,200		
United States	5,981,354		
European Union (27-member countries)	3,706,110		
India	2,839,420		
Russian Federation	2,051,437		
Japan	1,148,122		
Total	28,026,643		

 Table 4.8-2
 Top GHG Producing Countries and the European Union

(Urban Crossroads, 2023d, Table 2-3)

2. United States

As noted in Table 4.8-2, the United States, as a single country, was the number two producer of GHG emissions in 2020. (Urban Crossroads, 2023d, p. 25)

3. State of California

California has significantly slowed the rate of growth of GHG emissions due to the implementation of energy efficiency programs as well as adoption of strict emission controls, but is still a substantial contributor to the United States emissions inventory total. The California Air Resource Board (CARB) compiles GHG inventories for the State of California. Based upon the 2022 GHG inventory data (i.e., the latest year for which data are available) for the 2000-2020 GHG emissions period, California emitted an average 369.2 million metric tons of CO₂e per year (MMTCO₂e/yr) or 369,200 Gg CO₂e (6.17% of the total United States GHG emissions) (Urban Crossroads, 2023d, p. 25)

D. <u>Effects of Climate Change in California</u>

1. Public Heath

Higher temperatures may increase the frequency, duration, and intensity of conditions conducive to air pollution formation. For example, days with weather conducive to ozone formation could increase from 25 to 35% under the lower warming range to 75 to 85% under the medium warming range. In addition, if global background ozone levels increase as predicted in some scenarios, it may become impossible to meet local air quality standards. Air quality could be further compromised by increases in wildfires, which emit fine particulate matter that can travel long distances, depending on wind conditions. The Climate Scenarios report indicates that large wildfires could become up to 55% more frequent if GHG emissions are not significantly reduced. (Urban Crossroads, 2023d, p. 28)

In addition, under the higher warming range scenario, there could be up to 100 more days per year with temperatures above 90°F in Los Angeles and 95°F in Sacramento by 2100. This is a significant increase over historical patterns and approximately twice the increase projected if temperatures remain within or below the



lower warming range. Rising temperatures could increase the risk of death from dehydration, heat stroke/exhaustion, heart attack, stroke, and respiratory distress caused by extreme heat. (Urban Crossroads, 2023d, pp. 28-29)

2. Water Resources

A vast network of man-made reservoirs and aqueducts captures and transports water throughout the State from northern California rivers and the Colorado River. The current distribution system relies on Sierra Nevada snowpack to supply water during the dry spring and summer months. Rising temperatures, potentially compounded by decreases in precipitation, could severely reduce spring snowpack, increasing the risk of summer water shortages. (Urban Crossroads, 2023d, p. 29)

If temperatures continue to increase, more precipitation could fall as rain instead of snow, and the snow that does fall could melt earlier, reducing the Sierra Nevada spring snowpack by as much as 70 to 90%. Under the lower warming range scenario, snowpack losses could be only half as large as those possible if temperatures were to rise to the higher warming range. How much snowpack could be lost depends in part on future precipitation patterns, the projections for which remain uncertain. However, even under the wetter climate projections, the loss of snowpack could pose challenges to water managers and hamper hydropower generation. It could also adversely affect winter tourism. Under the lower warming range, the ski season at lower elevations could be reduced by as much as a month. If temperatures reach the higher warming range and precipitation declines, there might be many years with insufficient snow for skiing and snowboarding. (Urban Crossroads, 2023d, p. 29)

The State's water supplies are also at risk from rising sea levels. An influx of saltwater could degrade California's estuaries, wetlands, and groundwater aquifers. Saltwater intrusion caused by rising sea levels is a major threat to the quality and reliability of water within the southern edge of the Sacramento/San Joaquin River Delta, a major fresh water supply. (Urban Crossroads, 2023d, p. 29)

3. Agriculture

Increased temperatures could cause widespread changes to the agriculture industry reducing the quantity and quality of agricultural products statewide. First, California farmers could possibly lose as much as 25% of the water supply needed. Although higher CO₂ levels can stimulate plant production and increase plant water-use efficiency, California's farmers could face greater water demand for crops and a less reliable water supply as temperatures rise. Crop growth and development could change, as could the intensity and frequency of pest and disease outbreaks. Rising temperatures could aggravate ozone pollution, which makes plants more susceptible to disease and pests and interferes with plant growth. (Urban Crossroads, 2023d, p. 29)

Plant growth tends to be slow at low temperatures, increasing with rising temperatures up to a threshold. However, faster growth can result in less-than-optimal development for many crops, so rising temperatures could worsen the quantity and quality of yield for a number of California's agricultural products. Products likely to be most affected include wine grapes, fruits, and nuts. (Urban Crossroads, 2023d, p. 29)



In addition, continued GCC could shift the ranges of existing invasive plants and weeds and alter competition patterns with native plants. Range expansion could occur in many species while range contractions may be less likely in rapidly evolving species with significant populations already established. Should range contractions occur, new or different weed species could fill the emerging gaps. Continued GCC could alter the abundance and types of many pests, lengthen pests' breeding season, and increase pathogen growth rates. (Urban Crossroads, 2023d, p. 30)

4. Forests and Landscapes

GCC has the potential to intensify the current threat to forests and landscapes by increasing the risk of wildfire and altering the distribution and character of natural vegetation. If temperatures rise into the medium warming range, the risk of large wildfires in California could increase by as much as 55%, which is almost twice the increase expected if temperatures stay in the lower warming range. However, since wildfire risk is determined by a combination of factors, including precipitation, winds, temperature, and landscape and vegetation conditions, future risks will not be uniform throughout the State. In contrast, wildfires in northern California could increase by up to 90% due to decreased precipitation. (Urban Crossroads, 2023d, p. 30)

Moreover, continued GCC has the potential to alter natural ecosystems and biological diversity within the State. For example, alpine and subalpine ecosystems could decline by as much as 60 to 80% by the end of the century as a result of increasing temperatures. The productivity of the State's forests has the potential to decrease as a result of GCC. (Urban Crossroads, 2023d, p. 30)

5. Rising Sea Levels

Rising sea levels, more intense coastal storms, and warmer water temperatures could increasingly threaten the state's coastal regions. Under the higher warming range scenario, sea level is anticipated to rise 22 to 35 inches by 2100. Elevations of this magnitude would inundate low-lying coastal areas with saltwater, accelerate coastal erosion, threaten vital levees and inland water systems, and disrupt wetlands and natural habitats. Under the lower warming range scenario, sea level could rise 12-14 inches. (Urban Crossroads, 2023d, p. 30)

E. <u>Existing Project Site GHG Emissions</u>

The southern portion of the Project site is currently occupied by residential uses. Existing emissions were calculated utilizing CalEEMod version 2022.1. The emissions calculated are based on the existing trips as well as model defaults for area and energy sources. GHG emissions from existing development are summarized in Table 4.8-3, *Emissions from Existing Development*. As shown, GHG emissions from the sum of all sources of the existing development are approximately 54.77 MTCO₂e/yr. (Urban Crossroads, 2023d, p. 55)

4.8.2 APPLICABLE REGULATORY REQUIREMENTS

The following is a brief description of the international, federal, State, and local environmental laws and related regulations related to GHG emissions.



Emission Source	Emissions (MT/yr)				
Emission Source	CO ₂	CH₄	N ₂ O	Refrigerants	Total CO ₂ e
Mobile Source	41.20	<0.005	<0.005	0.07	41.90
Area Source	0.98	<0.005	<0.005	0.00	1.01
Energy Source	10.10	< 0.005	< 0.005	0.00	10.10
Water Usage	0.74	<0.005	< 0.005	0.00	0.87
Waste	0.25	0.03	0.00	0.00	0.88
Refrigerants	0.00	0.00	0.00	0.01	0.01
Total CO ₂ e (All Sources)			54.77		

 Table 4.8-3
 Emissions from Existing Development

Source: CalEEMod output, See Appendix 3.1 to the Project's GHGA (*Technical Appendix G*) for detailed model outputs. (Urban Crossroads, 2023d, Table 3-1)

A. <u>International Regulations</u>

1. Kyoto Protocol

The Kyoto Protocol is an international agreement linked to the United Nations Framework Convention on Climate Change, which commits its Parties by setting internationally binding emission reduction targets. Recognizing that developed countries are principally responsible for the current high levels of GHG emissions in the atmosphere as a result of more than 150 years of industrial activity, the Kyoto Protocol places a heavier burden on developed nations under the principle of "common but differentiated responsibilities." (UNFCCC, n.d.)

The Kyoto Protocol was adopted in Kyoto, Japan, on December 11, 1997, and entered into force on February 16, 2005. The detailed rules for the implementation of the Protocol were adopted at Conference of the Parties (COP) 7 in Marrakesh, Morocco, in 2001, and are referred to as the "Marrakesh Accords." Its first commitment period started in 2008 and ended in 2012. (UNFCCC, n.d.)

On December 8, 2012, in Doha, Qatar, the "Doha Amendment to the Kyoto Protocol" was adopted. The amendment includes:

- New commitments for Annex I Parties to the Kyoto Protocol who agreed to take on commitments in a second commitment period from January 1, 2013 to December 31, 2020;
- A revised list of GHGs to be reported on by Parties in the second commitment period; and
- Amendments to several articles of the Kyoto Protocol which specifically referenced issues pertaining to the first commitment period and which needed to be updated for the second commitment period. (UNFCCC, n.d.)



On December 21, 2012, the amendment was circulated by the Secretary-General of the United Nations, acting in his capacity as Depositary, to all Parties to the Kyoto Protocol in accordance with Articles 20 and 21 of the Protocol. (UNFCCC, n.d.)

During the first commitment period, 37 industrialized countries and the European Community committed to reduce GHG emissions to an average of five percent against 1990 levels. During the second commitment period, Parties committed to reduce GHG emissions by at least 18 percent below 1990 levels in the eight-year period from 2013 to 2020; however, the composition of Parties in the second commitment period is different from the first. (UNFCCC, n.d.)

2. The Paris Agreement

The Paris Agreement builds upon the Convention and – for the first time – brings all nations into a common cause to undertake ambitious efforts to combat climate change and adapt to its effects, with enhanced support to assist developing countries to do so. The Paris Agreement's central aim is to strengthen the global response to the threat of climate change by keeping a global temperature rise this century well below 2 degrees Celsius above pre-industrial levels and to pursue efforts to limit the temperature increase even further to 1.5 degrees Celsius. Additionally, the agreement aims to strengthen the ability of countries to deal with the impacts of climate change. The Paris Agreement requires all Parties to put forward their best efforts through "nationally determined contributions" (NDCs) and to strengthen these efforts in the years ahead. This includes requirements that all Parties report regularly on their emissions and on their implementation efforts. The Paris Agreement entered into force on November 4, 2016, thirty days after the date on which at least 55 Parties to the Convention accounting in total for at least an estimated 55% of the total global greenhouse gas emissions have deposited their instruments of ratification, acceptance, approval, or accession with the Depositary. (UNFCCC, n.d.)

On June 1, 2017, President Donald Trump announced he would begin the process of withdrawing the United States from the Paris Agreement. In accordance with articles within the Paris Agreement, the earliest effective date for the United States' withdrawal from the Agreement was November 4, 2020, at which time the withdraw became official. On January 20, 2021, President Biden signed the executive order for the United States to rejoin the Paris Agreement, which became official on February 19, 2021.

B. <u>Federal Regulations</u>

1. Clean Air Act

Coinciding with the 2009 meeting of international leaders in Copenhagen on December 7, 2009, the EPA issued an Endangerment Finding under § 202(a) of the Clean Air Act (CAA), opening the door to federal regulation of GHGs. The Endangerment Finding notes that GHGs threaten public health and welfare and are subject to regulation under the CAA. To date, the EPA has not promulgated regulations on GHG emissions, but it has begun to develop them. (EPA, 2022a; DOJ, 2021)

Previously the EPA had not regulated GHGs under the CAA because it asserted that the Act did not authorize it to issue mandatory regulations to address GCC and that such regulation would be unwise without an



unequivocally established causal link between GHGs and the increase in global surface air temperatures. In *Massachusetts v. Environmental Protection Agency et al.* (127 S. Ct. 1438 [2007]); however, the United States Supreme Court held that GHGs are pollutants under the CAA and directed the EPA to decide whether the gases endangered public health or welfare. The EPA had also not moved aggressively to regulate GHGs because it expected Congress to make progress on GHG legislation, primarily from the standpoint of a cap-and-trade system. However, proposals circulated in both the House of Representative and Senate have been controversial and it may be some time before the United States Congress adopts major climate change legislation. The EPA's Endangerment Finding paves the way for federal regulation of GHGs with or without Congress. (EPA, 2022a; DOJ, 2021)

C. <u>State Regulations</u>

1. Title 24 Building Energy Standards

The California Energy Commission (CEC) first adopted Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) in 1978 in response to a legislative mandate to reduce energy consumption in the state. Although not originally intended to reduce GHG emissions, increased energy efficiency, and reduced consumption of electricity, natural gas, and other fuels would result in fewer GHG emissions from residential and nonresidential buildings subject to the standard. The standards are updated periodically to allow for the consideration and inclusion of new energy efficiency technologies and methods. The latest revisions (2019 Building Energy Efficiency Standards) became effective on January 1, 2020. The 2019 Building Energy Efficiency Standards are 7 percent more efficient than the previous (2016) Building Energy Efficiency Standards for non-residential construction and 30 percent more efficient than the previous Standards for non-residential construction. (The 2016 Building Energy Efficiency Standards already were 28 percent more efficient for residential construction and 5 percent more efficient for nonresidential construction than the 2013 Building Energy Efficiency Standards they replaced.) (CEC, 2018)

Part 11 of Title 24 is referred to as the California Green Building Standards Code (CALGreen Code). The purpose of the CALGreen Code is to "improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices in the following categories: (1) Planning and design; (2) Energy efficiency; (3) Water efficiency and conservation; (4) Material conservation and resource efficiency; and (5) Environmental air quality." The CALGreen Code is not intended to substitute or be identified as meeting the certification requirements of any green building program that is not established and adopted by the California Building Standards Commission (CBSC). Unless otherwise noted in the regulation, all newly constructed buildings in California are subject of the requirements of the CALGreen Code. (CEC, 2018)

2. Assembly Bill 1493 (AB 1493)

Assembly Bill 1493 (AB 1493) required the CARB to adopt the nation's first GHG emission standards for automobiles. On September 24, 2009, the CARB adopted amendments to the "Pavley" regulations that reduce GHG emissions in new passenger vehicles from model year 2009 through 2016. These amendments were part of California's commitment toward a nationwide program to reduce new passenger vehicle GHGs from 2012



through 2016. The CARB's September amendments cement California's enforcement of the Pavley rule starting in 2009 while providing vehicle manufacturers with new compliance flexibility. The amendments also prepare California to harmonize its rules with the federal rules for passenger vehicles. (CARB, n.d.)

The United States EPA granted California the authority to implement GHG emission reduction standards for new passenger cars, pickup trucks, and sport utility vehicles on June 30, 2009. The first California request to implement GHG standards for passenger vehicles, known as a waiver request, was made in December 2005, and was denied by the EPA in March 2008. That decision was based on a finding that California's request to reduce GHG emissions from passenger vehicles did not meet the CAA requirement of showing that the waiver was needed to meet "compelling and extraordinary conditions." (CARB, n.d.)

CARB originally approved regulations to reduce GHGs from passenger vehicles in September 2004, with the regulations to take effect in 2009. These regulations were authorized by the 2002 legislation AB 1493 (Pavley). (CARB, n.d.)

The regulations had been threatened by automaker lawsuits and were stalled by the EPA's delay in reviewing and then initially denying California's waiver request. The parties involved entered a May 19, 2009 agreement to resolve these issues. With the granting of the waiver on June 30, 2009, it is expected that the Pavley regulations reduced GHG emissions from California passenger vehicles by about 22% in 2012 and about 30% in 2016, all while improving fuel efficiency and reducing motorists' costs. (CARB, n.d.)

The CARB has adopted a new approach to passenger vehicles – cars and light trucks – by combining the control of smog-causing pollutants and GHGs into a single coordinated package of standards. The new approach also includes efforts to support and accelerate the numbers of plug-in hybrids and zero-emission vehicles in California. (CARB, n.d.)

3. Executive Order S-3-05

Executive Order S-3-05 documents GHG emission reduction goals, creates the Climate Action Team and directs the Secretary of the California Environmental Protection Agency (CalEPA) to coordinate efforts with meeting the GHG reduction targets with the heads of other State agencies. The executive order requires the Secretary to report back to the Governor and Legislature biannually: progress toward meeting the GHG goals; GHG impacts to California; and applicable Mitigation and Adaptation Plans. Executive Order S-3-05 goals for GHG emissions reductions include: reducing GHG emissions to 2000 levels by the year 2010; reducing GHG emissions to 1990 levels by the year 2020; and reducing GHG emissions to 80% below 1990 levels by 2050. (CA State Library, 2005)

4. Assembly Bill 32 (AB 32) – Global Warming Solutions Act of 2006

In September 2006, Governor Schwarzenegger signed Assembly Bill 32 (AB 32), the California Climate Solutions Act of 2006. AB 32 required California to reduce its GHG emissions to 1990 levels by 2020, which represented a reduction of approximately 15% below emissions expected under a "business as usual" (BAU) scenario. Pursuant to AB 32, the CARB must adopt regulations to achieve the maximum technologically

feasible and cost-effective GHG emission reductions. The full implementation of AB 32 was estimated to help mitigate risks associated with climate change, while improving energy efficiency, expanding the use of renewable energy resources, cleaner transportation, and reducing waste. (CARB, 2018)

AB 32 specifically required that the CARB do the following: (CARB, 2018)

- Prepare and approve a Scoping Plan for achieving the maximum technologically feasible and costeffective reductions in GHG emissions from sources or categories of sources of GHGs by 2020, and update the Scoping Plan every five years.
- Maintain and continue reductions in emissions of GHG beyond 2020.
- Identify the Statewide level of GHG emissions in 1990 to serve as the emissions limit to be achieved by 2020.
- Identify and adopt regulations for discrete early actions that could be enforceable on or before January 1, 2010.
- Adopt a regulation that establishes a system of market-based declining annual aggregate emission limits for sources or categories of sources that emit GHG emissions.
- Convene an Environmental Justice Advisory Committee to advise the Board in developing and updating the Scoping Plan and any other pertinent matter in implementing AB 32.
- Appoint an Economic and Technology Advancement Advisory Committee to provide recommendations for technologies, research, and GHG emission reduction measures.

In November 2007, the CARB completed its estimated calculations of Statewide 1990 GHG levels. Net emission 1990 levels were estimated at 427 million metric tons (MMTs) (emission sources by sector were: transportation – 35%; electricity generation – 26%; industrial – 24%; residential – 7%; agriculture – 5%; and commercial – 3%). Accordingly, 427 MMTCO₂e was established as the emissions limit for 2020. For comparison, the CARB's estimate for baseline GHG emissions was 473 MMTCO₂e for 2000 and without emissions reduction measures 2010 emissions were projected to be 532 MMTCO₂e. BAU conditions (without the reductions to be implemented by CARB regulations) for 2020 were projected to be 596 MMTCO₂e. (CARB, 2007)

AB 32 required the CARB to develop a Scoping Plan which lays out California's strategy for meeting the goals. The Scoping Plan must be updated every five years. In December 2008, CARB approved the initial Scoping Plan, which included a suite of measures to sharply cut GHG emissions. Table 4.8-3, *Scoping Plan GHG Reduction Measures Towards 2020 Target*, shows the proposed reductions from regulations and programs outlined in the Scoping Plan. While local government operations were not accounted for in achieving the Year 2020 emissions reduction, local land use changes are estimated to result in a reduction of 5 MMTCO₂e, which is approximately 3 percent of the 2020 GHG emissions reduction goal. In recognition of the critical role local governments will play in successful implementation of AB 32, the CARB is recommending GHG reduction goals of 15 percent of 2006 levels by 2020 to ensure that municipal and community-wide emissions match the State's reduction target. According to the Measure Documentation Supplement to the Scoping Plan, local government actions and targets are anticipated to reduce vehicle miles

by approximately 2 percent through land use planning, resulting in a potential GHG reduction of 2 MMTCO₂e (or approximately 1.2 percent of the GHG reduction target). (CARB, 2018)

Table 4.8-4	Scoping Plan GHG Reduction Measures Towards 2020 Targ	get
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	Reductions Counted	Percentage of		
	toward	Statewide 2020		
	2020 Target of			
Recommended Reduction Measures	169 MMT CO2e	Target		
Cap and Trade Program and Associated Measures				
California Light-Duty Vehicle GHG Standards	31.7	19%		
Energy Efficiency	26.3	16%		
Renewable Portfolio Standard (33 percent by 2020)	21.3	13%		
Low Carbon Fuel Standard	15	9%		
Regional Transportation-Related GHG Targets ¹	5	3%		
Vehicle Efficiency Measures	4.5	3%		
Goods Movement	3.7	2%		
Million Solar Roofs	2.1	1%		
Medium/Heavy Duty Vehicles	1.4	1%		
High Speed Rail	1.0	1%		
Industrial Measures	0.3	0%		
Additional Reduction Necessary to Achieve Cap	34.4	20%		
Total Cap and Trade Program Reductions	146.7	87%		
Uncapped Sources/Sectors Measures				
High Global Warming Potential Gas Measures	20.2	12%		
Sustainable Forests	5	3%		
Industrial Measures (for sources not covered under cap and	11	1%		
trade program)	1.1	170		
Recycling and Waste (landfill methane capture)	1	1%		
Total Uncapped Sources/Sectors Reductions	27.3	16%		
Total Reductions Counted toward 2020 Target	174	100%		
Other Recommended Measures – Not Counted toward 2020 Target				
State Government Operations	1.0 to 2.0	1%		
Local Government Operations	To Be Determined ²	NA		
Green Buildings	26	15%		
Recycling and Waste	9	5%		
Water Sector Measures	4.8	3%		
Methane Capture at Large Dairies	1	1%		
Total Other Recommended Measures – Not Counted toward	12.8	NA		
2020 Target	12.0			

Source: CARB. 2008, MMTons CO2e: million metric tons of CO2e

¹Reductions represent an estimate of what may be achieved from local land use changes. It is not the SB 375 regional target. ²According to the Measure Documentation Supplement to the Scoping Plan, local government actions and targets are anticipated to reduce vehicle miles by approximately 2 percent through land use planning, resulting in a potential GHG reduction of 2 million metric tons of CO2e (or approximately 1.2 percent of the GHG reduction target). However, these reductions were not included in the Scoping Plan reductions to achieve the 2020 Target



Overall, CARB determined that achieving the 1990 emission level in 2020 would require a reduction in GHG emissions of approximately 28.5 percent in the absence of new laws and regulations (referred to as "Business-As-Usual" [BAU]). The Scoping Plan evaluates opportunities for sector-specific reductions, integrates all CARB and Climate Action Team (CAT) early actions and additional GHG reduction measures, identifies additional measures to be pursued as regulations, and outlines the role of the cap-and-trade program.

When the 2020 emissions level projection also was updated to account for implemented regulatory measures, including Pavley (vehicle model-years 2009 - 2016) and the Renewable Portfolio Standard (12% - 20%), the 2020 projection in the BAU condition was reduced further to 507 metric tons of carbon dioxide equivalent (MTCO₂e). As a result, based on the updated economic and regulatory data, CARB determined that achieving the 1990 emissions level in 2020 would now only require a reduction of GHG emissions of 80 MTCO₂e, or approximately 16 percent (down from 28.5 percent), from the BAU condition.

In May 2014, the CARB approved the First Update to the Climate Change Scoping Plan (Update), which builds upon the initial Scoping Plan with new strategies and recommendations. The Update highlights California's progress toward meeting the near-term 2020 GHG emission reduction goals, highlights the latest climate change science, and provides direction on how to achieve long-term emission reduction goals described in Executive Order S-3-05. The Update recalculates 1990 GHG emissions using new global warming potentials identified in the IPCC Fourth Assessment Report released in 2007. Using those GWPs, the 427 MTCO₂e 1990 emissions level and 2020 GHG emissions level projection identified in the 2011 Final Supplement and the updated 1990 emissions levels identified in the discussion draft of the First Update, it was estimated that achieving the 1990 emissions level in 2020 would require a reduction of 78 MTCO₂e (down from 509 MTCO₂e), or approximately 15.3 percent (down from 28.5 percent), from the BAU condition. (CARB, 2018; CARB, n.d.)

In November 2017, CARB released the Final 2017 Scoping Plan Update, which identifies the State's post-2020 reduction strategy. The Final 2017 Scoping Plan Update reflects the 2030 target of a 40% reduction below 1990 levels, set by Executive Order B-30-15 and codified by SB 32. Key programs that the proposed Second Update builds upon include the Cap-and-Trade Regulation, the Low Carbon Fuel Standard (LCFS), and much cleaner cars, trucks, and freight movement, utilizing cleaner, renewable energy, and strategies to reduce CH₄ emissions from agricultural and other wastes. The Final 2017 Scoping Plan Update establishes a new emissions limit of 260 MMTCO₂e for the year 2030, which corresponds to a 40% decrease in 1990 levels by 2030. (Urban Crossroads, 2023d, p. 40)

On December 15, 2022, CARB adopted the 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan). The 2022 Scoping Plan builds on the 2017 Scoping Plan as well as the requirements set forth by AB 1279, which directs the state to become carbon neutral no later than 2045. To achieve this statutory objective, the 2022 Scoping Plan lays out how California can reduce GHG emissions by 85% below 1990 levels and achieve carbon neutrality by 2045. The Scoping Plan scenario to do this is to "deploy a broad portfolio of existing and emerging fossil fuel alternatives and clean technologies, and align with statutes, Executive Orders, Board direction, and direction from the governor." The 2022 Scoping Plan sets one of the most aggressive



approaches to reach carbon neutrality in the world. Unlike the 2017 Scoping Plan, CARB no longer includes a numeric per capita threshold and instead advocates for compliance with a local GHG reduction strategy (CAP) consistent with CEQA Guidelines section 15183.5. (Urban Crossroads, 2023d, pp. 41-42)

Included in the 2022 Scoping Plan is a set of Local Actions (Appendix D to the 2022 Scoping Plan) aimed at providing local jurisdictions with tools to reduce GHGs and assist the state in meeting the ambitious targets set forth in the 2022 Scoping Plan. Appendix D to the 2022 Scoping Plan includes a section on evaluating plan-level and project-level alignment with the State's Climate Goals in CEQA GHG analyses. In this section, CARB identifies several recommendations and strategies that should be considered for new development in order to determine consistency with the 2022 Scoping Plan. Notably, this section is focused on Residential and Mixed-Use Projects, in fact CARB states in Appendix D (page 4): "…focuses primarily on climate action plans (CAPs) and local authority over new residential development. It does not address other land use types (e.g., industrial) or air permitting." (Urban Crossroads, 2023d, p. 43)

Additionally on Page 21 in Appendix D, CARB states: "The recommendations outlined in this section apply only to residential and mixed-use development project types. California currently faces both a housing crisis and a climate crisis, which necessitates prioritizing recommendations for residential projects to address the housing crisis in a manner that simultaneously supports the State's GHG and regional air quality goals. CARB plans to continue to explore new approaches for other land use types in the future." As such, it would be inappropriate to apply the requirements contained in Appendix D of the 2022 Scoping Plan to any land use types other than residential or mixed-use residential development. (Urban Crossroads, 2023d, p. 43)

5. Senate Bill 1368 (SB 1368)

In 2006, the State Legislature adopted Senate Bill 1368 (SB 1368) (Perata, Chapter 598, Statutes of 2006), which directs the California Public Utilities Commission (CPUC) to adopt a GHG emission performance standard (EPS) for the future power purchases of California utilities. SB 1368 seeks to limit carbon emissions associated with electrical energy consumed in California by forbidding procurement arrangements for energy longer than five years from resources that exceed specified emissions criteria. Accordingly, SB 1368 effectively prevents California's utilities from investing in, otherwise financially supporting, or purchasing power from new coal plants located in or out of the State. SB 1368 will lead to dramatically lower GHG emissions associated with California energy demand. (CEC, n.d.)

6. Executive Order S-01-07, Low Carbon Fuel Standard (LCFS)

Executive Order S-01-07 is effectively known as the LCFS. The Executive Order seeks to reduce the carbon intensity of California's passenger vehicle fuels by at least 10 percent by 2020. The LCFS requires fuel providers in California to ensure that the mix of fuel they sell into the California market meet, on average, a declining standard for GHG emissions measured in CO₂e grams per unit of fuel energy sold. (CA State Library, 2007)



7. Senate Bill 1078 (SB 1078)

Senate Bill 1078 (SB 1078) establishes the California Renewables Portfolio Standard Program, which requires electric utilities and other entities under the jurisdiction of the California Public Utilities Commission to meet 20% of their renewable power by December 31, 2017 for the purposes of increasing the diversity, reliability, public health, and environmental benefits of the energy mix. (CA Legislative Info, n.d.)

8. Senate Bill 107 (SB 107)

Senate Bill 107 (SB 107) directed California Public Utilities Commission's Renewable Energy Resources Program to increase the amount of renewable electricity (Renewable Portfolio Standard) generated per year, from 17% to an amount that equals at least 20% of the total electricity sold to retail customers in California per year by December 31, 2010. (CA Legislative Info, n.d.)

9. Executive Order S-14-08

On November 17, 2008, Governor Schwarzenegger signed Executive Order S-14-08, revising California's existing Renewable Portfolio Standard upward to require all retail sellers of electricity to serve 33% of their load from renewable energy sources by 2020. In order to meet this new goal, a substantial increase in the development of wind, solar, geothermal, and other "Renewable Portfolio Standard eligible" energy projects will be needed. Executive Order S-14-08 seeks to accelerate such development by streamlining the siting, permitting, and procurement processes for renewable energy generation facilities. To this end, S-14-08 issues two directives: (1) the existing Renewable Energy Transmission Initiative will identify renewable energy zones that can be developed as such with little environmental impact, and (2) the CEC and the California Department of Fish and Wildlife (CDFW) will collaborate to expedite the review, permitting, and licensing process for proposed Renewable Portfolio Standard eligible renewable energy projects. (CA State Library, 2008)

10. Senate Bill 97 (SB 97)

By enacting Senate Bill 97 (SB 97) in 2007, California's lawmakers expressly recognized the need to analyze GHGs as a part of the California Environmental Quality Act (CEQA) process. SB 97 required the Governor's Office of Planning and Research (OPR) to develop, and the Natural Resources Agency to adopt, amendments to the CEQA Guidelines addressing the analysis and mitigation of GHG emissions. Those CEQA Guidelines amendments clarified several points, including the following (CA Legislative Info, n.d.):

- Lead agencies must analyze the GHG emissions of proposed projects, and must reach a conclusion regarding the significance of those emissions. (See CEQA Guidelines § 15064.4.)
- When a project's GHG emissions may be significant, lead agencies must consider a range of potential mitigation measures to reduce those emissions. (See CEQA Guidelines § 15126.4(c).)
- Lead agencies must analyze potentially significant impacts associated with placing projects in hazardous locations, including locations potentially affected by climate change. (See CEQA Guidelines § 15126.2(a).)



- Lead agencies may significantly streamline the analysis of GHGs on a project level by using a programmatic GHG emissions reduction plan meeting certain criteria. (See CEQA Guidelines § 15183.5(b).)
- CEQA mandates analysis of a proposed project's potential energy use (including transportation-related energy), sources of energy supply, and ways to reduce energy demand, including through the use of efficient transportation alternatives. (See CEQA Guidelines, Appendix F.)

As part of the administrative rulemaking process, the Natural Resources Agency developed a Final Statement of Reasons explaining the legal and factual bases, intent, and purpose of the CEQA Guidelines amendments. The amendments to the CEQA Guidelines implementing SB 97 became effective on March 18, 2010. (CA Legislative Info, n.d.)

Of note, the new guidelines state that a lead agency shall have discretion to determine whether to use a quantitative model or methodology, or in the alternative, rely on a qualitative analysis or performance-based standards. Pursuant to CEQA Guidelines § 15064.4(a), "A lead agency shall have discretion to determine, in the context of a particular project, whether to: (1) Use a model or methodology to quantify GHGs resulting from a project, and which model or methodology to use; or (2) Rely on a qualitative analysis or performance-based standards." (CA Legislative Info, n.d.)

CEQA emphasizes that the effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impacts analysis. (See CEQA Guidelines § 15130(f)).

CEQA Guidelines § 15064.4(b) provides direction to lead agencies for assessing the significance of impacts of GHG emissions:

- 1. The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting;
- 2. Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; or
- 3. The extent to which the project complies with regulations or requirements adopted to implement a Statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. Such regulations or requirements must be adopted by the relevant public agency through a public review process and must include specific requirements that reduce or mitigate the project's incremental contribution of greenhouse gas emissions. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, an EIR must be prepared for the project.

The CEQA Guideline amendments do not identify a threshold of significance for GHG emissions, nor do they prescribe assessment methodologies or specific mitigation measures. Instead, they call for a "good-faith effort, based on available information, to describe, calculate, or estimate the amount of GHG emissions resulting from a project." The amendments encourage lead agencies to consider many factors in performing a CEQA analysis



and preserve lead agencies' discretion to make their own determinations based on substantial evidence. The amendments also encourage public agencies to make use of programmatic mitigation plans and programs from which to tier when they perform individual project analyses.

11. Senate Bill 375 (SB 375)

The Sustainable Communities and Climate Protection Act of 2008 (Sustainable Communities Act, Senate Bill 375 (SB 375), Chapter 728, Statutes of 2008) supports the State's climate action goals to reduce GHG emissions through coordinated transportation and land use planning with the goal of more sustainable communities. (CARB, n.d.)

Under the Sustainable Communities Act, the CARB sets regional targets for GHG emissions reductions from passenger vehicle use. In 2010, the CARB established these targets for 2020 and 2035 for each region covered by one of the State's metropolitan planning organizations (MPO). The CARB will periodically review and update the targets, as needed. (CARB, n.d.)

Each of California's MPOs must prepare a "sustainable communities strategy" (SCS) as an integral part of its regional transportation plan (RTP). The SCS contains land use, housing, and transportation strategies that, if implemented, would allow the region to meet its GHG emission reduction targets. Once adopted by the MPO, the RTP/SCS guides the transportation policies and investments for the region. CARB must review the adopted SCS to confirm and accept the MPO's determination that the SCS, if implemented, would meet the regional GHG targets. If the combination of measures in the SCS would not meet the regional targets, the MPO must prepare a separate "alternative planning strategy" (APS) to meet the targets. The APS is not a part of the RTP. (CARB, n.d.)

The Sustainable Communities Act also establishes incentives to encourage local governments and developers to implement the SCS or the APS. Developers can get relief from certain environmental review requirements under CEQA if their new residential and mixed-use projects are consistent with a region's SCS (or APS) that meets the targets (see Public Resources Code §§ 21155, 21155.1, 21155.2, and 21159.28.). (CARB, n.d.)

12. Executive Order B-30-15

On April 29, 2015, Governor Brown issued Executive Order B-30-15, which sets a goal to reduce GHG emissions in California to 40 percent below 1990 levels by 2030. The 2030 target serves as a benchmark goal on the way to achieving the GHG reductions goal set by former Governor Schwarzenegger via Executive Order S-3-05 (i.e., 80 percent below 1990 greenhouse gas emissions levels by 2050). (CA State Library, 2015)

13. Senate Bill 32 (SB 32)

On September 8, 2016, Governor Jerry Brown signed Senate Bill 32 (SB 32) and its companion bill, Assembly Bill 197 (AB 197). SB 32 requires the State to reduce Statewide GHG emissions to 40% below 1990 levels by 2030, a reduction target that was first introduced in Executive Order B-30-15. The new legislation builds upon the AB 32 goal of 1990 levels by 2020 and provides an intermediate goal to achieving S-3-05, which sets a Statewide greenhouse gas reduction target of 80% below 1990 levels by 2050. (CA Legislative Info, n.d.)



14. California Climate Crisis Act (AB 1279)

AB 1279, also known as the California Climate Crisis Act, declares that it is the policy of the State to achieve net zero greenhouse gas emissions as soon as possible, but no later than 2045; to achieve and maintain net negative greenhouse gas emissions thereafter; and to ensure that by 2045, Statewide anthropogenic greenhouse gas emissions are reduced to at least 85% below the 1990 levels. The bill requires the California Air Resources Board (CARB) to work with relevant State agencies to ensure that updates to the CARB Scoping Plan identify and recommend measures to achieve these policy goals and to identify and implement a variety of policies and strategies that enable carbon dioxide removal solutions and carbon capture, utilization, and storage technologies in California. AB 1279 also requires CARB to submit an annual report evaluating progress towards these policies. (CA Legislative Info, n.d.)

15. Clean Energy, Jobs, and Affordability Act of 2022 (Senate Bill 1020)

SB 1020, also known as the Clean Energy, Jobs, and Affordability Act of 2022, revised State policy to include interim targets requiring that eligible renewable energy resources and zero-carbon resources supply 90 percent of all retail sales of electricity to California end-use customers by December 31, 2035, 95 percent of all retail sales of electricity to California end-use customers by December 31, 2040, 100 percent of all retail sales of electricity to California end-use customers by December 31, 2045, and 100 percent of electricity procured to serve all state agencies by December 31, 2035. SB 1020 also requires each State agency to ensure that zero-carbon resources and eligible renewable energy resources supply 100 percent of electricity procured to serve their agency by December 31, 2035. In addition, SB 1020 requires the State Water Project (SWP) to procure eligible renewable energy and zero-carbon resources as necessary to meet the clean energy requirements specified for all State agencies. Finally, SB 1020 requires the CPUC to develop utility affordability metrics for both electricity and gas service. (CA Legislative Info, n.d.)

16. Carbon sequestration: Carbon Capture, Removal, Utilization, and Storage Program (Senate Bill 905)

SB 905 requires CARB to establish a Carbon Capture, Removal, Utilization, and Storage (CCRUS) Program and adopt regulations for a model unified permit program for the construction and operation of CCRUS projects. SB 905 is intended to accelerate the deployment of carbon management technologies and ensuring they are deployed in a safe and equitable way. SB 905 requires the CCRUS Program to ensure that carbon dioxide capture, removal, and sequestration projects include specified components including, among others, certain monitoring activities. In addition, SB 905 requires that by January 1, 2025, CARB shall adopt regulations for a unified permit application for the construction and operation of carbon dioxide capture, removal, or sequestration projects. SB 905 also requires the establishment of a centralized public database to track the deployment of carbon capture, utilization, or storage (CCUS) technologies and carbon dioxide removal (CDR) technologies. (CA Legislative Info, n.d.)



17. Assembly Bill 1757

AB 1757 directs the California Natural Resources Agency (CNRA) to determine an ambitious range of targets for natural carbon sequestration, and for nature-based climate solutions, that reduce GHG emissions for 2030, 2038, and 2045 to support State goals to achieve carbon neutrality and foster climate adaptation and resilience. Additionally, AB 1757 requires these targets to be integrated into the CARB Scoping Plan and other State policies. It also includes provisions to avoid double counting emission reductions, updates the Natural and Working Lands Climate Smart Strategy, develops GHG tracking protocols, and biennially post progress made in achieving the targets on CNRA's internet website. In addition, AB 1757 requires CARB to develop standard methods for State agencies to consistently track greenhouse gas emissions and reductions, carbon sequestration, and, where feasible, additional benefits from natural and working lands over time. (CA Legislative Info, n.d.)

D. <u>Regional Regulations</u>

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

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

SCAG's 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS), also referred to as Connect SoCal, develops long-range regional transportation plans including a sustainable communities strategy and growth forecast components, regional transportation improvement programs, regional housing needs allocations, and other plans for the region. Connect SoCal provides objectives for meeting air pollution emissions reduction targets set forth by the California Air Resources Board (CARB); these objectives were provided in direct response to SB 375 which was enacted to reduce GHGs from automobiles and light trucks through integrated transportation, land use, housing, and environmental planning.

The *Goods Movement Technical Report* of Connect SoCal recognizes that the SCAG region is the premier trade gateway for the United States. Connect SoCal acknowledges that the SCAG region has witnessed continued growth for warehousing, distribution, cold storage, and truck terminal facilities, with a majority of the growth for national and regional distribution facilities occurring in the Inland Empire. Through Connect SoCal, SCAG is working on various regional strategies to maintain the SCAG region as an important trade gateway while addressing regional transportation efficiency and environmental sustainability.

2. South Coast Air Quality Management District (SCAQMD)

To provide guidance to local lead agencies on determining significance for GHG emissions in CEQA documents, South Coast Air Quality Management District (SCAQMD) staff is convening an ongoing GHG



CEQA Significance Threshold Working Group. Members of the working group include government agencies implementing CEQA and representatives from various stakeholder groups that provide input to SCAQMD staff on developing the significance thresholds. On October 8, 2008, the SCAQMD released the Draft AQMD Staff CEQA GHG Significance Thresholds. These thresholds have not been finalized and continue to be developed through the working group.

The Draft AQMD Staff CEQA GHG Significance Thresholds guidance document, which builds on the previous guidance prepared by the California Air Pollution Control Officers Association (CAPCOA), explored various approaches for establishing a significance threshold for GHG emissions and was described as a "work in progress" of efforts to date. However, the draft interim CEQA thresholds guidance document was not adopted or approved by the Governing Board. In December 2008, the SCAQMD adopted an interim 10,000 metric tons of CO₂e per year (MTCO₂e/yr) screening level threshold for stationary source/industrial projects for which the SCAQMD is the lead agency. From December 2008 to September 2010, SCAQMD hosted working group meetings and revised the draft threshold proposal several times, although it did not officially provide these proposals in a subsequent document. SCAQMD has continued to consider adoption of significance thresholds for residential and general land use development projects. The most recent proposal, issued in September 2010, used the following tiered approach to evaluate potential GHG impacts from various uses:

- Tier 1: Determine if CEQA categorical exemptions are applicable. If not, move to Tier 2.
- Tier 2: Consider whether or not the proposed project is consistent with a locally-adopted GHG reduction plan that has gone through public hearing and CEQA review, that has an approved inventory, includes monitoring, etc. If not, move to Tier 3.
- Tier 3: Consider whether the project generates GHG emissions in excess of screening thresholds for individual land uses. The 10,000 MTCO₂e/yr threshold for industrial uses would be recommended for use by all lead agencies. Under option 1, separate screening thresholds are proposed for residential projects (3,500 MTCO₂e/yr), commercial projects (1,400 MTCO₂e/yr), and mixed-use projects (3,000 MTCO₂e/yr). Under option 2, a single numerical screening threshold of 3,000 MTCO₂e/yr would be used for all non-industrial projects. If the project generates emissions in excess of the applicable screening threshold, move to Tier 4.
- Tier 4: Consider whether the project generates GHG emissions in excess of applicable performance standards for the project service population (population plus employment). The efficiency targets were established based on the goal of AB 32 to reduce Statewide GHG emissions to 1990 levels by 2020. The 2020 efficiency targets are 4.8 MTCO₂e/yr per service population for project level analyses and 6.6 MTCO₂e/yr per service population for plan level analyses. If the project generates emissions in excess of the applicable efficiency targets, move to Tier 5.
- Tier 5: Consider the implementation of CEQA mitigation (including the purchase of GHG offsets) to reduce the project efficiency target to Tier 4 levels.



The SCAQMD has not announced when staff is expecting to present a finalized version of its GHG thresholds to the governing board. These thresholds were developed as part of the SCAQMD GHG CEQA Significance Threshold Working Group. This working group was formed to assist SCAQMD's efforts to develop a GHG significance threshold and is composed of a wide variety of stakeholders including the State OPR, CARB, the Attorney General's Office, a variety of city and county planning departments in the SCAB, various utilities such as sanitation and power companies throughout the SCAB, industry groups, and environmental and professional organizations. These thresholds were developed to be consistent with CEQA requirements for developing significance thresholds, are supported by substantial evidence, and provides guidance to CEQA practitioners with regard to determining whether GHG emissions from a proposed land use project are significant.

E. <u>Local Regulations</u>

1. Riverside County Climate Action Plan (CAP)

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

4.8.3 BASIS FOR DETERMINING SIGNIFICANCE

While estimated Project-related GHG emissions can be quantified, the direct impacts of such emissions on GCC and global warming cannot be determined on the basis of available science. There is no evidence at this time that would indicate that the emissions from a project the size of the proposed Project would directly or indirectly affect the global climate.



AB 32 states, in part, that "[g]lobal warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California." Because global warming is the result of GHG emissions, and GHGs are emitted by innumerable sources worldwide, the proposed Project would have no potential to result in a direct impact to global warming; rather, Project-related contributions to GCC, if any, only have potential significance on a cumulative basis. Therefore, the analysis below focuses on the Project's potential to contribute to GCC in a cumulatively-considerable way.

Section VIII of Appendix G to the CEQA Guidelines addresses typical adverse effects due to GHGs, and includes the following threshold questions:

- Would the project generate GHGs, either directly or indirectly, that may have a significant impact on the environment?
- Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs?

The following thresholds are derived directly from Section VIII of Appendix G to the CEQA Guidelines and the County's Environmental Assessment form, and address typical adverse effects associated with GHG emissions. The proposed Project would have a significant impact on GHG emissions if the Project or any Project-related component would:

- a. Generate GHGs, either directly or indirectly, that may have a significant impact on the environment; or
- b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

The above-listed thresholds for GHGs do not prescribe specific methodologies for performing an assessment, do not establish specific thresholds of significance, and do not mandate specific mitigation measures. Rather, the CEQA Guidelines emphasize the lead agency's discretion to determine the appropriate methodologies and thresholds of significance consistent with the manner in which other impact areas are handled in CEQA. With respect to GHG emissions, CEQA Guidelines Section 15064.4(a) states that lead agencies "shall make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate" GHG emissions resulting from a project. The CEQA Guidelines note that an agency has the discretion to either quantify a project's GHG emissions or rely on a "qualitative analysis or other performance-based standards." A lead agency may use a "model or methodology" to estimate GHG emissions and has the discretion to select the model or methodology it considers "most appropriate to enable decision makers to intelligently take into account the project's incremental contribution to climate change." Section 15064.4(b) provides that the lead agency should consider the following when determining the significance of impacts from GHG emissions on the environment:

- 1. The extent a project may increase or reduce GHG emissions as compared to the existing environmental setting.
- 2. Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
- 3. The extent to which the project complies with regulations or requirements adopted to implement a Statewide, regional, or local plan for the reduction or mitigation of GHG emissions (14 CCR 15064.4(b)).

In addition, Section 15064.7(c) of the CEQA Guidelines specifies that "[w]hen adopting or using thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence." The CEQA Guidelines also clarify that the effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis. As a note, the CEQA Guidelines were amended in response to SB 97. In particular, the CEQA Guidelines were amended to specify that compliance with a GHG emissions reduction plan renders a cumulative impact insignificant.

Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that would avoid or substantially lessen the cumulative problem within the geographic area of the project. To qualify, such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. Examples of such programs include a "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plans, [and] plans or regulations for the reduction of greenhouse gas emissions." Put another way, CEQA Guidelines Section 15064(h)(3) allows a lead agency to make a finding of less than significant for GHG emissions if a project complies with adopted programs, plans, policies, and/or other regulatory strategies to reduce GHG emissions.

The significance of the Project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b)(2) by considering whether the Project complies with applicable plans, policies, regulations, and requirements adopted to implement a Statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

The Riverside County 2019 CAP Update aims to reduce GHG emissions from development projects under County jurisdiction. The CAP Update builds on State and regional policies aimed at reducing GHG emissions consistent with the SB 32 2030 GHG reduction target and Statewide post-2030 reduction goals. The CAP Update identifies a two-step approach in evaluating GHG emissions. First, a screening threshold of 3,000 MTCO₂e/yr is used to determine if additional analysis is required. Projects that exceed 3,000 MTCO₂e/yr will be required to quantify and disclose the anticipated GHG emissions then either 1) demonstrate GHG emissions at project buildout year levels of efficiency and include project design features and/or mitigation measures to



reduce GHG emissions or 2) garner 100 points through the CAP Update Screening Tables. Projects that garner at least 100 points (equivalent to an approximate 49% reduction in GHG emissions) are determined to be consistent with the reduction quantities anticipated in the County's GHG Technical Report, and consequently would be consistent with the CAP Update. As such, projects that achieve a total of 100 points or more normally are considered to have a less-than-significant individual and cumulative impact on GHG emissions. However, and in an effort to provide a conservative evaluation of the Project's potential GHG impacts, for purposes of analysis herein, Project impacts due to GHG emissions would be cumulatively considerable if the Project's emissions exceed the 3,000 MTCO₂e/yr screening threshold identified in the CAP Update.

4.8.4 IMPACT ANALYSIS

A. <u>Greenhouse Gas Emissions Modeling</u>

In May 2022 the CAPCOA in conjunction with other California air districts, including SCAQMD, released the latest version of CalEEMod Version 2022.1. The purpose of this model is to calculate construction-source and operational-source criteria pollutants and GHG emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved from mitigation measures. Accordingly, the latest version of CalEEMod has been used for this Project to determine GHG emissions. Output from the model runs for construction and operational activity are provided in Appendices 4.1 through 4.2 of the Project's GHGA (*Technical Appendix G*). CalEEMod includes GHG emissions from the following source categories: construction, area, energy, mobile, waste, and water. (Urban Crossroads, 2023d, p. 58)

B. <u>Project Impacts due to Greenhouse Gas Emissions</u>

<u>Threshold a.</u>: Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

<u>Construction Emissions</u>

Project construction activities would generate CO₂ and CH₄ emissions. The Project's Air Quality Impact Analysis ("AQIA"; *Technical Appendix B1*) contains detailed information regarding Project construction activities. As discussed in the Project's AQIA, construction-related emissions are expected from the following construction activities: demolition; site preparation; grading; building construction; paving; and architectural coating. (Urban Crossroads, 2023d, p. 59)

The anticipated construction duration and anticipated construction equipment were previously summarized in EIR Tables 3-1 and 3-2. The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet and durations. (Urban Crossroads, 2023d, p. 59)

For construction phase Project emissions, GHGs are quantified and amortized over the life of the Project. To amortize the emissions over the life of the Project, the SCAQMD recommends calculating the total GHG emissions for the construction activities, dividing it by a 30-year Project life then adding that number to the annual operational phase GHG emissions. As such, construction emissions were amortized over a 30-year

period and added to the annual operational phase GHG emissions. The amortized construction emissions are presented in Table 4.8-5, *Project Amortized Annual Construction Emissions*. (Urban Crossroads, 2023d, p. 60)

Verr	Emissions (MT/ɣṟ)				
fear	CO2	CH₄	N ₂ O	Refrigerants	Total CO2e ⁵
2024	1,014.23	0.03	0.03	0.58	1,027.81
2025	803.66	0.02	0.03	0.61	816.05
Total GHG Emissions	1,817.89	0.05	0.06	1.19	1,843.86
Amortized Construction Emissions	60.60	1.67E-03	2.00E-03	0.04	61.46

 Table 4.8-5
 Project Amortized Annual Construction Emissions

Source: CalEEMod annual construction-source emissions are presented in Appendix 4.1.

^A CalEEMod reports the most common GHGs emitted which include CO₂, CH₄, and N₂O. These GHGs are then converted into the CO₂e by multiplying the individual GHG by the GWP.

(Urban Crossroads, 2023d, Table 4-3)

Operational Emissions

Operational activities associated with the proposed Project would result in emissions of CO₂, CH₄, and N₂O from the following primary sources: area source emissions; energy use emissions; mobile source emissions; on-site cargo handling equipment emissions; water supply, treatment, and distribution; and solid waste. Each is discussed below. (Urban Crossroads, 2023d, p. 61)

Area Source Emissions

Landscape Maintenance Equipment

Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shedders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the Project. It should be noted that as October 9, 2021, Governor Gavin Newsom signed AB 1346. The bill aims to ban the sale of new gasoline-powered equipment under 25 gross horsepower (known as small off-road engines [SOREs]) by 2024. For purposes of analysis, the emissions associated with landscape maintenance equipment were calculated based on assumptions provided in CalEEMod. (Urban Crossroads, 2023d, p. 61)

Energy Source Emissions

Combustion Emissions Associated with Natural Gas and Electricity

GHGs are emitted from buildings as result of activities for which electricity and natural gas are typically used as energy sources. Combustion of any type of fuel emits CO_2 and other GHGs directly into the atmosphere; these emissions are considered direct emissions associated with a building. The building energy use emissions



do not include street lighting². GHGs are also emitted during the generation of electricity from fossil fuels; these emissions are considered to be indirect emissions. Natural gas and electricity usage associated with the Project were calculated by CalEEMod using default parameters. (Urban Crossroads, 2023d, pp. 61-62)

Mobile Source Emissions

The Project-related operational GHG emissions derive primarily from vehicle trips generated by the Project, including employee and driver trips to and from the site and truck trips associated with the proposed uses. Trip characteristics available from the Project's Traffic Analysis ("TA"; EIR *Technical Appendix L2*) were utilized in the analysis. (Urban Crossroads, 2023d, p. 62)

Approach for Estimating Mobile Source Emissions

In order to determine emissions from passenger car vehicles, CalEEMod defaults for trip length and trip purpose were utilized. Default vehicle trip lengths for primary trips will be populated using data from the local metropolitan planning organizations/Regional Transportation Planning Agencies (MPO/RTPA). Trip type percentages and trip lengths provided by MPO/RTPAs truncate data at their demonstrative borders. For the proposed industrial uses, it is important to note that although the Project's TA does not breakdown passenger cars by type, this analysis assumes that passenger cars include Light-Duty-Auto vehicles (LDA), Light-Duty-Trucks (LDT1³ & LDT2⁴), Medium-Duty-Vehicles (MDV), and Motorcycles (MCY) vehicle types. In order to account for emissions generated by passenger cars, the fleet mix presented in Table 4-4 of the Project's GHGA (*Technical Appendix G*) was utilized in the analysis. (Urban Crossroads, 2023d, p. 62)

To determine emissions from trucks for the proposed industrial uses, the analysis incorporated SCAQMD recommended truck trip length 15.3 miles for 2-axle (LHDT1, LHDT2) trucks, 14.2 miles 3-axle (MHDT) trucks and 40 miles for 4+-axle (HHDT) trucks and weighting the average trip lengths using traffic trip percentages taken from the Project's TA. The trip length function for the high-cube fulfillment warehouse use has been calculated to 34.51 miles and an assumption of 100% primary trips. This trip length assumption is higher than the CalEEMod defaults for trucks. In order to be consistent with the Project's TA, trucks are broken down by truck type. The truck fleet mix is estimated by rationing the trip rates for each truck type based on information provided in the Project's TA. Heavy trucks are broken down by truck type (or axle type) and are categorized as either Light-Heavy-Duty Trucks (LHDT1⁵ & LHDT2⁶)/2-axle, Medium-Heavy-Duty Trucks (MHDT)/3-axle, and Heavy-Heavy-Duty Trucks (HHDT)/4+-axle. To account for emissions generated by trucks, the fleet mix presented in Table 4-5 of the Project's GHGA (*Technical Appendix G*) was utilized in the analysis. (Urban Crossroads, 2023d, pp. 62-63)

² The CalEEMod emissions inventory model does not include indirect emission related to street lighting. Indirect emissions related to street lighting are expected to be negligible and cannot be accurately quantified at this time as there is insufficient information as to the number and type of street lighting that would be installed.

³ Vehicles under the LDT1 category have a gross vehicle weight rating (GVWR) of less than 6,000 lbs. and equivalent test weight (ETW) of less than or equal to 3,750 lbs.

⁴ Vehicles under the LDT2 category have a GVWR of less than 6,000 lbs. and ETW between 3,751 lbs. and 5,750 lbs.

⁵ Vehicles under the LHDT1 category have a GVWR of 8,501 to 10,000 lbs.

⁶ Vehicles under the LHDT2 category have a GVWR of 10,001 to 14,000 lbs.



On-Site Cargo Handling Equipment Emissions

It is common for industrial buildings to require the operation of exterior cargo handling equipment in the building's truck court areas. In accordance with the County of Riverside Good Neighbor Policy for Logistics and Warehouse/Distribution uses it is assumed that all on-site cargo handling equipment would be electrically powered. (Urban Crossroads, 2023d, p. 63)

Water Supply, Treatment, and Distribution

Indirect GHG emissions result from the production of electricity used to convey, treat, and distribute water and wastewater. The amount of electricity required to convey, treat, and distribute water depends on the volume of water as well as the sources of the water. Unless otherwise noted, CalEEMod default parameters were used. (Urban Crossroads, 2023d, p. 63)

Solid Waste

Industrial land uses would result in the generation and disposal of solid waste. A percentage of this waste would be diverted from landfills by a variety of means, such as reducing the amount of waste generated, recycling, and/or composting. The remainder of the waste not diverted would be disposed of at a landfill. GHG emissions from landfills are associated with the anaerobic breakdown of material. GHG emissions associated with the disposal of solid waste associated with the proposed Project were calculated by CalEEMod using default parameters. (Urban Crossroads, 2023d, p. 63)

Emissions Summary

The annual GHG emissions associated with the operation of the proposed Project are estimated to be 5,006.24 MTCO₂e/yr as summarized in Table 4.8-6, *Project GHG Emissions*. With consideration of the existing development emissions the Project would result in a net increase of 4,951.47 MTCO₂e/yr. Detailed operation model outputs for the Project are presented in Appendix 4.2 of the Project's GHGA (*Technical Appendix G*). (Urban Crossroads, 2023d, pp. 63-64)


Emission Source	Emissions (MT/yr)					
Emission Source	CO ₂	CH₄	N2O	Refrigerants	Total CO ₂ e	
Annual construction-related emissions amortized over 30 years	60.60	1.67E-03	2.00E-03	0.04	61.46	
Mobile Source	3,450.90	0.09	0.35	4.64	3,563.30	
Area Source	12.51	0.00	0.00	0.00	12.81	
Energy Source	675.73	0.04	0.01	0.00	678.76	
Water Usage	273.49	4.46	0.11	0.00	416.58	
Waste	49.75	4.98	0.00	0.00	173.53	
Refrigerants	0.00	0.00	0.00	99.80	99.80	
Total CO₂e (All Sources)	5,006.24					
Existing	54.77					
Total Net CO₂e (All Sources)	4,951.47					

Table 4.8-6 Project GHG Emissions

Source: CalEEMod output, See Appendix 4.2 to the Project's GHGA (*Technical Appendix G*) for detailed model outputs. (Urban Crossroads, 2023d, Table 4-6)

Evaluation of Project Impacts due to GHGs

As previously indicated, Riverside County adopted CAP in December 2015, which was most recently updated in November 2019 ("CAP Update"). The purpose of the CAP Update is to provide guidance on how to analyze GHG emissions and determine significance during the CEQA review of proposed development projects within the County. To address the State's requirement to reduce GHG emissions, the County prepared its CAP Update with the goal of reducing GHG emissions within the County by 49% below "existing" 2008 levels by the 2030. The County's target is consistent with the AB 32 target and ensures that the County will be providing GHG reductions locally that will complement state efforts to reduce GHG emissions to 40% below the 1990 levels by 2030. Because the County's CAP Update addresses GHG emissions reductions and is consistent with the requirements of AB 32, SB 32, and international efforts to reduce GHG emissions, compliance with the CAP Update fulfills the description of mitigation found in the State CEQA Guidelines. (Urban Crossroads, 2023d, p. 64)

The CAP Update identifies a two-step approach in evaluating GHG emissions. First, a screening threshold of 3,000 MTCO₂e/yr is used to determine if additional analysis is required. Projects that exceed the 3,000 MTCO₂e/yr will be required to demonstrate and achieve a 25% reduction minimum of GHG emissions from a 2011-year level of efficiency compared to the mitigated Project buildout year or demonstrate at least 100 points (equivalent to an approximate 15% reduction in GHG emissions) through the CAP Screening Tables. (Urban Crossroads, 2023d, p. 65)



As shown on Table 4.8-6, the Project would result in approximately 5,006.24 MTCO₂e/yr of GHG emissions (or a net increase of 4,951.47 MTCO₂e/yr with consideration of the existing uses on the Project site). The proposed Project would exceed the County's screening threshold of 3,000 MTCO₂e/yr. Thus, the Project's cumulatively-considerable impacts due to GHG emissions would be potentially significant prior to mitigation. (Urban Crossroads, 2023d, p. 65)

<u>Threshold b.</u>: Would the Project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Pursuant to Section 15604.4 of the CEQA Guidelines, a lead agency may rely on qualitative analysis or performance-based standards to determine the significance of impacts from GHG emissions. As such, the Project's consistency with AB 32, SB 32, and the County's CAP are discussed below. It should be noted that the Project's consistency with the SB 32 (as identified through compliance with the 2022 Scoping Plan) also satisfies consistency with AB 32 since the 2022 Scoping Plan is based on the overall targets established by AB 32 and SB 32. Consistency with the 2008 Scoping Plan is not necessary, since the target year for the 2008 Scoping Plan was 2020, and the Project's buildout year is 2025. As such the 2008 Scoping Plan does not apply and consistency with the 2022 Scoping Plan is relevant. Project consistency with the 2022 Scoping Plan and County's CAP is evaluated in the following discussion.

Project Consistency with Riverside County CAP Update

The purpose of the Riverside County CAP Update is to provide guidance on how to analyze GHG emissions and determine significance during the CEQA review of proposed development projects within the County. Because the County of Riverside CAP Update addresses GHG emissions reductions and is consistent with the requirements of AB 32, SB 32, and international efforts to reduce GHG emissions, compliance with the CAP Update fulfills the description of mitigation found in the State CEQA Guidelines. (Urban Crossroads, 2023d, p. 65)

As previously shown on Table 4.8-6, the Project would result in approximately 5,006.24 MTCO₂e/yr of GHG emissions (or a net increase of 4,951.47 MTCO₂e/yr with consideration of the existing uses on the Project site). Thus, the Project would exceed the CAP screening threshold of 3,000 MTCO₂e/yr.

In order to evaluate consistency with the CAP Update, the County provided Screening Tables to aid in measuring the reduction of GHG emissions attributable to certain design and construction measures incorporated into development projects. Projects that garner at least 100 points (equivalent to an approximate 49% reduction in GHG emissions) are determined to be consistent with the reduction quantities anticipated in the County's GHG Technical Report, and consequently would be consistent with the CAP Update. Absent implementation of Screening Table Measures, the Project could be consistent with the County CAP. This is a potentially significant impact for which mitigation is required.

The CAP Update also includes measure R2-CE1, which requires on-site renewable energy production. This measure is required for any tentative tract map, plot plan, or conditional use permit that proposes to add more than 100,000 gross square feet of commercial, office, industrial, or manufacturing development. Renewable



energy production shall be onsite generation of at least 20% of energy demand for commercial, office, industrial or manufacturing development. Future implementing developments within the Project site would be subject to compliance with measure R2-CE1 as a standard condition of approval, and thus the Project would not conflict with CAP Update measure R2-CE1.

Project Consistency with 2022 Scoping Plan

The Project would not impede the State's progress towards carbon neutrality by 2045 under the 2022 Scoping Plan. The Project would be required to comply with applicable current and future regulatory requirements promulgated through the 2022 Scoping Plan. Some of the current transportation sector policies the Project would comply with (through vehicle manufacturer compliance) include: Advanced Clean Cars II, Advanced Clean Trucks, Advanced Clean Fleets, Zero Emission Forklifts, the Off-Road Zero-Emission Targeted Manufacturer rule, Clean Off-Road Fleet Recognition Program, In-use Off-Road Diesel-Fueled Fleets Regulation, Off-Road Zero-Emission Targeted Manufacturer rule, Clean Off-Road Zero-Emission Targeted Manufacturer rule, Clean Off-Road Zero-Emission Targeted Manufacturer rule, Clean Off-Road Jesel-Fueled Fleets Regulation, off-Road Zero-Emission Targeted Manufacturer rule, Clean Off-Road Jesel-Fueled Fleets Regulation, and the Low Carbon Fuel Standard. Notwithstanding, and as indicated above, the Project's level of GHG emissions would exceed the CAP Update screening threshold of 3,000 MTCO₂e/yr. As such, and in the absence of mitigation, the Project would result in a conflict with the CAP Update, and therefore would not be consistent with the GHG reduction mandates established by SB 32 and the 2022 Scoping Plan. Prior to mitigation, the Project's potential conflict with the County's CAP Update also represents a potential conflict with the 2022 Scoping Plan. This is evaluated as a potentially significant impact for which mitigation would be required. (Urban Crossroads, 2023d, p. 66)

4.8.5 CUMULATIVE IMPACT ANALYSIS

As discussed in Subsection 4.8.3, there is no evidence at this time that would indicate that the emissions from a project the size of the proposed Project would directly or indirectly affect the global climate. As such, Project impacts due to GHG emissions are inherently cumulative in nature.

As discussed under the analysis of Threshold a., the Project would result in approximately 5,006.24 MTCO₂e/yr of GHG emissions (or a net increase of 4,951.47 MTCO₂e/yr with consideration of the existing land uses on the Project site). Thus, the proposed Project would exceed the CAP Update screening threshold of 3,000 MTCO₂e per year, resulting in a cumulatively-considerable impact due to GHG emissions.

As discussed under the analysis of Threshold b., the Project has the potential to conflict with the Riverside County CAP Update and the CARB 2022 Scoping Plan. As other cumulative developments also have the potential to conflict with the CAP Update and/or 2022 Scoping Plan, the Project's impacts due to a conflict with the CAP Update and 2022 Scoping Plan would be cumulatively considerable prior to mitigation.

4.8.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

<u>Threshold a.: Significant Cumulatively-Considerable Impact</u>. The Project would emit approximately 5,006.24 MTCO₂e per year (or a net increase of 4,951.47 MTCO₂e/yr with consideration for the existing land uses at the Project site); thus, the proposed Project would exceed the County's CAP Update screening threshold of



3,000 MTCO₂e per year. Accordingly, prior to mitigation, Project-related GHG emissions would have the potential to result in a significant cumulatively-considerable impact on the environment.

<u>Threshold b.: Significant Direct and Cumulatively-Considerable Impact</u>. The Project has the potential to conflict with the Riverside County CAP Update, which also represents a potential conflict with the CARB 2022 Scoping Plan. This is considered a direct and cumulatively-considerable impact of the proposed Project.

4.8.7 COUNTY REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

Applicable County Regulations and Design Requirements

The following are regulations and design requirements that apply to the proposed Project and that reduce or preclude GHG emissions. Although compliance with mandatory regulatory requirements does not technically meet CEQA's definition for mitigation, they are specified herein as requirements for the Project.

• Pursuant to Riverside County Climate Action Plan Update Measure R2-CE1, prior to issuance of building permits, future implementing building permits that involve more than 100,000 gross square feet of commercial, office, industrial, or manufacturing development shall be required to offset the energy demand through renewable energy production. Renewable energy production shall be onsite generation of at least 20% of energy demand for commercial, office, industrial or manufacturing development.

In addition, the Project would be required to comply with all mandates imposed by the State of California and SCAQMD aimed at the reduction of GHG emissions. Those that are applicable to the Project and that would assist in the reduction of greenhouse gas emissions are listed below:

- Global Warming Solutions Act of 2006 (AB 32).
- Regional GHG Emissions Reduction Targets/Sustainable Communities Strategies (SB 375).
- Pavley Fuel Efficiency Standards (AB 1493). Establishes fuel efficiency ratings for new vehicles.
- California Green Building Standards Code (CALGreen also referred to as Title 24, Part 11 of the California Code of Regulations (CCR)). Establishes energy efficiency requirements for new construction.
- Appliance Energy Efficiency Standards (Title 20 CCR). Establishes energy efficiency requirements for appliances.
- Low Carbon Fuel Standard (LCFS). Requires carbon content of fuel sold in California to be 10% less by 2020.
- California Water Conservation in Landscaping Act of 2006 (AB 1881). Requires local agencies to adopt the Department of Water Resources updated Water Efficient Landscape Ordinance or equivalent by January 1, 2010 to ensure efficient landscapes in new development and reduced water waste in existing landscapes.
- Statewide Retail Provider Emissions Performance Standards (SB 1368). Requires energy generators to achieve performance standards for GHG emissions.

- Renewable Portfolio Standards (SB 1078). Requires electric corporations to increase the amount of energy obtained from eligible renewable energy resources to 20 percent by 2010 and 33 percent by 2020.
- California Global Warming Solutions Act of 2006 (SB 32). Requires the state to reduce Statewide GHG emissions to 40% below 1990 levels by 2030, a reduction target that was first introduced in Executive Order B-30-15.
- SCAQMD Rule 2305. The SCAQMD adopted Rule 2305, the Warehouse Indirect Source Rule, on May 7, 2021. Owners and operators associated with warehouses 100,000 s.f. or larger are required to directly reduce nitrogen oxides (NO_X) and particulate matter emissions, or to otherwise facilitate emission and exposure reductions of these pollutants in nearby communities.

Mitigation

MM 4.8-1 Prior to issuance of building permits, the Project Applicant shall demonstrate that appropriate building construction measures shall apply to achieve a minimum of 100 points per Appendix D to the Riverside County 2019 Climate Action Plan (CAP) Update. The conceptual measures anticipated for the Project are listed in Table ES-2 of the Project's Greenhouse Gas Analysis (GHGA) technical report (appended to the Project's EIR as *Technical Appendix G*). The conceptual measures may be replaced with other measures as listed in Appendix D to the 2019 Riverside County CAP Update, as long as they are replaced at the same time with other measures that in total achieve a minimum of 100 points per Appendix D to the 2019 Riverside County CAP Update. The County shall verify implementation of the identified measures prior to final building inspection.

4.8.8 SIGNIFICANCE OF IMPACTS AFTER MITIGATION

<u>Threshold a.: Less-than-Significant Impact with Mitigation Incorporated</u>. As previously stated, since the Project exceeds the 3,000 MTCO₂e threshold, the Project is required to demonstrate compliance with the County's CAP Screening Tables and achieve a minimum 100 points as identified in the CAP. Pursuant to Mitigation Measure MM 4.8-1, the Project Applicant would be required to implement Screening Tables (Appendix D to the CAP Update). With the implementation of Mitigation Measure MM 4.8-1, the Project would be consistent with the CAP Update's requirement to achieve at least 100 points and thus the Project would have a less than significant individual and cumulatively-considerable impact on GHG emissions.

<u>Threshold b.: Less-than-Significant Impact with Mitigation Incorporated</u>. Projects that garner at least 100 points through application of the CAP Update Screening Table measures are determined to be consistent with the reduction quantities anticipated in the County's GHG Technical Report, and consequently would be consistent with the CAP Update. With implementation of Mitigation Measure MM 4.8-1, the Project would be fully consistent with the 2019 CAP Update, which in turn also would ensure Project consistency with the CARB 2022 Scoping Plan. The Project would not conflict with any other applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. As such, with implementation of the required



mitigation, Project impacts due to a conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs would be reduced to less-than-significant levels.



4.9 HAZARDS AND HAZARDOUS MATERIALS

The information and analysis presented in this Subsection 4.9 is based in part on a technical study that was prepared to determine the presence or absence of hazardous materials on the Project site under existing conditions. This report is entitled, "Phase I Environmental Site Assessment, 20111 and 20117 Patterson Avenue, 23330 Walnut Street, Perris, CA 92570" (herein, "Phase I ESA"), prepared by Hazard Management Consulting (herein, "HMC"), dated February 9, 2022, and included as *Technical Appendix H* to this EIR (HMC, 2022)

4.9.1 EXISTING CONDITIONS

A. <u>Definition of Toxic Substances and Hazardous Waste</u>

For purposes of this EIR, the term "toxic substance" is defined as a substance which, because of its quantity, concentration, or physical, chemical, or infectious characteristics, may present an unreasonable risk of injury to human health or the environment. Toxic substances include chemical, biological, flammable, explosive, and radioactive substances.

"Hazardous material" is defined as a substance which, because of its quantity, concentration, or physical, chemical, or infectious characteristics, may: 1) pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, disposed of, or otherwise mismanaged; or 2) cause or contribute to an increase in mortality or an increase in irreversible or incapacitating illness.

Hazardous waste is defined in the California Code of Regulations (CCR) Title 22, Section (§) 66261.3. The defining characteristics of hazardous waste are ignitability (oxidizers, compressed gases, and extremely flammable liquids and solids), corrosivity (strong acids and bases), reactivity (explosives or generates toxic fumes when exposed to air or water), and toxicity (materials listed by the United States (U.S.) Environmental Protection Agency [EPA] as capable of inducing systemic damage to humans or animals).

Certain wastes are called "Listed Wastes" and are found in the CCR Title 22, §§ 66261.30 through 66261.35. Wastes appear on the lists because of their known hazardous nature or because the processes that generate them are known to produce hazardous wastes (which are often complex mixtures).

A Recognized Environmental Condition (REC) means the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property. The term is not intended to include de minimis conditions that generally do not present a material risk of harm to public health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies. (HMC, 2022, p. 2)

B. <u>Historical Review, Prior Investigations, Regulatory Review, and Field Reconnaissance</u>

As part of the Project's Phase I ESA (*Technical Appendix H*), HMC conducted a site walk to document the current condition of the Project site and neighboring facilities; a review of a regulatory databases; questionnaires to the current property owner; a review of historical references including aerial photographs,



city directories, Sanborn Maps and topographic maps; on-line research and file review requests concerning the Project site and suspect off-site sources at the Santa Ana Regional Water Quality Control Board (RWQCB) and Department of Toxic Substances Control (DTSC) websites; a review of records maintained by the Riverside County Department of Environmental Health (RCDEH) and/or Building and Safety Department; and a review of records maintained by the South Coast Air Quality Management District (SCAQMD). The results of the assessment are summarized below. (HMC, 2022, pp. 2-3)

1. Historical Review

Past usage of the subject Site was assessed through a review of historical aerial photographs, topographic maps, and an Environmental Data Resources, Inc. (EDR) search of city directories and prior reports. Review of the Sanborn Map collection indicates that Sanborn Maps were not produced for the Project site. (HMC, 2022, p. 5)

Aerial photographs covering the Project site were obtained from EDR. Photographs were available from the period 1938 through 2016. Copies of the aerial photographs are included in Appendix B to the Project's Phase I ESA (Technical Appendix H). Table 4.9-1, Aerial Photograph Review Results, presents the results of the aerial photograph review conducted by HMC. (HMC, 2022, p. 5)

Year	Findings
1938-53	The Project site was noted with a small area of agriculture use and the remainder was seen to be vacant land.
	The Project vicinity was noted with agricultural uses and vacant land.
1961	The Project site was observed to be entirely in use for agricultural operations. Increased agricultural uses were
	also noted in the vicinity.
1967	Two residential properties were first seen at the Project site along the southern border. Residential facilities
	were first seen north of the site.
1974-85	No significant changes to the Project site or vicinity were noted.
1989	Several vehicles were observed to be parked in the northwestern corner of the Project site. What appeared to be
	a grading project for a residential community was noted immediately west of the Project site. Increased
	residential uses were seen in the vicinity.
1990	No significant observations were made at the Project site. The previously noted land west of the site was noted
	with the construction of a residential community.
1994	No significant changes to the Project site or vicinity were noted.
1997	The Project site was mostly unseen in this aerial photograph with the exception of the eastern 500 feet of the
	Site. No significant changes to the Project site or vicinity were noted.
2002	No significant changes were noted at the Project site. The residential community immediately west of the
	Project site appeared to have completed construction.
2006	A third residential development was noted along the southern border of the Project site. No other significant
	changes to the Project site or vicinity were noted.
2009	A soil stockpile was observed in the southwestern quadrant of the Project site. No significant changes to the
	vicinity were observed.
2012-16	No significant changes to the Project site or vicinity were noted with the exception of some industrial/
	commercial activity at residential properties east of the Project site.
(HMC 202	(2, nn, 6, 7)

Table 4.9-1	Aerial Photoaraph	Review	Results
	/ what i hologiaph	NOTION.	Koudilu

(HMC, 2022, pp. 6-7)



Historical topographic maps also were reviewed as part of the Project's Phase I ESA and aided in interpreting the overall history of the Project site, though no specific observations regarding the Project site were made. (HMC, 2022, p. 7)

In summary, the Project site and vicinity were noted with vacant land and/or agricultural uses since the earliest records available. Subsequent development at the Project site included residential parcels along the southern border. A soil stockpile was first noted at the Project site in the 2009 photograph. Increasing residential development was noted over the years in the Project site vicinity as well as sparse commercial/industrial facilities. The soil stockpile at the Project site is considered an "issue of note" but does not pose a REC. (HMC, 2022, p. 9)

2. Prior Investigations

HMC previously prepared an ESA for Assessor's Parcel Number 317-210-018, dated April 5, 2021. The Project's Phase I ESA is an update to the previous report, with an expansion to include the three residential parcels along Walnut Street. No RECs were identified at this portion of the Project site. However, unidentified soil stockpiles at the Project site were considered an "issue of note" and it was recommended that they be sampled to assess if they contain hazardous materials. (HMC, 2022, p. 9)

3. Field Reconnaissance

HMC conducted a reconnaissance of the Project site and vicinity on January 25, 2022. The reconnaissance was conducted in order to identify visible evidence of RECs at the Project site and to assess possible conditions off site that may impact the Project site. (HMC, 2022, p. 9)

The Project site was seen with vacant, unpaved land and three residential properties. Several areas, most notably in the southwestern quadrant of the site, were seen with soil stockpiles that appeared to have been imported to the site. Some were observed with construction debris such as wood and concrete mixed into the soil. Just north of the residences, landscaping waste and construction debris was observed. Scattered trash and a concentrated area of illegally dumped refuse was also noted. (HMC, 2022, p. 9)

The residential properties were seen with some vehicle storage in the outdoor areas of the properties. There were no uses of concern observed at the residential properties. No RECs were noted at the Project site; however, the imported soil piles would be considered an "issue of note." (HMC, 2022, p. 9)

The residences were not entered however, given their age, it is likely that these structures contain asbestos containing materials (HMC, 2022, p. 10).

A summary of the Project site observations made by HMC is provided in Table 4.9-2, *Site Observation Summary*.

4. Regulatory Review

Regulatory agency database information was obtained from a standard radius Site Assessment (ASTM) report by EDR. The center of the search was in the approximate center of the Project site. Search distances for specific databases were one-quarter to one mile as specified in the ASTM 1527-13 standard. The database search



includes over 70 federal, State, local, and proprietary records. A complete copy of this report is included in Appendix B to the Project's Phase I ESA (*Technical Appendix H*). (HMC, 2022, p. 11)

Description and Use of	The Site contains a vacant, unpaved parcel of land as wells as three		
Site:	residential properties.		
Underground and			
Aboveground Storage	No evidence of USIS of ASIS were observed at the Site.		
Tanks:			
Hazardous Materials,			
Hazardous Wastes or	No chemical uses or hazardous wastes were seen.		
Petroleum Products:			
Drains, Drain lines and No drainage features were observed.			
Sumps:			
Pits, Ponds, Lagoons	No ponds, pits, or lagoons were observed at the Site.		
Industrial Wastewater:	Industrial wastewater was not observed to be generated at the Site.		
Stains:	No stains were seen at the Site.		
Wells:	No wells were noted at the Site.		
Transformers:	nsformers: Transformers were not observed at the Site.		
Other Features:	Soil stockpiles of what appeared to be imported soil were noted along with areas of refuse disposal and are considered an "issue of note".		

Table	4.9-2	Site Observation	Summary
	7./~~		variinary

Notes: UST = Underground Storage Tank; ASTS = Above-ground Storage Tanks. (HMC, 2022, p. 10)

The Project site was not listed on any database searched as part of the EDR Radius Report. HMC also reviewed the database report for off-site potential sources within the relevant search distance. Based on the review of the available regulatory information, the Project site is located in an area of some industrial operations. Some facilities in the Project vicinity were listed to use and store hazardous materials. Some of these facilities were noted with releases that have been remediated or potential for releases investigated in the Project vicinity. However, there was no information reviewed that provided evidence that off-site releases pose a threat to the Project site. There were no RECs identified from off-site sources. (HMC, 2022, pp. 11-13)

C. <u>Airport-Related Hazards</u>

The Project site is located approximately 2.0 miles south of the March Air Reserve Base (MARB). According to the Land Use Compatibility Plan prepared by the Riverside County Airport Land Use Commission (ALUC), the Project site is located within Compatibility Zone C2, which allows for development of uses with an average of 200 people per acre and a maximum of 500 people on any single acre, and has no open land requirements.



Highly noise-sensitive outdoor nonresidential uses and hazards to flight are prohibited within Zone C2. (ALUC, 2014, p. 9 and Map MA-1)

4.9.2 APPLICABLE REGULATORY REQUIREMENTS

The following is a brief description of the federal, State, and local environmental laws and related regulations related to hazards and hazardous materials.

A. <u>Hazardous Materials Regulations and Plans</u>

1. Federal Regulations

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and Superfund Amendments and Reauthorization Act (SARA)

The Comprehensive Environmental Response, Compensation, and Liability Act, also known as CERCLA or Superfund, provides a Federal "Superfund" to clean up uncontrolled or abandoned hazardous-waste sites as well as accidents, spills, and other emergency releases of pollutants and contaminants into the environment. Through CERCLA, the EPA was given power to seek out those parties responsible for any release and assure their cooperation in the cleanup. EPA cleans up orphan sites when potentially responsible parties cannot be identified or located, or when they fail to act. Through various enforcement tools, EPA obtains private party cleanup through orders, consent decrees, and other small party settlements. EPA also recovers costs from financially viable individuals and companies once a response action has been completed. (EPA, 2022f)

EPA is authorized to implement the Act in all 50 states and U.S. territories. Superfund site identification, monitoring, and response activities in states are coordinated through the state environmental protection or waste management agencies. (EPA, 2022f)

The Superfund Amendments and Reauthorization Act (SARA) of 1986 reauthorized CERCLA to continue cleanup activities around the country. Several site-specific amendments, definitions clarifications, and technical requirements were added to the legislation, including additional enforcement authorities. Also, Title III of SARA authorized the Emergency Planning and Community Right-to-Know Act (EPCRA). (EPA, 2022f)

<u>Resource Conservation and Recovery Act (RCRA)</u>

The Resource Conservation and Recovery Act (RCRA) gives EPA the authority to control hazardous waste from the "cradle-to-grave." This includes the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA also set forth a framework for the management of non-hazardous solid wastes. The 1986 amendments to RCRA enabled EPA to address environmental problems that could result from underground tanks storing petroleum and other hazardous substances. (EPA, 2022g)

The Federal Hazardous and Solid Waste Amendments (HSWA) are the 1984 amendments to RCRA that focused on waste minimization and phasing out land disposal of hazardous waste as well as corrective action for releases. Some of the other mandates of this law include increased enforcement authority for EPA, more stringent hazardous waste management standards, and a comprehensive underground storage tank program. (EPA, 2022g)

Hazardous Materials Transportation Act (HMTA)

The Hazardous Materials Transportation Act of 1975 (HMTA) empowered the Secretary of Transportation to designate as hazardous material any "particular quantity or form" of a material that "may pose an unreasonable risk to health and safety or property." (OSHA, n.d.)

Hazardous materials regulations are subdivided by function into four basic areas:

- Procedures and/or Policies 49 CFR Parts 101, 106, and 107
- Material Designations 49 CFR Part 172
- Packaging Requirements 49 CFR Parts 173, 178, 179, and 180
- Operational Rules 49 CFR Parts 171, 173, 174, 175, 176, and 177 (OSHA, n.d.)

The HMTA is enforced by use of compliance orders [49 U.S.C. 1808(a)], civil penalties [49 U.S.C. 1809(b)], and injunctive relief (49 U.S.C. 1810). The HMTA (§ 112, 40 U.S.C. 1811) preempts state and local governmental requirements that are inconsistent with the statute, unless that requirement affords an equal or greater level of protection to the public than the HMTA requirement. (OSHA, n.d.)

Hazardous Materials Transportation Uniform Safety Act of 1990

In 1990, Congress enacted the Hazardous Materials Transportation Uniform Safety Act (HMTUSA) to clarify the maze of conflicting state, local, and federal regulations. Like the HMTA, the HMTUSA requires the Secretary of Transportation to promulgate regulations for the safe transport of hazardous material in intrastate, interstate, and foreign commerce. The Secretary also retains authority to designate materials as hazardous when they pose unreasonable risks to health, safety, or property. (OSHA, n.d.)

The statute includes provisions to encourage uniformity among different state and local highway routing regulations, to develop criteria for the issuance of federal permits to motor carriers of hazardous materials, and to regulate the transport of radioactive materials. (OSHA, n.d.)

Occupational Safety and Health Act (OSHA)

Congress passed the Occupational and Safety Health Act (OSHA) to ensure worker and workplace safety. Their goal was to make sure employers provide their workers a place of employment free from recognized hazards to safety and health, such as exposure to toxic chemicals, excessive noise levels, mechanical dangers, heat or cold stress, or unsanitary conditions. (EPA, 2022b)

In order to establish standards for workplace health and safety, the Act also created the National Institute for Occupational Safety and Health (NIOSH) as the research institution for OSHA. OSHA is a division of the U.S. Department of Labor that oversees the administration of the Act and enforces standards in all 50 states. (EPA, 2022b)

<u>Toxic Substances Control Act</u>

The Toxic Substances Control Act (TSCA) of 1976 provides EPA with authority to require reporting, recordkeeping and testing requirements, and restrictions relating to chemical substances and/or mixtures. Certain substances are generally excluded from TSCA, including, among others, food, drugs, cosmetics, and pesticides. TSCA addresses the production, importation, use, and disposal of specific chemicals including polychlorinated biphenyls (PCBs), asbestos, radon, and lead-based paint. (EPA, 2022h)

Various sections of TSCA provide authority to:

- Require, under Section 5, pre-manufacture notification for "new chemical substances" before manufacture
- Require, under Section 4, testing of chemicals by manufacturers, importers, and processors where risks or exposures of concern are found
- Issue Significant New Use Rules (SNURs), under Section 5, when it identifies a "significant new use" that could result in exposures to, or releases of, a substance of concern.
- Maintain the TSCA Inventory, under Section 8, which contains more than 83,000 chemicals. As new chemicals are commercially manufactured or imported, they are placed on the list.
- Require those importing or exporting chemicals, under Sections 12(b) and 13, to comply with certification reporting and/or other requirements.
- Require, under Section 8, reporting and record-keeping by persons who manufacture, import, process, and/or distribute chemical substances in commerce.
- Require, under Section 8(e), that any person who manufactures (including imports), processes, or distributes in commerce a chemical substance or mixture and who obtains information which reasonably supports the conclusion that such substance or mixture presents a substantial risk of injury to health or the environment to immediately inform EPA, except where EPA has been adequately informed of such information. EPA screens all TSCA b§8(e) submissions as well as voluntary "For Your Information" (FYI) submissions. The latter are not required by law, but are submitted by industry and public interest groups for a variety of reasons. (EPA, 2022h)

2. State Regulations

<u>Cal/OSHA and the California State Plan</u>

Under an agreement with OSHA, since 1973 California has operated an occupational safety and health program in accordance with Section 18 of the federal OSHA. The State of California's Department of Industrial Relations administers the California Occupational Safety and Health Program, commonly referred to as Cal/OSHA. The State of California's Division of Occupational Safety and Health (DOSH) is the principal agency that oversees plan enforcement and consultation. In addition, the California State program has an independent Standards Board responsible for promulgating State safety and health standards, and reviewing variances. It also has an Appeals Board to adjudicate contested citations and the Division of Labor Standards Enforcement to investigate complaints of discriminatory retaliation in the workplace. (OSHA, n.d.)

Pursuant to 29 CFR 1952.172, the California State Plan applies to all public and private sector places of employment in the state, with the exception of federal employees, the United States Postal Service, private sector employers on Native American lands, maritime activities on the navigable waterways of the United States, private contractors working on land designated as exclusively under federal jurisdiction and employers that require federal security clearances. Cal/OSHA is the only agency in the state authorized to adopt, amend,



or repeal occupational safety and health standards or orders. In addition, the Standards Board maintains standards for certain things not covered by federal standards or enforcement, including elevators, aerial passenger tramways, amusement rides, pressure vessels and mine safety training. The Cal/OSHA enforcement unit conducts inspections of California workplaces in response to a report of an industrial accident, a complaint about an occupational safety and health hazard, or as part of an inspection program targeting industries with high rates of occupational hazards, fatalities, injuries, or illnesses. (OSHA, n.d.)

California Hazardous Waste Control Law

The Hazardous Waste Control Law (HWCL) (Health and Safety Code [HSC], Division 20, Chapter 6.5, § 25100, et seq.) is the primary hazardous waste statute in California. The HWCL implements RCRA as a "cradle-to-grave" waste management system in the state. It specifies that generators have the primary duty to determine whether their wastes are hazardous and to ensure its proper management. The HWCL also establishes criteria for the reuse and recycling of hazardous wastes used or reuse as raw materials. The HWCL exceeds federal requirements by mandating source reduction planning and broadening requirements for permitting facilities that treat hazardous waste. It also regulates a number of waste types and waste management activities not covered by federal law (RCRA). (CA Legislative Info, n.d.)

<u>California Code of Regulations (CCR), Titles 22 and 26</u>

A variety of California Code of Regulation (CCR) titles address regulations and requirements for generators of hazardous waste. Title 22 contains detailed compliance requirements for hazardous waste generators, transporters, and facilities for treatment, storage, and disposal. Because California is a fully-authorized state according to RCRA, most regulations (i.e., 40 CFR 260, et seq.) have been duplicated and integrated into Title 22. However, because the DTSC regulates hazardous waste more stringently than the EPA, the integration of state and federal hazardous waste regulations that make up Title 22 does not contain as many exemptions or exclusions as does 40 CFR 260. As with the HSC, Title 22 also regulates a wider range of waste types and waste management activities than does RCRA. To aid the regulated community, California has compiled hazardous materials, waste, and toxics-related regulations from CCR, Titles 3, 8, 13, 17, 19, 22, 23, 24 and 27 into one consolidated listing: CCR Title 26 (Toxics). However, the hazardous waste regulations are still commonly referred to collectively as "Title 22." (DTSC, n.d.)

Safe Drinking Water and Toxic Enforcement Act

Proposition 65, officially known as the Safe Drinking Water and Toxic Enforcement Act of 1986 (HSC, Division 20, Chapter 6.6, § 25249.5, et seq), protects the state's drinking water sources from being contaminated with chemicals known to cause cancer, birth defects, or other reproductive harm, and requires businesses to inform Californians about exposures to such chemicals. Proposition 65 requires the state to maintain and update a list of chemicals known to the state to cause cancer or reproductive toxicity. (CA Legislative Info, n.d.)

<u>California Water Code</u>

The California Water Code is the principal state law regulating water quality in California. Water quality provisions must be complied with as contained in numerous code sections including: 1) the HSC for the protection of ground and surface waters from hazardous waste and other toxic substances; 2) the Fish and



Game Code for the prevention of unauthorized diversions of any surface water and discharge of any substance that may be deleterious to fish, plant, animal, or bird life; 3) the Harbors and Navigation Code for the prevention of the unauthorized discharge of waste from vessels into surface waters; and 4) the Food and Agriculture Code for the protection of groundwater which may be used for drinking water supplies. The California Department of Fish and Wildlife (CDFW), through provisions of the Fish & Game Code (§§ 1601 - 1603) is empowered to issue agreements for any alteration of a river, stream, or lake where fish or wildlife resources may be adversely affected. CDFW regulates wetland areas only to the extent that those wetlands are part of a river, stream, or lake as defined by CDFW. (CA Legislative Info, n.d.)

Surface water quality is the responsibility of the RWQCB, water supply and wastewater treatment agencies, and city and county governments. The principal means of enforcement by the RWQCB is through the development, adoption, and issuance of water discharge permits. RWQCB basin plans establish water quality objectives that are defined as the limits or levels of water quality constituents or characteristics for the reasonable protection of beneficial uses of water. (CA Legislative Info, n.d.)

Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

California's Unified Program, overseen but the California Environmental Protection Agency (CalEPA), protect Californians from hazardous waste and hazardous materials by ensuring local regulatory agencies consistently apply statewide standards when they issue permits, conduct inspections, and engage in enforcement activities. The Unified Program is a consolidation of multiple environmental and emergency management programs, including the following:

- Aboveground Petroleum Storage Act (APSA) Program;
- Area Plans for Hazardous Materials Emergencies;
- California Accidental Release Prevention (CalARP) Program;
- Hazardous Materials Release Response Plans and Inventories (Business Plans);
- Hazardous Materials Management Plan (HMMP) and Hazardous Materials Inventory Statements (HMIS) (California Code)
- Hazardous Waste Generator and Onsite Hazardous Waste Treatment (tiered permitting) Programs; and
- Underground Storage Tank Program.

State agency partners involved in the implementation of the Unified Program are responsible for setting program element standards, working with CalEPA to ensure program consistency, and providing technical assistance to the California Unified Program Agencies (CUPAs) and Program Agencies (PAs). The state agencies involved with the Unified Program include CalEPA, DTSC, the Governor's Office of Emergency Services (Cal OES), CAL FIRE – Office of the State Fire Marshall, and the SWRCB. (CalEPA, n.d.)

Uniform Fire Code

The Uniform Fire Code, Article 80 (§ 80.103 of the Uniform Fire Code as adopted by the State Fire Marshal pursuant to HSC § 13143.9), includes specific requirements for the safe storage and handling of hazardous materials. These requirements are intended to reduce the potential for a release of hazardous materials and for mixing of incompatible chemicals, and specify the following specific design features to reduce the potential for a release of hazardous materials that could affect public health or the environment:



- Separation of incompatible materials with a noncombustible partition;
- Spill control in all storage, handling, and dispensing areas; and
- Separate secondary containment for each chemical storage system. The secondary containment must hold the entire contents of the tank, plus the volume of water needed to supply the fire suppression system for a period of 20 minutes in the event of catastrophic spill. (CCR, n.d.)

License to Transport Hazardous Materials

Caltrans regulates hazardous materials transportation on all interstate roads (California Vehicle Code, § 32000.5, et seq). Within California, the State agencies with primary responsibility for enforcing federal and State regulations and for responding to transportation emergencies are the California Highway Patrol and Caltrans. Together, federal and State agencies determine driver-training requirements, load labeling procedures, and container specifications for vehicles transporting hazardous materials. (CCR, n.d.)

California Hazardous Materials Release Response Plan and Inventory Law of 1985

The Business Plan Act requires preparation of Hazardous Materials Business Plans and disclosure of hazardous materials inventories, including an inventory of hazardous materials handled, plans showing where hazardous materials are stored, an emergency response plan, and provisions for employee training in safety and emergency response procedures for businesses that handle, store, or transport hazardous materials in amounts exceeding specified minimums (California HSC, Division 20, Chapter 6.95, Article 1). Statewide, DTSC has primary regulatory responsibility for management of hazardous materials, with delegation of authority to local jurisdictions that enter into agreements with the State. Local agencies are responsible for administering these regulations.

Several state agencies regulate the transportation and use of hazardous materials to minimize potential risks to public health and safety, including CalEPA and the California Emergency Management Agency. The California Highway Patrol and California Department of Transportation (Caltrans) enforce regulations specifically related to the transport of hazardous materials. Together, these agencies determine container types used and license hazardous waste haulers for hazardous waste transportation on public roadways. (CA Legislative Info, n.d.)

B. <u>Airport and Aircraft Hazards Regulations and Plans</u>

1. State Regulations

State Aeronautics Act

The State Aeronautics Commission Act of 1947 created the Division of Aeronautics ("Division"), and was later amended by statute to read the State Aeronautics Act (Aeronautics Act) in 1961. As a result of this legislation, the Division's first priorities are those mandated by the Aeronautics Act, then Caltrans guidance, then Division guidance as expressed through its Policy Element. As directed by the Aeronautics Act, the Division is a steward and advocate of aviation in California. To that end, its efforts are focused on activities that "protect the public interest in aeronautics and aeronautical progress." (§ 21002) (CA Legislative Info, n.d.)



The Aeronautics Act itself is divided into six chapters, the first five of which have not received significant cleanup legislation since its enabling in 1947. The first chapter begins with general provisions and definitions and explains the Legislature's intent for a State aviation program. Chapter two explains Caltrans' role in administering the Division, and explains the role of the California Transportation Commission (CTC). Chapter three includes many of the safety considerations from Federal Aviation Administration (FAA) regulations that help keep airports and the surrounding communities safe and compatible with flight operations. Chapter four deals with airport and heliport permitting, air navigation facilities, noise guidelines, funding, and importantly, the formation and authority of Airport Land Use Commissions (ALUC). Chapter five covers the investigations and hearings on matters covered in the Aeronautics Act. Finally, Chapter six introduces airport planning and specifically introduces the intent of the California Aviation System Plan (CASP) and how it can be used to support California aviation. (CA Legislative Info, n.d.)

<u>California Environmental Quality Act (CEQA)</u>

The operation of airports and aircraft is the responsibility of the FAA, but the requirement to document potential hazards related to airports and air activities when a new project is proposed is contained in CEQA, specifically PRC § 21096, which states: (CA Legislative Info, n.d.)

"(a) If a lead agency prepares an environmental impact report for a project situated within airport land use compatibility plan boundaries, or, if an airport land use compatibility plan has not been adopted, for a project within two nautical miles of a public airport or public use airport, the Airport Land Use Planning Handbook published by the Division of Aeronautics of the Department of Transportation, in compliance with section 21674.5 of the Public Utilities Code and other documents, shall be utilized as technical resources to assist in the preparation of the environmental impact report as the report relates to airport-related safety hazards and noise problems.

(b) A lead agency shall not adopt a negative declaration for a project described in subdivision (a) unless the lead agency considers whether the project will result in a safety hazard or noise problem for persons using the airport or for persons residing or working in the project area."

2. Local Regulations

<u>Riverside County Ordinance No. 615</u>

Riverside County Ordinance No. 615 (Hazardous Waste Generation, Storage, Handling and Disposal) was promulgated for the purpose of monitoring establishments where hazardous waste is generated, stored, handled, disposed, treated or recycled and to regulate the issuance of permits and the activities of establishments where hazardous waste is generated. This ordinance designates Riverside County Department of Environmental Health (RCDEH) to enforce the provisions of HSC Division 20, Chapter 6.5, § 25100, et seq., and the "Environmental Health Standards for the Management of Hazardous Waste," as specified in CCR Title 22, Division 4.5, pertaining to the generation, storage, handling, disposal, treatment and recycling of hazardous waste. (Riverside County, 2015a, p. 4.13-57)



Riverside County Ordinance No. 617

Riverside County Ordinance No. 617 (Underground Storage Tanks Containing Hazardous Substances) implements § 25280 et seq. of the California HSC to ensure that hazardous substances stored in underground tanks are done so safely and in a manner that prevents contamination. It does so by establishing appropriate construction standards for new underground storage tanks and requiring maintenance, monitoring and inspection of existing tanks. The ordinance also establishes a Local Oversight Program for "unauthorized releases of petroleum and petroleum-related materials from leaking underground tanks systems which require remedial action...to prevent long-term threats to the public health, water quality and environment." The RCDEH manages these programs. (Riverside County, 2015a, p. 4.13-57)

Riverside County Ordinance No. 651

Riverside County Ordinance No. 651 (Disclosure of Hazardous Materials and Business Emergency Plans) implements the State of California's "Hazardous Materials Release Response Plans and Inventory Law" (HSC, Chapter 6.95), to establish a system for permitting businesses handling hazardous materials. It serves to enforce minimum material standards and designates the Riverside County Community Health Agency as the agency responsible for administering and enforcing HSC Chapter 6.95. The RCDEH may require compliance with the applicable articles of the most-current Fire Codes. Pursuant to HSC § 25500, the Riverside County Board of Supervisors may also impose additional, more stringent requirements on businesses that handle hazardous materials. (Riverside County, 2015a, p. 4.13-57)

4.9.3 BASIS FOR DETERMINING SIGNIFICANCE

Section IX of Appendix G to the CEQA Guidelines addresses typical adverse effects due to hazards and hazardous materials and includes the following threshold questions to evaluate a project's impacts due to hazards and hazardous materials.

- Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
- Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?
- Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?
- Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?
- For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?
- Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

• Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Significance thresholds are set forth in Riverside County's Environmental Assessment Checklist, are derived from Section IX of Appendix G to the CEQA Guidelines, and state that the proposed Project would have a significant impact from hazards and hazardous materials if construction and/or operation of the Project would:

- a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
- b. Create a significant hazard to the public, or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;
- *c.* Impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan;
- *d. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;*
- e. Be located on a site, which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public, or the environment;
- f. Result in an inconsistency with an Airport Master Plan;
- g. Require review by the Airport Land Use Commission;
- h. For a project located within an airport land use plan or, where such a plan has not been adopted, within two (2) miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area; or
- *i.* For a project within the vicinity of a private airstrip, or heliport, would the project result in a safety hazard for people residing or working in the project area.

The significance thresholds set forth in Riverside County's Environmental Assessment Checklist, which were revised to incorporate the 2018 updates to the CEQA Guidelines, were used to evaluate the significance of the proposed Project's impacts due to hazards and hazardous materials. The issue of loss, injury, or death involving wildland fires is addressed separately in EIR Subsection 4.21, *Wildfire*.



4.9.4 IMPACT ANALYSIS

<u>Threshold a.</u> :	Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
<u>Threshold b.</u> :	Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Implementation of the Project would result in the construction and long-term operation of a 591,203 square foot (s.f.) warehouse building and associated parking areas for passenger vehicles and truck trailers. The analysis below evaluates the potential for the Project to result in a substantial hazard to people or the environment due to existing site conditions, construction activities, and long-term operation.

Impact Analysis for Existing Site Conditions

As indicated above under subsection 4.9.1, and based on the results of the Project's Phase I ESA, the Project site does not contain any evidence of RECs, Historical RECs (HRECs), or Controlled RECs (CRECs) (HMC, 2022, p. 16). As such, there are no conditions associated with the Project site's existing condition or surroundings that would create a significant hazard to the public or the environment through the routine transport, use, disposal, or accidental release of hazardous materials. Accordingly, no impact would occur associated with the Project site's existing conditions.

Impact Analysis for Demolition Activities

Two of the existing residential buildings on site were reported to have been built around 1967. The use of asbestos containing construction materials (ACCMs) (a known carcinogen) and lead-based paint (LBP) (a known toxin) were common in building construction prior to 1978.

Assuming that ACMs are present in the existing residential buildings located on the Project site, SCAQMD Rule 1403 would apply to the Project, which requires notification of the SCAQMD prior to commencing any demolition or renovation activities. Rule 1403 also sets forth specific procedures for the removal of asbestos, and requires that an on-site representative trained in the requirements of Rule 1403 be present during the stripping, removing, handling, or disturbing of ACMs. Mandatory compliance with the provisions of Rule 1403 would ensure that construction-related demolition activities do not expose construction workers or nearby sensitive receptors to significant health risks associated with ACMs. Because the Project would be required to comply with AQMD Rule 1403 during demolition activities, impacts due to potential asbestos exposure would be less than significant.

During demolition of the existing residential buildings on-site, there also is a potential to expose construction workers to health hazards associated with LBPs. Title 17, California Code of Regulations (CCR), Division 1, Chapter 8: *Accreditation, Certification and Work Practices for Lead-Based Paint and Lead Hazards*, defines and regulates lead-based paint. Any detectable amount of lead is regulated. The Project Applicant would be required to comply with Title 17, California Code of Regulations (CCR), Division 1, Chapter 8, which includes requirements such as employer provided training, air monitoring, protective clothing, respirators, and hand washing facilities. Mandatory compliance with these requirements would ensure that construction workers



and the public are not exposed to significant LBP health hazards during demolition and/or during transport of demolition waste to an appropriate disposal facility, and would ensure that impacts related to LBP remain less than significant.

As such, impacts due to hazards associated with demolition of the existing single-family homes would be less than significant.

Impact Analysis for Temporary Construction-Related Activities

Heavy equipment (e.g., dozers, excavators, tractors) would be operated on the Project site during construction of the Project. This heavy equipment likely would be fueled and maintained by petroleum-based substances such as diesel fuel, gasoline, oil, and hydraulic fluid, which are considered hazardous if improperly stored or handled. In addition, materials such as paints, adhesives, solvents, and other substances typically used in building construction would be used on the Project site during construction. Improper use, storage, or transportation of hazardous materials can result in accidental releases or spills, potentially posing health risks to workers, the public, and the environment. This is a standard risk on all construction sites, and there would be no greater risk for improper handling, transportation, or spills associated with the Project than would occur on any other similar construction site. Construction contractors would be required to comply with all applicable federal, State, and local laws and regulations regarding the transport, use, and storage of hazardous construction-related materials, including but not limited to requirements imposed by the EPA and DTSC, as well as the Santa Ana RWQCB pertaining to water quality as discussed in Subsection 4.10, *Hydrology and Water Quality*. With mandatory compliance with applicable hazardous materials regulations, the Project would not create significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials during the construction phase. Accordingly, impacts would be less than significant.

Impact Analysis for Long-Term Operation

The proposed residential dwelling units would not be associated with the transport, use, or disposal of significant quantities of hazardous materials. Household and other goods used by residential homes that contain toxic substances are usually low in concentration and small in amount; therefore, there is no significant risk to humans or the environment from the use of such household goods. Residents are required to dispose of household hazardous waste, including pesticides, batteries, old paint, solvents, used oil, antifreeze, and other chemicals, at a Household Hazardous Waste Collection Facility. Also, as of February 2006, fluorescent lamps, batteries, and mercury thermostats can no longer be disposed in the trash. Furthermore, the transport, use, and disposal of hazardous materials are fully regulated by the EPA, State, and/or the County of Riverside. With mandatory regulatory compliance, potential hazardous materials impacts associated with the Project's proposed residential uses under long-term operational conditions would be less than significant.

The future occupants of the proposed warehouse building are not yet known. However, the future occupant of the warehouse building likely would include general warehousing and/or similar uses and it is possible that hazardous materials could be used during the course of a future building user's daily operations. State and federal Community-Right-to-Know laws allow public access to information about the amounts and types of chemicals in use at local businesses. Laws also are in place that require businesses to plan and prepare for possible chemical emergencies. Any business that occupies the proposed building on the Project site and that handles hazardous materials (as defined in § 25500 of California HSC, Division 20, Chapter 6.95) would



require a permit from the RCDEH in order to register the business as a hazardous materials handler. Such businesses also are required to comply with California's Hazardous Materials Release Response Plans and Inventory Law, which requires immediate reporting to Riverside County Fire Department and the State Office of Emergency Services regarding any release or threatened release of a hazardous material, regardless of the amount handled by the business. In addition, any business handling at any one time, greater than 500 pounds of solid, 55 gallons of liquid, or 200 cubic feet of gaseous hazardous material, is required, under Assembly Bill 2185 (AB 2185), to file a Hazardous Materials Business Emergency Plan (HMBEP). A HMBEP is a written set of procedures and information created to help minimize the effects and extent of a release or threatened release of a hazardous material. The intent of the HMBEP is to satisfy federal and State Community Right-To-Know laws and to provide detailed information for use by emergency responders.

If businesses that use or store hazardous materials occupy the future building on the Project site, the business owners and operators would be required to comply with all applicable federal, State, and local regulations to ensure proper use, storage, use, emission, and disposal of hazardous substances (as described above). With mandatory regulatory compliance, the Project is not expected to pose a significant hazard to the public or the environment through the routine transport, use, storage, emission, or disposal of hazardous materials, nor would the Project increase the potential for accident conditions which could result in the release of hazardous materials into the environment. In addition, the Project would be required to comply with Riverside County Ordinance No. 651.5, which establishes specific requirements for the storage of hazardous materials and requirements for reporting and permitting the use, handling, storage, and transportation of hazardous materials.

With mandatory regulatory compliance, along with mandatory compliance with Riverside County Ordinance No. 651.5, potential hazardous materials impacts associated with long-term operation of the Project are determined to be less than significant and mitigation is not required.

<u>Threshold c.</u>: Would the Project impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan?

The Project site does not contain any emergency facilities, nor does it serve as an emergency evacuation route. Additionally, there are no emergency response plans or emergency evacuation plans in effect in the local area. During construction and long-term operation of the Project, adequate emergency access for emergency vehicles would be required to be maintained along public streets that abut the Project site. Furthermore, improvements planned as part of the Project are not anticipated to adversely affect traffic operations in the local area, including along nearby segments of Rider Street, Patterson Avenue, or Walnut Street. As part of the County's discretionary review process, Riverside County reviewed the Project's application materials to ensure that appropriate emergency ingress and egress would be available to and from the Project site and that circulation on the Project site was adequate for emergency vehicles. Accordingly, implementation of the proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan, and no impact would occur.



<u>Threshold d.</u>: Would the Project emit hazardous emissions, or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

There are no existing or planned schools within one-quarter mile of the Project site. The nearest school to the Project site is Val Verde High School, which is located approximately 0.6-mile northeast of the Project site along the eastern side of Interstate 215 (I-215). Accordingly, the Project would not emit hazardous emissions, or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, and impacts would be less than significant.

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

Based on the results of the Project's Phase I ESA (*Technical Appendix H*), the Project site is not located on any list of hazardous materials sites compiled pursuant to Government Code § 65962.5. (HMC, 2022) Accordingly, no impact would occur.

<u>Threshold f.</u>: Would the Project result in an inconsistency with an Airport Master Plan?
<u>Threshold g.</u>: Would the Project require review by the Airport Land Use Commission?
<u>Threshold h.</u>: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

The Project site is not located within the boundaries of any Airport Master Plans, and no impact due to an inconsistency with an Airport Master Plan would occur. As previously indicated, the Project site is located within the Airport Influence Area (AIA) for the MARB and is located within ALUCP Compatibility Zone C2. Because the Project site is located within the AIA for the MARB, the Project required review by the Riverside County Airport Land Use Commission (RCALUC). In accordance with the MARB ALUCP, the Riverside County ALUC reviewed the Project for consistency with the ALUCP. Based on the result of the ALUC's review, on February 9, 2023 the Project was determined to be fully consistent with the March ARB ALUCP, subject to compliance with several standard conditions of approval. As such, the Project would result in less-than-significant impacts due to a conflict with the MARB ALUCP.

<u>Threshold i.</u>: For a project within the vicinity of a private airstrip, or heliport, would the Project result in a safety hazard for people residing or working in the project area?

There are no private airport facilities or heliports within the Project vicinity. The nearest private airport is the Perris Valley Airport, located approximately 4.2 miles southeast of the Project site. However, according to the Riverside County ALUCP policy document, the Project site is not located within the AIA for the Perris Valley Airport, and also is not identified as being located within any of the Compatibility Zones for the Perris Valley Airport (ALUC, 2010). As such, the Project would not result in a safety hazard for people residing or working in the Project area associated with private airports or heliports, and no impact would occur.



4.9.5 CUMULATIVE IMPACT ANALYSIS

Because the issue of hazards and hazardous materials tends to be site-specific in nature, the cumulative study area includes existing and planned developments within a one-mile radius of the Project site. A one-mile radius is appropriate for most of the thresholds identified herein because that is the standard distance used in regulatory database searches of properties that may generate or store toxic materials. With respect to cumulatively-considerable impacts to public airport facilities, the cumulative study area would include the Project site and surroundings, as well as other properties located within the AIA for the MARB.

As discussed under the analysis of Thresholds a. and b., the Project site does not contain any RECs under existing conditions. As such, the Project would not result in any cumulatively-considerable impacts due to existing site contamination. With respect to construction activities, the Project would be subject to compliance with all applicable federal, State, and local laws and regulations regarding the transport, use, and storage of hazardous construction-related materials, including but not limited to requirements imposed by the EPA and DTSC, as well as the Santa Ana RWQCB pertaining to water quality. Other cumulative developments similarly would be subject to applicable federal, State, and local laws and regulations regarding the transport, use, and storage of hazardous construction-related materials. As such, cumulatively-considerable impacts would be less than significant. Similarly, under long-term operating conditions, future businesses on site that involve the storage or use of hazardous materials or substances would be subject to applicable federal, State, and local requirements related to hazardous materials. Other businesses within the Project's cumulative study area similarly would be required to comply with applicable federal, State, and local requirements related to hazardous materials. With mandatory regulatory compliance, along with mandatory compliance with Riverside County Ordinance No. 651.5 (or the applicable ordinances of other local agencies), potential hazardous materials impacts associated with long-term operation of the Project are determined to be less-thancumulatively considerable.

As discussed under the analysis of Threshold c., the Project site does not contain any emergency facilities nor does it serve as an emergency evacuation route. Additionally, there are no emergency response plans or emergency evacuation plans in effect in the local area, and the Project construction activities are not anticipated to adversely affect operations of existing local roadways in the area, including Rider Street, Patterson Avenue, and Walnut Street. Thus, there is no potential for the Project to contribute to any cumulative impacts associated with an adopted emergency response plan or emergency evacuation plan.

As indicated under the discussion of Threshold d., there are no existing or planned schools within one-quarter mile of the Project site. The nearest school to the Project site is Val Verde High School, which is located approximately 0.6-mile northeast of the Project site along the eastern side of I-215. As such, the Project has no potential to result in cumulatively-considerable impacts due to hazardous emissions, or due to the handling of hazardous or acutely hazardous materials, substances, or waste, within one-quarter mile of an existing or planned school.

The Project site is not located on the list of hazardous materials sites compiled pursuant to Government Code § 65962.5; therefore, the Project has no potential to contribute to substantial, cumulative effects related to the development of contaminated sites listed on regulatory databases.



The Project site is located within the Airport Influence Area (AIA) for the MARB and is located within ALUCP Compatibility Zone C2. Because the Project site is located within the AIA for the MARB, the Project required review by the Riverside County Airport Land Use Commission (RCALUC). In accordance with the MARB ALUCP, the Riverside County ALUC reviewed the Project for consistency with the ALUCP. Based on the result of the ALUC's review, on February 9, 2023 the Project was determined to be fully consistent with the MARB ALUCP, subject to compliance with several standard conditions of approval. As such, the Project would result in less-than-significant cumulatively-considerable impacts due to a conflict with the MARB ALUCP.

As indicated under the analysis of Threshold i., there are no private airport facilities or heliports within the Project vicinity, and the nearest private airport is the Perris Valley Airport, located approximately 4.2 miles southeast of the Project site. The Project site is not located within the AIA for the Perris Valley Airport. Accordingly, the Project would not result in any cumulatively-considerable impacts associated with public or private airport-related hazards.

4.9.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

<u>Thresholds a. and b.: Less-than-Significant Impact</u>. Based on the Project's Phase I ESA (*Technical Appendix H*), the Project site does not contain any RECs. Although the existing single-family residences on site may contain ACCMs and/or LBP, compliance with applicable regulations during construction would ensure that Project demolition activities do not expose nearby sensitive receptors or construction workers to significant health risks. With respect to construction activities, the Project would be subject to compliance with all applicable federal, State, and local laws and regulations regarding the transport, use, and storage of hazardous construction-related materials, including but not limited to requirements imposed by the EPA and DTSC, as well as the Santa Ana RWQCB pertaining to water quality. With mandatory compliance with applicable hazardous materials regulations, the Project would result in less-than-significant impacts due to the creation of a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials during the construction phase. Additionally, with mandatory regulatory compliance, along with mandatory compliance with Riverside County Ordinance No. 651.5, potential hazardous materials impacts associated with long-term operation of the Project are determined to be less than significant and mitigation is not required.

<u>Threshold c.: No Impact</u>. The Project site does not contain any emergency facilities nor does it serve as an emergency evacuation route. Additionally, there are no emergency response plans or emergency evacuation plans in effect in the local area. Accordingly, implementation of the proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan, and no impact would occur.

<u>Threshold d.: Less-than-Significant Impact</u>. There are no existing or planned schools within one-quarter mile of the Project site. The nearest school is the Val Verde High School, which is located approximately 0.6-mile northeast of the Project site and east of I-215. Accordingly, the Project would not emit hazardous emissions, or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, and impacts would be less than significant.



<u>Threshold e.: No Impact</u>. Based on the results of the Project's Phase I ESA (*Technical Appendix H*), the Project site is not located on any list of hazardous materials sites complied pursuant to Government Code Section 65962.5. Accordingly, no impact would occur.

<u>Thresholds f., g., and h.: Less-than-Significant Impact</u>. The Project site is located within the Airport Influence Area (AIA) for the MARB and is located within ALUCP Compatibility Zone C2. Because the Project site is located within the AIA for the MARB, the Project required review by the Riverside County Airport Land Use Commission (RCALUC). In accordance with the MARB ALUCP, the Riverside County ALUC reviewed the Project for consistency with the ALUCP. Based on the result of the ALUC's review, on February 9, 2023 the Project was determined to be fully consistent with the March ARB ALUCP, subject to compliance with several standard conditions of approval. As such, the Project would result in less-than-significant impacts due to a conflict with the MARB ALUCP.

<u>Threshold i.: No Impact</u>. There are no private airstrips in the Project vicinity. The nearest private airport facility is Perris Valley Airport, located approximately 4.2 miles southeast of the Project site. However, according to the Riverside County ALUCP policy document, the Project site is not located within the AIA for the Perris Valley Airport, and also is not identified as being located within any of the Compatibility Zones for the Perris Valley Airport (ALUC, 2010). As such, the Project would not result in a safety hazard for people residing or working in the Project area associated with private airports or heliports, and no impact would occur.

4.9.7 COUNTY REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

Applicable County Regulations and Design Requirements

The following are regulations and design requirements that apply to the proposed Project and that reduce or preclude hazards and hazardous materials impacts. Although compliance with mandatory regulatory requirements does not technically meet CEQA's definition for mitigation, they are specified herein as requirements for the Project.

- All future businesses operating on the site would be subject to compliance with Riverside County Ordinance No. 651.1, which sets forth requirements for handling hazardous materials, requires a permit for handling certain types and quantities of hazardous materials, requires businesses to report their hazardous materials inventory, identifies different classifications of hazardous materials handlers, and requires reporting of spills or releases or threatened releases of a hazardous material to the RCDEH and to the Governor's Office of Emergency Services.
- All future contracts with construction contractors shall comply with all applicable regulations and requirements promulgated by the federal OSHA.
- The Project shall comply with Title 22, Division 4.5 of the California Code of Regulations, which requires residents and employees to dispose of household hazardous waste, including pesticides, batteries, old paint, solvents, used oil, antifreeze, and other chemicals, at a Household Hazardous Waste Collection Facility.



- The Project shall comply with Title 22, Division 4.5, Chapter 11 of the California Code of Regulations which requires fluorescent lamps, batteries, and mercury thermostats be recycled or taken to a Household Hazardous Waste Collection Facility.
- Prior to the issuance of demolition permits for the existing on-site structures, the Project Applicant shall contract with a certified Asbestos Consultant to perform an asbestos survey for the existing structures on site. In the event asbestos containing materials (ACMs) are identified on site, the County of Riverside shall condition all demolition permits to comply with South Coast Air Quality Management District (SCAQMD) Rule 1403 with respect to asbestos-containing materials and the demolition contractor shall be required to comply with Rule 403. All asbestos-related work conducted during the demolition process shall be performed by a licensed Asbestos-abatement Contractor under the supervision of a certified Asbestos Consultant. Asbestos-containing construction materials (ACCMs) shall be removed and disposed of in compliance with notification and asbestos-removal procedures outlined in SCAQMD Rule 1403 to reduce asbestos-related health risks. During demolition, the demolition contractor shall maintain all records of compliance with Rule 1403, including, but not limited to, the following: evidence of notification of SCAQMD pursuant to Rule 1403; contact information for the Asbestos-abatement Contractor and Asbestos Consultant; and receipts (or other evidence) of off-site disposal of all ACCMs. These records shall be made available for County inspection upon request.
- Prior to the issuance of demolition permits for the existing on-site structures, the Project Applicant shall retain the services of a California-certified Lead Inspector/Risk Assessor to collect lead paint, dust, and/or soil samples. The samples shall be tested at a qualified facility for the presence of lead based paint (LBP). In the event that LBPs are identified, the County of Riverside shall condition all demolition permits to comply with Title 17, California Code of Regulations (CCR), Division 1, Chapter 8 (LBP Regulations), which addresses requirements for the removal of components painted with LBPs during demolition of existing structures. The demolition contractor shall be required to comply with these provisions. Notification to the California Department of Public Health (CDPH) shall be conducted through completion of an Abatement of Lead Hazards Notification, CDPH Form 8551. The removal of all LBP materials shall be conducted:
 - By a Certified Lead Supervisor or Certified Lead Works, as defined by §§ 35008 and 35009 of the LBP Regulations, respectively;
 - In accordance with the procedures specified in Chapter 12: Abatement, "Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing," U.S. Department of Housing and Urban Development, June 1995;
 - Using containment and in a manner which does not result in contamination of non-work areas with lead-contaminated dust, lead-contaminated soil, or lead-based paint debris; and
 - In accordance with an abatement plan prepared by a certified lead supervisor, certified lead project monitor, or certified lead project designer, which includes all of the requirements as specified in § 36100(4)(A) of the LBP Regulations

The Certified Lead Supervisor conducting abatement shall retain records of the notification to the CDPH, and shall retain a copy of the abatement plan on-site at all times during demolition



activities. The notification and abatement plan shall be made available to the County upon request for review. All demolition activities shall be subject to inspection by the CDPH and/or County officials to ensure compliance with the requirements of the LBP Regulations and abatement plan. Following completion of all abatement activities, a clearance inspection shall be conducted by a certified lead inspector/assessor or certified lead project monitor in accordance with §§ 36000(a) and 36000(c)(3) of Title 17, CCR, Division 1, Chapter 8. A copy of the results of the clearance inspection shall be provided to the County Planning Department upon completion of abatement and inspection activities.

- The Project shall comply with the conditions of approval imposed on the Project by the Riverside County Airport Land Use Commission (RCALUC) pursuant to their consistency determination letter dated February 9, 2023. Refer to *Technical Appendix M* to the Project's EIR for a copy the ALUC consistency determination letter. Conditions of approval imposed on the Project by the RCALUC include the following:
 - Any outdoor lighting installed shall be hooded or shielded so as to prevent either the spillage of lumens or reflection into the sky. Outdoor lighting shall be downward facing.
 - The following uses/activities are not included in the proposed Project and shall be prohibited at the 0 Project site: (a) Any use which would direct a steady light or flashing light of red, white, green, or amber colors associated with airport operations toward an aircraft engaged in an initial straight or circling climb following takeoff or toward an aircraft engaged in a straight or circling final approach toward a landing at an airport, other than a Department of Defense (DoD) or Federal Aviation Administration (FAA)-approved navigational signal light or visual approach slope indicator.; (b) Any use which would cause sunlight to be reflected towards an aircraft engaged in an initial straight climb or circling climb following takeoff or towards an aircraft engaged in a straight final approach towards a landing at an airport; (c) Any use which would generate smoke or water vapor or which would attract large concentrations of birds, or which may otherwise affect safe air navigation within the area (such uses include landscaping utilizing water features, aquaculture, production of cereal grains, sunflower, and row crops, composting operations, wastewater management facilities, artificial marshes, trash transfer stations that are open on one or more sides, recycling centers containing putrescible wastes, construction and demolition debris facilities, fly ash disposal, and incinerators.); (d) Any use which would generate electrical interference that may be detrimental to the operation of aircraft and/or aircraft instrumentation; (e) Highly noise-sensitive outdoor nonresidential uses (examples of noise-sensitive outdoor nonresidential uses that are prohibited include, but are not limited to, major spectator-oriented sports stadiums, amphitheaters, concert halls and drive-in theaters.); and (f) Other hazards to flight.
 - The following notice shall be given to all prospective purchasers of the property and tenants of the building, and shall be recorded as a deed notice:

"This property is presently located in the vicinity of an airport, within what is known as an airport influence area. For that reason, the property may be subject to some of the annoyances

or inconveniences associated with proximity to airport operations (for example: noise, vibration, or odors). Individual sensitivities to those annoyances can vary from person to person. You may wish to consider what airport annoyances, if any, are associated with the property before you complete your purchase and determine whether they are acceptable to you. See Business and Professions Code Section 11010(b)(13)(A)."

- Any proposed stormwater basins or facilities shall be designed and maintained to provide for a maximum 48-hour detention period following the design storm, and remain totally dry between rainfalls. Vegetation in and around the basins that would provide food or cover for birds would be incompatible with airport operations and shall not be utilized in project landscaping. Trees shall be spaced so as to prevent large expanses of contiguous canopy, when mature. Landscaping in and around the basin(s) shall not include trees or shrubs that produce seeds, fruits, or berries.
 - Landscaping in the detention basins, if not rip-rap, should be in accordance with the guidance provided in ALUC "LANDSCAPING NEAR AIRPORTS" brochure, and the "AIRPORTS, WILDLIFE AND STORMWATER MANAGEMENT" brochure available at <u>www.rcaluc.org</u>, which list acceptable plants from Riverside County Landscaping Guide or other alternative landscaping as may be recommended by a qualified wildlife hazard biologist.
 - A notice sign, in a form similar to that described above, shall be permanently affixed to the stormwater basin with the following language: "There is an airport nearby. This stormwater basin is designed to hold stormwater for only 48 hours and not attract birds. Proper maintenance is necessary to avoid bird strikes." The sign will also include the name, telephone number or other contact information of the person or entity responsible to monitor the stormwater basin.
- March Air Reserve Base must be notified of any land use having an electromagnetic radiation component to assess whether a potential conflict with Air Base radio communications could result. Sources of electromagnetic radiation include radio wave transmission in conjunction with remote equipment inclusive of irrigation controllers, access gates, etc.
- The Project has been evaluated to construct 591,203 square feet of manufacturing building space with mezzanines. Any increase in building area, change in use to any higher intensity use, change in building location, or modification of the tentative parcel map lot lines and areas will require an amended review to evaluate consistency with the ALUCP compatibility criteria, at the discretion of the ALUC Director.
- The Project does not propose rooftop solar panels at this time. However, if the Project were to propose solar rooftop panels in the future, the applicant/developer shall prepare a solar glare study that analyzes glare impacts, and this study shall be reviewed by the Airport Land Use Commission and March Air Reserve Base.

Mitigation

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



4.10 HYDROLOGY AND WATER QUALITY

The following analysis is based on a study entitled, "Preliminary Hydrology Calculations for Rider and Patterson Business Center," prepared by Thienes Engineering, Inc. (herein, "Thienes"), dated October 26, 2022, and included as *Technical Appendix I1* to this EIR (Thienes, 2022a)). Analysis in this Subsection 4.10 also is based in part on a Preliminary Water Quality Management Plan (P-WQMP) titled, "Project Specific Preliminary Water Quality Management Plan (P-WQMP) to this EIR (Thienes, 2022b). Refer to Section 7.0, *References*, for a complete list of these and other reference sources.

4.10.1 EXISTING CONDITIONS

A. <u>Regional Hydrology</u>

The Project site is located within the Santa Ana River Watershed, which drains a 2,840 square-mile area and is the principal surface flow water body within the region. The Santa Ana River flows over 100 miles and drains the largest coastal stream system in Southern California. It discharges into the Pacific Ocean at the City of Huntington Beach. The total stream length of the Santa Ana River and its major tributaries is about 700 miles. (SAWPA, 2019, p. 4-1) The Project site's location within the Santa Ana River Watershed is depicted on Figure 4.10-1, *Santa Ana River Watershed Map*. The Project site is located within the Perris Valley Hydrologic Subarea of the Perris Hydrologic Area of the San Jacinto Valley Hydrologic Unit (RWQCB, 2019, p. 4-33).

B. <u>Site Hydrology</u>

Under existing condition, offsite runoff enter the Project site at several locations. The largest tributary area is from offsite areas located south of Walnut Street, where approximately 29.0 acres drains to Walnut Street. There is an existing low point at Walnut Street near the southwest comer of the Project site. The 100-year peak flow rate at this location is approximately 45.8 cubic feet per second (cfs). (Thienes, 2022a)

Additional offsite areas enter the project site from three existing streets to the west. From south to north, the three streets are Sunny Canyon Street, Wildwood Lane, and Norrisgrove Drive, which terminate near the westerly Project site boundary where runoff continues to sheet flow into the Project site. The respective 100-year peak flow rates are 7.1 cfs, 6.0 cfs, and 17.4 cfs. (Thienes, 2022a)

The majority of the Project site currently consists of a vacant dirt lot with sparse natural grasses and vegetation, along with three existing residential lots in the southern portions of the Project site. Runoff from the Project site generally drains to the northeasterly comer of the site via natural drainage courses. As mentioned above, the Project site is tributary to offsite runoff. A hydrologic model was established for the offsite areas that continues through the Project site and adds in area from the site. The total 100-year peak flow rate from the Project site including the offsite areas is approximately 134.1 cfs over 87.20 acres. (Thienes, 2022a)

The existing hydrologic conditions of the Project site are depicted on Figure 4.10-2, *Existing Conditions Hydrology Map*.



C. <u>Flood Hazards</u>

According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) No. 06065C1410G, the Project site is located within "Zone X (unshaded)," which includes areas determined to be outside the 0.2% annual chance floodplain (FEMA, 2008). Accordingly, the Project site is not subject to flood hazards under existing conditions.

D. <u>Water Quality</u>

The Project site is located within the jurisdiction of the Santa Ana Basin Regional Water Quality Control Board (RWQCB). The receiving waters of flows from the Project site include Perris Valley Storm Drain; San Jacinto River, Reach 3; Canyon Lake (San Jacinto River, Reach 2); San Jacinto River, Reach 1; Lake Elsinore; Temescal Creek, Reach 6; Temescal Creek, Reach 5; Temescal Creek, Reach 4; Temescal Creek, Reach 3; Temescal Creek, Reach 2; Temescal Creek, Reach 1; Santa Ana River, Reach 3; Prado Basin Management Zone; Santa Ana River, Reach 2; Santa Ana River, Reach 1; Tidal Prism of Santa Ana River and Newport Slough; Pacific Ocean Near Shore Zone; and Pacific Ocean Offshore Zone. Table 4.10-1, *Receiving Waters, Section 303(d) Impairments, and Beneficial Uses*, provides a summary of the receiving waters for the Project site, their listed impairments pursuant to Clean Water Act (CWA) Section 303(d) list regulations, and their listed beneficial uses. (Thienes, 2022b, pp. 8-9)

E. <u>Groundwater</u>

The Project site is located within the West San Jacinto Groundwater Management Area (Management Area). Developments within the Management Area are subject to the Eastern Municipal Water District's (EMWD) "Groundwater Management Plan – West San Jacinto Groundwater Basin" (herein, "GMP"). The GMP is intended to manage the San Jacinto Groundwater Basin (SJGB) in a manner that would supplement EMWD's water supplies, thereby increasing the amount of locally-available water and reducing the amount of water that needs to be imported through Metropolitan Water District (MWD). The GMP covers approximately 256-square miles (over 164,200 acres) and has been divided into six (6) groundwater management zones. The Project site is located at the western edge of the Perris North Groundwater Management Zone (GMZ). (EMWD, 1995; EMWD, 2021b, p. 8 and Figures 7-1 and 7-2)

EMWD adopted the GMP in June 1995 in accordance with Assembly Bill 3030 (AB 3030) enacted in 1992, which is now codified in the California Water Code Sections 10750 through 10755. The GMP is intended to protect the vested interests of existing groundwater producers while providing a planning framework for new water supply projects for the benefit of groundwater producers and the public. The Management Plan goals include (EMWD, 2021b, p. 13):

- Establishment of a Groundwater Basin Manager
- Monitoring of Groundwater Production
- Monitoring of Groundwater Level and Quality
- Development of Well Construction Policies
- Development of a Well Abandonment and Destruction Program
- Monitoring of Well Construction, Abandonment, and Destruction
- Groundwater Quality Protection



Receiving Waters	EPA Approved 303(d) List Impairments	Designated Beneficial Uses	Proximity to RARE Beneficial Use
Perris Valley Storm Drain	None	N/A	Not classified as a RARE waterbody.
San Jacinto River, Reach 3	None	MUN, AGR, GWR, REC1, REC2, WARM, WILD	Not classified as a RARE waterbody.
Canyon Lake (aka San Jacinto River, Reach 2)	Nutrients	MUN, AGR, GWR, REC1, REC2, WARM, WILD	Not classified as a RARE waterbody.
San Jacinto River, Reach 1	None	MUN, AGR, GWR, REC1, REC2, WARM, WILD	Not classified as a RARE waterbody.
Lake Elsinore	DDT (Dichlorodiphenyltrichlo roethane), Nutrients, Organic Enrichment/Low Dissolved Oxygen, PCBs (Polychlorinated biphenyls), Toxicity	MUN, REC1, REC2, WARM, WILD	Not classified as a RARE waterbody.
Temescal Creek, Reach 6	None	MUN, GWR, REC1, REC2, WARM, WILD	Not classified as a RARE waterbody.
Temescal Creek, Reach 5	None	MUN, AGR, GWR, REC1, REC2, WARM, WILD, RARE	21 miles
Temescal Creek, Reach 4	None	MUN, AGR, GWR, REC1, REC2, WARM, WILD, RARE	27 miles
Temescal Creek, Reach 3 (aka Lee Lake)	None	MUN, AGR, IND, GWR, REC1, REC2, WARM, WILD	Not classified as a RARE waterbody.
Temescal Creek, Reach 2	None	MUN, AGR, IND, GWR, REC1, REC2, WARM, WILD	Not classified as a RARE waterbody.
Temescal Creek, Reach 1	None	MUN, REC1, REC2, WARM, WILD	Not classified as a RARE waterbody.
Santa Ana River, Reach 3	Copper, Indicator Bacteria, Lead	MUN, AGR, GWR, REC1, REC2, WARM, WILD, RARE, SPWN	44 miles
The Prado Basin Management Zone	рН	MUN, REC1, REC2, WARM, WILD, RARE	44 miles
Santa Ana River, Reach 2	None	MUN, AGR, GWR, REC1, REC2, WARM, WILD, RARE	49 miles
Santa Ana River, Reach 1	None	MUN, REC1, REC2, WARM, WILD	Not classified as a RARE waterbody.
Tidal Prism of Santa Ana River and Newport Slough	Indicator Bacteria	MUN, REC1, REC2, COMM, WILD, RARE, MAR	75 miles
Pacific Ocean Near shore Zone	None	MUN, IND, NAV, REC1, REC2, COMM, WILD, RARE, SPWN, MAR, SHEL	75 miles
Pacific Ocean Offshore Zone	None	MUN, IND, NAV, REC1, REC2, COMM, WILD, RARE, SPWN, MAR	76 miles

Table 4.10-1 Receiving Waters, Section 303(d) Impairments, and Beneficial Uses

(Thienes, 2022b, Table A.1)



- Exchange of Agricultural and Other Non-potable Groundwater Production to Municipal Use
- Maximize Yield Augmentation with Local Resources Local Runoff and Reclaimed Water
- Maximize Conjunctive Use
- Groundwater Treatment

4.10.2 APPLICABLE ENVIRONMENTAL REGULATIONS

The following is a brief description of the federal, State, and local environmental laws and related regulations related to hydrology and water quality.

A. <u>Federal Regulations</u>

1. Clean Water Act

The CWA establishes the basic structure for regulating discharges of pollutants into the waters of the United States and regulating quality standards for surface waters. The basis of the CWA was enacted in 1948 and was called the Federal Water Pollution Control Act, but the Act was substantially reorganized and expanded in 1972. "Clean Water Act" became the Act's common name with amendments in 1972. Under the CWA, the Environmental Protection Agency (EPA) has implemented pollution control programs such as setting wastewater standards for industry, and also has set water quality standards for all contaminants in surface waters. The CWA made it unlawful to discharge any pollutant from a point source into navigable waters, unless a permit was obtained. EPA's National Pollutant Discharge Elimination System (NPDES) permit program controls discharges. Point sources are discrete conveyances such as pipes or man- made ditches. Individual homes that are connected to a municipal system, use a septic system, or do not have a surface discharge do not need an NPDES permit; however, industrial, municipal, and other facilities must obtain permits if their discharges go directly to surface waters. (EPA, 2022e)

2. Federal Flood Insurance Program

The U.S. Congress established the National Flood Insurance Program (NFIP) with the passage of the National Flood Insurance Act of 1968. The NFIP is a Federal program enabling property owners in participating communities to purchase insurance as a protection against flood losses in exchange for State and community floodplain management regulations that reduce future flood damages. Participation in the NFIP is based on an agreement between communities and the Federal Government. If a community adopts and enforces a floodplain management ordinance to reduce future flood risk to new construction in floodplains, the Federal Government will make flood insurance available within the community as a financial protection against flood losses. This insurance is designed to provide an insurance alternative to disaster assistance to reduce the escalating costs of repairing damage to buildings and their contents caused by floods. The Federal Insurance and Mitigation Administration (FIMA) within the FEMA is responsible for administering the NFIP and administering programs that provide assistance for mitigating future damages from natural hazards. (FEMA, 2022)

3. Executive Order 11988 – Floodplain Management

Executive Order 11988 requires federal agencies to avoid to the extent possible the long- and short-term adverse impacts associated with the occupancy and modification of flood plains and to avoid direct and indirect

support of floodplain development wherever there is a practicable alternative. In accomplishing this objective, "each agency shall provide leadership and shall take action to reduce the risk of flood loss, to minimize the impact of floods on human safety, health, and welfare, and to restore and preserve the natural and beneficial values served by flood plains in carrying out its responsibilities" for the following actions: (FEMA, 2021)

- acquiring, managing, and disposing of federal lands and facilities;
- providing federally-undertaken, financed, or assisted construction and improvements; and
- conducting federal activities and programs affecting land use, including but not limited to water and related land resources planning, regulation, and licensing activities.

B. <u>State Regulations</u>

1. Porter-Cologne Water Control Act

The Porter-Cologne Act is the principal law governing water quality regulation in California. It establishes a comprehensive program to protect water quality and the beneficial uses of water. The Porter-Cologne Act applies to surface waters, wetlands, and ground water and to both point and nonpoint sources of pollution. Pursuant to the Porter-Cologne Act (California Water Code § 13000 et seq.), the policy of the State is as follows: (SWRCB, 2014)

- That the quality of all the waters of the State shall be protected;
- That all activities and factors affecting the quality of water shall be regulated to attain the highest water quality within reason; and
- That the State must be prepared to exercise its full power and jurisdiction to protect the quality of water in the State from degradation.

The Porter-Cologne Act established nine Regional Water Boards (based on hydrogeologic barriers) and the State Water Board, which are charged with implementing its provisions and which have primary responsibility for protecting water quality in California. The State Water Board provides program guidance and oversight, allocates funds, and reviews Regional Water Boards decisions. In addition, the State Water Board allocates rights to the use of surface water. The Regional Water Boards have primary responsibility for individual permitting, inspection, and enforcement actions within each of nine hydrologic regions. The State Water Board and Regional Water Boards have numerous non-point source (NPS) related responsibilities, including monitoring and assessment, planning, financial assistance, and management. (SWRCB, 2014)

The Regional Water Boards regulate discharges under the Porter-Cologne Act primarily through issuance of NPDES permits for point source discharges and waste discharge requirements (WDRs) for NPS discharges. Anyone discharging or proposing to discharge materials that could affect water quality (other than to a community sanitary sewer system regulated by an NPDES permit) must file a report of waste discharge. The State Water Resources Control Board (SWRCB) and the Regional Water Quality Control Boards (RWQCBs) can make their own investigations or may require dischargers to carry out water quality investigations and report on water quality issues. The Porter-Cologne Act provides several options for enforcing WDRs and other orders, including cease and desist orders, cleanup and abatement orders, administrative civil liability orders, civil court actions, and criminal prosecutions. (SWRCB, 2014)



The Porter-Cologne Act also implements many provisions of the Clean Water Act, such as the NPDES permitting program. The Porter-Cologne Act also requires adoption of water quality control plans that contain the guiding policies of water pollution management in California. In addition, regional water quality control plans (basin plans) have been adopted by each of the Regional Water Boards and get updated as necessary and practical. These plans identify the existing and potential beneficial uses of waters of the State and establish water quality objectives to protect these uses. The basin plans also contain implementation, surveillance, and monitoring plans. (SWRCB, 2014) The Project site is located in the Santa Ana River, which is within the purview of the Santa Ana RWQCB. The Santa Ana River Basin Plan is the governing water quality plan for the region.

2. California Water Code

The California Water Code is the principal state law regulating water quality in California. Water quality provisions must be complied with as contained in numerous code sections including: 1) the Health and Safety Code (HSC) for the protection of ground and surface waters from hazardous waste and other toxic substances; 2) the Fish and Game Code for the prevention of unauthorized diversions of any surface water and discharge of any substance that may be deleterious to fish, plant, animal, or bird life; 3) the Harbors and Navigation Code for the prevention of groundwater which may be used for drinking water supplies. The California Department of Fish and Wildlife (CDFW), through provisions of the Fish & Game Code (§§ 1601 - 1603) is empowered to issue agreements for any alteration of a river, stream, or lake where fish or wildlife resources may be adversely affected. CDFW regulates wetland areas only to the extent that those wetlands are part of a river, stream, or lake as defined by CDFW. (CA Legislative Info, n.d.)

Surface water quality is the responsibility of the RWQCB, water supply and wastewater treatment agencies, and city and county governments. The principal means of enforcement by the RWQCB is through the development, adoption, and issuance of water discharge permits. RWQCB basin plans establish water quality objectives that are defined as the limits or levels of water quality constituents or characteristics for the reasonable protection of beneficial uses of water. (CA Legislative Info, n.d.)

3. California Toxics Rule (CTR)

The California Toxics Rule (CTR) fills gap in California's water quality standards necessary to protect human health and aquatic life beneficial uses. The CTR criteria are similar to those published in the National Recommended Water Quality Criteria. The CTR supplements, and does not change or supersede, the criteria that EPA promulgated for California waters in the National Toxics Rule (NTR). The human health NTR and CTR criteria that apply to drinking water sources (those water bodies designated in the Basin Plans as municipal and domestic supply) consider chemical exposure through consumption of both water and aquatic organisms (fish and shellfish) harvested from the water. For waters that are not drinking water sources (e.g., enclosed bays and estuaries), human health NTR and CTR criteria only consider the consumption of contaminated aquatic organisms. The CTR and NTR criteria, along with the beneficial use designations in the Basin Plans and the related implementation policies, are the directly applicable water quality standards for toxic priority pollutants in California waters. (SWRCB, 2016, pp. 14-15)

4. CDFG Code Section 1600 et seq. (Lake- or Streambed Alteration Agreement Program)

Fish and Game Code § 1602 requires an entity to notify CDFW prior to commencing any activity that may do one or more of the following: (CDFW, n.d.)

- Substantially divert or obstruct the natural flow of any river, stream, or lake;
- Substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or
- Deposit debris, waste or other materials that could pass into any river, stream, or lake.

It should be noted that "any river, stream or lake" includes those that are episodic (they are dry for periods of time) as well as those that are perennial (they flow year-round). This includes ephemeral streams, desert washes, and watercourses with a subsurface flow. It may also apply to work undertaken within the flood plain of a body of water. (CDFW, n.d.)

CDFW requires a Lake and Streambed Alteration (LSA) Agreement when it determines that the activity, as described in a complete LSA Notification, may substantially adversely affect existing fish or wildlife resources. An LSA Agreement includes measures necessary to protect existing fish and wildlife resources. CDFW may suggest ways to modify a project that would eliminate or reduce harmful impacts to fish and wildlife resources. Before issuing an LSA Agreement, CDFW must comply with CEQA. (CDFW, n.d.)

5. Watershed Management Initiative (WMI)

The State and Regional Water Boards are currently focused on looking at entire watersheds when addressing water pollution. The Water Boards adopted the Watershed Management Initiative (WMI) to further their goals. The WMI establishes a broad framework overlying the numerous federal and State mandated priorities. As such, the WMI helps the Water Boards achieve water resource protection, enhancement and restoration while balancing economic and environmental impacts. (SWRCB, 2017) The integrated approach of the WMI involves three main ideas:

- Use water quality to identify and prioritize water resource problems within individual watersheds. Involve stakeholders to develop solutions.
- Better coordinate point source and nonpoint source regulatory efforts. Establish working relationships between staff from different programs.
- Better coordinate local, state, and federal activities and programs, especially those relating to regulations and funding, to assist local watershed groups. (SWRCB, 2017)

6. Sustainable Groundwater Management Act (SGMA)

The 2014 Sustainable Groundwater Management Act (SGMA) requires governments and water agencies of high and medium priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under SGMA, these basins should reach sustainability within 20 years of implementing their sustainability plans. The DWR categorizes the priority of groundwater basins. For critically over-drafted basins, that will be 2040. For the remaining high and medium priority basins, 2042 is the deadline. The SGMA also requires local public agencies and Groundwater Sustainability Agencies (GSAs) in high- and medium-


priority basins to develop and implement Groundwater Sustainability Plans (GSPs) or Alternatives to GSPs. GSPs are detailed road maps for how groundwater basins will reach long term sustainability. (DWR, n.d.) (DWR, 2020)

C. <u>Local Regulations</u>

1. Water Quality Control Plan for the Santa Ana River Basin (Basin Plan)

The California Porter-Cologne Water Quality Control Act (§ 13000 ("Water Quality") et seq., of the California Water Code), and the Federal Water Pollution Control Act Amendment of 1972 (also referred to as the Clean Water Act (CWA)) require that comprehensive water quality control plans be developed for all waters within the State of California. The Project site is located within the jurisdiction of the Santa Ana RWQCB. Water quality information for the Santa Ana watershed is contained in the "Water Quality Control Plan for the Santa Ana River Basin" (Basin Plan), which was most recently updated in June 2019. This document is herein incorporated by reference and is available for public review at the Santa Ana RWQCB office located at 3737 Main Street, Suite 500, Riverside, CA 92501-3339. The purpose of the Basin Plan is to: (1) designate beneficial uses of the Region's surface and ground waters; (2) designate water quality objectives for the reasonable protection of those uses; and (3) establish an implementation plan to achieve the objectives. A summary of the receiving waters for the Project site, their existing Section 303(d) impairments, and designated beneficial uses was previously shown in Table 4.10-1. (RWQCB, 2019)

4.10.3 BASIS FOR DETERMINING SIGNIFICANCE

Section X of Appendix G to the CEQA Guidelines addresses typical adverse effects to hydrology and water quality, and includes the following threshold questions to evaluate the Project's impacts on hydrology and water quality:

- Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality;
- Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin;
- Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
 - *Result in substantial erosion or siltation on or off site;*
 - Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;
 - Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or
 - *Impede or redirect flood flows;*



- In flood hazard, tsunami, or seiche zones, would the project risk release of pullutants due to project inundation; or
- Would the project conflict with or otherwise obstruct implementation of a water quality control plan or sustainable groundwater management plan.

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

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

The significance thresholds set forth in Riverside County's Environmental Assessment Checklist were used to evaluate the significance of the proposed Project's impacts on hydrology and water quality.



4.10.4 IMPACT ANALYSIS

<u>Threshold a.</u> :	Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?
<u>Threshold b.</u> :	Would the Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?
<u>Threshold i.</u> :	Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Potable water service to the Project site would be provided by the EMWD, and the Project would not involve direct groundwater extraction via existing or proposed groundwater wells. Additionally, although the Project would result in a substantial increase in impervious surfaces on the site, the total amount of runoff from the site would be similar to existing conditions, and all runoff would be conveyed to downstream facilities where groundwater infiltration would continue to occur (i.e., the San Jacinto River, Canyon Lake, and Lake Elsinore). Thus, the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. Impacts would be less than significant.

The Project site is located within the jurisdiction of the Santa Ana RWQCB. Water quality information for the Santa Ana River watershed is contained in the Santa Ana Region Basin Plan ("Basin Plan"), as most recently updated in June 2019 (RWQCB, 2019). In addition, the Project site is located at the western edge of the Perris North GMZ. Thus, the Project is subject to the EMWD's "Groundwater Management Plan – West San Jacinto Groundwater Basin." The Project's consistency with each is discussed below.

Santa Ana River Basin Plan

The California Porter-Cologne Water Quality Control Act (§ 13000 ("Water Quality") et seq., of the California Water Code), and the Federal Water Pollution Control Act Amendment of 1972 (also referred to as the CWA) require that comprehensive water quality control plans be developed for all waters within the State of California. The Project site is located within the jurisdiction of the Santa Ana RWQCB. Water quality information for the Santa Ana River watershed is contained in the Santa Ana Region Basin Plan (as most recently updated in June 2019). This document is herein incorporated by reference and is available for public review at the Santa Ana RWQCB office located at 3737 Main Street, Suite 500, Riverside, CA 92501-3348. (RWQCB, 2019)

The CWA requires all states to conduct water quality assessments of their water resources to identify water bodies that do not meet water quality standards. Water bodies that do not meet water quality standards are placed on a list of impaired waters pursuant to the requirements of Section 303(d) of the CWA. The Project site resides within the Santa Ana River Watershed and receiving waters for the property's drainage were previously summarized in Table 4.10-1, along with their listed Section 303(d) impairments.

Specific provision of the CWA applicable to the proposed Project is CWA Section 402, which authorizes the NPDES permit program that covers point sources of pollution discharging to a water body. The NPDES



program also requires operators of construction sites one acre or larger to prepare a Stormwater Pollution Prevention Plan (SWPPP) and obtain authorization to discharge stormwater under an NPDES construction stormwater permit.

Provided below is a discussion of the Project's potential to conflict with the Santa Ana Region Basin Plan during both construction and long-term operation.

Construction-Related Water Quality

Construction of the proposed Project would involve demolition, clearing, grading, paving, utility installation, building construction, and landscaping activities, which would result in the generation of potential water quality pollutants such as silt, debris, chemicals, paints, and other solvents with the potential to adversely affect water quality. As such, short-term water quality impacts have the potential to occur during construction of the Project in the absence of any protective or avoidance measures.

Pursuant to the requirements of the Santa Ana RWQCB and the County of Riverside, the Project Applicant would be required to obtain a NPDES Municipal Stormwater Permit for construction activities. The NPDES permit is required for all projects that include construction activities, such as clearing, grading, and/or excavation that disturb at least one acre of total land area. In addition, the Project would be required to comply with the RWQCB's Basin Plan. Compliance with the NPDES permit and the Basin Plan involves the preparation and implementation of a SWPPP for construction-related activities. The SWPPP is required to specify the Best Management Practices (BMPs) that the Project would be required to implement during construction activities to ensure that all potential pollutants of concern are prevented, minimized, and/or otherwise appropriately treated prior to being discharged from the subject property. Mandatory compliance with the SWPPP would ensure that the proposed Project does not violate any water quality standards or waste discharge requirements during construction activities. Therefore, with mandatory adherence to the future required SWPPP, runoff associated with Project-related construction activities would not conflict with the Santa Ana Region Basin Plan requirements, and impacts would be less than significant.

Operational Water Quality Impacts

With implementation of the proposed Project, runoff generated on site would be conveyed to a series of catch basins and storm drain lines ranging in size from 24 to 30 inches. First flush runoff would be conveyed to proposed underground detention systems proposed within the two truck courts and within the eastern parking lot. Discharge from the underground detention systems would be conveyed northerly via proposed private storm drains to the proposed bioretention basin in the northeast corner of the site for treatment, then further north via a proposed lateral to the extended Rider Street storm drain. (Thienes, 2022b, p. 7) The proposed bioretention basin would be effective in removing pollutants of concern in runoff leaving the Project site, such as bacterial indicators, metals, nutrients, pesticides, toxic organic compounds, sediments, trash/debris, and oil/grease (Thienes, 2022b, p. 21). Because all runoff generated on site would be appropriately treated prior to ultimate discharge from the site, the proposed Project would not conflict with the Santa Ana Region Basin Plan, and impacts would therefore be less than significant.



Groundwater Management Plan – West San Jacinto Groundwater Basin

The EMWD adopted the SJGB GMP on June 8, 1995, which is intended to manage the SJGB in a manner that would supplement EMWD's water supplies, thereby increasing the amount of locally-available water and reducing the amount of water that needs to be imported through MWD. The GMP covers approximately 256-square miles (over 164,200 acres) and has been divided into six (6) groundwater management zones. The Project site is located in the Perris North GMZ. (EMWD, 1995; EMWD, 2021b)

There are no existing groundwater wells on the Project site, and the Project does not propose to construct any wells on site. As such, the Project would not directly extract groundwater, but would instead obtain potable water from the EMWD, which relies in part on groundwater resources. Accordingly, the Project only would have the potential to conflict with the West San Jacinto GMP if the Project were to obstruct infiltration of runoff into the groundwater basin, or if the Project were to contribute to or exacerbate existing water quality problems within the basin.

As noted above under the discussion of the Project's consistency with the Santa Ana Region Basin Plan, the Project Applicant would be required to obtain a NPDES Municipal Stormwater Permit for construction activities. The NPDES permit is required for all projects that include construction activities, such as clearing, grading, and/or excavation that disturb at least one acre of total land area. Compliance with the NPDES permit and the Basin Plan involves the preparation and implementation of a SWPPP for construction-related activities. The SWPPP is required to specify the BMPs that the Project would be required to implement during construction activities to ensure that all potential pollutants of concern are prevented, minimized, and/or otherwise appropriately treated prior to being discharged from the subject property. Mandatory compliance with the SWPPP would ensure that construction of the proposed Project does result in polluted runoff that could adversely affect water quality within the SJGB. Additionally, the total amount of runoff from the Project site during construction would not change substantially in relation to existing conditions, thereby continuing to allow for infiltration into the SJGB. Accordingly, during construction the Project would not conflict with the West San Jacinto GMP, and a less-than-significant impact would occur.

Following construction activities, infiltration on the Project site largely would be precluded and would be limited to landscaped areas, as remaining areas of the site would be covered with impervious surfaces (i.e., buildings, drive aisles, etc.). However, under existing conditions all runoff generated on and tributary to the Project site is conveyed to existing storm drainage facilities located within Patterson Avenue. While a nominal amount of groundwater recharge may occur under existing conditions, the majority of runoff is conveyed to downstream facilities, which ultimately include unlined drainage channels and bodies of water (i.e., Canyon Lake and Lake Elsinore) wherein groundwater recharge occurs. These conditions would not substantially change under the proposed Project. Groundwater recharge would continue to occur downstream, as it does under existing conditions.

With respect to groundwater quality under long-term operations, the Project Applicant would be required to identify measures to reduce pollutants in runoff from the Project site pursuant to the applicable NPDES permit requirements. Measures identified to address water quality are identified as part of the Project's WQMP (*Technical Appendix 12*). These measures include routing first flush flows on the Project site towards a series of catch basins that would route flows to proposed underground detention systems proposed within the two truck courts and within the eastern parking lot. Discharge from the underground detention systems would be



conveyed northerly via proposed private storm drains to the proposed bioretention basin in the northeast corner of the site for treatment, then further north via a proposed lateral to the extended Rider Street storm drain. (Thienes, 2022b, p. 7) The proposed bioretention basin would be effective in removing pollutants of concern in runoff leaving the Project site, such as bacterial indicators, metals, nutrients, pesticides, toxic organic compounds, sediments, trash/debris, and oil/grease (Thienes, 2022b, p. 21). With mandatory compliance with the Project's WQMP, the Project would not contribute substantial amounts of polluted runoff towards the Perris North Groundwater Basin. As such, the proposed Project would not conflict with or interfere with implementation of the GMP, and impacts would therefore be less than significant.

<u>Threshold c.</u> :	Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces?
<u>Threshold f.</u> :	Would the Project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Please refer to the analysis of Thresholds a., b, and i. As indicated in the analysis, with implementation of the Project's proposed drainage system, the Project would not generate substantial additional sources of polluted runoff. Accordingly, impacts associated with water quality would be less than significant.

Figure 4.10-3, *Proposed Conditions Hydrology Map*, depicts the Project's proposed drainage conditions. As depicted on Figure 4.10-3, grading proposed as part of the Project generally would maintain the site's existing drainage patterns, with runoff continuing to flow in a generally northeasterly direction towards the northeast corner of the Project site. Thus, the Project would not substantially alter the existing drainage pattern of the Project site or surrounding areas, and impacts would be less than significant.

With implementation of the proposed Project, a majority of the Project site would be developed with impervious surfaces, with exception of proposed landscaped areas. As previously indicated, runoff generated on site would be conveyed to a series of catch basins and storm drain lines ranging in size from 24 to 30 inches. First flush runoff would be conveyed to proposed underground detention systems proposed within the two truck courts and within the eastern parking lot. Discharge from the underground detention systems would be conveyed northerly via proposed private storm drains to the proposed bioretention basin in the northeast corner of the site for treatment, then further north via a proposed lateral to the extended Rider Street storm drain. (Thienes, 2022b, p. 7) As demonstrated by the Project's Preliminary Hydrology Calculations technical report (Technical Appendix II), although the Project has the potential to result in a substantial increase in peak flows from the Project site, the proposed onsite storm drain system would be sized during the Project's final design phase to sufficiently restrict flow rates to the existing condition discharge rate (Thienes, 2022a). As such, implementation of the proposed Project would not result in an increase in peak runoff from the Project site. Because existing drainage facilities downstream are adequately sized to accommodate peak runoff from the Project site and surrounding areas under existing conditions, and because peak runoff from the Project site would not increase with development of the Project site as proposed, the Project would not contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems. Impacts would be less than significant.



<u>Threshold d.</u>: Would the Project result in substantial erosion or siltation on-site or off-site?

The Project has the potential to result in erosion or siltation during both construction and long-term operations. Each is discussed below.

Construction-Related Erosion Impacts

The Project has been designed to generally maintain the existing drainage patterns of the Project site. Nonetheless, construction of the proposed Project would involve substantial ground disturbance during clearing and grading of the site. In addition, on-site erosion could occur if graded slopes are not stabilized prior to ultimate development or landscaping. The proposed grading activities would generate silt which could be carried off-site during a heavy rainfall event. Should such an event occur in the absence of any preventative measures to contain silt and other soils on-site, erosion and/or siltation downstream could result.

However, pursuant to requirements of the SWRCB, the Project Applicant would be required to obtain a NPDES permit for construction activities on-site. The NPDES permit is required for all projects that include construction activities, such as clearing, grading, and/or excavation that disturb at least one (1) acre of total land area. Compliance with the NPDES permit involves the preparation and implementation of a SWPPP for construction related activities. The SWPPP would specify BMPs to minimize the potential for erosion and siltation to occur and would include specific Project site measures to address the potential for the caving in of temporary excavations. Typical BMPs that are implemented at construction sites to protect water quality include the implementation of straw bale barriers, plastic sheeting/erosion control blankets, and outlet protection measures. With mandatory adherence to the SWPPP requirements, effects associated with construction-related erosion, siltation, water quality, and flooding on downstream water sources and flood control systems would be maintained at a level below significance.

Post-Development Erosion Impacts

With development of the Project site, large portions of the Project site would consist of impervious surfaces, with areas of pervious surfaces largely confined to landscaped areas. Thus, the potential for erosion hazards on site would be substantially decreased as compared to existing conditions with buildout of the Project site. As such, long-term erosion impacts on site would be less than significant.

However, due to the increase in impervious surfaces on site, runoff from the site following development has the potential to contribute to erosion hazards downstream. As demonstrated by the Project's Preliminary Hydrology Calculations technical report (*Technical Appendix II*), although the Project has the potential to result in a substantial increase in peak flows from the Project site, the proposed onsite storm drain system would be sized during the Project's final design phase to sufficiently restrict flow rates to the existing condition discharge rate (Thienes, 2022a). As such, and as compared to the existing condition, the Project would not result in an increase in peak runoff from the site, and therefore runoff from the Project site would not cause or contribute to any increased erosion hazards downstream. Impacts would be less than significant.



<u>Threshold e.</u>: Would the Project substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-site or off-site?

Threshold g.: Would the Project impede or redirect flood flows?

As demonstrated by the Project's Preliminary Hydrology Calculations technical report (*Technical Appendix II*), although the Project has the potential to result in a substantial increase in peak flows from the Project site, the proposed onsite storm drain system would be sized during the Project's final design phase to sufficiently restrict flow rates to the existing condition discharge rate (Thienes, 2022a). As such, 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, and impacts would be less than significant.

As previously indicated, according to FEMA Firm No. 06065C1410G, the Project site is located within "Zone X (unshaded)," which includes areas determined to be outside the 0.2% annual chance floodplain (FEMA, 2008). Accordingly, the Project has no potential to impede or redirect flood flows, and no impact would occur.

Threshold h.: In flood hazard, tsunami, or seiche zones, would the Project risk the release of pollutants due to Project inundation?

As previously indicated, according to FEMA Firm No. 06065C1410G, the Project site is located within "Zone X (unshaded)," which includes areas determined to be outside the 0.2% annual chance floodplain (FEMA, 2008). Accordingly, the Project has no potential result in the release of pollutants due to site inundation, and no impacts would occur.

The Project site is located approximately 36 miles from the Pacific Ocean (Google Earth, 2022). As such, the Project has no potential to risk the release of pollutants due to inundation by tsunamis, and no impact would occur.

A seiche is an underwater wave that oscillates through a body of water which may be triggered by earthquakes or landslides. In general, seiches are small (on the order of a few inches) and are present in larger lakes as a result of the depth, temperature, and contours of the body of water. Due to the lack of an on-site body of water or other bodies of water within close proximity to the site that have the potential to result in site inundation, the potential for the subject site to be impacted by seiches is considered low. Additionally, according to Figure 5 of the General Plan Safety Element, the Project site is not located within a dam inundation area, thereby further demonstrating that the Project site is not subject to inundation by seiches (Riverside County, 2021a, Safety Element Figure 5). As such, impacts due to seiches would be less than significant.

4.10.5 CUMULATIVE IMPACT ANALYSIS

The cumulative impact analysis considers construction and operation of the proposed Project in conjunction with other development projects in the vicinity of the Project site and resulting from full buildout of the Riverside County General Plan and the general plans of local jurisdictions that are located within the Santa Ana River watershed.

As discussed under the analysis of Thresholds a., b., and i., the Project would result in less-than-significant impacts to surface and groundwater quality during construction because the Project Applicant would be



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required to obtain a NPDES Municipal Stormwater Permit for construction activities. Compliance with the NPDES permit and the Basin Plan involves the preparation and implementation of a SWPPP for constructionrelated activities. The SWPPP is required to specify the BMPs that the Project would be required to implement during construction activities to ensure that all potential pollutants of concern are prevented, minimized, and/or otherwise appropriately treated prior to being discharged from the subject property. Other cumulative developments within the cumulative study area also would be required to comply with the NPDES Municipal Stormwater Permit and would be required to implement BMPs during construction activities to preclude water quality impacts that could impair downstream waters or groundwater. As such, construction-related water quality impacts, as well as impacts due to a conflict with the Basin Plan and the GMP, would be less-thancumulatively considerable. With respect to long-term impacts to water quality, the Project's proposed storm drain system would be designed to route first flush runoff toto proposed underground detention systems proposed within the two truck courts and within the eastern parking lot. Discharge from the underground detention systems would be conveyed northerly via proposed private storm drains to the proposed bioretention basin in the northeast corner of the site for treatment, then further north via a proposed lateral to the extended Rider Street storm drain. (Thienes, 2022b, p. 7) The Project's drainage system has been designed to detain runoff and provide water quality treatment, and would reduce pollutants of concern in runoff leaving the Project site, such as bacterial indicators, metals, nutrients, pesticides, toxic organic compounds, sediments, trash/debris, and oil/grease (Thienes, 2022b, p. 21). Other cumulative developments would similarly be required to incorporate BMPs to treat water quality pollutants of concern. Accordingly, the Project's impacts would be less than significant on a cumulatively-considerable basis.

As indicated under the analysis of Thresholds c. and f., grading proposed as part of the Project generally would maintain the site's existing drainage patterns, with runoff continuing to flow in a generally northeasterly direction towards existing storm drain facilities within Rider Street. As such, the Project would not substantially alter the existing drainage pattern of the Project site or surrounding areas, and impacts would be less than significant on a cumulatively-considerable basis. Additionally, although the Project has the potential to result in a substantial increase in peak flows from the Project site, the proposed onsite storm drain system would be sized during the Project's final design phase to sufficiently restrict flow rates to the existing condition discharge rate (Thienes, 2022a). As such, implementation of the proposed Project would not result in an increase in peak runoff from the Project site and therefore would not result in the alteration of downstream receiving waters on either a direct or cumulatively-considerable basis. Additionally, because the Project would not result in an increase in peak runoff from the Project site, the Project would not contribute runoff water that could exceed the capacity of existing or planned stormwater drainage systems, and cumulatively-considerable impacts would be less than significant.

As discussed under the analysis of Threshold d., during construction the Project would be subject to compliance with the applicable NPDES permit, which requires the preparation and implementation of a SWPPP to address erosion hazards associated with construction activities. Other cumulative developments similarly would be required to prepare and implement a SWPPP. As such, erosion-related hazards during construction activities would be less-than-cumulatively considerable. With development of the Project site, large portions of the Project site would consist of impervious surfaces, with areas of pervious surfaces largely confined to landscaped areas. Thus, the potential for erosion hazards on site would be substantially decreased as compared to existing conditions with buildout of the Project site. Additionally, because peak runoff from the Project site would not increase as compared to existing conditions, the Project has no potential to cause or cumulatively



contribute to erosion hazards downstream. As such, the Project would not contribute to any cumulativelyconsiderable impacts due to long-term erosion.

As discussed under the analysis of Thresholds e. and g., although the Project has the potential to result in a substantial increase in peak flows from the Project site, the proposed onsite storm drain system would be sized during the Project's final design phase to sufficiently restrict flow rates to the existing condition discharge rate (Thienes, 2022a). As such, 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. Additionally, the Project site is not subject to flood hazards, and the Project has no potential to impede or redirect flood flows. Accordingly, impacts would be less than significant on a cumulatively-considerable basis.

The Project site is not subject to inundation due to floods, tsunamis, or seiches, and the Project site would therefore not be subject to inundation that could result in the release of pollutants. Cumulatively-considerable impacts would not occur.

4.10.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Thresholds a., b., and i.: Less-than-Significant Impact. The Project would be served potable water by the EMWD and does not include any proposed groundwater wells on site; thus, Project impacts to groundwater supplies would be less than significant. Additionally, the total amount of runoff from the site would not change with Project development, and as such Project-related runoff would be conveyed to downstream facilities where groundwater recharge would continue to occur. Additionally, water quality impacts during construction, including potential impacts due to a conflict with the Basin Plan and the West San Jacinto GMP, would be less than significant. In addition, with implementation of the proposed Project, all runoff generated on site would not adversely affect surface water or groundwater quality. Accordingly, the proposed Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface water or groundwater recharge; and would not conflict with the Santa Ana Region Basin Plan or the San Jacinto GMP. Impacts would be less than significant.

<u>Thresholds c. and f.: Less-than-Significant Impact</u>. Grading proposed as part of the Project generally would maintain the site's existing drainage patterns, with runoff continuing to flow in a generally northeasterly direction towards existing storm drains within Rider Street. In addition, although the Project has the potential to result in a substantial increase in peak flows from the Project site, the proposed onsite storm drain system would be sized during the Project's final design phase to sufficiently restrict flow rates to the existing condition discharge rate. As such, implementation of the proposed Project would not result in an increase in peak runoff from the Project site and therefore would not result in the alteration of any downstream receiving waters. Additionally, because existing drainage facilities downstream are adequately sized to accommodate peak runoff from the Project site and surrounding areas under existing conditions, and because peak runoff from the Project site would not increase with development of the Project site as proposed, the Project would not contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems. Impacts would be less than significant.



<u>Threshold d.: Less-than-Significant Impact</u>. With mandatory adherence to the SWPPP requirements, effects associated with construction-related erosion, siltation, water quality, and flooding on downstream water sources and flood control systems would be maintained at a level below significance. With development of the Project site, large portions of the Project site would consist of impervious surfaces, with areas of pervious surfaces largely confined to landscaped areas. Thus, the potential for erosion hazards on site would be substantially decreased as compared to existing conditions with buildout of the Project site. In addition, as compared to the existing conditions of the Project site, the Project would not result in an increase in peak runoff from the site, and therefore runoff from the Project site would not cause or contribute to any increased erosion hazards downstream. As such, long-term erosion impacts would be less than significant.

<u>Thresholds e. and g.: Less-than-Significant Impact</u>. Although the Project has the potential to result in a substantial increase in peak flows from the Project site, the proposed onsite storm drain system would be sized during the Project's final design phase to sufficiently restrict flow rates to the existing condition discharge rate. As such, 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, and impacts would be less than significant. In addition, the Project site is located within "Zone X (unshaded)," which includes areas determined to be outside the 0.2% annual chance floodplain. Accordingly, the Project has no potential to impede or redirect flood flows, and no impact would occur.

<u>Threshold h.: Less-than-Significant Impact</u>. The Project site is located within "Zone X (unshaded)," which includes areas determined to be outside the 0.2% annual chance floodplain. Accordingly, the Project has no potential result in the release of pollutants due to site inundation, and no impacts would occur. The Project site is located approximately 36 miles from the Pacific Ocean. As such, the Project has no potential to risk the release of pollutants due to inundation by tsunamis, and no impact would occur. Due to the lack of an on-site body of water or other bodies of water within close proximity to the site that have the potential to result in site inundation, the potential for the subject site to be impacted by seiches is considered low. Additionally, according to Figure 5 of the General Plan Safety Element, the Project site is not located within a dam inundation area, thereby further demonstrating that the Project site is not subject to inundation by seiches. As such, impacts due to seiches would be less than significant.

4.10.7 COUNTY REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

Applicable County Regulations and Design Requirements

The following are regulations and design requirements that apply to the proposed Project and that reduce or preclude hydrology and water quality impacts. Although compliance with mandatory regulatory requirements does not technically meet CEQA's definition for mitigation, they are specified herein as requirements for the Project.

• The Project Applicant is required to comply with the provisions of the Project's NPDES permit, and the Project's SWPPP. Compliance with the NPDES permit and the SWPPP would identify and implement an effective combination of erosion control and sediment control measures (i.e., Best Management Practices) to reduce or eliminate discharge to surface water from storm water and non-stormwater discharges during construction activities.



• Prior to issuance of grading permits, the Project Applicant shall provide evidence to the Riverside County Flood Control and Water Conservation District (RCFCWCD) that the Project's drainage system has been designed to ensure that peak flows from the Project site would not increase as compared to existing conditions.

Mitigation

Impacts to hydrology and water quality would be less than significant; therefore, mitigation measures are not required.





Source(s): Esri, Nearmap Imagery (September 2022), RCTLMA (2022)



Lead Agency: Riverside County

4.10 Hydrology and Water Quality

Figure 4.10-1

Santa Ana River Watershed Map

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Rider and Patterson Business Center Environmental Impact Report



Source(s): Thienes Engineering, Inc. (10-26-2022)



Lead Agency: Riverside County

Figure 4.10-2

Existing Conditions Hydrology Map



Rider and Patterson Business Center **Environmental Impact Report**



Source(s): Thienes Engineering, Inc. (10-26-2022)



Lead Agency: Riverside County

Proposed Conditions Hydrology Map

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4.11 LAND USE AND PLANNING

This Subsection 4.11 discusses consistency of the proposed Project with applicable land use and planning policies adopted by Riverside County and other governing agencies for the purpose of reducing adverse effects on the physical environment. This subsection also addresses present and future land uses, zoning, and the physical arrangement of uses on the land. Information used to support the analysis in this subsection was also obtained in part from the Riverside County General Plan (Riverside County, 2021a), the Mead Valley Area Plan (MVAP) (Riverside County, 2021b), and the Riverside County GIS database (RCIT, n.d.). Additionally, this Subsection relies in part on a separate analysis of the Project's consistency with the Riverside County General Plan and EAP, which is included as *Technical Appendix N* to this EIR. Refer to EIR Subsection 7.0, *References*, for a complete list of reference sources.

4.11.1 EXISTING CONDITIONS

A. <u>Existing On-Site and Adjacent Land Uses</u>

Under existing conditions, a majority of the 40.88-acre Project site is vacant and undeveloped and was previously used for stockpiling earthwork materials from an adjacent development. The southern portions of the Project site are developed with three large-lot residential homes along with several ancillary structures.

Lands to the north of the Project site include residential uses, undeveloped lands, and lands that appear to be utilized for dryland farming. Lands to the east of the Project site include residential uses, a church, and a fence and supply business, beyond which are undeveloped lands. Lands to the south of the Project site include residential uses, undeveloped lands, and lands that appear to be subject to dryland farming. Lands uses to the west of the Project site include an existing medium-density residential community, several large lot homes, and a children's educational center for children. (Google Earth, 2022)

B. <u>Existing On-Site and Surrounding Land Use Designations</u>

The prevailing planning document for the Project site and its surrounding area is the Riverside County General Plan. The Project site is located within the MVAP of the Riverside County General Plan. As previously depicted on EIR Figure 2-4, the 40.88-acre Project site is designated for "Community Development – Medium Density Residential (MDR)" land uses. The MDR land use designations is intended to accommodate single-family attached and detached residences with a density range of 5 to 8 dwelling units per acre and minimum lot sizes ranging from 4,000 to 6,500 square feet (s.f.) (Riverside County, 2021a, Table LU-4; RCIT, n.d.).

As also previously depicted on EIR Figure 2-4, lands to the west of the Project site are designated for MDR and "Rural Residential (RR)" land uses; lands to the south are designated for "Rural Community – Very Low Density Residential (RC-VLDR)" land uses; lands to the east are designated for RC-VLDR and "Business Park (BP)" land uses; and lands to the north are designated for RC-VLDR and "Light Industrial (LI)" land uses. The RR land use designation allows single-family residences on minimum 5-acre lot sizes, and also allows for limited animal keeping and agricultural uses. The RC-VLDR land use designation allows for single-family detached residences on large parcels of 1 to 2 acres, along with limited agricultural and equestrian uses. The BP land use designation allows for employee intensive uses, including research and development, technology centers, corporate offices, clean industry and supporting retail uses. The LI land use designation



allows for industrial and related uses including warehousing/distribution, assembly and light manufacturing, repair facilities, and supporting retail uses. (Riverside County, 2021a, Table LU-4; RCIT, n.d.)

C. Existing On-Site and Surrounding Zoning Classifications

As previously depicted on EIR Figure 2-5, under existing conditions a majority of the Project site is zoned for "One-Family Dwellings (R-1)," two parcels along the central southern boundary are zoned for "Light Agriculture (A-1-1)," and two parcels near the southeast corner of the Project site are zoned for "Rural Residential (R-R-1)." The R-1 zoning classification is intended to allow for on-family dwellings, with limited agricultural and equestrian uses. The A-1-1 zoning classification allows for on-family dwellings and limited agricultural uses, with minimum one-acre lot sizes. The R-R-1 zoning classification allows for one-family dwellings and limited agricultural uses, with minimum one-acre lot sizes. (Riverside County, 2021c; RCIT, n.d.)

As also depicted on EIR Figure 2-5, lands to the west of the Project site are zoned for R-1 land uses. Lands to the south and east of the Project site are zoned for R-R-1 and A-1-1. Lands to the north of the Project site are zoned for R-R-1 and "Residential Agricultural, 1-acre minimum lot size (R-A-1)." (RCIT, n.d.)

D. <u>Applicable Land Use and Planning Policies</u>

1. Riverside County General Plan

The Riverside County General Plan is a policy document that reflects the Riverside County's vision for the future. The General Plan was comprehensively revised in 2003 and most recently updated in 2021. The General Plan is organized into nine separate elements, including Land Use, Circulation, Multipurpose Open Space, Safety, Noise, Housing, Air Quality, Healthy Communities, and Administration. Each General Plan Element is instrumental to achieving the County's long-term development goals. Each element contains a series of policies that guide the course of action the County must take to achieve the County's vision for future development. (Riverside County, 2021a)

In addition, the General Plan divides the County into 19 Area Plans. The purpose of these Area Plans is to provide more detailed land use and policy direction regarding local issues such as land use, circulation, open space, and other topical areas. The Project site is located within the MVAP of the General Plan (Riverside County, 2021b). The MVAP was most recently updated on September 28, 2021. The following subsection provides a summary of each General Plan Element, while the MVAP is discussed below in subsection 4.11.1.D.2.

Land Use Element

The General Plan Land Use Element functions as a guide to planners, the general public, and decision makers as to the ultimate pattern of development. The Land Use Element designates the general distribution, general location, and extent of land uses, such as housing, business, industry, open space, agriculture, natural resources, recreation, and public/quasi-public uses. These designations are reflected on the General Plan Land Use Map, which categorizes individual parcels of land into five basic categories known as "Foundation Components": Rural, Rural Community, Community Development, Agriculture, and Open Space. As reflected on the General Plan Land Use Map, the Land



Use Element provides for a balanced mixture of land uses, including commercial, office, industrial, agriculture, and open space. For each of the various land use designations, the General Plan provides standards for residential density and non-residential intensity, and provides specific policies intended to ensure that product types, densities, and intensities respond to a multitude of market segments. The Land Use Element governs how land is to be utilized; therefore, many of the issues and policies contained in other plan elements are linked in some degree to this element. The Project site is currently located in the Community Development Foundation Component. The Project site is designated by the General Plan Land Use Plan for MDR land uses. (Riverside County, 2021a, p. LU-1)

Circulation Element

The purpose of the Circulation Element is to provide for the movement of goods and people, including pedestrians, bicycles, transit, train, air, and automobile traffic flows within and through the community. Efficient traffic circulation is important to economic viability and the creation and preservation of a quality living environment (Riverside County, 2021a, p. C-1). The Circulation Element designates future road improvements and extensions; addresses non-motorized transportation alternatives; and identifies funding options. The various roadway improvements and extensions contemplated by the Circulation Element are reflected on the General Plan Circulation Plan. The various roadway classifications depicted on the Circulation Plan correspond to specific roadway cross-sections, which provide specific standards for right-of-way (ROW) widths, lane configurations, medians, and landscaping requirements. The Riverside County General Plan and MVAP classify Rider Street and Patterson Avenue as "Secondary Highway (100-foot ROW)," while Walnut Street is not classified as a General Plan Circulation Element roadway.

The General Plan Circulation Element and MVAP identify numerous planned trails in the Project vicinity, however none of the planned trails abut the Project site (Riverside County, 2021b, Figure 9).

Multipurpose Open Space Element

The Multipurpose Open Space Element addresses forms of open space in the County, including scenic, habitat, and recreation. This element has the purpose of addressing the protection and preservation of natural resources, agriculture, and open space areas; managing mineral resources; preserving and enhancing cultural resources; and providing recreational opportunities for the residents of Riverside County. The Multipurpose Open Space Element also contains figures that detail the locations of water resources, vegetation communities, parks, forests, recreation areas, mineral resources, and cultural resources within the County. Together with the MSHCP, the Multipurpose Open Space Element seeks to preserve and protect identified open space areas in order to maintain or improve environmental quality. (Riverside County, 2021a, p. OS-1)

Safety Element

The Safety Element has the primary objective of reducing death, injuries, property damage, and economic and social impact of potential hazards within the County. The Safety Element serves to develop a framework by which safety considerations are introduced into the land use planning process; facilitate the identification and mitigation of hazards for new development; strengthen existing codes,



project review, and permitting processes; present policies directed at identifying and reducing hazards in existing development; and strengthen earthquake, flood, inundation, and wildland fire preparedness planning and post-disaster reconstruction policies. Within the Safety Element, policies are presented which pertain to seismic, slope and soil instability; flood and inundation; fire safety; hazardous waste and materials; and disaster preparedness, response, and recovery hazards. The Safety Element was last updated in September 2021 to address California Senate Bill 379, which required the County to include climate adaptation and resiliency strategies in its Safety Element. (Riverside County, 2021a, pp. S-1 - S-2)

Noise Element

The purpose of the Noise Element is to identify sources of noise generation in the County and provide policies to ensure development does not expose people to unacceptable noise levels. The establishment of desirable maximum noise levels and implementation of noise regulations are also included as part of the Noise Element. The Noise Element provides a systematic approach to identifying and managing noise problems in the community; quantifies existing and projected noise levels; addresses excessive noise exposure; and directs community planning for regulation of noise. The Noise Element includes policies, standards, criteria, programs, diagrams, a reference to action items, and maps related to the protection of public health and welfare with respect to noise. (Riverside County, 2021a, p. N-3)

Housing Element

The 2021-2029 Housing Element identifies and establishes County policies intended to fulfill the housing needs of existing and future residents in Riverside County. It establishes policies that guide County decision-making and sets forth an action plan to implement its housing goals. The Housing Element includes a review of previous housing goals, an assessment of the effectiveness of those goals, and an assessment of housing needs. Additionally, the Housing Element includes an inventory of resources and constraints related to meeting housing needs in the County; an analysis of affordable housing developments and programs intended to preserve such housing; community goals for the maintenance, preservation, improvement, and development of housing; and a program which sets forth a five-year schedule of actions that the County is undertaking or intends to undertake in implementing the polices set forth in the Housing Element. (Riverside County, 2021a, p. H-3)

Air Quality Element

The intent of the Air Quality Element is to provide background information on the physical and regulatory environment affecting air quality in the County. This element also identifies goals, policies, and programs that are meant to balance the County's actions regarding land use, circulation, and other issues potentially affecting air quality. This element works in conjunction with local and regional air quality planning efforts to address ambient air quality standards set forth by the United States (U.S.) Environmental Protection Agency (EPA) and the California Air Resources Board (CARB). The Air Quality Element sets ambient air quality standards for various air pollutants based on State and federal standards. The Element also contains policies regarding sensitive receptors, mobile and stationary pollution sources, energy efficiency and conservation, jobs and housing, and transportation. (Riverside County, 2021a, pp. AQ-3 - AQ-31)



Healthy Communities Element

The Healthy Communities Element provides a framework for translating the General Plan vision for a healthy Riverside County into reality by identifying policies aimed at achieving that vision. The Element addresses areas where public health and planning intersect, including transportation and active living; access to nutritious foods; access to health care; mental health; quality of life; and environmental health. This Element addresses overall health; land uses and community design; transportation system (with an emphasis on non-motorized transportation); arts and culture; social capital; complete communities; parks, trails, and open space; access to healthy foods and nutrition; healthcare and mental healthcare; schools, recreational centers, and daycare centers; and environmental health. The County of Riverside incorporated environmental justice policies into the General Plan Healthy Communities Element in September 2021. The environmental justice policies apply to the Environmental Justice Communities identified in the Land Use Element Figure LU-4.1. The Project site is located within an Environmental Justice Community boundary. (Riverside County, 2021a, pp. HC-1 - HC-12 and Figure LU-4.1)

Administration Element

The Administration Element focuses on the administration of the General Plan, which is the sole responsibility of Riverside County, under the authority of the Board of Supervisors. Administration of the General Plan policies includes establishing, maintaining, and applying tools and procedures for interpreting the intent of the General Plan and applying the interpretation to a variety of circumstances. This Element details the vision for Riverside County, General Planning Principles, Countywide Elements and Planning Policies/Area Plan, Appendices of the General Plan, and other administrative topics. (Riverside County, 2021a, pp. AQ-1 - AQ-20)

2. Mead Valley Area Plan (MVAP)

As noted above, the Project site is located within the MVAP of the Riverside County General Plan. The MVAP guides the evolving character of the area, and uses the Riverside County General Plan vision to establish policies for development and conservation within the specific area of Riverside County. The MVAP provides a description of the location, physical characteristic, and special features, in addition to a Land Use Plan, policies, and exhibits to better understand the physical, environmental, and regulatory characteristics that comprise the area. Each section of the MVAP addresses critical issues facing the Mead Valley community. The MVAP includes sections detailing the features, policy areas, land use, circulation, multipurpose open space, and hazards. (Riverside County, 2021b)

As shown on MVAP Figure 4, *Mead Valley Area Plan Overlays and Policy Areas*, the Project site is not located within any overlays or policy areas, although the Project site is located within the Airport Influence Area (AIA) for the March Air Reserve Base (MARB). However, MVAP Figure 7 shows that the Project site is located within Zone "B" of the "Mt. Palomar Night Time Lighting Policy Area," indicating that the Project is subject to the provisions of Riverside County Ordinance No. 655. (Riverside County, 2021b, Figures 4 and 7).



3. Riverside County Land Use Ordinance

The Riverside County Land Use Ordinance is intended to implement the Riverside County General Plan's Land Use Plan. Under existing conditions, a majority of the Project site is zoned for "One-Family Dwellings (R-1)," two parcels along the central southern boundary are zoned for "Light Agriculture (A-1-1)," and two parcels near the southeast corner of the Project site are zoned for "Rural Residential (R-R-1)." Refer to subsection 4.11.1.C for a more thorough discussion of the site's existing zoning classifications.

4. Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP)

Riverside County has adopted a MSHCP, which is a comprehensive, multi-jurisdictional Habitat Conservation Plan (HCP). The MSHCP promotes conservation of species and their associated habitats in Riverside County through implementation of several HCPs that affect lands within the County. The Western Riverside County MSHCP and the Coachella Valley MSHCP are the two dominant plans that impact the largest portions of the County. These plans coordinate multi-jurisdictional habitat-planning and conservation efforts in the region to promote biological and ecological diversity while accommodating the appropriate construction of new development and infrastructure projects. Riverside County catalogs acquisitions and conservation of lands with respect to the HCPs, and periodically updates the General Plan Land Use maps accordingly. (Riverside County, 2015a, p. 4.2-27)

The Project site is located within the Western Riverside County MSHCP. As previously shown on EIR Figure 2-6, *MSHCP Cell Groups and Criteria Cells*, the Project site is located within Criteria Cell 2432 of Cell Group B of the MVAP. In addition to conservation criteria within areas designated to be included within the MSHCP Reserve System, the MSHCP also identifies a number of additional survey and conservation requirements that apply to the Project area. Refer to EIR Subsection 4.4, *Biological Resources*, for a more thorough discussion of the MSHCP and the Project site's relationship thereto.

5. Stephen's Kangaroo Rat Habitat Conservation Plan (SKR HCP)

The Stephens' Kangaroo Rat Habitat Conservation Plan (SKR HCP) was prepared under the direction of the Riverside County Habitat Conservation Agency (RCHCA) Board of Directors, in consultation with U.S. Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW). Riverside County is a member agency of the RCHCA. The 30-year SKR HCP was designed to acquire and permanently conserve, maintain, and fund the conservation, preservation, restoration, and enhancement of Stephens' kangaroo ratoccupied habitat. The SKR HCP covers approximately 534,000 acres within the member jurisdictions and includes an estimated 30,000 acres of occupied Stephens' kangaroo rat habitat. The SKR HCP requires members to preserve and manage 15,000 acres of occupied habitat in seven core reserves encompassing over 41,000 acres. (Riverside County, 2015a, p. 4.8-52)

On May 3, 1996, the USFWS issued a permit to the Riverside County Habitat Conservation Agency to incidentally take the federally endangered Stephens' kangaroo rat ("SKR"; *Dipodomys stephensi*). Similarly, the CDFW issued a California Endangered Species Act Management Authorization for Implementation of the SKR HCP on May 6, 1996. To date, more than \$50 million has been dedicated to the establishment and management of a system of regional preserves designed to ensure the survival of SKR in the plan area. This effort resulted in the permanent conservation of approximately 50% of the SKR-occupied habitat remaining in the HCP area. Through direct funding and in-kind contributions, SKR habitat in the regional reserve system is



managed to ensure its continuing ability to support the species. Core reserves were deemed complete in December of 2003. (Riverside County, 2015a, p. 4.8-52)

Although the Project site is not targeted for conservation as part of the SKR HCP, the Project site is located within the SKR HCP fee area. Thus, the Project Applicant would be required to contribute fee payments pursuant to Riverside County Ordinance No. 663.

6. Southern California Association of Governments (SCAG)

The Southern California Association of Governments (SCAG) is a Joint Powers Authority (JPA) under California State law, established as an association of local governments and agencies that voluntarily convene as a forum to address regional issues. Under federal law, SCAG is designated as a Metropolitan Planning Organization (MPO) and under State law as a Regional Transportation Planning Agency and a Council of Governments. The SCAG region encompasses six counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura) and 191 cities in an area covering more than 38,000 square miles. SCAG develops long-range regional transportation plans including sustainable communities strategy and growth forecast components, regional transportation improvement programs, regional housing needs allocations and other plans for the region. (SCAG, n.d.)

As an MPO and public agency, SCAG develops transportation and housing strategies that transcend jurisdictional boundaries that affect the quality of life for southern California as a whole. On September 3, 2020, SCAG's Regional Council adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, known as "Connect SoCal". Connect SoCal includes long-range regional transportation plans, regional transportation improvement programs, regional housing needs allocations, and other plans for the region. Connect SoCal also provides objectives for meeting emissions reduction targets set forth by the CARB; these objectives were provided in a direct response to Senate Bill 375 (SB 375) which was enacted to reduce greenhouse gas emissions from automobiles and light trucks through integrated transportation, land use, housing, and environmental planning (SCAG, 2020). Connect SoCal is updated periodically to allow for the consideration and inclusion of new transportation strategies and methods.

Connect SoCal includes a Technical Appendix titled "Goods Movement" that is applicable to the Project because the Project entails a use that is closely associated with, and relies directly on the goods movement system (e.g., manufacturing, construction, retail trade, wholesale trade and transportation, and warehousing). In April 2018 SCAG published *Industrial Warehousing in the SCAG Region*. According to the document, the SCAG region is a vibrant hub for international and domestic trade because of its large transportation base and extensive multimodal transportation system. The SCAG region's freight transportation system includes warehouses and distribution centers; the Ports of Los Angeles, Long Beach, and Hueneme; airports; rail intermodal terminals; rail lines, and local streets, State highways and interstates. Together the system enables the movement of goods from source to market, facilitating uninterrupted global commerce. The region is home to approximately 34,000 warehouses with 1.17 billion square feet (s.f.) of warehouse building space, and undeveloped land that could accommodate an additional 338 million s.f. of new warehouse building space. These regions attract robust logistics activities, and are a major reason the region is a critical mode in the global supply chain. (SCAG, 2018, p. ES-1)



7. South Coast Air Quality Management District Air Quality Management Plan (SCAQMD AQMP)

California Health & Safety Code § 40702 et seq., the California Clean Air Act (CCAA), requires that an Air Quality Management Plan (AQMP) be developed and then updated every three years for air basins with nonattainment status. As discussed in EIR Section 4.3, *Air Quality*, the Project site is located in the South Coast Air Basin (SCAB). The SCAB is within the jurisdiction of the South Coast Air Quality Management District (SCAQMD), the agency charged with bringing air quality in the SCAB into conformity with federal and State air quality standards. Air quality within the SCAB is regulated by the SCAQMD and standards for air quality are documented in the SCAQMD's 2022 AQMP. Although air quality in the SCAB has improved over the past several decades, according to the SCAQMD, the SCAB currently does not meet National Ambient Air Quality Standards (NAAQS) attainment status for ozone (O₃) and particulate matter less than 2.5 microns (PM_{2.5}). The SCAB currently is considered non-attainment under the California Ambient Air Quality Standards (CAAQS) due to levels of O₃, PM_{2.5}, and particulate matter less than 10 microns (PM₁₀). (SCAQMD, 2022)

The SCAQMD AQMP is a plan for the regional improvement of air quality. Projects such as the proposed Project relate to the air quality planning process through the growth forecasts that were used as inputs into the regional transportation model. If a proposed project is consistent with these growth forecasts, and if all available emissions reduction strategies are implemented as effectively as possible on a project-specific basis, then the project is consistent with the AQMP.

4.11.2 APPLICABLE REGULATORY REQUIREMENTS

The following is a brief description of the federal, State, and local environmental laws and related regulations related to land use and planning.

A. <u>Federal Regulations</u>

1. Clean Water Act

The Clean Water Act (CWA) establishes the basic structure for regulating discharges of pollutants into the waters of the United States and regulating quality standards for surface waters. The basis of the CWA was enacted in 1948 and was called the Federal Water Pollution Control Act, but the Act was substantially reorganized and expanded in 1972. "Clean Water Act" became the Act's common name with amendments in 1972. Under the CWA, the EPA has implemented pollution control programs such as setting wastewater standards for industry, and also has set water quality standards for all contaminants in surface waters. The CWA made it unlawful to discharge any pollutant from a point source into navigable waters, unless a permit was obtained. EPA's National Pollutant Discharge Elimination System (NPDES) permit program controls discharges. Point sources are discrete conveyances such as pipes or man- made ditches. Individual homes that are connected to a municipal system, use a septic system, or do not have a surface discharge do not need an NPDES permit; however, industrial, municipal, and other facilities must obtain permits if their discharges go directly to surface waters. (EPA, 2022e)

2. Federal Aviation Regulations Part 77

Federal Regulation Title 14 Part 77 establishes standards and notification requirements for objects affecting navigable airspace. This notification serves as the basis for: (FAA, 2022)



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- Evaluating the effect of the construction or alteration on operating procedures;
- Determining the potential hazardous effect of the proposed construction on air navigation;
- Identifying mitigating measures to enhance safe air navigation; and
- Charting of new objects.

Notification allows the Federal Aviation Administration (FAA) to identify potential aeronautical hazards in advance to prevent or minimize the adverse impacts to the safe and efficient use of navigable airspace. Any person/organization who intends to sponsor any of the following construction or alterations must notify the Administrator of the FAA: (FAA, 2022)

- Any construction or alteration exceeding 200 feet above ground level.
- Any construction or alteration:
 - within 20,000 feet of a public use or military airport which exceeds a 100:1 surface from any point on the runway of each airport with at least one runway more than 3,200 feet.
 - within 10,000 feet of a public use or military airport which exceeds a 50:1 surface from any point on the runway of each airport with its longest runway no more than 3,200 feet.
 - within 5,000 feet of a public use heliport which exceeds a 25:1 surface.
- Any highway, railroad, or other traverse way whose prescribed adjusted height would exceed that above noted standards.
- When requested by the FAA.
- Any construction or alteration located on a public use airport or heliport regardless of height or location. (FAA, 2022)

Persons failing to comply with the provisions of FAR Part 77 are subject to Civil Penalty under Section 902 of the Federal Aviation Act of 1958, as amended and pursuant to 49 U.S.C. Section 46301(a). (FAA, 2022)

B. <u>State Regulations</u>

1. Porter-Cologne Water Control Act

The Porter-Cologne Act is the principal law governing water quality regulation in California. It establishes a comprehensive program to protect water quality and the beneficial uses of water. The Porter-Cologne Act applies to surface waters, wetlands, and ground water and to both point and nonpoint sources of pollution. Pursuant to the Porter-Cologne Act (California Water Code § 13000 et seq.), the policy of the State is as follows: (SWRCB, 2014)

- That the quality of all the waters of the State shall be protected;
- That all activities and factors affecting the quality of water shall be regulated to attain the highest water quality within reason; and
- That the State must be prepared to exercise its full power and jurisdiction to protect the quality of water in the State from degradation.

The Porter-Cologne Act established nine Regional Water Boards (based on hydrogeologic barriers) and the State Water Board, which are charged with implementing its provisions and which have primary responsibility



for protecting water quality in California. The State Water Board provides program guidance and oversight, allocates funds, and reviews Regional Water Boards decisions. In addition, the State Water Board allocates rights to the use of surface water. The Regional Water Boards have primary responsibility for individual permitting, inspection, and enforcement actions within each of nine hydrologic regions. The State Water Board and Regional Water Boards have numerous non-point source (NPS) related responsibilities, including monitoring and assessment, planning, financial assistance, and management. (SWRCB, 2014)

The Regional Water Boards regulate discharges under the Porter-Cologne Act primarily through issuance of NPDES permits for point source discharges and waste discharge requirements (WDRs) for NPS discharges. Anyone discharging or proposing to discharge materials that could affect water quality (other than to a community sanitary sewer system regulated by an NPDES permit) must file a report of waste discharge. The State Water Resources Control Board (SWRCB) and the Regional Water Quality Control Boards (RWQCBs) can make their own investigations or may require dischargers to carry out water quality investigations and report on water quality issues. The Porter-Cologne Act provides several options for enforcing WDRs and other orders, including cease and desist orders, cleanup and abatement orders, administrative civil liability orders, civil court actions, and criminal prosecutions. (SWRCB, 2014)

The Porter-Cologne Act also implements many provisions of the Clean Water Act, such as the NPDES permitting program. The Porter-Cologne Act also requires adoption of water quality control plans that contain the guiding policies of water pollution management in California. In addition, regional water quality control plans (basin plans) have been adopted by each of the Regional Water Boards and get updated as necessary and practical. These plans identify the existing and potential beneficial uses of waters of the State and establish water quality objectives to protect these uses. The basin plans also contain implementation, surveillance, and monitoring plans. (SWRCB, 2014)

2. California Water Code

The California Water Code is the principal state law regulating water quality in California. Water quality provisions must be complied with as contained in numerous code sections including: 1) the Health and Safety Code (HSC) for the protection of ground and surface waters from hazardous waste and other toxic substances; 2) the Fish and Game Code for the prevention of unauthorized diversions of any surface water and discharge of any substance that may be deleterious to fish, plant, animal, or bird life; 3) the Harbors and Navigation Code for the prevention of the unauthorized discharge of waste from vessels into surface waters; and 4) the Food and Agriculture Code for the protection of groundwater which may be used for drinking water supplies. The CDFW, through provisions of the Fish & Game Code (§§ 1601 - 1603) is empowered to issue agreements for any alteration of a river, stream, or lake where fish or wildlife resources may be adversely affected. CDFW regulates wetland areas only to the extent that those wetlands are part of a river, stream, or lake as defined by CDFW. (CA Legislative Info, n.d.)

Surface water quality is the responsibility of the RWQCB, water supply and wastewater treatment agencies, and city and county governments. The principal means of enforcement by the RWQCB is through the development, adoption, and issuance of water discharge permits. RWQCB basin plans establish water quality objectives that are defined as the limits or levels of water quality constituents or characteristics for the reasonable protection of beneficial uses of water. (CA Legislative Info, n.d.)



3. California Planning and Zoning Law

The legal framework in which California cities and counties exercise local planning and land use functions is set forth in the California Planning and Zoning Law, §§ 65000 - 66499.58. Under State of California planning law, each city and county must adopt a comprehensive, long-term general plan. State law gives cities and counties wide latitude in how a jurisdiction may create a general plan, but there are fundamental requirements that must be met. These requirements include the inclusion of seven mandatory elements described in the Government Code, including a section on land use. Each of the elements must contain text and descriptions setting forth objectives, principles, standards, policies, and plan proposals; diagrams and maps that incorporate data and analysis; and mitigation measures. (OPR, n.d.)

4. Subdivision Map Act

The Subdivision Map Act ("Map Act") vests in the cities and counties the power to regulate and control the design and improvement of subdivisions within its boundaries. Each city must adopt an ordinance regulating and controlling subdivisions for which the Map Act requires a tentative and final or parcel map. The authority for a city or county to regulate land use, including subdivisions, flows from the general police power. However, the Map Act sets forth certain mandates that must be followed for subdivision processing. A city can impose conditions on the subdivision process when the Map Act is silent, but it cannot regulate contrary to specific provisions contained in the Map Act. (Curtin, Jr. & Merritt, 2002, p. 1) The Map Act's primary goals are:

- To encourage orderly community development by providing for the regulation and control of the design and improvement of the subdivision, with a proper consideration of its relation to adjoining areas;
- To ensure that the areas within the subdivision that are dedicated for public purposes will be properly improved by the subdivider so that they will not become an undue burden on the community; and
- To protect the public and individual transferees from fraud and exploitation. (Curtin, Jr. & Merritt, 2002, p. 1)

The Map Act is applied in conjunction with other state land use laws such as the general plan, specific plans, zoning, CEQA, and the Permit Streamlining Act. The Map Act provides for regulation of land divisions by a city or county and is interpreted and enforced by the city or county. (Curtin, Jr. & Merritt, 2002, p. 2)

5. Office of Planning and Research (OPR) General Plan Guidelines

Each city and county in California must prepare a comprehensive, long term general plan to guide its future. To assist local governments in meeting this responsibility, the Governor's Office of Planning and Research (OPR) is required to adopt and periodically revise guidelines for the preparation and content of local general plans pursuant to Government Code § 65040.2. The General Plan Guidelines are advisory, not mandatory. Nevertheless, it is the state's only official document explaining California's legal requirements for general plans. Planners, decision-making bodies, and the public depend upon the General Plan Guidelines for help when preparing local general plans. The courts have periodically referred to the General Plan Guidelines for assistance in determining compliance with planning law. For this reason, the General Plan Guidelines closely adheres to statute and case law. It also relies upon commonly accepted principles of contemporary planning practice. (OPR, 2017b, p. 1)



6. State Aeronautics Act

The State Aeronautics Commission Act of 1947 created the Division of Aeronautics ("Division"), and was later amended by statute to read the State Aeronautics Act (Aeronautics Act) in 1961. As a result of this legislation, the Division's first priorities are those mandated by the Aeronautics Act, then Caltrans guidance, then Division guidance as expressed through its Policy Element. As directed by the Aeronautics Act, the Division is a steward and advocate of aviation in California. To that end, its efforts are focused on activities that "protect the public interest in aeronautics and aeronautical progress." (§ 21002) (CA Legislative Info, n.d.)

The Aeronautics Act itself is divided into seven chapters, the first five of which have not received significant cleanup legislation since its enabling in 1947. The first chapter begins with general provisions and definitions and explains the Legislature's intent for a State aviation program. Chapter two explains Caltrans' role in administering the Division, and explains the role of the California Transportation Commission (CTC). Chapter three includes many of the safety considerations from FAA regulations that help keep airports and the surrounding communities safe and compatible with flight operations. Chapter four deals with airport and heliport permitting, air navigation facilities, noise guidelines, funding, and importantly, the formation and authority of Airport Land Use Commissions (ALUC). Chapter five covers the investigations and hearings on matters covered in the Aeronautics Act. Chapter six introduces airport planning and specifically introduces the intent of the California Aviation Systems Plan (CASP) and how it can be used to support California aviation. Finally, Chapter 7 covers skydiving or sport parachuting operations to ensure they are in compliance with federal safety laws. (CA Legislative Info, n.d.)

7. Senate Bill 375 (SB 375)

SB 375 contains five major components. The first is regional GHG emissions targets: California ARB's Regional Targets Advisory Committee guides the adoption of targets to be met by 2035 for each MPO in the state. These targets, which MPOs may propose themselves, are updated every eight years in conjunction with the revision schedule of housing and transportation elements. (CA Legislative Info, n.d.)

Second, MPOs are required to prepare a Sustainable Communities Strategy (SCS) that provides a plan for meeting regional targets. The SCS and the Regional Transportation Plan (RTP) must be consistent with each other, including action items and financing decisions. If the SCS does not meet the regional target, the MPO must produce an Alternative Planning Strategy that details an alternative plan to meet the target. (CA Legislative Info, n.d.)

Third, SB 375 requires that regional housing elements and transportation plans be synchronized on 8-year schedules. In addition, Regional Housing Needs Assessment (RHNA) allocation numbers must conform to the SCS. If local jurisdictions are required to rezone land as a result of changes in the housing element, rezoning must take place within three years. (CA Legislative Info, n.d.)

Fourth, SB 375 provides CEQA streamlining incentives for preferred development types. Certain residential or mixed-use projects qualify if they conform to the SCS. Transit-oriented developments (TODs) also qualify if they (1) are at least 50% residential, (2) meet density requirements, and (3) are within 0.5-mile of a transit stop. The degree of CEQA streamlining is based on the degree of compliance with these development preferences. (CA Legislative Info, n.d.)



Finally, MPOs must use transportation and air emissions modeling techniques consistent with guidelines prepared by the CTC. Regional Transportation Planning Agencies, cities, and counties are encouraged, but not required, to use travel demand models consistent with the CTC guidelines. (CA Legislative Info, n.d.)

8. SCAG Connect SoCal

The Southern California Association of Governments (SCAG) is a Joint Powers Authority (JPA) under California State law, established as an association of local governments and agencies that voluntarily convene as a forum to address regional issues. Under federal law, SCAG is designated as a MPO and under State law as a Regional Transportation Planning Agency and a Council of Governments. The SCAG region encompasses six counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura) and 191 cities in an area covering more than 38,000 square miles. SCAG develops long-range regional transportation plans including sustainable communities strategy and growth forecast components, regional transportation improvement programs, regional housing needs allocations and other plans for the region. (SCAG, n.d.)

Connect SoCal, is SCAG's 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). *Connect SoCal* includes a Technical Appendix titled "Goods Movement" that is applicable to the Project because the Project entails a use that is closely associated with, and relies directly on the goods movement system (e.g., manufacturing, construction, retail trade, wholesale trade and transportation, and warehousing). In April 2018 SCAG published *Industrial Warehousing in the SCAG Region*. According to the document, the SCAG region is a vibrant hub for international and domestic trade because of its large transportation base and extensive multimodal transportation system. The SCAG region's freight transportation system includes warehouses and distribution centers; the Ports of Los Angeles, Long Beach, and Hueneme; airports; rail intermodal terminals; rail lines, and local streets, state highways and interstates. Together the system enables the movement of goods from source to market, facilitating uninterrupted global commerce. The region is home to approximately 34,000 warehouses with 1.17 billion square feet of warehouse building space, and undeveloped land that could accommodate an additional 338 million square feet of new warehouse building space. These regions attract robust logistics activities, and are a major reason the region is a critical mode in the global supply chain. (SCAG, 2018, p. ES-1)

4.11.3 BASIS FOR DETERMINING SIGNIFICANCE

Section XI of Appendix G to the CEQA Guidelines, as updated in December 2018, addresses typical adverse effects on land use and planning, and includes the following threshold questions to evaluate the Project's impacts on land use and planning:

- Would the project physically divide an established community?
- Would the project cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Significance thresholds are set forth in Riverside County's Environmental Assessment Checklist, and have been updated to reflect the 2018 updates to Section XI of Appendix G to the CEQA Guidelines (listed above).



Accordingly, the proposed Project would have a significant impact on land use and planning if construction and/or operation of the Project would:

- a. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect; or
- b. Disrupt or divide the physical arrangement of an established community (including a low-income or minority community).

The significance thresholds set forth in Riverside County's Environmental Assessment Checklist, as modified/updated per the 2018 updates to the CEQA Guidelines, were used to evaluate the significance of the proposed Project's impacts on land use and planning. It should be noted that the Project's consistency with the Western Riverside County MSHCP and the SKR HCP, which are the only habitat conservation plans or natural community conservation plans applicable to the Project site, is evaluated in EIR Subsection 4.4, *Biological Resources*, under the analysis of Threshold a., and the analysis concludes that impacts due to a conflict with the MSHCP and SKR HCP would be less than significant with mitigation. Project consistency with the MSHCP and SKR HCP is not further discussed in this Subsection.

4.11.4 IMPACT ANALYSIS

<u>Threshold a.</u>: Would the Project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

The proposed Project has the potential to conflict with the Riverside County General Plan and MVAP, as well as Connect SoCal. Additionally, the Project's consistency with the SCAQMD AQMP is addressed under EIR Subsection 4.3, *Air Quality*. Similarly, the Project's consistency with the Western Riverside County MSHCP and the SKR HCP are addressed in EIR Subsection 4.4, *Biological Resources*. In addition, the Project's consistency with Riverside County's Climate Action Plan (CAP) is addressed in EIR Subsection 4.8, *Greenhouse Gas Emissions*. As discussed in Subsection 4.3, the Project would be fully consistent with the 2016 SCAQMD AQMP. As indicated in EIR Subsections 4.4 and 4.8, the Project would not conflict with the MSHCP, the SKR HCP, or the Riverside County CAP; thus, impacts due to a conflict with the MSHCP, SKR HCP, and CAP would be less than significant. The Project's consistency with the SCAQMD AQMP, MSHCP, SKR HCP, and the County's CAP is not further discussed below.

A. <u>Project Consistency with the Riverside County General Plan and MVAP</u>

1. General Plan and MVAP Land Use Consistency

Under existing conditions, the General Plan and MVAP designate the Project site for MDR land uses. The Project Applicant proposes General Plan Amendment No. 220003 (GPA 220003) to modify the land use designations assigned to the 40.5-acre Project site. As part of GPA 220003, 36.0 acres of the Project site would be redesignated for "Community Development – Light Industrial (LI)" land uses, with remaining areas continuing to be designated for MDR land uses. With approval of GPA 220003, the Project would be fully consistent with the General Plan and MVAP land use designations for the 40.5-acre property. Moreover, impacts associated with the proposed land uses have been evaluated throughout this EIR. Where significant



impacts are identified, mitigation measures are identified to reduce impacts to the maximum feasible extent. Based on the foregoing analysis, the proposed Project would not result in a significant environmental impact due to a conflict with any land use plan adopted for the purpose of avoiding or mitigating an environmental effect, and impacts would be less than significant.

2. General Plan and MVAP Policy Consistency

A General Plan Policies Consistency Analysis was prepared for the proposed Project in order to demonstrate the Project's consistency with applicable General Plan Policies, and is included as EIR *Technical Appendix N*. For more information regarding the Project's consistency with specific applicable Riverside County General Plan and MVAP policies, please refer to *Technical Appendix N*. As concluded therein, the Project would not conflict with any of the applicable General Plan or MVAP policies adopted for the purpose of avoiding or reducing significant environmental effects. Accordingly, impacts due to a conflict with applicable General Plan or MVAP policies would be less than significant.

B. <u>Project Consistency with Connect SoCal</u>

As previously noted, SCAG has published a draft 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), referred to as "Connect SoCal." Connect SoCal seeks to improve mobility, promote sustainability, facilitate economic development, and preserve the quality of life for the residents in the region. The long-range visioning plan balances future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health. The goals included in Connect SoCal are pertinent to the proposed Project. These goals are meant to provide guidance for considering the proposed Project within the context of regional goals and policies. An analysis of the Project's consistency with the relevant goals of Connect SoCal is presented below in Table 4.11-1, *Analysis of Consistency with Connect SoCal Goals*. As indicated, the Project would not conflict with any Connect SoCal goals, and no impact would occur.

C. <u>Conclusion</u>

Based on the foregoing analysis, the proposed Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, and impacts would be less than significant.

GOAL	GOAL STATEMENT	PROJECT CONSISTENCY DISCUSSION
1.	Encourage regional economic prosperity and global competitiveness.	<u>Consistent.</u> This policy would be implemented by the cities and counties within the SCAG region as part of comprehensive local and regional planning efforts. The Project would support this goal by providing an employment-generating land use (i.e., a warehouse on land proposed to be designated Industrial Park) in a portion of unincorporated Riverside County that has a low jobs-to-housing ratio.

 Table 4.11-1
 Analysis of Consistency with Connect SoCal Goals



GOAL	GOAL STATEMENT	PROJECT CONSISTENCY DISCUSSION
2.	Improve mobility, accessibility, reliability, and travel safety for people and goods.	<u>Consistent.</u> EIR Section 4.18, <i>Transportation</i> , evaluates the potential for Project-related transportation impacts and specifies mitigation measures to reduce the Project's vehicle miles traveled (VMT) impact to the extent feasible. The Project Applicant would implement local transportation improvements that would improve mobility, accessibility, reliability, and travel safety for people and goods in the local area. Specifically, the Project includes frontage improvements on Patterson Avenue, Rider Street, and Walnut Street including sidewalks on all three street frontages and a multiuse trail segment along Patterson Avenue and Walnut Street to form a portion of the community's trail system. The Project's driveways are designed to accommodate vehicle turning movements and bicycle storage facilities would be provided internal to the site.
3.	Enhance the preservation, security, and resilience of the regional transportation system.	<u>Consistent.</u> This policy would be implemented by the cities and counties within the SCAG region as part of comprehensive local and regional planning efforts. As disclosed in EIR Section 4.18, <i>Transportation</i> , there are no components of the proposed Project that would adversely affect the preservation, security, or resilience of the regional transportation system, and the Project Applicant would contribute fees towards regional improvements required in the Project vicinity. The Project Applicant also proposes to install a traffic signal northeast of the Project site at the intersection of Rider Street to improve traffic flow, and install frontage improvements that include road widening, sidewalk installation, and landscaping along Patterson Avenue, Rider Street, and Walnut Street, consistent with the County General Plan Circulation Element, MVAP, and the Riverside County Road Standards (Ordinance No. 461). Furthermore, the Project Applicant will install trail segments along the Project's frontage with Patterson Avenue and Walnut Street to enhance the community multi-use trail network.
4.	Increase person and goods movement and travel choices within the transportation system.	<u>Consistent.</u> This policy would be implemented by the cities and counties within the SCAG region as part of the overall planning and maintenance of the regional transportation system. The Project includes a proposed warehouse, which would function as part of the regional supply chain for goods movement. The Project's design also facilitates travel choice by providing for frontage street widening, sidewalks, trail segments, and providing for bicycle storage internal to the Project site as required by CALGreen. Additionally, the Project would add employees to the area, which would encourage and facilitate expanded transit service and ridership in the local area.

Table 4.11-1 Analysis of Consistency with Connect SoCal Goals



GOAL	GOAL STATEMENT	PROJECT CONSISTENCY DISCUSSION
5.	Reduce greenhouse gas emissions and	Consistent. This policy would be implemented by the cities and
	improve air quality.	counties within the SCAG region as part of comprehensive
		transportation planning efforts. The Project would entail
		development of a warehouse building in a portion of Riverside
		County that experiences a relatively low jobs-to-housing ratio; thus,
		the Project would assist in reducing worker commute times in the
		local area by providing jobs in close proximity to housing.
		Additionally, and as discussed in EIR Subsections 4.3, Air Quality,
		and 4.8, Greenhouse Gas Emissions, the Project would be
		consistent with the County's Climate Action Plan (CAP) and would
		be required to implement mitigation measures to air pollutant
		South Coast Air Quality Management District's (SCAQMD's)
		South Coast Air Quality Management District's (SCAQMD's)
		mandetery compliance with applicable air pollutant control
		regulations that are enforced across federal. State regional and
		local levels
(
6.	Support healthy and equitable	<u>Consistent.</u> The Project's design provides for physical separation
	communities.	and bullering between the proposed warehouse and an established
		area is planned along the western perimeter of the warehouse parcel
		that is designed to include a landscaped berm for visual screening.
		noise attenuation, and other environmental benefits.
		The Project includes three residentially zoned lots, on which no
		homes are currently proposed and that could be used for community
		benefit. The Project Applicant also proposes to construct cul-de-sacs
		for Wildwood Lane and Sunny Canyon Street for the benefit of the
		community to the west. Walnut Street along the Project site's
		frontage would be improved and include a sidewalk and trail
		segment, also for the benefit of the community.
		The Project would implement trails and sidewalks along the
		Patterson Avenue. Walnut Street, and Rider Street public rights-of-
		way in a manner that is consistent with Riverside County General
		Plan. The Project study area is within the service area of the
		Riverside Transit Authority (RTA), a public transit agency serving
		various jurisdictions within Riverside County. The Project would not
		conflict with any existing or planned RTA routes.
		An analysis of the Project's environmental impacts is provided
		warranted Additionally and as discussed in detail in EID Tashuised
		Annendix N the Project would be consistent with or otherwise would
		not conflict with any applicable General Plan policies or
		requirements, including policies and requirements included in the
		General Plan's Healthy Communities Element. Thus, the Project

Table 4.11-1 Analysis of Consistency with Connect SoCal Goals



GOAL	GOAL STATEMENT	PROJECT CONSISTENCY DISCUSSION
		would facilitate the establishment of healthy and equitable
		communities.
7.	Adapt to a changing climate and support an integrated regional development pattern and transportation network.	<u>Consistent.</u> This policy would be implemented by the cities and counties within the SCAG region as part of comprehensive transportation planning efforts. Specific to the Project, the Project supports an integrated regional development pattern by defining the physical transition area between employment uses and residential uses in this area of Mead Valley. Specifically, the Project design provides a 6.0-acre area along the warehouse parcel's western boundary that is designed to contain a landscaped berm as the separating physical feature. Driveway positioning directs truck traffic to the east toward I-215 and away from residential neighborhoods. As indicated in EIR Subsection 4.8, <i>Greenhouse</i> <i>Gas Emissions</i> , the Project would be conditioned to ensure full compliance with the Riverside County CAP, thereby demonstrating that the Project would assist the County in meeting its greenhouse gas reduction targets. The Project also would be conditioned to construct transportation improvements including widening of Patterson Avenue, Walnut Street, and Rider Street along the Project site's frontage, and install a traffic signal at the intersection of Rider Street and Harvill Avenue. Additionally, the Project Applicant is obligated to contribute fees towards improving the regional transportation network through the TUMF program.
8.	Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	Not Applicable. This policy provides guidance to cities and counties to leverage new transportation technologies and data- driven solutions that result in more efficient travel. There are no components of the proposed Project that would preclude the County's ability to implement this goal.
9.	Encourage development of diverse housing types in areas that are supported by multiple transportation options.	Not Applicable. This policy would be implemented by the cities and counties within the SCAG region as part of comprehensive transportation planning efforts. The Project includes three residential parcels for the benefit of an existing residential subdivision to the west, but has no potential to conflict with this goal.
10.	Promote conservation of natural and agricultural lands and restoration of habitats.	No conflict identified. The Project site is located in a MSHCP Criteria Cell but is not identified for preservation. The Project's impacts to biological resources would be mitigated to less than significant as discussed in EIR Subsection 4.3, <i>Biological</i> <i>Resources</i> . Additionally, as discussed in EIR Subsection 4.2, <i>Agriculture and Forestry Resources</i> , the Project site is not mapped as containing any important farmland types. Additionally, the Project site is designated by the Riverside County General Plan for future development with urban land uses, and therefore the Project site is not suitable for conservation as agricultural land.

Table 4.11-1	Analysis of Consistency with Connect SoCal Go	bals
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(SCAG, 2020)



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

Under existing conditions, there is an existing residential community immediately to the west of the Project site, while lands to the north, east, and south are partially developed with large-lot single-family residential uses. However, there are no components of the Project that would disrupt or divide the physical arrangement of the existing residential uses. With implementation of the Project, access between these residential areas would continue to be provided along Rider Street, Patterson Avenue, and Walnut Street. Accordingly, the Project would not disrupt or divide the physical arrangement of an established community (including a low-income or minority community), and impacts would be less than significant.

4.11.5 CUMULATIVE IMPACT ANALYSIS

As indicated under the analysis of Threshold a., with approval of GPA 220003, the proposed Project would not conflict with any of the policies included in the Riverside County General Plan or MVAP, and would not conflict with Connect SoCal. Other developments within the western Riverside County region similarly would be required to demonstrate compliance with applicable General Plan and Connect SoCal policies. Thus, the Project's impacts due to a conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect would be less-than-cumulatively considerable.

As indicated under the analysis of Threshold b., the Project would not disrupt or divide the physical arrangement of an established community (including a low-income or minority community). As such, cumulatively-considerable impacts would not occur.

4.11.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

<u>Threshold a.: Less-than-Significant Impact</u>. The Project would not conflict with the General Plan, MVAP, Connect SoCal, or any other land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Additionally, there are no impacts due to land use incompatibility that have not already been evaluated and mitigated to the maximum feasible extent in relevant sections of this EIR; therefore, Project impacts due to land use incompatibility would be less than significant.

<u>Threshold b.: Less-than-Significant Impact</u>. The Project would not disrupt or divide the physical arrangement of an established community (including a low-income or minority community), and impacts would be less than significant.

4.11.7 COUNTY REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

Impacts associated with land use and planning would be less than significant; therefore, mitigation measures are not required.



4.12 MINERAL RESOURCES

This Subsection 4.12 describes the potential mineral resources that are located on or beneath the Project site and in the Project vicinity and evaluates the potential effects that the Project may have on these resources. The following analysis is based in part on information obtained in the County's General Plan (Riverside County, 2021a). The analysis in this subsection also is based, in part, on information from the report titled, "Geotechnical Investigation, Proposed Warehouse, SWC Rider Street and Patterson Avenue," prepared by Southern California Geotechnical (herein, "SCG"), dated March 23, 2022, and included as EIR *Technical Appendix F* (SCG, 2022) Refer to EIR Subsection 7.0, *References*, for a complete list of reference sources.

4.12.1 EXISTING CONDITIONS

A. <u>Geology</u>

The Project site is located in the Peninsular Ranges geomorphic province of California. The Peninsular Ranges province extends from the Los Angeles Basin southeast to Baja California and from the Pacific Ocean eastward to the Coachella Valley and Colorado Desert. The province consists of numerous northwest to southeast-trending mountain ranges and valleys that are geologically controlled by several major active faults. The Project site is located within and near the central part of the Perris block, which is bounded on the northeast by the San Jacinto fault zone, on the north by the Sierra Madre-Cucamonga fault zone, and on the west by the Elsinore Fault zone.

The Project site is predominantly underlain by early Pleistocene (Map Symbol Qvof) old alluvial valley deposits, which are described as predominantly composed of moderately indurated, slightly dissected, sandy alluvium, containing lesser silt, and clay-bearing alluvium. Based on the mapping of the geologic formations present near the Project site, SCG anticipates that the near-surface older alluvium is underlain by Val Verde tonalite (Map Symbol Kvt) formation, which is described as gray-weathering, relatively homogeneous, massive to well-foliated, medium to coarse grained, hypautomorphic granular biotite-hornblende tonalite. The geologic conditions encountered at the site are consistent with the mapped geologic conditions. (SCG, 2022, p. 9)

B. <u>Mineral Resources Potential</u>

The Surface Mining and Reclamation Act of 1975 (SMARA) Public Resources Code (PRC), Sections (§§) 2710-2796 provides a comprehensive surface mining and reclamation policy with the regulation of surface mining operations to assure that adverse environmental impacts are minimized and mined lands are reclaimed to a usable condition. The SMARA requires the State Geologist to classify land according to the presence, absence, or likely occurrence of significant mineral deposits in certain areas of the State subject to urban expansion or land uses incompatible with mining. The State classification system is broken out into four general zones, as shown below in Table 4.12-1, *Mineral Resources Zones*. According to mapping information available from the California Department of Conservation (CDC), the Project site is classified as MRZ-3, which indicates that the Project site occurs in an area of undetermined mineral resource significance (CDC, n.d.). Accordingly, the Project site does not contain any areas of known mineral resources.



Zone	Significance
MRZ-1	Areas where the available geologic information indicates no significant mineral deposits or a minimal likelihood of significant mineral deposits.
MRZ-2a	Areas where the available geologic information indicates that there are significant mineral deposits.
MRZ-2b	Areas where the available geologic information indicates that there is a likelihood of significant mineral deposits.
MRZ-3a	Areas where the available geologic information indicates that mineral deposits are likely to exist, however, the significance of the deposit is undetermined.
MRZ-4	Areas where there is not enough information available to determine the presence or absence of mineral deposits.

 Table 4.12-1
 Mineral Resources Zones

(Riverside County, 2021a, pp. OS-37 to OS-38)

4.12.2 APPLICABLE ENVIRONMENTAL REGULATIONS

The following is a brief description of the applicable State law related to mineral resources.

A. <u>State Regulations</u>

1. Surface Mining and Reclamation Act of 1975

The Surface Mining and Reclamation Act (SMARA) PRC, §§ 2710-2796 provides a comprehensive surface mining and reclamation policy with the regulation of surface mining operations to assure that adverse environmental impacts are minimized and mined lands are reclaimed to a usable condition. SMARA also encourages the production, conservation, and protection of California's mineral resources. PRC § 2207 provides annual reporting requirements for all mines in the State, under which the State Mining and Geology Board is also granted authority and obligations. (CDC, n.d.) SMARA, Chapter 9, Division 2 of the PRC, requires the State Mining and Geology Board to adopt State policy for the reclamation of mineral lands and the conservation of mineral resources. These policies are prepared in accordance with the Administrative Procedures Act, (Government Code) and are found in California Code of Regulations, Title 14, Division 2, Chapter 8, Subchapter 1. (CDC, n.d.)

4.12.3 Basis for Determining Significance

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

- a. Result in the loss of availability of a known mineral resource that would be of value to the region or the residents of the State;
- b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan;
- c. Be an incompatible land use located adjacent to a State classified or designated area or existing surface mine; or


d. Expose people or property to hazards from proposed, existing or abandoned quarries or mines.

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

4.12.4 IMPACT ANALYSIS

Threshold a: Result in the loss of availability of a known mineral resource that would be of value to the region or the residents of the State?

According to the CDC, the Project site is classified as Mineral Resources Zone (MRZ) 3, which includes "areas where the available geologic information indicates that mineral deposits are likely to exist, however, the significance of the deposit is undetermined" (CDC, n.d.). Therefore, the Project site does not contain any known mineral resources that would be of value to the region or the residents of the State. Accordingly, with implementation of the proposed Project there would be no impact to known mineral resources.

Threshold b: Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

The Project site is not designated as a mineral resource recovery site by the County's General Plan or the Mead Valley Area Plan (MVAP), and is not located within the boundaries of any specific plans. There are no other land use plans that identify the Project site for containing mineral resources. Accordingly, the Project would not result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan, and no impact would occur.

Threshold c: Be an incompatible land use located adjacent to a State classified or designated area or existing surface mine?

As mapped by the CDC, there are no areas surrounding the Project site that contain known mineral resources. No lands in the Project vicinity are classified or designated by the State as containing mineral resource deposits, and there are no known surface mines in the Project vicinity. Accordingly, the Project would not be an incompatible land use located adjacent to a State classified or designated area or existing surface mine, and no impact would occur.

Threshold d: Expose people or property to hazards from proposed, existing, or abandoned quarries or mines?

Historical records indicate that no quarrying or mining activities ever occurred on the Project site, and there is no evidence of any proposed, existing, or abandoned quarries in the surrounding area (HMC, 2022). Accordingly, the Project would not expose people or property to hazards from proposed, existing, or abandoned quarries or mines, and no impact would occur.

4.12.5 CUMULATIVE IMPACT ANALYSIS

This cumulative impact analysis considers development of the proposed Project in conjunction with other development projects within the western Riverside County region. This cumulative study area was selected



because western Riverside County encompasses large areas that include geologic conditions similar to those that occur on the Project site, and because this study area encompasses a large portion of the local market for the production and consumption of mineral resources.

As mapped by the CDC, the Project site is classified as MRZ-3 and contains no known mineral resource deposits. As such, the Project has no potential to result in cumulatively-considerable impacts due to the loss of availability of a known mineral resource that would be of value to the region or residents of the State. No cumulatively-considerable impacts would occur.

Riverside County's General Plan, and the MVAP do not designate the Project site or surrounding areas as a mineral resource recovery site, and there are no other land use plans that identify the site or surrounding areas for containing mineral resources. As such, the Project has no potential to result in cumulatively-considerable impacts due to the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. No cumulatively-considerable impacts would occur.

There are no lands in the Project vicinity that include State classified or designated areas for mineral resources, and there are no existing surface mines in the Project vicinity. As such, no cumulatively-considerable impacts to State classified or designated areas or existing surface mines would occur.

There are no known proposed, existing, or abandoned quarries or mines in the Project vicinity. As such, the Project has no potential to expose people or property to hazards from proposed, existing, or abandoned quarries or mines, and no cumulatively-considerable impacts would occur.

4.12.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

<u>Threshold a.: No Impact</u>. The Project site does not contain any known mineral resources that would be of value to the region or the residents of the State. Accordingly, with implementation of the proposed Project there would be no impact to known mineral resources.

<u>Threshold b.: No Impact</u>. The Project would not result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan, and no impact would occur.

<u>Threshold c.: No Impact</u>. The Project would not be an incompatible land use located adjacent to a State classified or designated area or existing surface mine, and no impact would occur.

<u>Threshold d.: No Impact</u>. The Project would not expose people or property to hazards from proposed, existing, or abandoned quarries or mines, and no impact would occur.

4.12.7 APPLICABLE REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

No impact to mineral resources would occur with implementation of the proposed Project; thus, mitigation measures are not required.



4.13 <u>Noise</u>

This Subsection 4.13 addresses the environmental issue of noise. The information in this Subsection is based in part on a technical report prepared by Urban Crossroads, Inc. (herein, "Urban Crossroads"), titled, "Rider & Patterson (PPT220004) Noise Impact Analysis" (herein, "NIA"), dated November 21, 2023, and included as *Technical Appendix J* to this EIR (Urban Crossroads, 2023e). Refer to Section 7.0, *References*, for a complete list of reference sources.

4.13.1 FUNDAMENTALS OF NOISE AND ENVIRONMENTAL SOUND

Noise is simply defined as "unwanted sound." Sound becomes unwanted when it interferes with normal activities, when it causes actual physical harm, or when it has adverse effects on health. Noise is measured on a logarithmic scale of sound pressure level known as a decibel (dB). A-weighted decibels (dBA) approximate the subjective response of the human ear to broad frequency noise sources by discriminating against very low and very high frequencies of the audible spectrum. They are adjusted to reflect only those frequencies which are audible to the human ear. Figure 4.13-1, *Typical Noise Levels*, presents a summary of the typical noise levels and their subjective loudness and effects. (Urban Crossroads, 2023e, p. 7)

COMMON OUTDOOR ACTIVITIES	COMMON INDOOR ACTIVITIES	A - WEIGHTED SOUND LEVEL dBA	SUBJECTIVE LOUDNESS	EFFECTS OF NOISE	
THRESHOLD OF PAIN		140			
NEAR JET ENGINE	130		INTOLERABLE OR		
		120	DEAFENING	HEARING LOSS	
JET FLY-OVER AT 300m (1000 ft)	ROCK BAND	110			
LOUD AUTO HORN		100			
GAS LAWN MOWER AT 1m (3 ft) 90		90			
DIESEL TRUCK AT 15m (50 ft), at 80 km/hr (50 mph)	FOOD BLENDER AT 1m (3 ft)	80			
NOISY URBAN AREA, DAYTIME	VACUUM CLEANER AT 3m (10 ft)	70	LOUD	SPEECH	
HEAVY TRAFFIC AT 90m (300 ft)	NORMAL SPEECH AT 1m (3 ft)	60			
QUIET URBAN DAYTIME	LARGE BUSINESS OFFICE	50	MODERATE	ci ere p	
QUIET URBAN NIGHTTIME	THEATER, LARGE CONFERENCE ROOM (BACKGROUND)	40		DISTURBANCE	
QUIET SUBURBAN NIGHTTIME	LIBRARY	30			
QUIET RURAL NIGHTTIME	BEDROOM AT NIGHT, CONCERT HALL (BACKGROUND)	20	FAINT		
	BROADCAST/RECORDING 10 STUDIO 10			NO EFFECT	
LOWEST THRESHOLD OF HUMAN HEARING	LOWEST THRESHOLD OF HUMAN HEARING	0	VENT FAINI		

Figure	1 1 3-1	Typical	Noico	ا مربحا
rigule	4.13-1	Typical	110190	LGAGI9

Source: Environmental Protection Agency Office of Noise Abatement and Control, Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety (EPA/ONAC 550/9-74-004) March 1974. (Urban Crossroads, 2023e, Exhibit 2-A)



B. <u>Range of Noise</u>

Since the range of intensities that the human ear can detect is so large, the scale frequently used to measure intensity is a scale based on multiples of 10, the logarithmic scale. The scale for measuring intensity is the decibel scale. Each interval of 10 decibels indicates a sound energy 10 times greater than before, which is perceived by the human ear as being roughly twice as loud. The most common sounds vary between 40 dBA (very quiet) to 100 dBA (very loud). Normal conversation at three feet is roughly 60 dBA, while loud jet engine noises equate to 110 dBA at approximately 100 feet, which can cause serious discomfort. Another important aspect of noise is the duration of the sound and the way it is described and distributed in time. (Urban Crossroads, 2023e, pp. 7-8)

C. <u>Noise Descriptors</u>

Environmental noise descriptors are generally based on averages, rather than instantaneous, noise levels. The most used figure is the equivalent continuous sound pressure level (Leq). Leq is not measured directly but is calculated from sound pressure levels typically measured in dBA. Leq represents a steady state sound level containing the same total energy as a time varying signal over a given sample period and is commonly used to describe the "average" noise levels within the environment. (Urban Crossroads, 2023e, p. 8)

Peak hour or average noise levels, while useful, do not completely describe a given noise environment. Noise levels lower than peak hour may be disturbing if they occur during times when quiet is most desirable, namely evening and nighttime (sleeping) hours. To account for this, the Community Noise Equivalent Level (CNEL), representing a composite 24-hour noise level is utilized. The CNEL is the weighted average of the intensity of a sound, with corrections for time of day, and averaged over 24 hours. The time-of-day corrections require the addition of 5 decibels to dBA Leq sound levels in the evening from 7:00 p.m. to 10:00 p.m., and the addition of 10 decibels to dBA Leq sound levels at night between 10:00 p.m. and 7:00 a.m. These additions are made to account for the noise sensitive time periods during the evening and night hours when sound appears louder. CNEL does not represent the actual sound level heard at any time, but rather represents the total sound exposure. Riverside County relies on the 24-hour CNEL level to assess land use compatibility with transportation-related noise sources. (Urban Crossroads, 2023e, p. 8)

D. Sound Propagation

When sound propagates over a distance, it changes in level and frequency content. The way noise reduces with distance depends on the factors described below. (Urban Crossroads, 2023e, p. 8)

1. Geometric Spreading

Sound from a localized source (i.e., a stationary point source) propagates uniformly outward in a spherical pattern. The sound level attenuates (or decreases) at a rate of 6 dB for each doubling of distance from a point source. Highways consist of several localized noise sources on a defined path and hence can be treated as a line source, which approximates the effect of several point sources. Noise from a line source propagates outward in a cylindrical pattern, often referred to as cylindrical spreading. Sound levels attenuate at a rate of 3 dB for each doubling of distance from a line source. (Urban Crossroads, 2023e, p. 8)



2. Ground Absorption

The propagation path of noise from a highway to a receiver is usually very close to the ground. Noise attenuation from ground absorption and reflective wave canceling adds to the attenuation associated with geometric spreading. Traditionally, the excess attenuation has also been expressed in terms of attenuation per doubling of distance. This approximation is usually sufficiently accurate for distances of less than 200 feet. For acoustically hard sites (i.e., sites with a reflective surface between the source and the receiver, such as a parking lot or body of water), no excess ground attenuation is assumed. For acoustically absorptive or soft sites (i.e., those sites with an absorptive ground surface between the source and the receiver such as soft dirt, grass, or scattered bushes and trees), an excess ground attenuation value of 1.5 dB per doubling of distance is normally assumed. When added to the cylindrical spreading, the excess ground attenuation results in an overall drop-off rate of 4.5 dB per doubling of distance from a line source. (Urban Crossroads, 2023e, pp. 8-9)

3. Atmospheric Effects

Receivers located downwind from a source can be exposed to increased noise levels relative to calm conditions, whereas locations upwind can have lowered noise levels. Sound levels can be increased at large distances (e.g., more than 500 feet) due to atmospheric temperature inversion (i.e., increasing temperature with elevation). Other factors such as air temperature, humidity, and turbulence can also have significant effects. (Urban Crossroads, 2023e, p. 9)

4. Shielding

A large object or barrier in the path between a noise source and a receiver can substantially attenuate noise levels at the receiver. The amount of attenuation provided by shielding depends on the size of the object and the frequency content of the noise source. Shielding by trees and other such vegetation typically only has an "out of sight, out of mind" effect. That is, the perception of noise impact tends to decrease when vegetation blocks the line-of-sight to nearby residents. However, for vegetation to provide a substantial, or even noticeable, noise reduction, the vegetation area must be at least 15 feet in height, 100 feet wide, and dense enough to completely obstruct the line-of sight between the source and the receiver. This size of vegetation may provide up to 5 dBA of noise reduction. The Federal Highway Administration (FHWA) does not consider the planting of vegetation to be a noise abatement measure. (Urban Crossroads, 2023e, p. 9)

E. <u>Noise Control</u>

Noise control is the process of obtaining an acceptable noise environment for an observation point or receiver by controlling the noise source, transmission path, receiver, or all three. This concept is known as the source-path-receiver concept. In general, noise control measures can be applied to these three elements. (Urban Crossroads, 2023e, p. 9)

F. <u>Noise Barrier Attenuation</u>

Effective noise barriers can reduce noise levels by 10 to 15 dBA, cutting the loudness of traffic noise in half. A noise barrier is most effective when placed close to the noise source or receiver. Noise barriers, however,



do have limitations. For a noise barrier to work, it must block the line-of-sight path of sound from the noise source. (Urban Crossroads, 2023e, p. 9)

G. Land Use Compatibility With Noise

Some land uses are more tolerant of noise than others. For example, schools, hospitals, churches, and residences are more sensitive to noise intrusion than are commercial or industrial developments and related activities. As ambient noise levels affect the perceived amenity or livability of a development, so too can the mismanagement of noise impacts impair the economic health and growth potential of a community by reducing the area's desirability as a place to live, shop and work. For this reason, land use compatibility with the noise environment is an important consideration in the planning and design process. The FHWA encourages State and local government to regulate land development in such a way that noise-sensitive land uses are either prohibited from being located adjacent to a highway, or that the developments are planned, designed, and constructed in such a way that noise impacts are minimized. (Urban Crossroads, 2023e, p. 10)

H. <u>Community Response to Noise</u>

Approximately 16% of the population has a very low tolerance for noise and will object to any noise not of their making. Consequently, even in the quietest environment, some complaints may occur. 20 to 30% of the population will not complain even in very severe noise environments. Thus, a variety of reactions can be expected from people exposed to any given noise environment. Surveys have shown that community response to noise varies from no reaction to vigorous action for newly introduced noises averaging from 10 dB below existing to 25 dB above existing. According to research originally published in the Noise Effects Handbook, the percentage of high annoyance ranges from approximately 0 percent at 45 dB or less, 10 percent are highly annoyed around 60 dB, and increases rapidly to approximately 70 percent being highly annoyed at approximately 85 dB or greater. Despite this variability in behavior on an individual level, the population can be expected to exhibit the following responses to changes in noise levels as shown in Figure 4.13-2, *Noise Level Increase Perception*. A change of 3 dBA is considered barely perceptible, and changes of 5 dBA are considered readily perceptible. (Urban Crossroads, 2023e, p. 10)





⁽Urban Crossroads, 2023e, Exhibit 2-B)



I. <u>Vibration</u>

Per the Federal Transit Administration (FTA) *Transit Noise Impact and Vibration Assessment*, vibration is the periodic oscillation of a medium or object. The rumbling sound caused by the vibration of room surfaces is called structure-borne noise. Sources of ground-borne vibrations include natural phenomena (e.g., earthquakes, volcanic eruptions, sea waves, landslides) or human-made causes (e.g., explosions, machinery, traffic, trains, construction equipment). Vibration sources may be continuous, such as factory machinery, or transient, such as explosions. As is the case with airborne sound, ground-borne vibrations may be described by amplitude and frequency. (Urban Crossroads, 2023e, p. 11)

There are several different methods that are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal. The PPV is most frequently used to describe vibration impacts to buildings but is not always suitable for evaluating human response (annoyance) because it takes some time for the human body to respond to vibration signals. Instead, the human body responds to average vibration amplitude often described as the root mean square (RMS). The RMS amplitude is defined as the average of the squared amplitude of the signal and is most frequently used to describe the effect of vibration on the human body. Decibel notation (VdB) is commonly used to measure RMS. VdB serves to reduce the range of numbers used to describe human response to vibration. Typically, ground-borne vibration generated by man-made activities attenuates rapidly with distance from the source of the vibration. Sensitive receivers for vibration include structures (especially older masonry structures), people (especially residents, the elderly, and sick), and vibration-sensitive equipment and/or activities. (Urban Crossroads, 2023e, p. 11)

The background vibration-velocity level in residential areas is generally 50 VdB. Ground-borne vibration is normally perceptible to humans at approximately 65 VdB. For most people, a vibration-velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels. Typical outdoor sources of perceptible ground-borne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the ground-borne vibration is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration-velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings. Figure 4.13-3, *Typical Levels of Ground-Borne Vibration*, illustrates common vibration sources and the human and structural response to ground-borne vibration.

4.13.2 EXISTING CONDITIONS

To assess the existing noise level environment, 24-hour noise level measurements were taken at six locations in the Project study area. The receiver locations were selected to describe and document the existing noise environment within the Project study area. Figure 4.13-4, *Noise Measurement Locations*, provides the boundaries of the Project study area and the noise level measurement locations. To fully describe the existing noise conditions, noise level measurements were collected by Urban Crossroads, Inc. on Wednesday, October 6, 2022. (Urban Crossroads, 2023e, p. 25)



Human/Structural Response		Veloci Level	ty *	Typical Sources (50 ft from source)
Threshold, minor cosmetic damage fragile buildings		100	-	Blasting from construction projects
Difficulty with tasks such as reading a VDT screen	-	90	•	Bulldozers and other heavy tracked construction equipment
			-	Commuter rail, upper range
Residential annoyance, infrequent events (e.g. commuter rail)	-	80	-	Rapid transit, upper range
			-	Commuter rail, typical
Residential annoyance, frequent events (e.g. rapid transit)		70	÷	Bus or truck over bump Rapid transit, typical
Limit for vibration sensitive equipment. Approx. threshold for human perception of vibration	-	60	•	Bus or truck, typical
		50	•	Typical background vibration
		\bigcirc		

Figure 4.13-3 Typical Levels of Ground-Borne Vibration

* RMS Vibration Velocity Level in VdB relative to 10⁻⁶ inches/second

Source: Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment Manual. (Urban Crossroads, 2023e, Exhibit 2-C)





Noise Measurement Locations

Lead Agency: Riverside County

SCH No. 2022120110



B. <u>Measurement Procedure and Criteria</u>

To describe the existing noise environment, the hourly noise levels were measured during typical weekday conditions over a 24-hour period. By collecting individual hourly noise level measurements, it is possible to describe the equivalent daytime and nighttime hourly noise levels and calculate the 24-hour CNEL. The long-term noise readings were recorded using Piccolo Type 2 integrating sound level meter and dataloggers. The Piccolo sound level meters were calibrated using a Larson-Davis calibrator, Model CAL 150. All noise meters were programmed in "slow" mode to record noise levels in "A" weighted form. The sound level meters and microphones were equipped with a windscreen during all measurements. All noise level measurement equipment satisfies the American National Standards Institute (ANSI) standard specifications for sound level meters ANSI S1.4-2014/IEC 61672-1:2013. (Urban Crossroads, 2023e, p. 25)

C. <u>Noise Measurement Locations</u>

The long-term noise level measurements were positioned as close to the nearest sensitive receiver locations as possible to assess the existing ambient hourly noise levels surrounding the Project site. Both Caltrans and the FTA recognize that it is not reasonable to collect noise level measurements that can fully represent every part of a private yard, patio, deck, or balcony normally used for human activity when estimating impacts for new development projects. This is demonstrated in the Caltrans general site location guidelines which indicate that sites must be free of noise contamination by sources other than sources of interest. Avoid sites located near sources such as barking dogs, lawnmowers, pool pumps, and air conditioners unless it is the express intent of the analyst to measure these sources. Further, FTA guidance states that it is not necessary nor recommended that existing noise exposure be determined by measuring at every noise-sensitive location in a project area. Rather, the recommended approach is to characterize the noise environment for clusters of sites based on measurements or estimates at representative locations in the community. (Urban Crossroads, 2023e, p. 25)

Based on recommendations of Caltrans and the FTA, it is not necessary to collect measurements at each individual building or residence, because each receiver measurement represents a group of buildings that share acoustical equivalence. In other words, the area represented by the receiver shares similar shielding, terrain, and geometric relationship to the reference noise source. Receivers represent a location of noise sensitive areas and are used to estimate the future noise level impacts. Collecting reference ambient noise level measurements at the nearby sensitive receiver locations allows for a comparison of the before and after Project noise levels and is necessary to assess potential noise impacts due to the Project's contribution to the ambient noise levels. (Urban Crossroads, 2023e, pp. 25-26) Note that the noise measurement locations are not the same exact locations as the analyzed sensitive receiver locations, which are oftentimes in a private yard or at a private residence where it was not possible to place a noise meter due to the private locations of the receivers.

D. <u>Noise Measurement Results</u>

The noise measurements presented below focus on Leq. Leq represents a steady state sound level containing the same total energy as a time-varying signal over a given sample period. Table 4.13-1, *24-Hour Ambient Noise Level Measurement*, identifies the hourly daytime (7:00 a.m. to 10:00 p.m.) and nighttime (10:00 p.m. to 7:00 a.m.) noise levels at each noise level measurement location. (Urban Crossroads, 2023e, p. 26)



Location ¹	Description	Energy Noise (dBA	CNEL	
		Daytime	Nighttime	
L1	Located north of the Project site near single-family residence at 19971 Patterson Avenue.	58.9	56.8	63.9
L2	Located east of the Project site near single-family residence at 20050 Patterson Avenue.	51.1	49.5	56.5
L3	Located southeast of the Project site near U-Turn for Christ at 20170 Patterson Avenue.	55.9	50.7	59.0
L4	Located south of the Project site near single-family residence at 20111 Patterson Avenue.	51.8	49.9	57.2
L5	Located west of the Project site near single-family residence at 23246 Sunny Canyon Street.	50.7	48.4	55.5
L6	Located west of the Project site near single-family residence at 23249 <u>Norrisgrove</u> Drive.	46.6	42.2	50.3

Table 4.13-1 24-Hour Ambient Noise Level Measurement

¹ See Figure 4.13-4 for the noise level measurement locations.

² Energy (logarithmic) average levels. The long-term 24-hour measurement worksheets are included in Appendix 5.2 of the Project NIA (*Technical Appendix J*).

"Daytime" = 7:00 a.m. to 10:00 p.m.; "Nighttime" = 10:00 p.m. to 7:00 a.m.

(Urban Crossroads, 2023e, Table 5-1)

Table 4.13-1 provides the equivalent noise levels used to describe the daytime and nighttime ambient conditions. These daytime and nighttime energy average noise levels represent the average of all hourly noise levels observed during these time periods expressed as a single number. Appendix 5.2 of the Project's NIA (*Technical Appendix J*) provides summary worksheets of the noise levels for each hour as well as the minimum, maximum, L₁, L₂, L₅, L₈, L₂₅, L₅₀, L₉₀, L₉₅, and L₉₉ percentile noise levels observed during the daytime and nighttime periods, (Urban Crossroads, 2023e, p. 26)

4.13.3 APPLICABLE REGULATORY REQUIREMENTS

The following is a brief description of the federal, State, and local environmental laws and related regulations related to noise.

A. <u>Federal Regulations</u>

1. Noise Control Act of 1972

The Noise Control Act of 1972 establishes a national policy to promote an environment for all Americans free from noise that jeopardizes their health and welfare. The Act also serves to (1) establish a means for effective coordination of federal research and activities in noise control; (2) authorize the establishment of federal noise



emission standards for products distributed in commerce; and (3) provide information to the public respecting the noise emission and noise reduction characteristics of such products. (EPA, 2022i)

While primary responsibility for control of noise rests with State and local governments, federal action is essential to deal with major noise sources in commerce, control of which requires national uniformity of treatment. The United States (U.S.) Environmental Protection Agency (EPA) is directed by Congress to coordinate the programs of all federal agencies relating to noise research and noise control. (EPA, 2022i)

2. Federal Transit Administration

The FTA has published a Noise and Vibration Impact Assessment (NVIA), which provides guidance for preparing and reviewing the noise and vibration sections of environmental documents. In the interest of promoting quality and uniformity in assessments, the manual is used by project sponsors and consultants in performing noise and vibration analyses for inclusion in environmental documents. The manual sets forth the methods and procedures for determining the level of noise and vibration impact resulting from most federally-funded transit projects and for determining what can be done to mitigate such impact. (FTA, 2006, pp. p. 1-1)

The NVIA also establishes criteria for acceptable ground-borne vibration, which are expressed in terms of RMS velocity levels in decibels, and the criteria for acceptable ground-borne noise expressed in terms of A-weighted sound levels. As shown in Table 4.13-2, *Ground-Borne Vibration and Ground-Borne Noise Impact Criteria for General Assessment*, the FTA identifies three categories of land uses and provides Ground-Based Vibration (GBV) and Ground-Based Noise (GBN) criteria for each category of land use. (FTA, 2006, pp. 8-3 and 8-4)

3. Federal Highway Administration (FHWA)

The FHWA is the agency responsible for administering the federal-aid highway program in accordance with federal statutes and regulations. The FHWA developed the noise regulations as required by the Federal-Aid Highway Act of 1970 (Public Law 91-605, 84 Stat. 1713). The Code of Federal Regulations (CFR) Title 23 Part 772 (23 CFR 772), *Procedures for Abatement of Highway Traffic Noise and Construction Noise*, applies to highway construction projects where a state department of transportation has requested federal funding for participation in a project. The regulation requires the highway agency to investigate traffic noise impacts in areas adjacent to federally-aided highways for proposed construction of a highway on a new location or the reconstruction of an existing highway to either significantly change the horizontal or vertical alignment or increase the number of through-traffic lanes. If the highway agency identifies impacts, it must consider abatement. The highway agency must incorporate all feasible and reasonable noise abatement into the project design. (FHWA, 2022)



Table 4.13-2Ground-Borne Vibration and Ground-Borne Noise Impact Criteria for GeneralAssessment

Land Use Category	GBV Impact Levels (VdB re 1 micro-inch /sec)			GBN Impact Levels (dB re 20 micro Pascals)			
	Frequent Events ¹	Occasional Events ²	Infrequent Events ³	Frequent Events ¹	Occasional Events ²	Infrequent Events ³	
Category 1 : Buildings where vibration would interfere with interior operations.	$65 \mathrm{VdB}^4$	$65~{ m VdB}^4$	$65~{ m VdB^4}$	N/A ⁴	N/A ⁴	N/A ⁴	
Category 2 : Residences and buildings where people normally sleep.	72 VdB	75 VdB	80 VdB	35 dBA	38 dBA	43 dBA	
Category 3 : Institutional land uses with primarily daytime use.	75 VdB	78 VdB	83 VdB	40 dBA	43 dBA	48 dBA	

Notes:

1. "Frequent Events" is defined as more than 70 vibration events of the same source per day. Most rapid transit projects fall into this category.

2. "Occasional Events" is defined as between 30 and 70 vibration events of the same source per day. Most commuter trunk lines have this many operations.

- 3. "Infrequent Events" is defined as fewer than 30 vibration events of the same kind per day. This category includes most commuter rail branch lines.
- 4. This criterion limit is based on levels that are acceptable for most moderately sensitive equipment such as optical microscopes. Vibration-sensitive manufacturing or research will require detailed evaluation to define the acceptable vibration levels. Ensuring lower vibration levels in a building often requires special design of the HVAC systems and stiffened floors.
- 5. Vibration-sensitive equipment is generally not sensitive to ground-borne noise.
- (FTA, 2006, Table 8-1)

The FHWA regulations for mitigation of highway traffic noise in the planning and design of federally aided highways are contained in 23 CFR 772. The regulations require the following during the planning and design of a highway project:

- Identification of traffic noise impacts;
- Examination of potential mitigation measures;
- The incorporation of reasonable and feasible noise mitigation measures into the highway project; and
- Coordination with local officials to provide helpful information on compatible land use planning and control. (FHWA, 2022)

The regulations contain noise abatement criteria, which represent the upper limit of acceptable highway traffic noise for different types of land uses and human activities. The regulations do not require meeting the abatement criteria in every instance. Rather, they require highway agencies make every reasonable and feasible effort to provide noise mitigation when the criteria are approached or exceeded. Compliance with the noise



regulations is a prerequisite for the granting of federally aided highway funds for construction or reconstruction of a highway. (FHWA, 2022)

4. OSHA Hearing Conservation Program

The OSHA hearing conservation program is designed to protect workers with significant occupational noise exposures from hearing impairment even if they are subject to such noise exposures over their entire working lifetimes. Standard 29 CFR Part 1910 indicates the noise levels under which a hearing conservation program is required to be provided to workers exposed to high noise levels. (OSHA, 2002) This analysis does not evaluate the noise exposure of construction workers within the Project site based on CEQA requirements, and instead, evaluates the Project-related construction noise levels at the nearby sensitive receiver locations in the Project study area. Further, periodic exposure to high noise levels in short duration, such as Project construction, is typically considered an annoyance and not impactful to human health. It would take several years of exposure to high noise levels to result in hearing impairment.

B. <u>State Regulations</u>

1. Building Standards Code

The State of California's noise insulation standards are codified in the California Code of Regulations (CCR) Title 24, Building Standards Administrative Code, Part 2, and the California Building Standards Code. These noise standards are applied to new construction in California for the purpose of controlling interior noise levels resulting from exterior noise sources. The regulations specify that acoustical studies must be prepared when noise-sensitive structures, such as residential buildings, schools, or hospitals, are developed near major transportation noise sources, and where such noise sources create an exterior noise level of 60 dBA CNEL or higher. Acoustical studies that accompany building plans for noise-sensitive land uses must demonstrate that the structure has been designed to limit interior noise in habitable rooms to acceptable noise levels. For new residential buildings, schools, and hospitals, the acceptable interior noise limit for new construction is 45 dBA CNEL. (BSC, n.d.)

2. California Noise Insulation Standards

The California Noise Insulation Standards (CCR Title 25 Section 1092) establish uniform minimum noise insulation performance standards for new hotels, motels, dormitories, apartment houses, and dwellings other than detached single-family dwellings. Specifically, Title 25 specifies that interior noise levels attributable to exterior sources shall not exceed 45 dBA Ldn/CNEL (i.e., the same levels that the EPA recommends for residential interiors) in any habitable room of a new dwelling. An acoustical study must be prepared for proposed multiple unit residential and hotel/motel structures where outdoor Ldn/CNEL is 60 dBA or greater. The study must demonstrate that the design of the building would reduce interior noise to 45 dBA Ldn/CNEL or lower. Because noise levels can increase over time in developing areas, Title 25 also specifies that dwellings are to be designed so that interior noise levels will meet this standard for at least 10 years from the time of building permit application. (MLA, n.d.)



3. OPR General Plan Guidelines

Though not adopted by law, the 2017 California General Plan Guidelines, published by the California Governor's Office of Planning and Research (OPR), provides guidance for local agencies in preparing or updating general plans. The General Plan Guidelines provide direction on the required noise element portion of the general plans. The purpose of the noise element is to limit the exposure of the community to excessive noise levels. Local governments must "analyze and quantify" noise levels and the extent of noise exposure through actual measurement or the use of noise modeling. Technical data relating to mobile and point sources must be collected and synthesized into a set of noise control policies and programs that "minimizes the exposure of community residents to excessive noise." Noise level contours must be mapped and the conclusions of the element used as a basis for land use decisions. The element must include implementation measures and possible solutions to existing and foreseeable noise problems. Furthermore, the policies and standards must be sufficient to serve as a guideline for compliance with sound transmission control requirements. A general plan's noise element directly correlates to the land use, circulation, and housing elements. The noise element must be used to guide decisions concerning land use and the location of new roads and transit facilities since these are common sources of excessive noise levels. The noise levels from existing land uses, including mining, agricultural, and industrial activities, must be closely analyzed to ensure compatibility, especially where residential and other sensitive receptors have encroached into areas previously occupied by these uses. (OPR, 2017b, pp. 131-132)

C. <u>Local Regulations</u>

1. Riverside County General Plan

The Riverside County General Plan Noise Element was adopted to control and abate environmental noise, and to protect the citizens of Riverside County from excessive exposure to noise. The Noise Element specifies the maximum allowable exterior noise levels for new developments impacted by transportation noise sources such as arterial roads, freeways, airports, and railroads. In addition, the Noise Element identifies several polices to minimize the impacts of excessive noise levels throughout the community and establishes noise level requirements for all land uses. To protect Riverside County residents from excessive noise, the Noise Element contains the following policies related to the Project:

- N 1.1 Protect noise-sensitive land uses from high levels of noise by restricting noise-producing land uses from these areas. If the noise-producing land use cannot be relocated, then noise buffers such as setbacks, landscaping, or block walls shall be used.
- N 1.2 Guide noise-tolerant land uses into areas irrevocably committed to land uses that are noise producing, such as transportation corridors or within the projected noise contours of any adjacent airports.
- *N 1.3* Consider the following uses noise sensitive and discourage these uses in areas in excess of 65 CNEL:
 - Schools
 - Hospitals
 - *Rest Homes*



- Long Term Care Facilities
- Mental Care Facilities
- Residential Uses
- Libraries
- Passive Recreation Uses
- Places of Worship
- *N 1.4* Determine if existing land uses will present noise compatibility issues with proposed projects by undertaking site surveys.
- N 1.5 Prevent and mitigate the adverse impacts of excessive noise exposure on the residents, employees, visitors, and noise-sensitive uses of Riverside County.
- *N 4.1* Prohibit facility-related noise, received by any sensitive use, from exceeding the following worst-case noise levels:
 - a. 45 dBA 9-minute L_{eq} between 10:00 p.m. and 7:00 a.m.;
 - b. 65 dBA 9-minute L_{eq} between 7:00 a.m. and 10:00 p.m.
- N 13.1 Minimize the impacts of construction noise on adjacent uses within acceptable standards.
- *N 13.2* Ensure that construction activities are regulated to establish hours of operation in order to prevent and/or mitigate the generation of excessive or adverse impacts on surrounding areas.
- N 13.3 Condition subdivision approval adjacent to developed/occupied noise-sensitive land uses (see policy N 1.3) by requiring the developer to submit a construction-related noise mitigation plan to the [County] for review and approval prior to issuance of a grading permit. The plan must depict the location of construction equipment and how the noise from this equipment will be mitigated during construction of this project, through the use of such methods as:
 - *i. Temporary noise attenuation fences;*
 - *ii.* Preferential location and equipment; and
 - *iii.* Use of current noise suppression technology and equipment.
- N 14.1 Enforce the California Building Standards that sets standards for building construction to mitigate interior noise levels to the tolerable 45 CNEL limit. These standards are utilized in conjunction with the Uniform Building Code by the County's Building Department to ensure that noise protection is provided to the public. Some design features may include extra-dense insulation, double-paned windows, and dense construction materials.
- N 16.3 Prohibit exposure of residential dwellings to perceptible ground vibration from passing trains as perceived at the ground or second floor. Perceptible motion shall be presumed to be a motion velocity of 0.01 inches/second over a range of 1 to 100 Hz.

To ensure noise-sensitive land uses are protected from high levels of noise (N 1.1), Table N-1 of the Noise Element identifies guidelines to evaluate proposed developments based on exterior and interior noise level limits for land uses and requires a noise analysis to determine needed mitigation measures if necessary. The Noise Element identifies residential use as a noise-sensitive land use (N 1.3) and discourages new development



in areas with transportation related levels of 65 dBA CNEL or greater existing ambient noise levels. To prevent and mitigate noise impacts for its residents (N 1.5), County of Riverside requires exterior noise attenuation measures for sensitive land use exposed to transportation related noise levels higher than 65 dBA CNEL. In addition, the County of Riverside had adopted an interior noise level limit of 45 dBA CNEL. (Urban Crossroads, 2023e, p. 14)

Policy N 4.1 of the Noise Element sets a stationary-source exterior noise limit to not to be exceeded for a cumulative period of more than ten minutes in any hour of 65 dBA L_{eq} for daytime hours of 7:00 a.m. to 10:00 p.m., and 45 dBA L_{eq} during the noise-sensitive nighttime hours of 10:00 p.m. to 7:00 a.m. To prevent high levels of construction noise from impacting noise-sensitive land uses, policies N 13.1 through 13.3 identify construction noise mitigation requirements for new development located near existing noise-sensitive land uses. (Urban Crossroads, 2023e, pp. 14-15)

Land Use Compatibility

The noise criteria identified in the Riverside County General Plan Noise Element (Table N-1) are guidelines to evaluate the land use compatibility of transportation related noise. The compatibility criteria, shown on Table 4.13-3, *Land Use Compatibility for Community Noise Exposure*, provides the County with a planning tool to gauge the compatibility of land uses relative to existing and future exterior noise levels. Table 4.13-3 describes categories of compatibility and not specific noise standards. Residentially-designated land uses in the Project study area are considered normally acceptable with exterior noise levels below 60 dBA CNEL, and conditionally acceptable with exterior noise levels of up to 70 dBA CNEL. For conditionally-acceptable exterior noise levels, approaching 80 dBA CNEL for Project land uses, new construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and the needed noise insulation features are included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice. (Urban Crossroads, 2023e, p. 15)

2. Construction Noise Standards

To control noise impacts associated with the construction of projects, such as the proposed Project, Riverside County has established limits to the hours of construction activities. Section 2.i of Riverside County Ordinance No. 847 (herein, "Noise Ordinance") indicates that noise associated with any private construction activity located within one-quarter of a mile from an inhabited dwelling is considered exempt between the hours of 6:00 a.m. and 6:00 p.m., during the months of June through September, and 7:00 a.m. and 6:00 p.m., during the months of June through September, and 7:00 a.m. and 6:00 p.m., during the months of June through September, and 7:00 a.m. and 6:00 p.m., during the months of October through May. Neither the County's General Plan nor Municipal Code establish numeric maximum acceptable construction source noise levels at potentially affected receivers, which would allow for a quantified determination of what CEQA constitutes a substantial temporary or periodic noise increase. Therefore, a numerical construction threshold based on FTA Transit Noise and Vibration Impact Assessment Manual is used for analysis of daytime construction impacts, as discussed below. (Urban Crossroads, 2023e, p. 55)



Table 4.13-3 Land Use Compatibility for Community Noise Exposure

LAND USE CATEGORY COMMUNITY NOISE EXPOSURE LEVEL Ldn or CNEL, dBA 65 70 75 80 60 55 **Residential-Low Density** Single Family, Duplex, Mobile Homes **Residential-Multiple Family Transient Lodging-Motels, Hotels** Schools, Libraries, Churches, Hospitals, Nursing Homes Auditoriums, Concert Halls, Amphitheaters Sports Arena, Outdoor Spectator Sports Playgrounds, Neighborhood Parks Golf Courses, Riding Stables, Water Recreation, Cemeteries Office Buildings, Businesses, Commercial, and Professional Industrial, Manufacturing, Utilities, Agriculture Legend: Clearly Unacceptable: Normally Acceptable: Conditionally Acceptable: Normally Unacceptable: sormany Unacceptable: New construction or development should generally be discorraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made with needed noise invaluation features induced in the design. Outdoor areas must be shielded. Specified land use is satisfactory based upon the assumption that any buildings involved ar of normal conventional construction, without any special noise insulation requirements. old be should New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply construction or development rally not be undertaken. Con-s to make the indoor environm table would be prohibitive and the or environment would not be usab Source: California Office of Noise Control systems or air conditioning will normally suffice. Outdoor environment will seem

(Urban Crossroads, 2023e, Exhibit 3-A)

According to the FTA, local noise ordinances are typically not very useful in evaluating construction noise. They usually relate to nuisance and hours of allowed activity, and sometimes specify limits in terms of maximum levels, but are generally not practical for assessing the impact of a construction project. Project



construction noise criteria should account for the existing noise environment, the absolute noise levels during construction activities, the duration of the construction, and the adjacent land use. Due to the lack of standardized construction noise thresholds, the FTA provides guidelines that can be considered reasonable criteria for construction noise assessment. The FTA considers a daytime exterior construction noise level of 80 dBA L_{eq} as a reasonable threshold for noise sensitive residential land use with a nighttime exterior construction noise level of 70 dBA L_{eq} . (Urban Crossroads, 2023e, p. 55)

3. Vibration Standards

Construction activity can result in varying degrees of ground-borne vibration, depending on the equipment and methods used, distance to the affected structures and soil type. Construction vibration is generally associated with pile driving and rock blasting. Other construction equipment such as air compressors, light trucks, hydraulic loaders, etc., generates little or no ground vibration. To analyze vibration impacts originating from the operation and construction of the Project, vibration-generating activities are appropriately evaluated against standards established under the Municipal Code, if such standards exist. However, the Riverside County does not identify specific construction vibration level limits. However, the analysis within this EIR relies on the Caltrans Transportation and Construction Vibration Guidance Manual. The nearest noise sensitive buildings adjacent to the Project site can best be described as "older residential structures," and based on Caltrans guidance, the maximum acceptable continuous vibration threshold is 0.3 PPV (in/sec). (Urban Crossroads, 2023e, pp. 17-18)

4. Operational Noise Standards

Riverside County has set stationary-source hourly average Leq exterior noise limits to control loading dock activity, roof-top air conditioning units, trash enclosure activity, parking lot vehicle movements, and truck movements associated with the development of the proposed Project. The County considers noise generated using motor vehicles to be a stationary noise source when operated on private property such as at a loading dock. These facility-related noises, as projected to any portion of any surrounding property containing a habitable dwelling, hospital, school, library or nursing home, must not exceed the following worst-case noise levels. Policy N 4.1 of the Riverside County General Plan Noise Element sets a stationary-source average Leq exterior noise limit not to be exceeded for a cumulative period of more than ten minutes in any hour of 65 dBA Leq for daytime hours of 7:00 AM to 10:00 PM, and 45 dBA Leq during the noise-sensitive nighttime hours of 10:00 PM to 7:00 AM. (Urban Crossroads, 2023e, p. 15)

The County of Riverside County Code Section 9.52.040 General sound level standards summarizing Ordinance No. 847 *Regulating Noise* identify lower, more restrictive exterior noise level standards, which for the purpose of this report, are used to evaluate potential Project-related operational noise level limits instead of the higher the General Plan exterior noise level standards previously identified. The County of Riverside County Code identifies residential exterior noise level limits of 55 dBA L_{eq} during the daytime hours of 7:00 a.m. to 10:00 p.m., and 45 dBA L_{eq} during the noise-sensitive nighttime hours of 10:00 p.m. to 7:00 a.m., commercial exterior noise level limits of 65 dBA L_{eq} during the daytime hours, and 55 dBA L_{eq} during the noise-sensitive nighttime hours, and 55 dBA L_{eq} during the noise-sensitive nighttime hours, and 55 dBA L_{eq} during the noise-sensitive nighttime hours, 2023e, pp. 15-16)



Based on several discussions with the County of Riverside Department of Environmental Health (DEH), Office of Industrial Hygiene (OIH), it is important to recognize that the County of Riverside County Code noise level standards, incorrectly identify maximum noise level (L_{max}) standards that should instead reflect the average L_{eq} noise levels. Moreover, the County of Riverside DEH OIH's April 15th, 2015, *Requirements for determining and mitigating, non-transportation noise source impacts to residential properties* also identifies operational (stationary-source) noise level limits using the L_{eq} metric, consistent with the direction of the County of Riverside General Plan guidelines and standards provided in the Noise Element. Therefore, the Project's NIA (*Technical Appendix J*) has been prepared consistent with direction of the County of Riverside DEH OIH guidelines and standards using the average L_{eq} noise level metric for stationary-source (operational) noise level evaluation. (Urban Crossroads, 2023e, p. 17)

4.13.4 BASIS FOR DETERMINING SIGNIFICANCE

A. <u>Significance Thresholds</u>

Section XIII of Appendix G to the CEQA Guidelines addresses typical adverse effects to noise, and includes the following threshold questions to evaluate a project's impacts on noise:

- Would the project result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?
- Would the project result in the generation of excessive ground-borne vibration or noise levels?
- For a project located within the vicinity of a private airstrip or an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Additionally, the following thresholds are derived from Riverside County's Environmental Assessment Checklist and are used to evaluate the significance of the proposed Project's impacts due to noise. Thus, for purposes of analysis herein, significant impacts to noise would occur if the Project or any Project-related component would:

- a. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels;
- b. For a project within the vicinity of a private airstrip, expose people residing or working in the project area to excessive noise levels;
- c. Result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan, noise ordinance, or applicable standards of other agencies; or



d. Generate excessive ground-borne vibration or ground-borne noise levels.

B. <u>Noise-Sensitive Receptors</u>

Noise level increases resulting from the Project are evaluated based on the Appendix G CEQA Guidelines described above at the closest sensitive receiver locations. Under CEQA, consideration must be given to the magnitude of the increase, the existing baseline ambient noise levels, and the location of noise-sensitive receivers to determine if a noise increase represents a significant adverse environmental impact. This approach recognizes that there is no single noise increase that renders a noise impact significant. This is primarily because of the wide variation in individual thresholds of annoyance and differing individual experiences with noise. Thus, an important way of determining a person's subjective reaction to a new noise is the comparison of it to the existing environment to which one has adapted – the so-called ambient environment. In general, the more a new noise level exceeds the previously existing ambient noise level, the less acceptable the new noise level will typically be judged. (Urban Crossroads, 2023e, p. 21)

The Federal Interagency Committee on Noise (FICON) developed guidance to be used for the assessment of project-generated increases in noise levels that consider the ambient noise level. The FICON recommendations are based on studies that relate aircraft noise levels to the percentage of persons highly annoyed by aircraft noise. Although the FICON recommendations were specifically developed to assess aircraft noise impacts, these recommendations are often used in environmental noise impact assessments involving the use of cumulative noise exposure metrics, such as the CNEL and L_{eq} . (Urban Crossroads, 2023e, p. 21)

As previously stated, the approach used in this noise study recognizes that there is no single noise increase that renders a noise impact significant, based on a 2008 California Court of Appeal ruling on Gray v. County of *Madera*. For example, if the ambient noise environment is quiet (<60 dBA) and the new noise source greatly increases the noise levels, an impact may occur if the noise criteria may be exceeded. Therefore, for this analysis, a readily perceptible 5 dBA or greater project-related noise level increase is considered a significant impact when the without project noise levels are below 60 dBA. Per the FICON, in areas where the without project noise levels range from 60 to 65 dBA, a 3 dBA barely perceptible noise level increase appears to be appropriate for most people. When the without project noise levels already exceed 65 dBA, any increase in community noise louder than 1.5 dBA or greater is considered a significant impact if the noise criteria for a given land use is exceeded, since it likely contributes to an existing noise exposure exceedance. The FICON guidance provides an established source of criteria to assess the impacts of substantial temporary or permanent increase in baseline ambient noise levels. Based on the FICON criteria, the amount to which a given noise level increase is considered acceptable is reduced when the without Project (baseline) noise levels are already shown to exceed certain land-use specific exterior noise level criteria. The specific levels are based on typical responses to noise level increases of 5 dBA or readily perceptible, 3 dBA or barely perceptible, and 1.5 dBA depending on the underlying without Project noise levels for noise-sensitive uses. These levels of increases and their perceived acceptance are consistent with guidance provided by both the FHWA and Caltrans. (Urban Crossroads, 2023e, pp. 21-22)



C. <u>Non-Noise-Sensitive Receivers</u>

The Riverside County Noise Element, Table N-1, Land Use Compatibility for Community Noise Exposure, was used to establish the satisfactory noise levels of significance for non-noise-sensitive land uses in the Project study area. As shown in Table 4.13-3, the normally acceptable exterior noise level for non-noise-sensitive land uses is 70 dBA CNEL. Noise levels greater than 70 dBA CNEL are considered conditionally acceptable per the Land Use Compatibility for Community Noise Exposure. (Urban Crossroads, 2023e, p. 22)

To determine if Project-related traffic noise level increases are significant at off-site non-noise-sensitive land uses, a barely perceptible 3 dBA criteria is used. When the without Project noise levels are greater than the normally acceptable 70 dBA CNEL land use compatibility criteria, a barely perceptible 3 dBA or greater noise level increase is considered a significant impact since the noise level criteria is already exceeded. The noise level increases used to determine significant impacts for non-noise-sensitive land uses is generally consistent with the FICON noise level increase thresholds for noise-sensitive land uses but instead rely on the County of Riverside General Plan Noise Element, Table N-1, Land Use Compatibility for Community Noise Exposure normally acceptable 70 dBA CNEL exterior noise level criteria. (Urban Crossroads, 2023e, p. 22)

D. <u>Vibration</u>

The vibration impacts originating from the construction of Project, vibration-generating activities are appropriately evaluated using the Caltrans vibration damage thresholds to assess potential temporary construction-related impacts at adjacent building locations. The nearest noise sensitive buildings adjacent to the Project site can best be described as "older residential structures" with a maximum acceptable continuous vibration threshold of 0.3 PPV (in/sec). (Urban Crossroads, 2023e, p. 22)

E. <u>Summary of Significance Criteria</u>

Noise impacts shall be considered significant if any of the conditions listed in Table 4.13-4, *Significance Criteria Summary*, would occur as a direct result of the proposed Project. (Urban Crossroads, 2023e, p. 23)

4.13.5 METHODOLOGY FOR CALCULATING PROJECT-RELATED NOISE IMPACTS

A. <u>Sensitive Receiver Locations</u>

To assess the potential for long-term operational and short-term construction noise impacts, sensitive receiver locations, as shown on Figure 4.13-5, *Receiver Locations*, were identified as representative locations for analysis. Sensitive receivers are generally defined as locations where people reside or where the presence of unwanted sound could otherwise adversely affect the use of the land. Noise-sensitive land uses are generally considered to include schools, hospitals, single-family dwellings, mobile home parks, churches, libraries, and recreation areas. Moderately noise-sensitive land uses typically include multi-family dwellings, hotels, motels, dormitories, outpatient clinics, cemeteries, golf courses, country clubs, athletic/tennis clubs, and equestrian clubs. Land uses that are considered relatively insensitive to noise include business, commercial, and professional developments. Land uses that are typically not affected by noise include industrial, manufacturing, utilities, agriculture, undeveloped land, parking lots, warehousing, liquid and solid waste facilities, salvage yards, and transit terminals. (Urban Crossroads, 2023e, p. 43)



Analysis Receiving Land Use		Condition()	Significance Criteria		
		Condition(s)	Daytime	Nighttime	
		If ambient is < 60 dBA CNEL	≥ 5 dBA CNEL P	roject increase	
	Noise- Sensitive ¹	If ambient is 60 - 65 dBA CNEL	≥ 3 dBA CNEL P	roject increase	
Off-Site	Sensitive	If ambient is > 65 dBA CNEL	≥ 1.5 dBA CNEL	Project increase	
Traffic	Non-Noise- Sensitive ²	If ambient is > 70 dBA CNEL	≥ 3 dBA CNEL Project increase		
		Exterior Noise Level Standards ³	55 dBA L _{eq}	45 dBA L _{eq}	
Operational	Noise- Sensitive	If ambient is < 60 dBA Leq ¹	$Leq^1 \ge 5 dBA L_{eq} Project incre$		
Operational		If ambient is 60 - 65 dBA Leq ¹	≥ 3 dBA L _{eq} Project increase		
		If ambient is > 65 dBA Leq ¹	≥ 1.5 dBA L _{eq} P	roject increase	
Construction	Noise-	Noise Level Threshold ⁴	80 dBA L _{eq}	70 dBA L _{eq}	
Construction	Sensitive	Vibration Level Threshold ⁵	0.3 PPV (in/sec)		

Table 4.13-4 Significance Criteria Summary

¹FICON, 1992.

²County of Riverside General Plan Noise Element, Table N-1.

³ County of Riverside General Plan Municipal Code, Section 9.52.040.

⁴ Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual.

⁵ Caltrans Transportation and Construction Vibration Manual, April 2020 Table 19

"Daytime" = 7:00 a.m. to 10:00 p.m.; "Nighttime" = 10:00 p.m. to 7:00 a.m.

(Urban Crossroads, 2023e, Table 4-1)







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To describe the potential off-site Project noise levels, six receiver locations in the vicinity of the Project site were identified. The selection of receiver locations is based on FHWA guidelines and is consistent with additional guidance provided by Caltrans and the FTA. Other sensitive land uses in the Project study area that are located at greater distances than those identified in this noise study will experience lower noise levels than those presented in this report due to the additional attenuation from distance and the shielding of intervening structures. Distance is measured in a straight line from the project boundary to each receiver location. (Urban Crossroads, 2023e, pp. 43-44)

- Location R1: Location R1 represents the existing residence at 19971 Patterson Avenue, approximately 208 feet north of the Project site. R1 is placed in the private outdoor living areas (backyard) facing the Project site. A 24-hour noise measurement was taken near this location, L1, to describe the existing ambient noise environment.
- Location R2: Location R2 represents the existing residence at 20050 Patterson Avenue, approximately 155 feet east of the Project site. R2 is placed in the private outdoor living areas (backyard) facing the Project site. A 24-hour noise measurement was taken near this location, L2, to describe the existing ambient noise environment.
- Location R3: Location R3 represents the existing residence at 20210 Patterson Avenue, approximately 140 feet east of the Project site. R3 is placed in the private outdoor living areas (backyard) facing the Project site. A 24-hour noise measurement was taken near this location, L3, to describe the existing ambient noise environment.
- Location R4: Location R4 represents the existing residence at 20281 Patterson Avenue, approximately 185 feet south of the Project site. R4 is placed in the private outdoor living areas (backyard) facing the Project site. A 24-hour noise measurement was taken near this location, L4, to describe the existing ambient noise environment.
- Location R5: Location R5 represents the existing residence at 23246 Sunny Canyon Street located immediately adjacent to the southwestern portion of the site boundary. A 24-hour noise measurement was taken near this location, L5, to describe the existing ambient noise environment.
- Location R6: Location R6 represents the existing residence at 23249 Norrisgrove Avenue located immediately adjacent to the northwestern portion of the site boundary. A 24-hour noise measurement was taken near this location, L6, to describe the existing ambient noise environment.

B. <u>Construction Noise Methodology</u>

1. Typical Construction Reference Noise Levels

To describe the Project construction noise levels, construction noise analysis was prepared using reference construction equipment noise levels from the FHWA published the Roadway Construction Noise Model (RCNM), which includes a national database of construction equipment reference noise emission levels. The RCNM equipment database, provides a comprehensive list of the noise generating characteristics for specific types of construction equipment. In addition, the database provides an acoustical usage factor to estimate the



fraction of time each piece of construction equipment is operating at full power (i.e., its loudest condition) during a construction operation. (Urban Crossroads, 2023e, p. 56)

Using the reference construction equipment noise levels and the CadnaA noise prediction model, calculations of the Project construction noise level impacts at the nearby sensitive receiver locations were completed. Consistent with FTA guidance for general construction noise assessment, Table 4.13-5, *Construction Reference Noise Levels*, presents the combined noise levels for the loudest construction equipment, assuming they operate at the same time. (Urban Crossroads, 2023e, p. 57)

Construction Stage	Reference Construction Activity	Reference Noise Level @ 50 Feet (dBA L _{eq}) ¹	Combined Noise Level (dBA L _{eq}) ²	Combined Sound Power Level (PWL) ³	
	Demolition Equipment	82			
Demolition	Backhoes	74	83	115	
	Hauling Trucks	72			
	Crawler Tractors	78			
Site	Hauling Trucks	72	80	112	
rieparation	Rubber Tired Dozers	75			
	Graders	81		115	
Grading	Excavators	77	83		
	Compactors	76			
	Cranes	73		113	
Building	Tractors	80	81		
construction	Welders	70			
	Pavers	74			
Paving	Paving Equipment	82	83	115	
	Rollers	73			
	Cranes	73			
Architectural	Air Compressors	74	77	109	
Coating	Generator Sets	70			

Table 4.13-5 Construction Reference Noise Levels

¹ FHWA Roadway Construction Noise Model (RCNM).

² Represents the combined noise level for all equipment assuming they operate at the same time consistent with FTA Transit Noise and Vibration Impact Assessment guidance.

³ Sound power level represents the total amount of acoustical energy (noise level) produced by a sound source independent of distance or surroundings. Sound power levels calibrated using the <u>CadnaA</u> noise model at the reference distance to the noise source.

(Urban Crossroads, 2023e, Table 10-1)

2. Construction Vibration

Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods employed. Operation of construction equipment causes ground vibrations that spread through the



ground and diminish in strength with distance. Ground vibration levels associated with various types of construction equipment are summarized on Table 4.13-6, *Vibration Source Levels for Construction Equipment*. Based on the representative vibration levels presented for various construction equipment types, it is possible to estimate the potential Project construction vibration levels using the vibration assessment methods defined by the FTA, as more fully described in subsection 10.6 of the Project's NIA (*Technical Appendix J*). (Urban Crossroads, 2023e, p. 61)

Equipment	PPV (in/sec) at 25 feet
Small bulldozer	0.003
Jackhammer	0.035
Loaded Trucks	0.076
Large bulldozer	0.089
Vibratory Roller	0.210

 Table 4.13-6
 Vibration Source Levels for Construction Equipment

Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual (Urban Crossroads, 2023e, Table 10-5)

C. <u>Operational Noise Methodology</u>

Following is a summary of the methodology used to evaluated Project-related operational noise impacts. Refer to Section 9 of the Project's NIA (*Technical Appendix J*) for a complete discussion of the methodology and modeling inputs and assumptions.

1. Reference Noise Levels

To estimate the Project operational noise impacts, reference noise level measurements were collected from similar types of activities to represent the noise levels expected with the development of the proposed Project. Subsection 9.2 of the Project's NIA (*Technical Appendix J*) provides a detailed description of the reference noise level measurements shown on Table 4.13-7, *Reference Noise Level Measurements*, which were used to estimate the Project operational noise impacts. The projected noise levels assume the worst-case noise environment with the loading dock activity, roof-top air conditioning units, trash enclosure activity, parking lot vehicle movements, and truck movements all operating at the same time. These sources of noise activity likely would vary throughout the day. (Urban Crossroads, 2023e, p. 45)

2. Measurement Procedures

The reference noise level measurements presented in Section 9 of the Project's NIA (*Technical Appendix J*) were collected using a Larson Davis LxT Type 1 precision sound level meter (serial number 01146). The LxT sound level meter was calibrated using a Larson-Davis calibrator, Model CAL 200, was programmed in "slow" mode to record noise levels in "A" weighted form and was located at approximately five feet above the ground elevation for each measurement. The sound level meters and microphones were equipped with a windscreen



during all measurements. All noise level measurement equipment satisfies the ANSI standard specifications for sound level meters ANSI S1.4-2014/IEC 61672-1:2013. (Urban Crossroads, 2023e, p. 45)

Notes forward	Noise Source	Min./ Hour ²		Reference Noise Level	Sound Power
Noise Source-	Height (Feet)	Day	Night	(dBA L _{eq}) @ 50 Feet	Level (dBA) ³
Loading Dock Activity	8'	60	60	62.8	103.4
Roof-Top Air Conditioning Units	5'	39	28	57.2	88.9
Trash Enclosure Activity	5'	60	30	57.3	89.0
Parking Lot Vehicle Movements	5'	60	60	52.6	81.1
Truck Movements	8'	60	60	59.8	93.2

Table 4.13-7	Reference	Noise Level	Measurements
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¹ As measured by Urban Crossroads, Inc.

² Anticipated duration (minutes within the hour) of noise activity during typical hourly conditions expected at the Project site. "Daytime" = 7:00 a.m. - 10:00 p.m.; "Nighttime" = 10:00 p.m. - 7:00 a.m.

³ Sound power level represents the total amount of acoustical energy (noise level) produced by a sound source independent of distance or surroundings. Sound power levels calculated using the CadnaA noise model at the reference distance to the noise source. Numbers may vary due to size differences between point and area noise sources.

(Urban Crossroads, 2023e, Table 9-1)

3. CadnaA Noise Prediction Model

To fully describe the exterior operational noise levels from the Project, Urban Crossroads developed a noise prediction model using the Computer Aided Noise Abatement (CadnaA) computer program. CadnaA can analyze multiple types of noise sources using the spatially accurate Project site plan, georeferenced Nearmap aerial imagery, topography, buildings, and barriers in its calculations to predict outdoor noise levels. (Urban Crossroads, 2023e, p. 49)

Using the International Organization for Standardization (ISO) 9613 protocol, CadnaA calculates the distance from each noise source to the noise receiver locations, using the ground absorption, distance, and barrier/building attenuation inputs to provide a summary of noise level at each receiver and the partial noise level contributions by noise source. Consistent with the ISO 9613 protocol, the CadnaA noise prediction model relies on the reference sound power level (Lw) to describe individual noise sources. While sound pressure levels (e.g., Leq) quantify in decibels the intensity of given sound sources at a reference distance, Lw is connected to the sound source and is independent of distance. Lw varies substantially with distance from the source and diminishes from intervening obstacles and barriers, air absorption, wind, and other factors. Sound power is the acoustical energy emitted by the sound source and is an absolute value that is not affected by the environment. The operational noise level calculations provided herein account for the distance attenuation provided due to geometric spreading, when sound from a localized stationary source (i.e., a point source) propagates uniformly outward in a spherical pattern. A default ground attenuation factor of 0.5 was used to account for mixed ground representing a combination of hard and soft surfaces consistent with study area



conditions. Appendix 9.1 to the Project's NIA (*Technical Appendix J*) includes the detailed noise model inputs. (Urban Crossroads, 2023e, p. 49)

D. Off-Site Traffic Modeling Methodology

1. FHWA Traffic Noise Prediction Model

The expected roadway noise level increases from vehicular traffic were calculated by Urban Crossroads using a computer program that replicates the FHWA Traffic Noise Prediction Model FHWA-RD-77-108. The FHWA Model arrives at a predicted noise level through a series of adjustments to the Reference Energy Mean Emission Level (REMEL). In California the national REMELs are substituted with the California Vehicle Noise (Calveno) Emission Levels. Adjustments are then made to the REMEL to account for: the roadway classification (e.g., collector, secondary, major, or arterial); the roadway active width (i.e., the distance between the center of the outermost travel lanes on each side of the roadway); the total average daily traffic (ADT); the travel speed; the percentages of automobiles, medium trucks, and heavy trucks in the traffic volume; the roadway grade; the angle of view (e.g., whether the roadway view is blocked); the site conditions ("hard" or "soft" relates to the absorption of the ground, pavement, or landscaping); and the percentage of total ADT which flows each hour throughout a 24-hour period. Research conducted by Caltrans has shown that the use of soft site conditions is appropriate for the application of the FHWA traffic noise prediction model used in the analysis. (Urban Crossroads, 2023e, p. 29)

2. Off-Site Traffic Noise Prediction Model Inputs

Table 6-1 of the Project's NIA (*Technical Appendix J*) presents the roadway parameters used to assess the Project's off-site transportation noise impacts. NIA Table 6-1 identifies the six study area roadway segments, the distance from the centerline to adjacent land use based on the functional roadway classification per the Riverside County General Plan Circulation Element, and the vehicle speeds. The ADT volumes used in the analysis area presented on Table 6-2 of the Project's NIA are based on the Project's Traffic Analysis ("TA"; *Technical Appendix L2*) for the following traffic scenarios under both Without and With Project scenarios: Existing, Existing plus Ambient Growth plus Cumulative Projects, and Horizon Year (HY). (Urban Crossroads, 2023e, p. 29)

The ADT volumes vary for each roadway segment based on the existing traffic volumes and the combination of Project traffic distributions. The analysis herein relies on comparative analysis of the off-site traffic noise impacts at the boundary of the right-of-way of the receiving adjacent land use, without and with project ADT traffic volumes from the Project's TA (*Technical Appendix L2*). Consistent with the Project's TA, the Project is anticipated to generate a net total of 1,260 two-way trips per day (actual vehicles) that include 224 truck trips. (Urban Crossroads, 2023e, pp. 29-30)

To quantify the off-site noise levels, the Project related truck trips were added to the heavy trick category in the FHWA noise prediction model. The addition of the Project-related truck trips increases the percentage of heavy trucks in the vehicle mix. This approach recognizes that the FHWA noise prediction model is significantly influenced by the number of heavy trucks in the vehicle mix. Table 6-3 of the Project's NIA (*Technical Appendix J*) provides the time of day (daytime, evening, and nighttime) vehicle splits. The daily



Project truck trip-ends were assigned to the individual off-site study area roadway segments based on the Project truck trip distribution percentages documented in the Project's TA (*Technical Appendix L2*). Using the Project truck trips in combination with the Project trip distribution, Urban Crossroads, Inc. calculated the number of additional Project truck trips and vehicle mix percentages for each of the study area roadway segments. Table 6-4 of the Project's NIA shows the traffic flow by vehicle type (vehicle mix) used for all without Project traffic scenarios, and Tables 6-5 to 6-7 of the Project's NIA show the vehicle mixes used for the with Project traffic scenarios. (Urban Crossroads, 2023e, p. 31)

Due to the added Project truck trips, the increase in Project traffic volumes and the distributions of trucks on the study area road segments, the percentage of autos, medium trucks and heavy trucks will vary for each of the traffic scenarios. This explains why the existing and future traffic volumes and vehicle mixes vary between seemingly identical study area roadway segments. (Urban Crossroads, 2023e, p. 31)

4.13.6 IMPACT ANALYSIS

<u>Threshold a.</u>: For a project located within an airport land use plan or, where such a plan has not been adopted, within two (2) miles of a public airport or public use airport, would the Project expose people residing or working in the Project area to excessive noise levels?

The Project site is located within two miles of a public airport or within an airport land use plan. The March Air Reserve Based Inland Port Airport (MARB/IPA) runway is located approximately 2 miles northeast of the Project site. According to Table 2B of the Riverside County Airport Land Use Compatibility Plan Policy Document, the Project's industrial land uses are considered clearly acceptable with exterior noise levels below 60 dBA CNEL. Normally acceptable noise levels for industrial land uses range from 60 to 65 dBA CNEL. Marginally acceptable noise levels at industrial land uses range from 65 to 70 dBA CNEL. Additionally, the Project's single-family residential land use is considered clearly acceptable exterior noise levels below 55 dBA CNEL and marginally acceptable with exterior noise levels between 55-60 dBA CNEL. The 70, 65 and 60 dBA CNEL noise contour boundaries used to determine the potential aircraft-related noise impacts at the Project site are found on Figure 6-9 of the March Air Reserve Base 2018 Final Air Installations Compatible Uses Zones Study and are presented on Exhibit 3-C of the Project's NIA (*Technical Appendix J*). Based on the 2018 noise level contours for the MARB/IPA, the Project development area is located outside the 60 dBA CNEL noise level contour boundaries and the Project's industrial and residential land use is considered clearly acceptable. (Urban Crossroads, 2023e, p. 18) As such, the Project would not exposed people residing or working in the area to excessive noise levels from airport operations, and impacts would be less than significant.

<u>Threshold b.</u>: 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?

There are no private airstrips in the Project vicinity. The nearest private airport facility is the Perris Valley Airport, located approximately 4.2 miles southeast of the Project site within the City of Perris. According to Map PV-3 of the Riverside County Airport Land Use Compatibility Plan (ALUCP), the Project site is located well outside of the 55 dBA CNEL noise contour for the Perris Valley Airport, indicating that the Project site



would be subject to noise levels of less than 55 dBA CNEL associated with the Perris Valley Airport. As previously noted, the Project's single-family residential land use is considered clearly acceptable exterior noise levels below 55 dBA CNEL, while the Project's light industrial use is considered clearly acceptable exterior noise levels below 60 dBA CNEL. As such, both the residential and warehouse building components of the Project would not be exposed to excessive noise levels associated with the Perris Valley Airport, and impacts would therefore be less than significant. (ALUC, 2010)

Threshold c.:Would the Project result in the generation of a substantial temporary or permanent increase
in ambient noise levels in the vicinity of the project in excess of standards established in the
local general plan, noise ordinance, or applicable standards of other agencies?

The Project has the potential to result in the generation of substantial noise levels associated with construction activities, site operations, and Project-related traffic. Each is discussed below.

A. <u>Construction Noise Impacts</u>

Following is an analysis of the potential average dBA Leq impacts resulting from short-term construction activities associated with the development of the Project. Figure 4.13-6, *Construction Noise Source Locations*, shows the construction noise source activity including the site adjacent roadway improvements in relation to the nearest sensitive receiver locations previously depicted on Figure 4.13-5. To support the Project development, off-site street widening and storm drain construction activity would take place on Rider Street, Patterson Avenue, and Walnut Street. The off-site improvements would be installed within the existing public right-of-way (ROW) with construction activities moving linearly along a proposed alignment. It is expected that the off-site construction noise from this off-site work would, therefore, be relatively short term and the noise levels would be reduced as construction work moves linearly along the existing public ROW and farther from sensitive uses. (Urban Crossroads, 2023e, p. 55)

1. Construction Noise Levels

The FTA *Transit Noise and Vibration Impact Assessment Manual* recognizes that construction projects are accomplished in several different stages and outlines the procedures for assessing noise impacts during construction. Each stage has a specific equipment mix, depending on the work to be completed during that stage. As a result of the equipment mix, each stage has its own noise characteristics; some stages have higher continuous noise levels than others, and some have higher impact noise levels than others. The Project construction activities are expected to occur in the following stages: (Urban Crossroads, 2023e, p. 55)

- Demolition
- Site Preparation
- Grading
- Building Construction
- Paving
- Architectural Coating





Lead Agency: Riverside County

SCH No. 2022120110



2. Typical Construction Noise Analysis

Using the reference construction equipment noise levels and the CadnaA noise prediction model, calculations of the Project construction noise level impacts at the nearest sensitive receiver locations were completed. As shown in Table 4.13-8, *Construction Equipment Noise Level Summary*, the construction noise levels are expected to range from 57.9 to 76.1 dBA Leq, and the highest construction levels are expected to range from 65.0 to 76.1 dBA Leq at the nearest receiver locations. Appendix 10.1 to the Project's NIA (*Technical Appendix J*) includes the detailed CadnaA construction noise model inputs. (Urban Crossroads, 2023e, p. 57)

	Construction Noise Levels (dBA Leq)						
Receiver Location ¹	Demolition	Site Preparation	Grading	Building Construction	Paving	Architectural Coating	Highest Levels ²
R1	65.0	62.4	65.0	63.0	65.0	59.0	65.0
R2	68.9	66.3	68.9	66.9	68.9	62.9	68.9
R3	65.0	63.3	65.0	63.0	65.0	59.0	65.0
R4	68.9	61.3	68.9	66.9	68.9	62.9	68.9
R5	65.9	76.1	65.9	63.9	65.9	59.9	76.1
R6	63.9	73.8	63.9	61.9	63.9	57.9	73.8

Table 4.13-8 Construction Equipment Noise Level Summary

1 Construction noise source and receiver locations are shown on Figure 4.13-6.

2 Construction noise level calculations based on distance from the construction activity, which is measured from the Project site boundary to the nearest receiver locations. CadnaA construction noise model inputs are included in Appendix 10.1 to the Project's NIA (EIR *Technical Appendix J*).

(Urban Crossroads, 2023e, Table 10-2)

3. Typical Construction Noise Level Compliance

To evaluate whether the Project will generate potentially significant short-term noise levels at nearby receiver locations, a construction-related noise level threshold of 80 dBA Leq is used as a reasonable threshold to assess the daytime construction noise level impacts. The construction noise analysis shows that the nearest receiver locations would satisfy the reasonable daytime 80 dBA Leq significance threshold during Project construction activities as shown on Table 4.13-9, *Construction Noise Level Compliance*. Therefore, the noise impacts due to Project construction noise would be less than significant at all receiver locations. (Urban Crossroads, 2023e, p. 58)

4. Nighttime Concrete Pour Analysis

Nighttime concrete pouring activities are anticipated occur as a part of Project building construction activities. Nighttime concrete pouring activities are often used to support reduced concrete mixer truck transit times and lower air temperatures than during the daytime hours and are generally limited to the actual building pad area as shown on Exhibit 10-B of the Project's NIA (*Technical Appendix J*). Since the nighttime concrete pours would take place outside the permitted by Riverside County Ordinance No. 847 Regulating Noise Section 2i (Code Section 9.52.020[I]), the Project Applicant would be required to obtain authorization for nighttime work



from the County of Riverside. Any nighttime construction noise activities are evaluated against the FTA nighttime exterior construction noise level threshold of 70 dBA Leq for noise sensitive residential land use. (Urban Crossroads, 2023e, p. 59)

Passiver	Construction Noise Levels (dBA Leq)					
Location ¹	Highest Construction Noise Levels ²	Threshold ³	Threshold Exceeded? ⁴			
R1	65.0	80	No			
R2	68.9	80	No			
R3	65.0	80	No			
R4	68.9	80	No			
R5	76.1	80	No			
R6	73.8	80	No			

 Table 4.13-9
 Construction Noise Level Compliance

1 Construction noise source and receiver locations are shown on Figure 4.13-6.

2 Highest construction noise level calculations based on distance from the construction noise source activity to the nearest receiver locations as shown on Table 4.13-8.

3 Construction noise level thresholds as shown on Table 4.13-4.

4 Do the estimated Project construction noise levels exceed the construction noise level threshold?

(Urban Crossroads, 2023e, Table 10-3)

To estimate the noise levels due to nighttime concrete pour activities, sample reference noise level measurements were taken during a nighttime concrete pour at a construction site. Urban Crossroads collected short-term nighttime concrete pour reference noise level measurements during the noise-sensitive nighttime hours between 1:00 a.m. to 2:00 a.m. at 27334 San Bernardino Avenue in the City of Redlands. The reference noise levels describe the expected concrete pour noise sources that may include concrete mixer truck movements and pouring activities, concrete paving equipment, rear mounted concrete mixer truck backup alarms, engine idling, air brakes, generators, and workers communicating/whistling. (Urban Crossroads, 2023e, p. 59)

To describe the nighttime concrete pour noise levels associated with the construction of the Project, this analysis relies on reference sound pressure level of 67.7 dBA Leq at 50 feet representing a sound power level of 100.3 dBA Lw. While the Project noise levels would depend on the actual duration of activities and specific equipment fleet in use at the time of construction, the reference sound power level of 100.3 dBA Lw is used to describe the expected Project nighttime concrete pour noise activities. (Urban Crossroads, 2023e, p. 59)

As shown on Table 4.13-10, *Nighttime Concrete Pour Noise Level Compliance*, the noise levels associated with the nighttime concrete pour activities are estimated to range from 40.8 to 44.1 dBA Leq. The analysis shows that the unmitigated nighttime concrete pour activities would satisfy the FTA 70 dBA Leq nighttime residential noise level threshold at all the nearest noise sensitive receiver locations. Therefore, the noise impacts due to Project construction nighttime concrete pour noise activity are considered less than significant



at all receiver locations with prior authorization for nighttime work from the County of Riverside. Appendix 10.2 to the Project's NIA (*Technical Appendix J*) includes the CadnaA nighttime concrete pour noise model inputs. (Urban Crossroads, 2023e, p. 59)

Receiver Location ¹	Concrete Pour Construction Noise Levels (dBA Leq)		
	Exterior Noise Levels ²	Threshold ³	Threshold Exceeded? ⁴
R1	42.9	70	No
R2	44.1	70	No
R3	43.4	70	No
R4	42.9	70	No
R5	40.8	70	No
R6	41.6	70	No

 Table 4.13-10 Nighttime Concrete Pour Noise Level Compliance

¹Concrete noise source and receiver locations are shown on Exhibit 10-B of the Project's NIA (*Technical Appendix J*).

 2 Nighttime Concrete Pour noise model inputs are included in Appendix 10.2 to the Project's NIA.

³ Construction noise level thresholds as shown on Table 4.13-4.

⁴ Do the estimated Project construction noise levels exceed the construction noise level threshold? (Urban Crossroads, 2023e, Table 10-4)

B. Operational Noise Impacts

Following is an analysis of the potential stationary-source operational noise impacts at the nearest receiver location, identified previously in Subsection 4.13.5A, resulting from the operation of the proposed Project. Figure 4.13-7, *Operational Noise Source Locations*, identifies the noise source locations used to assess the hourly average Leq operational noise levels. The operational noise analysis includes the planned berm west of the loading dock areas for the warehouse building. As shown in Figure 4.13-7, the berm is designed for screening, privacy, noise control, and security. (Urban Crossroads, 2023e, p. 45)

1. Operational Noise Sources

The operational noise analysis is intended to describe noise level impacts associated with the expected typical of daytime and nighttime activities at the Project site. Consistent with similar warehouse uses, the Project business operations would primarily be conducted within the enclosed building, except for traffic movement, parking, as well as loading and unloading of trucks at designated loading bays. The on-site Project-related noise sources are expected to include: loading dock activity, roof-top air conditioning units, trash enclosure activity, parking lot, vehicle movements, and truck movements. It is important to note that the following projected noise levels assume the worst-case noise environment with the loading dock activity, roof-top air conditioning units, trash enclosure activity, parking lot vehicle movements, and truck movements, and truck movements all operating at the same time. These sources of noise activity likely would vary throughout the day. (Urban Crossroads, 2023e, p. 45)





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Operational Noise Source Locations


2. Project Operational Noise Levels

Using the reference noise levels to represent the proposed Project operations that include loading dock activity, roof-top air conditioning units, trash enclosure activity, parking lot vehicle movements, and truck movements, Urban Crossroads calculated the operational source noise levels that are expected to be generated at the Project site and the Project-related noise level increase that would be experienced at each of the sensitive receiver locations. Table 4.13-11, *Daytime Project Operational Noise Levels*, shows the Project operational noise levels during the daytime hours of 7:00 a.m. to 10:00 p.m. The daytime hourly noise levels at the off-site receiver locations are expected to rang from 37.2 to 45.5 dBA Leq. (Urban Crossroads, 2023e, pp. 49-50)

Noise Sourcel	Operational Noise Levels by Receiver Location (dBA Leq)						
Noise Source-	R1	R2	R3	R4	R5	R6	
Loading Dock Activity	43.5	26.3	39.5	41.1	32.2	39.2	
Roof-Top Air Conditioning Units	27.6	30.9	31.3	30.0	19.5	21.5	
Trash Enclosure Activity	33.6	23.3	28.7	31.4	13.5	20.7	
Parking Lot Vehicle Movements	34.6	44.5	41.7	38.3	16.2	18.9	
Truck Movements	34.4	26.2	39.7	34.5	35.3	38.6	
Total (All Noise Sources)	44.9	44.8	45.5	44.0	37.2	42.0	

Table 4.13-11 Daytime Project Operational Noise Levels

1 See Figure 4.13-7 for the noise source locations. CadnaA noise model calculations are included in Appendix 9.1 to the Project's NIA (EIR *Technical Appendix J*).

(Urban Crossroads, 2023e, Table 9-3)

Table 4.13-12, Nighttime Project Operational Noise Levels, shows the Project operational noise levels during the nighttime hours of 10:00 p.m. to 7:00 a.m. The nighttime hourly noise levels at the off-site receiver locations are expected to range 34.1 to 44.7 dBA Leq. The difference between the daytime and nighttime noise levels is largely related to the duration of noise activity (Table 4.13-7). Appendix 9.1 to the Project's NIA (*Technical Appendix J*) includes the detailed noise model inputs. (Urban Crossroads, 2023e, p. 50)

Noise Sourcel	Operational Noise Levels by Receiver Location (dBA Leq)						
Noise Source	R1	R2	R3	R4	R5	R6	
Loading Dock Activity	43.5	26.3	39.5	41.1	32.2	39.2	
Roof-Top Air Conditioning Units	25.2	28.5	28.9	27.6	17.1	19.1	
Trash Enclosure Activity	29.6	19.4	24.8	27.4	9.5	16.8	
Parking Lot Vehicle Movements	34.6	44.5	41.7	38.3	16.2	18.9	
Truck Movements	28.1	19.7	33.3	28.1	29.0	32.3	
Total (All Noise Sources)	44.3	44.7	44.3	43.3	34.1	40.1	

1 See Figure 4.13-7 for the noise source locations. CadnaA noise model calculations are included in Appendix 9.1 to the Project's NIA (EIR *Technical Appendix J*).

(Urban Crossroads, 2023e, Table 9-4)



3. Project Operational Noise Level Compliance

To demonstrate compliance with local noise regulations, the Project-only operational noise levels are evaluated against exterior noise level thresholds based on the Riverside County exterior noise level standards at nearby noise-sensitive receiver locations. Table 4.13-13, *Operational Noise Level Compliance*, shows the operational noise levels associated with the proposed Project would satisfy the Riverside County 55 dBA Leq daytime and 45 dBA Leq nighttime exterior noise level standards at the nearest receiver locations. Therefore, the operational noise impacts are considered less than significant at the nearest noise-sensitive receiver locations. (Urban Crossroads, 2023e, pp. 50-51)

Receiver	Project O Noise Level	perational s (dBA Leq) ²	Noise Leve (dBA	l Standards Leq) ³	Noise Level Standards Exceeded? ⁴		
Location	Daytime	Nighttime	Daytime	Nighttime	Daytime	Nighttime	
R1	44.3	44.3	55	45	No	No	
R2	44.7	44.7	55	45	No	No	
R3	44.3	44.3	55	45	No	No	
R4	43.3	43.3	55	45	No	No	
R5	34.1	34.1	55	45	No	No	
R6	40.1	40.1	55	45	No	No	

Table 4.13-13 Operational Noise Level Compliance

1 See Figure 4.13-5 for the receiver locations.

2 Proposed operational noise level calculations are included in Appendix 9.1 to the Project's NIA (*Technical Appendix J*).

3 Exterior noise level standards, as shown on Table 4.13-4.

4 Do the estimated Project operational noise source activities exceed the noise level standards?

"Daytime" = 7:00 a.m. - 10:00 p.m.; "Nighttime" = 10:00 p.m. - 7:00 a.m.

(Urban Crossroads, 2023e, Table 9-5)

4. Project Operational Noise Level Increases

To describe the Project operational noise level increases, the Project operational noise levels are combined with the existing ambient noise levels measurements for the nearest receiver locations potentially impacts by Project operational noise sources. Since the dB units used to measure noise are logarithmic units, the Project-operational and existing ambient noise levels cannot be combined using standard arithmetic equations. Instead, they must be logarithmically added using the formula presented in Subsection 9.5 of the Project's NIA (*Technical Appendix J*). (Urban Crossroads, 2023e, p. 51)

The difference between the combined Project and ambient noise levels describes the Project noise level increases to the existing ambient noise environment. Noise levels that would be experienced at receiver locations when Project-source noise is added to the daytime and nighttime ambient conditions are presented on Table 4.13-14, *Daytime Project Operational Noise Level Increases*, and Table 4.13-15, *Nighttime Operational Noise Level Increases*. (Urban Crossroads, 2023e, p. 51)



Receiver Location ¹	Total Project Operational Noise Level ²	Measurement Location ³	Reference Ambient Noise Levels ⁴	Combined Project and Ambient ⁵	Project Increase ⁶	Increase Criteria ⁷	Increase Criteria Exceeded?
R1	44.3	L1	58.9	59.0	0.1	5.0	No
R2	44.7	L2	51.1	52.0	0.9	5.0	No
R3	44.3	L3	55.9	56.2	0.3	5.0	No
R4	43.3	L4	51.8	52.4	0.6	5.0	No
R5	34.1	L5	50.7	50.8	0.1	5.0	No
R6	40.1	L6	46.6	47.5	0.9	5.0	No

1 See Figure 4.13-5 for the receiver locations.

2 Total Project daytime operational noise levels as shown on Table 4.13-11.

3 Reference noise level measurement locations as shown on Figure 4.13-4.

4 Observed daytime ambient noise levels as shown on Table 4.13-1.

5 Represents the combined ambient conditions plus the Project activities.

6 The noise level increase expected with the addition of the proposed Project activities.

7 Significance increase criteria as shown on Table 4.13-4.

(Urban Crossroads, 2023e, Table 9-6)

Table 4.13-15 Nighttime Operational Noise Level Increases

Receiver Location ¹	Total Project Operational Noise Level ²	Measurement Location ³	Reference Ambient Noise Levels ⁴	Combined Project and Ambient ⁵	Project Increase ⁶	Increase Criteria ⁷	Increase Criteria Exceeded?
R1	44.3	L1	56.8	57.0	0.2	5.0	No
R2	44.7	L2	49.5	50.7	1.2	5.0	No
R3	44.3	L3	50.7	51.6	0.9	5.0	No
R4	43.3	L4	49.9	50.8	0.9	5.0	No
R5	34.1	L5	48.4	48.6	0.2	5.0	No
R6	40.1	L6	42.2	44.3	2.1	5.0	No

1 See Figure 4.13-5 for the receiver locations.

2 Total Project nighttime operational noise levels as shown on Table 4.13-12.

3 Reference noise level measurement locations as shown on Figure 4.13-4.

4 Observed daytime ambient noise levels as shown on Table 4.13-1.

5 Represents the combined ambient conditions plus the Project activities.

6 The noise level increase expected with the addition of the proposed Project activities.

7 Significance increase criteria as shown on Table 4.13-4.

(Urban Crossroads, 2023e, Table 9-7)

As shown in Table 4.13-14, the Project would generate a daytime operational noise level increases ranging from 0.1 to 0.9 dBA Leq at the nearest receiver locations. As shown in Table 4.13-15, the Project would



generate a nighttime operational noise level increases ranging from 0.2 to 2.1 dBA L_{eq} at the nearest receiver locations. Project-related operational noise level increases would satisfy the operational noise level increase significance criteria presented in Table 4.13-4, and therefore the Project noise level increases at the sensitive receiver locations would be less than significant. (Urban Crossroads, 2023e, p. 51)

C. Off-Site Transportation Noise Impacts

To assess the off-site transportation CNEL noise levels impacts associated with the proposed Project, noise contours were developed based on the Project's TA (*Technical Appendix L2*). Noise contour boundaries represent the equal levels of noise exposure and are measured in CNEL from the center of the roadway. The noise contours do not consider the effect of any existing noise barriers or topography that may attenuate ambient noise levels. In addition, because the noise contours reflect modeling of vehicular noise on area roadways, they appropriately do not reflect noise contributions from the surrounding stationary noise sources within the Project study area. Refer to Subsection 7.1 of the Project's NIA (*Technical Appendix J*) for a discussion of traffic noise contours developed for the Project, which are presented in NIA Tables 7-1 through 7-6. (Urban Crossroads, 2023e, p. 35)

1. Existing Project Traffic Noise Level Increases

An analysis of existing traffic noise levels plus traffic noise generated by the proposed Project has been included in this report to fully analyze all the existing traffic scenarios identified in the Project's TA (*Technical Appendix L2*). This condition is provided solely for informational purposes and would not occur, since the Project would not be fully developed and occupied under Existing conditions. Therefore, no mitigation measures are considered to reduce the Existing Plus Project traffic noise level increases. Table 7-1 of the Project's NIA (*Technical Appendix J*) shows the Existing without Project conditions CNEL noise levels. The Existing without Project exterior noise levels are expected to range from 49.5 to 74.6 dBA CNEL, without accounting for any noise attenuation features such as noise barriers or topography. Table 7-2 of the Project's NIA shows the Existing with Project conditions would range from 55.6 to 74.6 dBA CNEL. Table 4.13-16, *Existing With Project Traffic Noise Level Increase*, shows that the Project off-site traffic noise level increases range from 0.0 to 6.1 dBA CNEL on the study area roadway segments. (Urban Crossroads, 2023e, p. 38)

2. Project Traffic Level Increases – Existing Plus Ambient Growth Plus Cumulative (EAC)

Table 7-3 of the Project's NIA (*Technical Appendix J*) presents the Existing plus Ambient Growth plus Cumulative (EAC) without Project conditions CNEL noise levels. The EAC without Project exterior noise levels are expected to range from 49.7 to 76.2 dBA CNEL, without accounting for any noise attenuation features such as noise barriers or topography. Table 7-4 of the Project's NIA (*Technical Appendix J*) shows that the EAC with Project conditions are expected to range 55.6 to 76.2 dBA CNEL. Table 4.13-17, *Project Traffic Noise Increases – Existing Plus Ambient Plus Cumulative*, shows that the Project off-site traffic noise level increases would range from 0.0 to 5.9 dBA CNEL. (Urban Crossroads, 2023e, p. 38)



ID	Road	Road Segment		CN La	CNEL at Receiving Land Use (dBA) ²			Incremental Noise Level Increase Threshold ³	
			Land Use ¹	No Project	With Project	Project Increment	Limit	Exceeded?	
1	Patterson Av.	n/o Placentia Av.	Sensitive	49.5	55.6	6.1	5.0	Yes	
2	Harvill Av.	n/o Cajalco Expy.	Non-Sensitive	70.4	70.6	0.2	3.0	No	
3	Harvill Av.	n/o Rider St.	Non-Sensitive	69.4	70.1	0.7	n/a	No	
4	Harvill Av.	n/o Placentia Av.	Non-Sensitive	70.5	70.9	0.4	3.0	No	
5	Harvill Av.	s/o Placentia Av.	Non-Sensitive	70.6	70.6	0.0	3.0	No	
6	Cajalco Expy.	w/o Harvill Av.	Non-Sensitive	71.7	71.8	0.1	3.0	No	
7	Cajalco Expy.	e/o Harvill Av.	Non-Sensitive	72.2	72.2	0.0	3.0	No	
8	Cajalco Expy.	e/o Harvill Av.	Non-Sensitive	74.6	74.6	0.0	3.0	No	
9	Rider St.	w/o Harvill Av.	Sensitive	52.2	56.6	4.4	5.0	No	
10	Placentia Av.	w/o Harvill Av.	Sensitive	52.0	56.7	4.7	5.0	No	

Table 4.13-16 Existing With Project Traffic Noise Level Increase

Based on a review of existing aerial imagery. Noise sensitive uses limited to existing residential land uses.

2 The CNEL is calculated from the centerline to the nearest receiving land use.

3 Does the Project create an incremental noise level increase exceeding the significance criteria (Table 4.13-4)? "n/a" Per the County of Riverside General Plan Noise Element Table N-1, a barely perceptible 3 dBA or greater noise level increase is considered a significant impact when the ambient non-noise sensitive noise level is greater than the normally acceptable 70 dBA CNEL land use compatibility criteria.

(Urban Crossroads, 2023e, Table 7-7)

ID	Road	Segment	Receiving	CNEL at Receiving Receiving Land Use (dBA) ²			Incremental Noise Level Increase Threshold ³		
			Land Use ¹	No Project	With Project	Project Increment	Limit	Exceeded?	
1	Patterson Av.	n/o Placentia Av.	Sensitive	49.7	55.6	5.9	5.0	Yes	
2	Harvill Av.	n/o Cajalco Expy.	Non-Sensitive	74.3	74.4	0.1	3.0	No	
3	Harvill Av.	n/o Rider St.	Non-Sensitive	72.7	73.1	0.4	3.0	No	
4	Harvill Av.	n/o Placentia Av.	Non-Sensitive	73.3	73.5	0.2	3.0	No	
5	Harvill Av.	s/o Placentia Av.	Non-Sensitive	74.0	74.0	0.0	3.0	No	
6	Cajalco Expy.	w/o Harvill Av.	Non-Sensitive	74.9	75.0	0.1	3.0	No	
7	Cajalco Expy.	e/o Harvill Av.	Non-Sensitive	76.2	76.2	0.0	3.0	No	
8	Cajalco Expy.	e/o Harvill Av.	Non-Sensitive	75.8	75.8	0.0	3.0	No	
9	Rider St.	w/o Harvill Av.	Sensitive	52.8	56.8	4.0	5.0	No	
10	Placentia Av.	w/o Harvill Av.	Sensitive	61.4	62.2	0.8	3.0	No	

Table 4.13-17 Project Traffic Noise Increases – Existing Plus Ambient Plus Cumulative

1 Based on a review of existing aerial imagery. Noise sensitive uses limited to existing residential land uses.

2 The CNEL is calculated from the centerline to the nearest receiving land use.

3 Does the Project create an incremental noise level increase exceeding the significance criteria (Table 4.13-4)? "n/a" Per the County of Riverside General Plan Noise Element Table N-1, a barely perceptible 3 dBA or greater noise level increase is considered a significant impact when the ambient non-noise sensitive noise level is greater than the normally acceptable 70 dBA CNEL land use compatibility criteria.

(Urban Crossroads, 2023e, Table 7-8)



3. Horizon Year Project Traffic Noise Level Increases

Table 7-5 of the Project's NIA (*Technical Appendix J*) presents the HY without Project conditions CNEL noise levels. The HY without Project exterior noise levels are expected to range from 49.9 to 76.4 dBA CNEL, without accounting for any noise attenuation features such as noise barrier or topography. Table 7-6 of the Project's NIA (*Technical Appendix J*) shows that the HY with Project conditions are expected to range from 55.7 to 76.5 dBA CNEL. Table 4.13-18, *Project Traffic Noise Increases – Horizon Year*, shows that the Project off-site traffic noise level increases would range from 0.0 to 5.8 dBA CNEL. (Urban Crossroads, 2023e, p. 39)

ID	Road	Segment	Receiving	CN La	IEL at Receivi and Use (dBA	ng) ²	Incremental Noise Level Increase Threshold ³	
			Land Use ¹	No Project	With Project	Project Increment	Limit	Exceeded?
1	Patterson Av.	n/o Placentia Av.	Sensitive	49.9	55.7	5.8	5.0	Yes
2	Harvill Av.	n/o Cajalco Expy.	Non-Sensitive	74.6	74.6	0.0	3.0	No
3	Harvill Av.	n/o Rider St.	Non-Sensitive	73.0	73.3	0.3	3.0	No
4	Harvill Av.	n/o Placentia Av.	Non-Sensitive	73.5	73.7	0.2	3.0	No
5	Harvill Av.	s/o Placentia Av.	Non-Sensitive	74.3	74.3	0.0	3.0	No
6	Cajalco Expy.	w/o Harvill Av.	Non-Sensitive	75.1	75.2	0.1	3.0	No
7	Cajalco Expy.	e/o Harvill Av.	Non-Sensitive	76.4	76.5	0.1	3.0	No
8	Cajalco Expy.	e/o Harvill Av.	Non-Sensitive	76.0	76.0	0.0	3.0	No
9	Rider St.	w/o Harvill Av.	Sensitive	52.9	56.8	3.9	5.0	No
10	Placentia Av.	w/o Harvill Av.	Sensitive	61.6	62.4	0.8	3.0	No

Table 4.13-18 Project Traffic Noise Increases - Horizon Year

1 Based on a review of existing aerial imagery. Noise sensitive uses limited to existing residential land uses.

2 The CNEL is calculated from the centerline to the nearest receiving land use.

3 Does the Project create an incremental noise level increase exceeding the significance criteria (Table 4.13-4)? "n/a" Per the County of Riverside General Plan Noise Element Table N-1, a barely perceptible 3 dBA or greater noise level increase is considered a significant impact when the ambient non-noise sensitive noise level is greater than the normally acceptable 70 dBA CNEL land use compatibility criteria.

(Urban Crossroads, 2023e, Table 7-9)

4. Project Off-site Traffic Noise Impacts

The off-site traffic noise analysis recognizes that the Project would generate a noise level increase of up to 6.1 dBA CNEL on a segment of Patterson Avenue north of Placentia Avenue. This noise level increase affects three existing residences located at 19542, 19543, and 19972 Patterson Avenue and is largely due to the lack of existing traffic volume on this roadway segment at the time that traffic counts were collected. The existing traffic noise levels on this segment are calculated at 49.5 dBA CNEL. The addition of near-term Project traffic is expected to increase the off-site traffic noise levels to 55.6 dBA CNEL resulting in a Project incremental traffic noise level increase of 6.1 dBA CNEL.

The off-site Project traffic noise on Patterson Avenue would not exceed the County of Riverside General Plan Noise Element Policy N 1.3 exterior noise level criteria of 65 dBA CNEL for noise sensitive residential land



uses. Further, the thresholds of significance do not specifically identify what portion of the residential land use that is considered "noise sensitive." Noise-sensitive land use is generally limited to the outdoor living areas since it is unlikely that humans will be frequently occupying the front yard areas abutting the right-of-way boundary of Patterson Avenue. Therefore, front and side yards of residences adjacent to off-site roadway segments do not represent noise sensitive areas of frequent human use that require exterior noise mitigation. Regardless, because the Project's contribution to traffic noise level increases would be up to 6.1 dBA CNEL on the segment of Patterson Avenue north of Placentia Avenue and affect three residential homes, the impact is conservatively concluded to be significant. (Urban Crossroads, 2023e, p. 38)

The existing ambient noise level measurements presented on Table 4.13-1 show that the existing residences located adjacent to Patterson Avenue north of Placentia Avenue already experience exterior noise levels ranging from 56.5 to 59.0 dBA CNEL. Since the existing ambient noise levels currently exceed the calculated existing traffic noise levels, it expected that the noise sensitive residential land uses adjacent to the Patterson Avenue would not perceive a significant incremental noise level increase due to the Project traffic. Regardless, to present a conservative conclusion when evaluating traffic noise levels in isolation of other noise sources, the three residences on Patterson Avenue would experience a significant noise level increase as a result of traffic volume increases associated with Project traffic. (Urban Crossroads, 2023e, p. 38)

D. <u>Summary of Significance of Project-Related Noise Impacts</u>

As indicated in the preceding analysis, Project-related construction activities and long-term operational activities on site would not expose nearby sensitive receptors to noise increases exceeding the thresholds of significance presented in Table 4.13-4, other than at three residential lots located on Patterson Avenue north of Placentia Avenue that would experience significant traffic noise level increases when traffic noise is considered in isolation of other noise sources. The Project would not result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan, noise ordinance, or applicable standards of other agencies, but would generate a substantial permanent increase in traffic noise on one roadway segment (Patterson Avenue north of Placentia Avenue) when traffic noise is considered in isolation of other noise is considered in isolation of other noise is considered in isolation of other noise is considered in traffic noise on one roadway segment (Patterson Avenue north of Placentia Avenue) when traffic noise is considered in isolation of other noise sources, resulting in a significant traffic noise impact.

<u>Threshold d.</u>: Would the Project result in the generation of excessive ground-borne vibration or groundborne noise levels?

The construction and operation of the proposed Project has the potential to result in ground-borne vibration or ground-borne noise during both construction and long-term operation. Each is discussed below.

A. <u>Construction-Related Vibration Impacts</u>

Using the vibration source level of construction equipment previously presented on Table 4.13-6 and the construction vibration assessment methodology published by the FTA, it is possible to estimate the Project vibration impacts. Table 4.13-19, *Project Construction Vibration Levels*, presents the expected Project related vibration impacts at the nearby receiver locations. At distances ranging from 50 to 141 feet from Project



construction activities including the planned 50-foot building setback at the residential areas, construction vibration velocity levels are estimated to range from 0.016 to 0.074 in/sec PPV. Based on a maximum acceptable continuous vibration threshold of 0.3 PPV (in/sec), the typical Project construction vibration levels would fall below the building damage thresholds at all the noise sensitive receiver locations. Therefore, the Project-related vibration impacts would be less than significant during typical construction activities at the Project site. Moreover, the vibration levels reported at the sensitive receiver locations are unlikely to be sustained during the entire construction period but will occur rather only during the times that heavy construction equipment is operating adjacent to the Project site perimeter. (Urban Crossroads, 2023e, pp. 63-64)

	Distance to		Typical	Thresholds	Thresholds				
Location ¹	Const. Activity (Feet) ²	Small bulldozer	Jackhammer	Loaded Trucks	Large bulldozer	Vibratory Roller	Highest Vibration Level	PPV (in/sec)⁴	Exceeded? ⁵
R1	127'	0.000	0.003	0.007	0.008	0.018	0.018	0.3	No
R2	111'	0.000	0.004	0.008	0.010	0.022	0.022	0.3	No
R3	86'	0.000	0.005	0.012	0.014	0.033	0.033	0.3	No
R4	141'	0.000	0.003	0.006	0.007	0.016	0.016	0.3	No
R5	50'	0.001	0.012	0.027	0.031	0.074	0.074	0.3	No
R6	50'	0.001	0.012	0.027	0.031	0.074	0.074	0.3	No

Table 4.13-19 Project Construction Vibration Levels

1 Construction noise source and receiver locations are shown on Figure 4.13-6.

2 Distance from receiver building facade to Project construction activity (Project site boundary with 50 foot building setback at residential areas).

- 3 Based on the Vibration Source Levels of Construction Equipment (Table 4.13-6).
- 4 Caltrans Transportation and Construction Vibration Guidance Manual, April 2020, Table 19, p. 38.
- 5 Does the peak vibration exceed the acceptable vibration thresholds?

"PPV" = Peak Particle Velocity

(Urban Crossroads, 2023e, Table 10-6)

B. Operational-Related Vibration Impacts

Under long-term conditions, the Project would not include or require equipment or activities that would result in perceptible groundborne vibration beyond the Project site. Caltrans has issued a publication entitled, "Transportation Construction Vibration Guidance Manual," dated April 2020 (Caltrans, 2020). As noted by Caltrans:

"Because vehicles traveling on highway are supported on flexible suspension systems and pneumatic tires, these vehicles are not an efficient source of ground vibration. They can, however, impart vibration into the ground when they roll over pavement that is not smooth. Continuous traffic traveling on a smooth highway creates a fairly continuous but relatively low level of vibration. Where discontinuities exist in the pavement, heavy truck passages can be the primary source of localized, intermittent vibration peaks. These peaks typically last no more than a few seconds and often for only



a fraction of a second. Because vibration drops off rapidly with distance, there is rarely a cumulative increase in ground vibration from the presence of multiple trucks." (Caltrans, 2020, p. 10)

All trucks generated by the Project would travel along County roadways that are regularly maintained to prevent discontinuous pavement (e.g., potholes). As such, and based on guidance from Caltrans, the Project's operational traffic-related vibration impacts would be less than significant.

4.13.7 CUMULATIVE IMPACT ANALYSIS

The cumulative study area for the issue of noise includes the Project vicinity as well as areas adjacent to roadways evaluated by the Project's TA (*Technical Appendix L2*). Areas outside of the cumulative study area are too far away to be adversely impacted by noise and ground-borne vibration generated as a result of the proposed Project.

As indicated under the analysis of Thresholds a. and b., there are no private airstrips in the Project vicinity and the Project development area is located outside the 60 dBA CNEL noise level contour boundaries for the MARB/IPA, and as such the Project would not be exposed to excessive noise levels associated with public or private airport operations. There are no components of the proposed Project that would cause or contribute to increased airport-related noise in the area. As such, impacts would be less-than-cumulatively considerable.

The analysis under Threshold c. indicates that the Project would not generate substantial amounts of construction-related noise that could adversely affect nearby sensitive receptors. Construction activities associated with the proposed Project and other construction projects in the area may overlap, resulting in cumulative periodic noise increases in the local area. However, construction noise impacts primarily affect the areas immediately adjacent to a construction site. Although lands surrounding the Project site may be under construction simultaneous with the Project, there would be no sensitive receptors within these areas that could be impacted by Project-related cumulative construction noise while these areas are under construction. Due to distance and intervening topography, the Project's contribution to construction-related noise affecting sensitive receptors in the local area would be less than significant on a cumulatively-considerable basis.

With respect to Project operational noise increases, areas surrounding the Project site are planned primarily for industrial uses, with the exception of the residential uses to the west and south of Walnut Street. As previously indicated in Table 4.13-11 and Table 4.13-12, the daytime hourly noise levels at the off-site receiver locations are expected to range from 37.2 to 45.5 dBA Leq while the nighttime hourly noise levels at the off-site receiver locations are expected to range from 34.1 to 44.7 dBA Leq. The Project-related operational noise levels at the nearest sensitive receptors would be below the Riverside County 55 dBA Leq daytime and 45 dBA Leq nighttime exterior noise level standards. Although Project-related operational noise would combine with other noise sources in the local area, including nearby warehouse uses, the data presented in Table 4.13-11 and Table 4.13-12 demonstrates that even when combined with noise from cumulative developments, the Project's operational noise levels at the nearby sensitive receptor locations would be below the identified thresholds of significance. Accordingly, noise impacts under long-term operation of the proposed Project would be less than significant on a cumulatively-considerable basis.



With respect to traffic-related noise impacts, Table 4.13-17 and Table 4.13-18 (previously presented) show that Project-related traffic noise increases would generate a noise level increase of up to 5.9 dBA CNEL on the segment of Patterson Avenue north of Placentia Avenue under cumulative conditions. However, the existing ambient noise level measurements presented on Table 4.13-1 show that the existing residences adjacent to Patterson Avenue already experience exterior noise levels ranging from 56.5 to 59.0 dBA CNEL. Since the existing ambient noise levels currently exceed the calculated existing traffic noise levels, it expected that the noise sensitive land uses adjacent to Patterson Avenue would not perceive a significant off-site incremental traffic noise level increase due to the Project traffic. Regardless, when traffic noise is considered in isolation of other noise sources, the traffic noise increase would be significant from the addition of Project traffic and traffic from other projects. Accordingly, Project-related traffic noise increases on the segment of Patterson Avenue north of Placentia Avenue would be significant and cumulatively considerable.

With respect to construction-related vibration impacts, the data presented previously in Table 4.13-19 shows that at distances ranging from 50 to 141 feet from Project construction activities, construction vibration velocity levels are estimated 0.016 to 0.074 in/sec PPV and would remain below the continuous vibration threshold of 0.3 PPV at all receiver locations. Because vibration levels drop off rapidly with distance, it is not expected that the Project's construction-related vibration would combine with vibration from other nearby construction activities such that the threshold of 0.3 PPV would be exceeded at any nearby sensitive receptor. Accordingly, Project-related construction vibration impacts would be less-than-cumulatively considerable. As also discussed in the analysis of Threshold d., traffic produced by the Project during long-term operation would have no potential to result in operational vibration impacts, indicating that cumulatively-considerable impacts would not occur.

4.13.8 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

<u>Threshold a.: Less-than-Significant Impact</u>. The MARB/IPA runway is located approximately 2 miles northeast of the Project site. Based on the 2018 noise level contours for the MARB/IPA, the Project development area is located outside the 60 dBA CNEL noise level contour boundaries and the Project's industrial and residential land use is considered clearly acceptable. As such, the Project would not exposed people residing or working in the area to excessive noise levels from airport operations, and impacts would be less than significant.

<u>Threshold b.: Less-than-Significant Impact</u>. There are no private airstrips in the Project vicinity. The nearest private airport facility is the Perris Valley Airport, located approximately 4.2 miles southeast of the Project site within the City of Perris. According to Map PV-3 of the Riverside County Airport Land Use Compatibility Plan (ALUCP), the Project site is located well outside of the 55 dBA CNEL noise contour for the Perris Valley Airport, indicating that the Project site would be subject to noise levels of less than 55 dBA CNEL associated with the Perris Valley Airport. The Project's single-family residential land use is considered clearly acceptable exterior noise levels below 55 dBA CNEL, while the Project's light industrial use is considered clearly acceptable components of the Project would not be exposed to excessive noise levels associated with the Perris Valley Airport, and impacts would therefore be less than significant.



Threshold c.: Significant and Cumulatively-Considerable Impact. As shown in Table 4.13-9, Project-related construction noise levels are expected to range from 57.9 to 76.1 dBA Leq at the nearest receiver locations and would not expose nearby sensitive receptors to Project-related construction noise levels exceeding the 80 dBA Leg significance threshold; therefore, the noise impacts due to Project construction noise would be less than significant at all receiver locations. Table 4.13-10 shows that the noise levels associated with the nighttime concrete pour activities during Project construction are estimated to range from 40.8 to 44.1 dBA Leq, which would not exceed the FTA 70 dBA Leq nighttime residential noise level threshold at all the nearest noise sensitive receiver locations; thus, the noise impacts due to Project construction nighttime concrete pour noise activity are considered less than significant at all receiver locations. With respect to Project operations, Table 4.13-14 and Table 4.13-15 show that the Project's operations would not expose any nearby sensitive receptors to noise levels exceeding the daytime threshold of 55 dBA Leq or the nighttime threshold of 45 dBA Leq; thus, the Project's operational noise impacts would be less than significant at the nearest noise-sensitive receiver locations. Table 4.13-16 through Table 4.13-18 demonstrate that Project traffic-related noise increases would not exceed the identified thresholds of significance, with exception of the segment of Patterson Avenue north of Placentia Avenue, which would experience a noise increase of up to 6.1 dBA CNEL. Because the existing ambient noise levels currently exceed the calculated existing traffic noise levels, it expected that the noisesensitive land uses adjacent to Patterson Avenue would not perceive a significant off-site incremental traffic noise level increase due to the Project traffic. Regardless, when traffic noise is considered in isolation of other noise sources, the Project's traffic noise increase would be significant and cumulatively considerable on the segment of Patterson Avenue north of Placentia Avenue.

<u>Threshold d.: Less-than-Significant Impact</u>. At distances ranging from 50 to 141 feet from Project construction activities, construction vibration velocity levels are 0.016 to 0.074 in/sec PPV and would remain below the continuous vibration threshold of 0.3 PPV at all receiver locations. Therefore, the Project-related vibration impacts would be less than significant during the construction activities at the Project site. Project operations would not include the use of any stationary equipment that would result in excessive vibration levels. Additionally, because all roadways that would carry Project-related truck traffic are regularly maintained by Riverside County so as to prevent discontinuous pavement (e.g., potholes), truck traffic associated with the Project's long-term operations would not generate substantial amounts of groundborne vibration. Therefore, construction and long-term operation of the proposed Project would not result in the generation of excessive ground-borne vibration or ground-borne noise levels, and impacts would be less than significant.

4.13.9 COUNTY REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

Applicable County Regulations and Design Requirements

The following are regulations and design requirements that apply to the proposed Project and that reduce or preclude noise. Although compliance with mandatory regulatory requirements does not technically meet CEQA's definition for mitigation, they are specified herein as requirements for the Project.

• All construction activities and haul truck deliveries shall adhere to Section 2.i of Riverside County Ordinance No. 847, which prohibits construction activities that make loud noise from occurring between 6:00 p.m. and 6:00 a.m. during the months of June through September, and between 6:00 p.m.



and 7:00 a.m. during the months of October through May, and on Sundays and federal holidays. Exceptions to these time restrictions may be granted pursuant to Section 7 of Ordinance No. 847 (e.g., if needed to accommodate nighttime concrete pouring activities).

Mitigation

No feasible mitigation is available to address the Project's off-site traffic noise increase along the segment of Patterson Avenue north of Placentia Avenue.

4.13.10 SIGNIFICANCE OF IMPACTS AFTER MITIGATION

Threshold c.: Significant and Unavoidable Direct and Cumulatively-Considerable Impact. Potential mitigation measures were considered and were found to be infeasible for reducing the Project's off-site traffic noise level increase (when considering traffic noise in isolation of other noise sources) affecting three residential lots on the segment of Patterson Avenue north of Placentia Avenue. Potential mitigation considered included the use of rubberized asphalt hot mix pavement and the installation of off-site noise barriers adjacent to the impacted roadway segment. While rubberized asphalt could provide some nominal noise reduction, rubberized asphalt is only effective in the reduction of tire-on-pavement noise at higher speeds and would not materially reduce the Project's traffic noise increase. Because the use of rubberized asphalt would not materially lower off-site traffic noise levels at potentially affected receptors, rubberized asphalt is not considered effective and feasible as mitigation. Regarding the potential installation of noise barriers at the impacted residential lots, the barriers would need to be high enough and long enough to block the line-of-sight from the noise source (at 11.5 feet high for trucks) to the receiver and it is not practical given the need for driveway openings and the usability of front and side yards to construct 11.5 foot-high uninterrupted barriers at this off-site location along Patterson Avenue. Further, the significant impact is identified for traffic noise in isolation of other noise sources and the existing ambient noise levels at the affected residential lots currently exceed the calculated existing traffic noise levels, so it expected that the noise-sensitive land uses adjacent to Patterson Avenue would not perceive a significant traffic noise level increase even though one is calculated by noise modeling to occur. (Urban Crossroads, 2023e, pp. 43-44)



4.14 PALEONTOLOGICAL RESOURCES

This Subsection 4.14 evaluates the Project's potential to result in direct, indirect, or cumulatively-considerable impacts to paleontological resources. The analysis in this subsection is based, in part, on information from the report titled, "Paleontological Assessment for the Rider and Patterson Project" (herein, "Paleontological Assessment"), prepared by BFSA Environmental Services (BFSA), dated November 17, 2022, and included as *Technical Appendix K* to this EIR (BFSA, 2022b). Refer to Section 7.0, *References*, for a complete list of reference sources.

4.14.1 EXISTING CONDITIONS

A. <u>Paleontological Resources Definition</u>

Paleontological resources are the remains of prehistoric life that have been preserved in geologic strata. These remains are called fossils and include bones, shells, teeth, and plant remains (including their impressions, casts, and molds) in the sedimentary matrix, as well as trace fossils such as footprints and burrows. Fossils are considered older than 5,000 years of age but may include younger remains (subfossils) when viewed in the context of local extinction of the organism or habitat, for example. Fossils are considered a non-renewable resource under State and local guidelines (BFSA, 2022b, p. 7)

B. <u>Geological Setting</u>

Geomorphically, the Project site is mostly flat with a gentle northeastward gradient, situated along the western edge of the Perris Valley, on the eastern slopes of the northern part of the Peninsular Ranges. Geologic maps of the area show that the Project site is located within the central part of the Perris tectonic block and is underlain by lower Pleistocene (approximately 1.8 million- to perhaps 200,000- to 300,000-year-old) sandy, very old alluvial fan deposits. The deposits are composed of "mostly well-dissected, well-indurated, reddishbrown sand deposits. Commonly contains duripans and locally silcretes." The granitic basement occurs as extensive outcrops west of, and within the very southern portion of, the Project site. (BFSA, 2022b, p. 5)

C. <u>Paleontological Sensitivity</u>

The Society of Vertebrate Paleontology drafted a set of standard guidelines intended to assist paleontologists to assess and mitigate any adverse effects/impacts to nonrenewable paleontological resources. The guidelines defined four categories of paleontological sensitivity for geologic units (formations) that might be impacted by a proposed project, as listed below:

- <u>High Potential</u>: Rock units from which vertebrate or significant invertebrate, plant, or trace fossils have been recovered.
- <u>Undetermined Potential</u>: Rock units for which little information is available concerning their paleontological content, geologic age, and depositional environment, and that further study is needed to determine the potential of the rock unit.
- <u>Low Potential</u>: Rock units that are poorly represented by fossil specimens in institutional collections or based upon a general scientific consensus that only preserve fossils in rare circumstances.



• <u>No Potential</u>: Rock units that have no potential to contain significant paleontological resources, such as high-grade metamorphic rocks and plutonic igneous rocks. (BFSA, 2022b, pp. 7-8)

Using these criteria, based on the Pleistocene age of the sediments mapped at the Project site and nearby fossil localities found in similar deposits as those at the project, the very old alluvial fan deposits can be considered to have an "Undetermined" to "High" potential to yield significant paleontological resources. The granitic rocks within the very southern portion of the Project site have no potential for fossils. (BFSA, 2022b, p. 8)

According to mapping information available from Riverside County Geographic Information Systems (GIS), the lower Pleistocene-aged very old alluvial fan deposits on the northeast half of the Project site are mapped as having a "High B" paleontological sensitivity. The category "High B" indicates that fossils are likely to be encountered four feet below the surface and may be impacted during excavation by construction activities. The southwest half of the Project site is mapped as having a "Low" paleontological potential. However, BFSA asserts that this mapping is an error, as this designation is usually applied to Holocene-aged sediments, which rarely yield fossils, and plutonic igneous rocks, which never contain fossils. (BFSA, 2022b, p. 8)

D. <u>Fossil Locality Search</u>

A paleontological literature review and collections and locality records search was conducted for the project using records obtained from the Division of Geological Sciences at the San Bernardino County Museum (SBCM), the Los Angeles County Museum of Natural History (LACM), the Western Science Center (WSC) in Hemet, and data from published and unpublished paleontological literature. The resulting locality records search did not identify any previously-recorded fossil localities from within the boundaries of the Project site. The closest recorded fossil localities may be those recorded by the SBCM (SBCM localities 5.3.151 and 5.3.153) from Pleistocene old alluvium near the Lakeview Hot Springs area on the southeast side of the Perris Reservoir. Fossil vertebrates collected from these localities include mammoths, extinct horses, and extinct bison. From WSC records, the closest fossil localities are likely the many located along Olive Avenue in the Winchester area, several miles southeast of the Project site. These localities are from Pleistocene deposits that yielded the remains of many species of large and small mammals. The nearest known LACM fossil locality (LACM locality 5168) in Pleistocene sediments is located several miles to the south of the project in the vicinity of Canyon Lake and Menifee, yielding a camel specimen. (BFSA, 2022b, p. 7)

4.14.2 APPLICABLE REGULATORY REQUIREMENTS

The following is a brief description of the federal, state, and local environmental laws and related regulations governing issues related to paleontological resources.

A. <u>Federal Regulations</u>

1. Paleontological Resources Preservation Act (PRPA)

The Paleontological Resources Preservation Act (PRPA) was signed into law on March 30, 2009 (Public Law 111-11, Title VI, Subtitle D; 16 U.S.C. Sections (§) 470aaa - 470aaa-11). PRPA directs the Department of Agriculture (U.S. Forest Service) and the Department of the Interior (National Park Service, Bureau of Land Management, Bureau of Reclamation, and Fish and Wildlife Service) to implement comprehensive paleontological resource management programs. Section 6310 of PRPA specifically states, "As soon as



practical after the date of enactment of this Act, the Secretary shall issue such regulations as are appropriate to carry out this subtitle, providing opportunities for public notice and comment." (NPS, 2022b)

B. <u>State Regulations</u>

1. California Administrative Code, Title 14, Section 4308

Section 4308, *Archaeological Features*, of Title 14 of the California Administrative Code provides that: "No person shall remove, injure, disfigure, deface, or destroy any object of archaeological, or historical interest or value." (CCR, n.d.)

2. California Public Resources Code (PRC)

Public Resources Code (PRC) § 5097.5 states that "A person shall not knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands." (CCR, n.d.)

PRC § 30244 states that, "Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required." (CCR, n.d.)

C. Local Regulations

1. Riverside County Planning Department Procedures

In order to ensure the review and protection of paleontological resources for projects subject to CEQA and not otherwise categorically exempt, the Riverside County Geologist performs an initial review of the County of Riverside's database and mapped information for the subject site. When existing information indicates that a site proposed for development has high paleontological sensitivity, a paleontological resource impact mitigation program (PRIMP) is required for the project. A PRIMP is required to specify the steps to be taken to mitigate impacts to paleontological resources. If the site warrants protection, then an "Environmental Constraint" is placed on the approved map for the project, stating that:

"This site, as delineated on this [Environmental Constraint Sheet] map and as indicated in the county's General Plan, has been mapped as having a high potential for containing significant nonrenewable fossil material. The proposed project's potential to impact paleontological resources has been determined to be possible. Therefore, mitigation of this potential impact in the form of monitoring of all site earth-moving activities and collection/curation of all significant fossils unearthed is required unless proven unnecessary through comprehensive literature research and site inspection." (Riverside County, 2015a, pp. 4.9-26 and -27)

When existing information indicates that a site proposed for development has low paleontological sensitivity, no direct mitigation is required unless a fossil is encountered during site development. Should a fossil be encountered, the Riverside County Geologist must be notified, and a paleontologist must be retained by the project proponent. The paleontologist documents the extent and potential significance of the paleontological



resources on the site and establishes appropriate mitigation measures for further site development. (Riverside County, 2015a, p. 4.9-27)

When existing information indicates that a site proposed for development has undetermined paleontological sensitivity, a report is filed with the Riverside County Geologist documenting the extent and potential significance of the paleontological resources on site and identifying mitigation measures for the fossil and for impacts to significant paleontological resources. (Riverside County, 2015a, p. 4.9-27)

4.14.3 BASIS FOR DETERMINING SIGNIFICANCE

Significance thresholds are set forth in Riverside County's Environmental Assessment Checklist, as modified based on the 2018 updates to Section VII of Appendix G to the State CEQA Guidelines (listed above), and indicate significant impacts would occur if the Project or any Project-related component would:

a. Directly or indirectly destroy a unique paleontological resources, site, or unique geologic feature.

The significance threshold set forth in Riverside County's Environmental Assessment Checklist, as modified by the 2018 updates to the State CEQA Guidelines, was used to evaluate the significance of the proposed Project's impacts on paleontological resources.

4.14.4 IMPACT ANALYSIS

Threshold a: Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Under existing conditions, the Project site exhibits little topographic variation, has been disturbed by past agricultural uses, residential development, and soil stockpiling activities, and the Project site does not contain any unique geologic features. As such, no impacts to unique geologic features would occur with Project implementation. (Google Earth, n.d.)

Literature review and locality records research has confirmed the existence of potentially fossiliferous Pleistocene very old alluvial fan deposits mapped across the majority of the Project site. Although the locality search did not indicate the presence of any known fossil localities within the Project site, the occurrence of terrestrial vertebrate fossils at shallow depths from Pleistocene older alluvial fan sediments across western Riverside County is well documented. These Pleistocene older alluvial fan sediments are typically assigned a "High" paleontological sensitivity rating for yielding paleontological resources. (BFSA, 2022b, p. 10)

As such, it is possible that earth-moving activities beyond the disturbed topsoil may disrupt or adversely affect paleontological resources. Therefore, while surface grading impacting previously-disturbed soils would not likely reach any fossiliferous sediments, excavations into the native soils have potential to encounter paleontological resources. (BFSA, 2022b, p. 8) This is considered a potentially significant impact for which mitigation would be required.



4.14.5 CUMULATIVE IMPACT ANALYSIS

This cumulative impact analysis considers development of the proposed Project in conjunction with other development projects and planned development in the vicinity of the Project site, including buildout of the Riverside County General Plan Land Use Plan and the general plans of cities throughout western Riverside County. This cumulative study area was selected for analysis because it encompasses a region in which geological conditions, and thus paleontological sensitivity, are similar to what occurs in the immediate vicinity of the Project site.

As indicated under the analysis of Threshold a., while surface grading impacting previously disturbed soils would not likely reach any fossiliferous sediments, excavations into the native soils (i.e., at depths exceeding 4 feet) have potential to encounter paleontological resources. As such, the Project's grading activities have the potential to directly impact paleontological resources that may be present beneath the Project site. Other developments within the region occurring on soils/geologic units with a "High" potential for containing paleontological resources also have the potential to impact subsurface unique paleontological resources during grading and excavation. Therefore, the Project's potential impacts to paleontological resources on site would be cumulatively considerable.

4.14.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

<u>Threshold a.: Significant Direct and Cumulatively-Considerable Impact</u>. The Project would not impact any known paleontological resources or unique geological features. However, the Pleistocene older alluvial fan sediments in the Project area have a high potential to contain significant, nonrenewable fossil remains, and Riverside County classifies portions of the Project site as having a "High B" sensitivity rating for paleontological resources. Any earth-moving activities beyond the disturbed topsoil may disrupt or adversely affect paleontological resources. This is considered a potentially significant impact on both a direct and cumulatively-considerable basis.

4.14.7 APPLICABLE REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

Mitigation

- MM 4.14-1 Prior to the issuance of grading permits, the Project Applicant shall retain a qualified paleontologist approved by Riverside County to create and implement a Project-specific plan for monitoring site grading/earth-moving activities (Project Paleontologist). The Project Paleontologist retained shall review the approved development plan and grading plan and conduct any pre-construction work necessary to render appropriate monitoring and mitigation requirements as appropriate. These requirements shall be documented by the Project Paleontologist in a Paleontological Resource Impact Mitigation Program (PRIMP). This PRIMP shall be submitted to the County Geologist for approval prior to issuance of a grading permit. Information to be contained in the PRIMP, at a minimum and in addition to other industry standards and Society of Vertebrate Paleontology standards, is as follows:
 - Prior to issuance of grading permits, a qualified vertebrate paleontologist ("Project Paleontologist") shall review the Project grading plans and geotechnical report data, with particular regard to location and depth of earth moving and the rock unit(s) being



encountered. The review is for the purpose of assessing potential for fossil remains being encountered by earth moving. If previously undisturbed strata with potential for containing fossil remains will be encountered by earth moving, the following measures shall be implemented.

- <u>Museum Storage Agreement</u>. The Western Science Center (WSC), Natural History Museum of Los Angeles County (LACM), San Diego Natural History Museum (SDNHM), San Bernardino County Museum (SBCM), or Riverside Municipal Museum (RMM) shall be the designated museum repository for any vertebrate, invertebrate, and plant fossil remains and associated specimen data and corresponding geologic and geographic site data that might be recovered from the site as a result of the PRIMP. Prior to any earth moving at the Project site, the Project Paleontologist shall develop a formal agreement with the museum regarding final disposition and permanent storage and maintenance of the fossil collection and associated data. The agreement shall cover, but not necessarily be limited to, museum requirements regarding: 1) level of treatment of the collection; 2) storage and maintenance fees, if any; 3) purchase of specimen storage cabinets and drawers, as well as specimen trays, vials, specimen data cards, and other curatorial supplies, if required.
- <u>Discovery Clause/Treatment Plan</u>. As part of the PRIMP, the Project Paleontologist shall develop a discovery clause/treatment plan (DC/TP) to allow for the additional tasks (recovery, geologic mapping, fossiliferous rock sample processing, specimen preparation, identification, curation, cataloging, data entry, specimen storage, and maintenance by museum) and manpower required to treat a large or productive fossil occurrence that cannot be treated without diverting the monitor from routine monitoring. The DC/TP shall also include approved procedures and lines of communication to be followed by specific individuals if fossil remains are uncovered by earth moving, particularly when a paleontological monitor is not present at the site. Names and telephone numbers of contact personnel shall be included in the lines of communication. The preparation of the required PRIMPs for future grading permits would ensure compliance with these requirements.
- <u>Pre-Construction Meeting</u>. The Project Paleontologist or field supervisor, as well as a
 paleontological construction monitor, shall attend a preconstruction meeting to explain
 the PRIMP to construction contractor and the developer's construction workers. The
 presentation shall summarize mitigation procedures to be employed by PRIMP
 personnel and shall detail procedures and lines of communication to be followed by
 specific Project personnel when fossil remains are found at the site.

The Project Paleontologist or field supervisor shall inform the construction contractor and the developer's construction workers of the following items:



- 1) Routine mitigation measures (primarily monitoring and test screening) to be employed by a monitor during earth moving.
- 2) The potential for fossil remains being uncovered by earth moving in particular areas of the site and the need to implement specific actions and additional mitigation measures when a fossil occurrence is uncovered by earth moving.
- 3) Functions and responsibilities of the monitor when fossil remains are uncovered by earth moving and can be recovered without diverting the monitor from monitoring (temporarily divert earth moving around fossil site until remains evaluated, recovered, and earth moving allowed to proceed through site by monitor; if approved by construction contractor, enlist assistance of earth-moving equipment and operator to expedite recovery of remains, obviate need for additional personnel, and reduce any potential construction delay).
- 4) Functions and responsibilities of the monitor when a fossil occurrence is uncovered by earth moving and is sufficiently large or productive that it cannot be recovered without diverting the monitor from monitoring.
 - 4a) Flag the site.
 - 4b) Advise construction contractor to avoid fossil site until further notice.
 - 4c) Call the Project Paleontologist or field supervisor to site.
- 5) Functions and responsibilities of the Project Paleontologist or field supervisor when notified by the monitor that a large or productive fossil occurrence has been uncovered by earth moving and cannot be recovered without diverting the monitor from monitoring. Evaluate occurrence to determine if recovery is warranted.
 - 5a) If recovery is warranted, notify construction contractor and the Project developer of necessity for implementing additional mitigation measures specified in DC/TP initiating increased level of monitoring, if not already in effect, in immediate vicinity of fossil site and assigning additional personnel to PRIMP.
 - 5b) Within 24 hours, mobilize recovery crew to recover occurrence; supervise recovery of occurrence and its transport to laboratory facility or to location elsewhere at site approved by construction contractor for initial/field processing of a fossiliferous rock sample or to laboratory facility for preparation of a fossil specimen.
 - 5c) If warranted and approved by construction contractor, enlist assistance of the earth-moving equipment and operator to expedite recovery of occurrence.
 - 5d) To obviate need for additional personnel and reduce any potential construction delay, after recovery of occurrence, have construction contractor allow earth moving to proceed through fossil site.



- 5e) Notify Project developer of recovery (or of decision not to recover fossil occurrence, if appropriate) and of authorization for earth moving to proceed through fossil site.
- 6) Responsibilities of the construction contractor and earth-moving equipment operators if fossil remains are uncovered by earth moving, particularly if a monitor is not present at the site when the remains are encountered.
 - 6a) Avoid disturbance of fossil site by earth moving.
 - 6b) Notify monitor, the Project Paleontologist or the field supervisor and Project developer of the fossil occurrence.
 - 6c) Avoidance of fossil site by earth-moving activities.
 - 6d) Assist with equipment and operator to expedite recovery of occurrence.

If warranted, the Project Paleontologist or field supervisor and a monitor shall give a similar presentation to the earth-moving equipment operators at one of their earliest safety meetings. The operators shall be instructed on recognizing fossil remains in the field, informed of their responsibilities if they observe fossil remains when the monitor is not present at the site (avoid disturbance of occurrence by earth moving; have construction contractor call monitor to fossil site; expedite recovery of occurrence, if requested), and advised that unauthorized collecting of fossil remains is illegal.

- Monitoring Earth Moving. Earth moving shall be monitored by a paleontological 0 monitor only in those areas of the site where earth moving will disturb soils greater than 4 feet deep (monitoring will not be conducted in areas in which soils will be buried, but not disturbed) and where paleontological resources have the potential to occur. Monitoring shall not be implemented until earth moving has reached a depth of 4 feet below current grade. Monitoring shall consist of visually inspecting freshly exposed rock and debris for larger fossil remains and periodically dry test screening a small (25 pound) sample of rock and debris with a 20-mesh box screen for smaller vertebrate fossil remains. Monitoring shall be conducted on a full-time basis. However, if too few or no fossil remains are uncovered by earth moving in areas underlain by a particular rock unit, monitoring can be reduced, generally, to half or quarter time or suspended once 50% of earth moving in the area underlain by the rock unit has been completed. Alternatively, if sufficient fossil remains are uncovered by earth moving, monitoring may be increased in areas underlain by the fossil-bearing rock unit, at least in the immediate vicinity of the fossil site.
- Large-Specimen Evaluation and Recovery Option.
 - 1) If a large fossil specimen is found as a result of monitoring earth moving and the specimen can be recovered without significantly diverting the monitor from monitoring, earth moving shall be temporarily diverted around the fossil site and



the specimen shall be evaluated, and, if warranted, excavated, covered with a protective plaster-impregnated burlap jacket, if required, and recovered.

If necessary, earth-moving equipment and an operator shall be enlisted to expedite recovery of the specimen and obviate the need for additional personnel, and the construction contractor shall be allowed to have earth moving proceed through the fossil site immediately after recovery of the specimen. A temporary field number shall be assigned to the specimen; the field number, a preliminary field identification, and pertinent specimen (field number, identification by taxon and element) and geologic (particularly stratigraphic level within rock unit) and geographic site data (location, elevation) recorded in the monitor's daily monitoring log; and the field number recorded and the fossil site location plotted on a map of the site.

At the end of the day the monitor or, following his next site inspection, the field supervisor shall transport the fossil remains and associated data to a laboratory facility for further treatment. If appropriate, samples of fossil wood will be submitted for carbon-14 dating analysis.

- 2) If a fossil specimen is found and is sufficiently large that it cannot be recovered without significantly diverting the monitor from monitoring, the fossil site shall be flagged with colored survey ribbon to temporarily divert earth moving around the site, the construction contractor shall be advised to avoid the site until further notice, and the Project Paleontologist or field supervisor shall be called to the site. The grading contractor will notify the Project developer and Project Paleontologist or field supervisor in turn shall evaluate the specimen to determine if recovery is warranted.
 - 2a) If specimen recovery is not warranted, no further action will be taken to preserve the fossil site or remains, and the construction contractor will be allowed to have earth moving proceed through the site immediately.
 - 2b) If specimen recovery is warranted, the Project Paleontologist or field supervisor shall notify the construction contractor and Project developer of the necessity for implementing additional mitigation measures specified in the DC/TP, initiating full-time monitoring, if not already in effect, at least in the immediate vicinity of the site in areas underlain by the fossil-bearing rock unit, and assigning additional personnel to the PRIMP. Within 24 hours a recovery crew shall be mobilized to recover the specimen. The size of the crew shall reflect the size of the specimen and the need to recover the specimen as quickly as possible.

The specimen shall be excavated with hand tools, covered with a protective plaster-impregnated burlap jacket, and recovered. If necessary and approved by the construction contractor, earth-moving equipment and an operator shall be enlisted to expedite recovery of the specimen, reduce any potential construction delay, and obviate the need for additional personnel. The construction contractor shall be allowed to have earth moving proceed through the fossil site immediately after recovery of the specimen.

A temporary field number shall be assigned to the specimen; the field number, a preliminary field identification, and pertinent specimen (field number, identification by taxon and element) and geologic (particularly stratigraphic level within rock unit) and geographic site data (location, elevation) recorded in the monitor's daily monitoring log; and the field number recorded, and the fossil site location plotted on a map of the site. The field supervisor and, if necessary, a crew member shall transport the fossil specimen and associated site data to a laboratory facility for further treatment.

Small-Specimen Sample Evaluation, Recovery, and Processing. If a sufficient number of smaller vertebrate fossil remains are found at one site as a result of test screening by the paleontological monitor, the fossil site shall be flagged with colored survey ribbon to temporarily divert earth moving around the site. The construction contractor shall be advised to avoid the site until further notice, and if requested by the monitor to expedite recovery of a fossiliferous rock sample, reduce any potential construction delay and obviate the need for additional personnel, the construction contractor shall have earthmoving equipment and an operator acquire a rock sample from the fossil site and transport the sample, if possible, to a nearby temporary location at the site approved by the construction contractor.

If a sample is recovered, the construction contractor shall be allowed to have earth moving proceed through the fossil site immediately after recovery of the sample. The Project Paleontologist or field supervisor shall be called to the fossil/storage site to determine if the fossil site/sample is sufficiently productive to warrant recovery of a large sample of fossiliferous rock to process for additional small remains.

- 1) If the site/sample is determined too unproductive or the remains too poorly preserved or insufficiently diagnostic, no further action will be taken to preserve the fossil site/sample or remains, and the construction contractor will be allowed to have earth moving proceed through the fossil/storage site immediately.
- 2) If sample recovery is warranted, the Project Paleontologist or field supervisor shall notify the construction contractor and Project developer of the necessity for implementing additional mitigation measures specified in the DC/TP and assigning additional personnel to the PRIMP.
 - 2a) Within 24 hours, a recovery crew shall be mobilized to recover the sample. The size of the crew shall reflect the need to recover the sample as quickly as possible. The field supervisor shall record the size and supervise recovery of the sample. Up to 3 tons of fossiliferous rock shall be recovered. The sample shall be excavated with hand tools for recovery. If necessary and if

approved by the construction contractor, earth-moving equipment and an operator shall be enlisted to expedite transportation of the sample to the processing facility site, obviate the need for additional personnel, and reduce any potential construction delay and the construction contractor will be allowed to have earth moving proceed through the fossil site immediately after recovery of the sample.

- 2b) A temporary field number shall be assigned to the sample; the field number and pertinent specimen (field number, identification by taxon and element) and geologic (particularly stratigraphic level within rock unit) and geographic site data (location, elevation) recorded in the monitor's daily monitoring log; and the field number recorded, and the fossil site location plotted on a map of the site. The field supervisor and, if necessary, a crew member will transport the sample to a location elsewhere at the site approved by the construction contractor or to an offsite location for initial/field processing (wet screening) of the sample. The total weight of all samples from each fossil-bearing rock unit at the site shall not exceed 3 tons.
- 2c) If warranted, the field supervisor shall set up a field processing facility for wet screening the sample at a site location approved by the construction contractor. Wet screening shall consist of sieving rock through a 20- (and/or finer) mesh box screen immersed in a tub of water to remove the smaller (clay and silt) particles from the larger (sand and rock) particles and small fossil remains and could result in a reduction in sample weight/volume in excess of 90%. If necessary, rock shall be soaked in an environmentally safe dispersant (citrus oil) prior to screening to improve the separation of the clay particles from the rest of the sample during screening. The monitor shall conduct wet screening if screening can be accomplished without diverting the monitor from monitoring. If it is not possible to have the monitor perform the wet screening, a field technician shall be assigned to the task. Following the next site inspection, the field supervisor will transport the concentrate (larger particles and small fossil remains) generated by initial processing to a laboratory facility for final/laboratory processing.
- 2d) If the fossil remains in the concentrate are sufficiently fossilized (dense), an environmentally safe heavy liquid (sodium polytungstate), if appropriate, shall be used by the senior vertebrate paleontologist to separate the remains from the remaining sand and rock particles. When added to a beaker filled with heavy liquid, the concentrate will separate, the particles floating to the surface, and the remains sinking to the bottom, from where they are retrieved. This technique can result in a further sample weight/volume reduction in excess of 90% (less than 1% of original sample size). The final concentrate shall be examined under a microscope and fossil specimens recovered from any remaining sand and rock particles. If the fossil bone in the original concentrate is not sufficiently dense for use of the heavy-liquid separation technique, the entire sample of concentrate shall be sorted under a

microscope for fossil remains. Recovered fossil remains shall then be treated as outlined herein.

- 2e) During the final processing of a sample, the senior vertebrate paleontologist shall continually evaluate the results of field and laboratory processing. If the sample is insufficiently productive or the fossil remains are too poorly preserved, the senior vertebrate paleontologist shall have the option of discontinuing further laboratory processing of the sample, having field processing of the remainder of the sample suspended, and disposing of the remainder of the sample and unprocessed concentrate. Similarly, processing shall be discontinued if, after preliminary identification of some specimens, the remains are determined insufficiently diagnostic or diverse taxonomically, or the species represented are the same as those in another sample from the fossil-bearing rock unit. If appropriate, small splits from one or more samples shall be submitted for palynological analysis.
- Fossil Treatment. Final treatment of all fossil specimens recovered from the site as a 0 result of the PRIMP shall be conducted at a laboratory facility. Larger vertebrate fossil specimens shall be removed from their protective jackets, prepared to the point of identification using hand tools, and hardened or stabilized with a penetrating solution by a preparator. All recovered fossil specimens shall be identified to the lowest taxonomic level possible by knowledgeable vertebrate and invertebrate paleontologists and, if required, other knowledgeable paleontologists (i.e., paleobotanists, micropaleontologists, palynologists). The specimens shall then be curated (assigned and labeled with museum specimen data and corresponding site numbers, placed in specimen trays and, if appropriate, vials with completed specimen data cards), catalogued (specimen and site numbers and specimen data and corresponding geologic and geographic site data, respectively, archived [entered into appropriate catalogs and computerized databases]), and accessioned into the museum fossil collection, where they will be permanently stored, maintained, and, along with associated data, made available for future study by qualified investigators. With the possible exception of those tasks (curation, cataloging) that might be conducted by museum staff, all treatment of the fossil specimens shall be conducted by a laboratory technician. Fossil specimen preparation, identification, curation, and cataloguing are now required before a fossil collection will be accepted by most museum repositories, including the WSC, LACM, SDNHM, SBCM, and RMM. Moreover, the scientific importance of a fossil specimen cannot be evaluated until the specimen has been identified to the lowest taxonomic level possible, and specimen identification often is not possible without prior preparation.
- <u>Final Report</u>. A final technical report of findings shall be prepared by the Project Paleontologist and shall describe the site's stratigraphy, summarize field and laboratory methods employed during the PRIMP, include a taxonomic list and an inventory of catalogued fossil specimens recovered as a result of the PRIMP, evaluate the scientific



importance of the specimens, and discuss the relationship of the fossil assemblage from any newly recorded fossil site at the project site to relevant fossil assemblages from fossil sites in other areas. The report shall be submitted to the contractor and County Geologist. Submission of the final report will signify completion of the PRIMP and will ensure Project compliance with Public Resources Code Section 21081.6 (mitigation monitoring, reporting, and compliance).

All reports shall be signed by the Project Paleontologist and all other professionals responsible for the report's content (e.g., Project Geologist), as appropriate. One original signed copy of the report(s) shall be submitted to the County Geologist along with a copy of this condition and the grading plan for appropriate case processing and tracking. These documents should not be submitted to the Project Planner, Plan Check staff, Land Use Counter or any other County office. In addition, the Project Applicant shall submit proof of hiring (i.e. copy of executed contract, retainer agreement, etc.) a Project Paleontologist for the in-grading implementation of the PRIMP.

4.14.8 SIGNIFICANCE OF IMPACTS AFTER MITIGATION

<u>Threshold a.: Less-than-Significant Impact with Mitigation Incorporated</u>. Implementation of Mitigation Measure MM 4.14-1 would ensure that a PRIMP is prepared and implemented as part of future site grading activities. Implementation of the required PRIMP would ensure that paleontological resources, if uncovered during site grading activities, are appropriately treated, and would reduce the Project's direct and cumulatively-considerable impacts to paleontological resources to less-than-significant levels.



4.15 POPULATION AND HOUSING

The following analysis discloses existing population and housing data from Riverside County and assesses the potential for impacts on population and housing associated with implementation of the Project. The analysis in this Subsection 4.15 is based on information contained in the Riverside County General Plan (Riverside County, 2021a) and addresses population and housing projections and requirements from the Southern California Association of Governments (SCAG). Refer to Section 7.0, *References*, for a complete list of reference sources.

4.15.1 EXISTING CONDITIONS

A. <u>Existing Site Conditions</u>

As previously shown on EIR Figure 2-7, under existing conditions a majority of the Project site is vacant and undeveloped, was previously used as a stockpile area for an adjacent development and is characterized by low-lying natural vegetation. In the southern portions of the Project site are three existing residential homes along with several ancillary buildings.

The Project site is located in the Mead Valley Area Plan (MVAP) of the Riverside County General Plan. As previously depicted on EIR Figure 2-4, the 40.88-acre Project site is designated for "Community Development – Medium Density Residential (MDR)" land uses. The MDR land use designations is intended to accommodate single-family attached and detached residences with a density range of 5 to 8 dwelling units per acre and minimum lot sizes ranging from 4,000 to 6,500 square feet (s.f.) (Riverside County, 2021a, Table LU-4; RCIT, n.d.).

B. <u>Population Projections</u>

The Project site is located within the Mead Valley community of unincorporated Riverside County. According to SCAG's 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy ("Connect SoCal"), and as shown in Table 4.15-1, *SCAG Region Projected 2000-2045 Growth Forecast*, in 2000 the SCAG region had a population of approximately 16,574,000 persons. The population within the SCAG region is expected to increase to 22,504,000 persons by 2045, reflecting a 35.7% increase in population over the 45-year period. While the annual rate of household growth has steadily tracked upward since its low of 0.2% in 2010, household growth in the SCAG region remains much flatter than before the Great Recession (i.e., a post-recession household growth rate of 0.6% from 2017-2019). After losing over 700,000 jobs between 2007 and 2010, the region experienced tremendous job growth between 2010 and 2019, reaching nearly 8.7 million jobs and cresting the previous high of 8.1 million reached in 2007. (SCAG, 2020, Demographics and Growth Forecast Technical Appendix)

 Table 4.15-1
 SCAG Region Projected 2000-2045 Growth Forecast

	2000	2010	2016	2045
Population	16,574,000	18,076,000	18,832,000	22,504,000
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(SCAG, 2020, Demographics and Growth Forecast Technical Appendix, Table 3)



4.15.2 APPLICABLE ENVIRONMENTAL REGULATIONS

The following is a brief description of the federal, State, and local environmental laws and related regulations governing environmental topics related to population and housing.

A. <u>Federal Plans, Policies, and Regulations</u>

1. Fair Housing Act

The federal Fair Housing Act protects people from discrimination when they are renting or buying a home, getting a mortgage, seeking housing assistance, or engaging in other housing-related activities. Additional protections apply to federally-assisted housing. (HUD, n.d.)

2. U.S. Census Bureau

The U.S. Census Bureau is the leading source of statistical information about the nation's people. Population statistics come from decennial censuses, which count the entire U.S. population every ten years, along with several other surveys. The American Community Survey (ACS) is an ongoing annual survey intended to help communities decide where to target services and resources. Demographic surveys measure income, poverty, education, health insurance coverage, housing quality, crime victimization, computer usage, and many other subjects. Economic surveys are conducted monthly, quarterly, and yearly, and cover selected sectors of the nation's economy. (USCB, n.d.)

B. <u>State and Regional Plans, Policies, and Regulations</u>

1. State Housing Law

The State law regulating residential occupancies is entitled the "State Housing Law" and is found in Division 13, Part 1.5 of the California Health and Safety Code (HSC), Sections (§§) 17910 to 17998.3 Regulations implementing the State Housing Law mandate statewide residential building standards for new construction, which are found in the California Code of Regulations, Title 24, also referred to as the California Green Building Standards Code (CalGreen). (CA Legislative Info, n.d.)

2. Southern California Association of Governments (SCAG)

SCAG determines regional housing needs and the share of the regional needs to be addressed by Riverside County and its constituent cities. SCAG is a Joint Powers Agency and is the designated Council of Governments (COG), Regional Transportation Planning Agency (RTPA), and Metropolitan Planning Organization (MPO) for the six-county region of Los Angeles, Orange, Ventura, San Bernardino, Riverside, and Imperial counties. SCAG's Regional Comprehensive Plan and Guide (RCPG) and Regional Housing Needs Assessment (RHNA) are tools for coordinating regional planning and housing development strategies in southern California. (SCAG, n.d.)

3. Regional Housing Needs Assessment (RHNA)

State Housing Law (California Government Code Article 10.6, §§ 65580-65590) mandates that local governments, through COGs, identify existing and future housing needs in a RHNA. The RHNA provides recommendations and guidelines to identify housing needs within counties and cities. The County of Riverside



addresses its RHNA allocation through its General Plan Housing Element. The RHNA prepared by SCAG projects the County's share of regional housing need for 2021-2029 as 40,647 housing units. (SCAG, n.d.)

4. Senate Bill 330 (Housing Crisis Act of 2019) and Senate Bill 8 (2021)

On October 9, 2019, California Governor Gavin Newsom signed the Housing Crisis Act of 2019 (HCA) into law, commonly known as Senate Bill (SB) 330 (Chapter 654, Statutes of 2019) to respond to the California housing crisis. On September 16, 2021, Gov. Newsom also signed SB 8 (Chapter 161, Statutes of 2021), which is an extension of the HCA. The HCA aims to increase residential unit development, protect existing housing inventory, and expedite permit processing, and applies only to "affected cities" and "affected counties." Under this legislation, municipal and county agencies are restricted in ordinances and polices that can be applied to residential development. For example, State law prohibits a local agency from disapproving, or conditioning approval in a manner that renders infeasible, a housing development project for very low, low-, or moderate-income households or an emergency shelter unless the local agency makes specified written findings based on a preponderance of the evidence in the record. SB 330 requires a local agency that proposes to disapprove a housing development project that complies with applicable, objective general plan and zoning standards and criteria that were in effect at the time the application was deemed to be complete, or to approve it on the condition that it be developed at a lower density, to base its decision upon written findings supported by substantial evidence on the record that specified conditions exist, and places the burden of proof on the local agency to that effect. (CA Legislative Info, n.d.)

C. <u>Regional and Local Plans, Policies, and Regulations</u>

1. SCAG Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal)

The Southern California Association of Governments (SCAG) is a Joint Powers Authority (JPA) under California State law, established as an association of local governments and agencies that voluntarily convene as a forum to address regional issues. Under federal law, SCAG is designated as a MPO and under State law as a Regional Transportation Planning Agency and a Council of Governments. The SCAG region encompasses six counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura) and 191 cities in an area covering more than 38,000 square miles. SCAG develops long-range regional transportation plans including sustainable communities strategy and growth forecast components, regional transportation improvement programs, regional housing needs allocations and other plans for the region. (SCAG, n.d.)

Connect SoCal, is SCAG's 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). SCAG's 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy (*RTP/SCS*), also referred to as *Connect SoCal*, develops long-range regional transportation plans including a sustainable communities strategy and growth forecast components, regional transportation improvement programs, regional housing needs allocations, and other plans for the region. Connect SoCal provides objectives for meeting air pollution emissions reduction targets set forth by the California Air Resources Board (CARB); these objectives were provided in direct response to Senate Bill (SB) 375 which was enacted to reduce GHGs from automobiles and light trucks through integrated transportation, land use, housing, and environmental planning.

Connect SoCal includes a Technical Appendix titled "Goods Movement" that is applicable to the Project because the Project entails a use that is closely associated with, and relies directly on the goods movement



system (e.g., manufacturing, construction, retail trade, wholesale trade and transportation, and warehousing). In April 2018 SCAG published *Industrial Warehousing in the SCAG Region*. According to the document, the SCAG region is a vibrant hub for international and domestic trade because of its large transportation base and extensive multimodal transportation system. The SCAG region's freight transportation system includes warehouses and distribution centers; the Ports of Los Angeles, Long Beach, and Hueneme; airports; rail intermodal terminals; rail lines, and local streets, state highways and interstates. Together the system enables the movement of goods from source to market, facilitating uninterrupted global commerce. The region is home to approximately 34,000 warehouses with 1.17 billion square feet of warehouse building space, and undeveloped land that could accommodate an additional 338 million square feet of new warehouse building space. These regions attract robust logistics activities, and are a major reason the region is a critical mode in the global supply chain. (SCAG, 2018, p. ES-1)

2. Riverside County General Plan Housing Element

The 2021-2029 Housing Element identifies and establishes policies intended to fulfill the housing needs of existing and future residents in Riverside County. It establishes policies that guide County decision-making and set forth an action plan to implement its housing goals. The Housing Element includes a review of previous housing goals, an assessment of the effectiveness of those goals, and an assessment of housing needs. Additionally, the Housing Element includes an inventory of resources and constraints related to meeting housing needs in Riverside County; an analysis of affordable housing developments and programs intended to preserve such housing; community goals for the maintenance, preservation, improvement and development of housing; and a program which sets forth a five-year schedule of actions that the County is undertaking or intends to undertake in implementing the polices set forth in the Housing Element. (Riverside County, 2021a, pp. H1 to H-3)

4.15.3 Basis for Determining Significance

Section XIV of Appendix G to the California Environmental Quality Act (CEQA) Guidelines addresses typical adverse effects due to population and housing, and includes the following threshold questions to evaluate the Project's impacts due to population and housing:

- Would the Project induce substantial unplanned population growth in an area, either directly (for example by proposing new homes and businesses) or indirectly (for example, through the extension of infrastructure)?
- Would the Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

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

a. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere;



- b. Create a demand for additional housing, particularly housing affordable to households earning 80% or less of the County's median income; or
- c. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).

The significance thresholds set forth in Riverside County's Environmental Assessment Checklist were used to evaluate the significance of the proposed Project's impacts on population and housing.

4.15.4 IMPACT ANALYSIS

Threshold a: Would the Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Under existing conditions, there are three existing occupied residential homes in the southern portion of the Project site, along with several ancillary buildings. Implementation of the proposed Project would result in the demolition of these existing homes. The removal of these three homes from the Project site would not substantially affect the supply of housing in the County and would not displace substantial numbers of existing people or housing necessitating the construction of replacement housing elsewhere. Adequate housing opportunities exist or are planned within the Riverside County region to accommodate the existing residents on the Project site, and there would be no direct need for the construction of replacement housing as a result of Project implementation. Furthermore, although not proposed for development as part of the Project, the Project's Tentative Parcel Map (TPM) accommodates three residential units. As such, the Project would displace substantial numbers of existing people or housing these lots develop with residential units. As such, the Project would displace substantial numbers of existing people or housing these lots develop with residential units. As such, the Project would displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere, and impacts would be less than significant.

A public comment made in response to this EIR's NOP requested that the County consider potential impacts on housing and whether residents in affordable housing may choose to relocate if they don't want to live near the proposed Project should it be approved and constructed. First, the potential that households would voluntarily move due the Project is speculative. Second, there would be an equal speculative assumption that other households would choose to move closer to the Project site should the Project be approved and constructed due to the availability of employment opportunities at the site. The planning principle of locating housing opportunities near job opportunities is inherent in State Senate Bill 743, which promotes the reduction of greenhouse gas emissions by reducing vehicle miles traveled, which in part promotes diverse land uses and infill development to reduce the distances that people drive in vehicles on a daily basis. With existing housing being located close to the Project site to the there would be opportunities for residents to walk and bike to the Project site, and should they choose to drive, the distance would be short.

Should any existing residents decide to move due to the Project, it is reasonable to assume that the housing unit being vacated would be reoccupied given the Statewide housing shortage. It is also reasonable to assume that residents choosing to relocate, if any, would not be substantial in number to the extent that new unplanned replacement housing would need to be constructed. Impacts, if any, would be less than significant.



<u>Threshold b</u>: Would the Project create a demand for additional housing, particularly housing affordable to households earning 80% or less of the County's median income?

The Project would entail the construction and operation of a 591,203 square foot (s.f.) warehouse building on the 40.88-acre Project site. According to Appendix E to the County's General Plan, light industrial uses generate approximately one employee per 1,030 s.f. of building area. As such, the Project would provide jobs for approximately 574 employees ($591,203 \text{ s.f.} \div 1,030 \text{ s.f./employee} = 574.0 \text{ employees}$). (Riverside County, 2021a, Appendix E, Table E-5) Riverside County currently suffers from a poor jobs-housing ratio, wherein there are not enough jobs within the County to prevent the need for County residents to travel outside the region for employment (Riverside County, 2021a, p. LU-27). Thus, by developing the Project site primarily with an employment-generating land use, the Project would assist the County in improving its jobs-housing balance. Furthermore, the Riverside County General Plan designates areas of the County in which lowerincome housing can be accommodated to meet the County's RHNA obligations, and does not rely on residential development on the Project site in order to meet its RHNA obligations. Moreover, it is anticipated that any future employees generated by the Project could be accommodated by existing residential communities and/or by future residential uses to be constructed in accordance with the General Plan Land Use Plan or the general plans of cities within the County, and that no additional housing, including housing affordable to households earning 80% or less of the County's median income, would be required to accommodate Project-related employees. Impacts would be less than significant.

<u>Threshold c</u>: Would the Project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Under existing conditions, the 40.88-acre Project site is designated by the General Plan Land Use Element for "Medium Density Residential (MDR)" land uses. According to Appendix E to the County's General Plan, MDR land uses are expected to be developed at a mid-point density of 3.5 dwelling units per acre (du/ac), and residential uses within the MVAP area are expected to generate approximately 3.79 persons per household (pph). Thus, should the Project site develop under its existing MDR designation, it would be expected to accommodate 142 dwelling units (40.5 ac x 3.5 du/ac = 141.75 du), resulting in a planned population of 538 persons (142 households x 3.79 pph = 538.2 persons). (Riverside County, 2021a, Appendix E, Tables E-1 and E-2)

As indicated above under the analysis of Threshold b., the Project is anticipated to provide approximately 574 new, recurring jobs with development of the site as proposed. Although the Project would result in the generation of more employees than anticipated by the General Plan, Riverside County currently suffers from a poor jobs-housing ratio, wherein there are not enough jobs within the County to prevent the need for County residents to travel outside the region for employment (Riverside County, 2021a, p. LU-27). Thus, by developing the Project site with employment-generating land uses, the Project would assist the County in improving its jobs-housing balance. Housing for these employees does not represent "substantial" unplanned population growth, as there is already sufficient housing in the County to accommodate workers. Furthermore, the Project's proposed roadway and other infrastructure (e.g., water, sewer, storm drain, etc.) improvements have been designed and sized to serve the proposed Project, and would not indirectly induce growth in the



local area. Thus, the Project would not induce substantial unplanned population growth in the area, either directly or indirectly, and impacts would be less than significant.

4.15.5 CUMULATIVE IMPACT ANALYSIS

For purposes of analysis, the cumulative study area for the issue of population and housing encompasses western Riverside County as well as the various cities within western Riverside County. This study area is appropriate because growth in the region is largely controlled by the Riverside County General Plan and the general plans of the various cities within the County.

As indicated under the analysis of Threshold a., although the Project would result in the removal of three existing homes on site, the removal of these three homes from the Project site would not substantially affect the supply of housing in the County and would not displace substantial numbers of existing people or housing necessitating the construction of replacement housing elsewhere. Adequate housing opportunities exist or are planned within the Riverside County region to accommodate the existing residents on the Project site, and there would be no direct need for the construction of replacement housing as a result of Project implementation. Furthermore, although not proposed for development as part of the Project, the Project's TPM accommodates three residential lots, which would offset the loss of three residential units from the site should these lots develop with residential units. As such, Project impacts due to the displacement of substantial numbers of existing people or housing would be less than significant on a cumulatively-considerable basis.

As indicated under the analysis of Threshold b., the Project would generate approximately 574 employees, which would increase the area's demand for housing, including affordable housing. However, Riverside County currently suffers from a poor jobs-housing ratio, wherein there are not enough jobs within the County to prevent the need for County residents to travel outside the region for employment (Riverside County, 2021a, p. LU-27). Thus, by developing the Project site with employment-generating land uses, the Project would assist the County in improving its jobs-housing balance. Furthermore, the Riverside County General Plan designates areas of the County in which lower-income housing can be accommodated to meet the County's RHNA obligations, and does not rely on residential development on the Project site in order to meet its RHNA obligations. Moreover, it is anticipated that any future employees generated by the Project could be accommodated by existing residential communities and/or by future residential uses to be constructed in accordance with the General Plan Land Use Plan or the general plans of cities within the County's median income, would be required to accommodate Project-related employees. Accordingly, Project impacts would be less than significant on a cumulatively-considerable basis.

As discussed under the analysis of Threshold c., the Project is anticipated to provide approximately 574 new, recurring jobs with development of the site as proposed. Although the Project would result in the generation of more employees than anticipated by the General Plan, Riverside County currently suffers from a poor jobshousing ratio, wherein there are not enough jobs within the County to prevent the need for County residents to travel outside the region for employment (Riverside County, 2021a, p. LU-27). Thus, by developing the Project site with employment-generating land uses, the Project would assist the County in improving its jobs-housing balance. Housing for these employees does not represent "substantial" unplanned population growth, as there is already sufficient housing in the County to accommodate workers. Furthermore, the Project's proposed roadway and other infrastructure (e.g., water, sewer, storm drain, etc.) improvements have been designed and



sized to serve the proposed Project, and would not indirectly induce growth in the local area. There are no components of the proposed Project that would cumulatively contribute to substantial unplanned population growth in the local area. Accordingly, cumulatively-considerable impacts associated with substantial unplanned population growth would be less than significant.

4.15.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

<u>Threshold a: Less-than-Significant Impact</u>. Although the Project would result in the removal of three existing residential homes on site, the removal of these three homes from the Project site would not substantially affect the supply of housing in the County and would not displace substantial numbers of existing people or housing necessitating the construction of replacement housing elsewhere. Adequate housing opportunities exist or are planned within the Riverside County region to accommodate the existing residents on the Project site, and there would be no direct need for the construction of replacement housing as a result of Project implementation. Furthermore, although not proposed for development as part of the Project, the Project's TPM accommodates three residential lots, which would offset the loss of three residential units from the site should these lots develop with residential units. As such, impacts would be less than significant.

<u>Threshold b.: Less-than-Significant Impact</u>. Although the Project would result in approximately 574 future employees, Riverside County currently suffers from a poor jobs-housing ratio, wherein there are not enough jobs within the County to prevent the need for County residents to travel outside the region for employment. Thus, by developing the Project site with employment-generating land uses, the Project would assist the County in improving its jobs-housing balance. Furthermore, the Riverside County General Plan designates areas of the County in which lower-income housing can be accommodated to meet the County's RHNA obligations, and does not rely on residential development on the Project site in order to meet its RHNA obligations. Moreover, it is anticipated that any future employees generated by the Project could be accommodated by existing residential communities and/or by future residential uses to be constructed in accordance with the General Plan Land Use Plan or the general plans of cities within the County, and that no additional housing, including housing affordable to households earning 80% or less of the County's median income, would be required to accommodate Project-related employees. Impacts would be less than significant.

<u>Threshold c.: Less-than-Significant Impact</u>. Although the Project would result in the generation of more employees than anticipated by the General Plan, Riverside County currently suffers from a poor jobs-housing ratio, wherein there are not enough jobs within the County to prevent the need for County residents to travel outside the region for employment. Thus, by developing the Project site with employment-generating land uses, the Project would assist the County in improving its jobs-housing balance. Housing for these employees does not represent "substantial" unplanned population growth, as there is already sufficient housing in the County to accommodate workers. Furthermore, the Project's proposed roadway and other infrastructure (e.g., water, sewer, storm drain, etc.) improvements have been designed and sized to serve the proposed Project, and would not indirectly induce growth in the local area. Thus, the Project would not induce substantial unplanned population growth in the area, either directly or indirectly, and impacts would be less than significant.

4.15.7 APPLICABLE REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

No significant environmental impacts related to population and housing would occur as a result of the proposed Project. Thus, no mitigation measures are required.



4.16 PUBLIC SERVICES

This Subsection 4.16 provides information on existing public services and service levels for fire protection, police protection, schools, libraries, and public health facilities, and evaluates impacts to the physical environment that may result from the demand the Project may have on such services.

4.16.1 EXISTING CONDITIONS

A. <u>Fire Protection/Emergency Medical Services</u>

Fire protection services for the Project site are provided by the Riverside County Fire Department (RCFD). The RCFD provides a full range of fire services within the County and contracting cities. The level of service provided is dependent on response times, travel distance, and staffing workload levels established in the Riverside County Fire Protection and Emergency Medical Aid Plan. The Fire Protection Master Plan contains four fire response categories that are used to determine the response times/travel distances for primary and secondary fire stations. The response categories are based on the amount of community build-out presumed in the Master Fire Plan. The Fire Department assumes in any given region that three or more fire engines respond to any reported fire.

The fire station that would serve the Project is Station 59 (Mead Valley), which is located approximately 2.7 roadway miles west of the Project site. The Project site also could be served by Station 90 (North Perris City), which is located approximately 5.1 roadway miles east of the Project site. (Google Earth, 2022) The fire stations that could serve the Project site are staffed full-time, 24 hours per day, 7 days per week with a minimum three-person crew, including paramedics, operating a "Type 1" structural firefighting apparatus.

B. <u>Sheriff Services</u>

The Riverside County Sheriff's Department (RCSD) provides community policing for the Project area. The Sheriff Station serving the Project area is the Perris Station, located at 137 North Perris Boulevard in Perris, CA, 92570, approximately 3.0 miles southeast of the Project site (Google Earth, 2022). In addition to community policing, other services provided by the Sheriff's Department include, but are not limited to, operating of the emergency 911 system, operating correctional facilities, performing traffic control, and providing crime prevention education. Also, the Sheriff's Department coordinates with volunteer groups such as Neighborhood Watch Programs and the Community Oriented and Policing Problem Solving (COPPS) Program and the Community Oriented Policing (COP) Program. COPPS shifts the focus of police work from a solely reactive mode by supplementing traditional law enforcement methods with proactive problem-solving approaches that involve the community as well as the police.

Unincorporated Riverside County has set a minimum standard of 1.0 deputy per 1,000 residents. This standard was adopted as part of the "Commitment to Public Safety and Citizens' Option for Public Safety," by the Board of Supervisors on September 17, 1996. The Sheriff's Department has indicated that their desired staffing level is 1.2 deputies per 1,000 residents, while Mitigation Measure 4.15.C of EIR No. 441, which was prepared for the County's 2003 General Plan, establishes a standard of one sworn peace officers per 1,000 population.



C. <u>Schools</u>

The Project site is located within the Val Verde Unified School District (VVUSD). The nearest public schools to the Project site include the Val Verde Elementary School, located approximately 1.0 mile southeast of the Project site; Thomas Rivera Middle School, located approximately 1.7 miles northwest of the Project site; and Val Verde high School, located approximately 0.6-mile northeast of the Project site (Google Earth, 2022). As of the 2021-2022 school year, the VVUSD had a total capacity of 22,016 students and had a total enrollment of 19,216 students (VVUSD, 2018, Table 5; DOE, n.d.).

D. <u>Libraries</u>

The Project site is located within the Riverside County Public Library System (RCPLS) service area. The County of Riverside operates a system of 35 libraries and two book mobiles (one serving Coachella Valley and one serving western Riverside County) to serve unincorporated populations. In addition, the Riverside County Library System operates an automated network that currently deploys over 350 computer/terminal workstations in the library branches of the Riverside County Library System, Riverside Public Library, Moreno Valley Library, Murrieta Public Library, Murrieta Valley High School and College of the Desert. The network can also be accessed by Riverside County residents via the Internet. The library system manages the library catalog of the 1.3 million items in the library system and the annual checkout of over 3.5 million books, audios, and videos. (Riverside County, 2015a, pp. 4.17-65 and 4.17-66)

The Riverside County library system does not maintain a specific numerical factor to analyze the needs created by new development. However, the American Library Association suggests that an appropriate service criterion would be availability of convenient library facilities and book reserves at a rate of 0.5 square foot of library space and 2.5 volumes per capita. The County's ability to support the needs of future growth is dependent upon its ability to secure sites for, construct and stock new libraries on a timely basis. As of 2015, there was no specific funding mechanism for expansion of library facilities. Based on 2010 reported registered borrowers (681,117) and the square footage of library facilities available (333,884), as of 2015 facilities provided approximately 0.49 square feet of space per registered borrower (not the Riverside County population as a whole). (Riverside County, 2015a, p. 4.17-66)

E. <u>Health Services</u>

Public health services in Riverside County are provided by the County Department of Public Health. However, most health services are provided by the private sector. The nearest medical facilities to the Project site are the Kindred Hospital Riverside, located at 2224 Medical Center Drive in the City of Perris, or approximately 2.0 miles southeast of the Project site; and the Riverside University Health System Medical Center - Medical Center, located at 26520 Cactus Ave in the City of Moreno Valley, or approximately 6.3 miles northeast of the Project site (Google Earth, 2022).

4.16.2 APPLICABLE REGULATORY REQUIREMENTS

The following is a brief description of the federal, State, and local environmental laws and related regulations related to public services.



A. <u>State Regulations</u>

1. Fire Protection Services Regulations and Plans

Public Resources Code (PRC) Sections (§§) 4290-4299

These sections establish minimum statewide fire safety provisions pertaining to roads for fire equipment access; signs identifying streets, roads, and buildings; minimum private water supply reserves for emergency fire use; and fire fuel breaks and greenbelts. With certain exceptions, all new construction after July 1, 1991, in potential wildland fire areas, is required to meet these statewide standards. The state requirements, however, do not supersede more restrictive local regulations. (CA Legislative Info, n.d.)

As defined by CalFire, wildland areas defined as State Responsibility Areas (SRAs) may contain substantial wildfire risks and hazards. They consist of lands exclusive of cities, and federal lands regardless of ownership. The primary financial responsibility for preventing and suppressing fires within wildlands belongs to the State of California. However, it is not the State of California's responsibility to provide fire protection services to buildings or structures located within the wildlands unless CalFire has entered into a cooperative agreement with a local agency for those purposes pursuant to PRC § 4142. As such, wildland areas require disclosure of these fire hazards in real estate transactions, and owners of properties in wildland areas are subject to PRC § 4291 maintenance requirements. The law requires CalFire every five years (1991, 1996, 2001, etc.) to provide maps identifying the boundaries of lands classified as SRAs to the Riverside County Assessor. (CA Legislative Info, n.d.)

PRC §§ 4102 and 4127 - State Responsibility Areas (SRAs)

PRC § 4102 specifies that "State responsibility areas' means areas of the state in which the financial responsibility of preventing and suppressing fires has been determined by the [State Fire] Board pursuant to Section 4125, to be primarily the responsibility of the state." These areas may contain state or privately-owned forest, watershed, and rangeland. §§ 4126-4127 of the PRC further specify the standards that define what does and does not constitute an SRA. (CA Legislative Info, n.d.)

California Code of Regulations (CCR) Title 24, Parts 2 and 9 – Fire Codes

Part 2 of Title 24 of the CCR refers to the California Building Code which contains complete regulations and general construction building standards of State of California adopting agencies, including administrative, fire and life safety and field inspection provisions. Part 2 was updated in 2008 to reflect changes in the base document from the Uniform Building Code to the International Building Code. Part 9 refers to the California Fire Code, which contains other fire safety-related building standards. In particular, Chapter 7A, "Materials and Construction Methods for Exterior Wildfire Exposure," in the 2010 California Building Code addresses fire safety standards for new construction and Section 701A.3.2 addresses "New Buildings Located in Any Fire Hazard Severity Zone." (CBSC, 2022)

<u>CCR Title 14 – Natural Resources</u>

These regulations constitute the basic wildland fire protection standards of the California Board of Forestry. They were prepared and adopted to establish minimum wildfire protection standards in conjunction with building, construction, and development within SRAs. Among other things, Title 14 requires the design and


construction of structures, subdivisions, and developments in an SRA provide for basic emergency access and perimeter wildfire protection measures (fire fuel modification zones, etc.). (CCR, n.d.)

California Government Code (CGC) §§ 51178-51179 – Very High Fire Hazard Severity Zones

CGC § 51178 specifies that the Director of CalFire, in cooperation with local fire authorities, must identify areas that are Very High Fire Hazard Severity Zones (VHFHSZs) in Local Responsibility Areas (LRAs), based on consistent statewide criteria and the expected severity of fire hazard. It further specifies that VHFHSZs "shall be based on fuel loading, slope, fire weather and other relevant factors," including areas subject to Santa Ana winds which are a "major cause of wildfire spread." § 51179 states that a local agency (such as a county) must also designate (and map) the VHFHSZs in its jurisdiction by ordinance. (See the discussion on Ordinance No. 787, below, regarding Riverside County's VHFHSZs). Other portions of the Government Code outline when a local agency may use its discretion to exclude areas from VHFHSZ requirements or add areas not designated by the State of California to its VHFHSZ areas. (CA Legislative Info, n.d.)

<u>CGC § 51182 – Defensible Space</u>

Pursuant to this code, a person who "owns, leases, controls, operates or maintains an occupied dwelling or occupied structure in, upon or adjoining a mountainous area, forest-covered land, brush-covered land, grass-covered land or land that is covered with flammable material" in a very high fire hazard severity zone designated by the local agency pursuant to § 51179, shall at all times maintain a specified amount of "defensible space" to protect structures in high fire hazard areas. (CA Legislative Info, n.d.)

<u>PRC § 4213 - Fire Prevention Fees</u>

Pursuant to PRC § 4213, in July of 2011, the State of California began assessing an annual "Fire Prevention Fee" for all habitable structures within the State's Responsibility Area (SRA) to pay for fire prevention services. The SRA is the portion of the state where the State of California is financially responsible for the prevention and suppression of wildfires. The SRA does not include lands within incorporated city boundaries, Tribal or federally owned land. As a result of AB 398, California Global Warming Solutions Act of 2006, the fire prevention fee was suspended as of July 1, 2017. (CCR, n.d.)

2. School Services Regulations and Plans

Assembly Bill (AB) 16

In 2002, AB 16 created the Critically Overcrowded School Facilities program, which supplements the new construction provisions within the School Facilities Program (SFP). The SFP provides State of California funding assistance for new facility construction projects and modernization projects. The Critically Overcrowded School Facilities program allows school districts with critically overcrowded school facilities, as determined by the California Department of Education (CDE), to apply for new construction projects in advance of meeting all SFP new construction program requirements. Districts with SFP new construction eligibility and school sites included on a CDE list of source schools may apply. (CA Legislative Info, n.d.)



Leroy F. Greene School Facilities Act of 1998 (Senate Bill [SB] 50)

Senate Bill 50 (SB 50) was enacted by the State Legislature in 1998, which amended existing state law governing school fees. In particular, SB 50 amended prior CGC § 65995(a) to prohibit state or local agencies from imposing school impact mitigation fees, dedications, or other requirements in excess of those provided in the statute in connection with "any legislative or adjudicative act...by any state or local agency involving...the planning, use, or development of real property...." (CA Legislative Info, n.d.)

The legislation also amended CGC § 65996(b) to prohibit local agencies from using the inadequacy of school facilities as a basis for denying or conditioning approvals of any "legislative or adjudicative act [involving] the planning, use or development of real property." Further, SB 50 established the base amount of allowable developer fees: \$1.93 per square foot for residential construction and \$0.31 per square foot for commercial. These base amounts are commonly called "Level 1 fees" and are the same caps that were in place at the time SB 50 was enacted. Level 1 fees are subject to inflation adjustment every two years. (CA Legislative Info, n.d.)

In certain circumstances, for residential construction, school districts can impose fees that are higher than Level 1 fees. School districts can impose Level 2 fees, which are equal to 50% of land and construction costs if they: (1) prepare and adopt a school needs analysis for facilities; (2) are determined by the State Allocation Board to be eligible to impose these fees; and (3) meet at least two of the following four conditions: (CA Legislative Info, n.d.)

- At least 30% of the district's students are on a multi-track year-round schedule.
- The district has placed on the ballot within the previous four years a local school bond that received at least 50% of the votes cast.
- The district has passed bonds equal to 30% of its bonding capacity.
- Or, at least 20% of the district's teaching stations are relocatable classrooms.

Additionally, if the State of California's bond funds are exhausted, a school district that is eligible to impose Level 2 fees is authorized to impose even higher fees. Commonly referred to as "Level 3 fees," these fees are equal to 100% of land and construction costs of new schools required as a result of new developments. (CA Legislative Info, n.d.)

B. Local Regulations

1. Ordinance No. 787 - Fire Code Standards

This ordinance addresses implementation of the California Fire Code, based on the International Code Council. The codes prescribe performance characteristics and materials to be used to achieve acceptable levels of fire protection and include the WUI fire area building standards mentioned above. Collectively, the ordinance establishes the requirements and standards for fire hazard reduction regulations within Riverside County (including additions and deletions to the California Fire Code) to fully protect the health, safety and welfare of existing and future residents and workers of Riverside County. (Riverside County, 2015a, p. 4.13-49)



Among other things, this ordinance assures that structural and nonstructural architectural elements of the building do not: a) impede emergency egress for fire safety staffing/ personnel, equipment, and apparatus; nor b) hinder evacuation from fire, including potential blockage of stairways or fire doors. In addition, for the purposes of CFC implementation, the ordinance also adds a statement noting: "In accordance with Government Code sections 51175 through 51189, Very High Fire Hazard Severity Zones are designated as shown on a map titled Very High Fire Hazard Severity Zones, dated April 8, 2010, and retained on file at the office of the Fire Chief and supersedes other maps previously adopted by Riverside County designating high fire hazard areas." It also defines a "hazardous fire area" as: "Private or public land not designated as state or local fire hazard severity zone (FHSZ) which is covered with grass, grain, brush or forest and situated in a location that makes suppression difficult resulting in great damage. Such areas are designated on Hazardous Fire Area maps filed with the office of the Fire Chief." (Riverside County, 2015a, p. 4.13-49)

Included in Riverside County Ordinance No. 787 are the California Fire Code, Part 4, Appendix B, for establishing fire flow, duration and pressure requirements for fire flow. The requirements are based on building size, type, materials, purpose, location, proximity to other structures and the type of fire suppression systems installed. The various water districts in Riverside County are required to test fire protection capability for the various land uses per the flow requirements of the Fire Code. In addition, areas of Riverside County not served by water districts are required to meet similar requirements as outlined in PRC Sections 4290-4299. (Riverside County, 2015a, p. 4.13-49)

2. Riverside County Ordinance No. 659 (Development Mitigation Fee for Residential Development)

Riverside County Ordinance No. 659 (Development Mitigation Fee for Residential Development) requires that new development pay Development Impact Fees (DIF) to ensure that certain facility obligations are met in order to reasonably serve the subject development. The fees will be used to help establish new County of Riverside facilities that are necessary to meet the increased demand that will come about due to new development. These facilities include new fire and police stations, courts, libraries, regional parks and other facilities necessary to provide services to the residents of Riverside County. (Riverside County, 2015a, p. 4.2-26)

4.16.3 Basis for Determining Significance

Section XV of Appendix G to the State CEQA Guidelines addresses typical adverse effects to public services, and includes the following threshold question to evaluate the Project's impacts to public services:

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



- o Parks?
- Other public facilities?

Significance thresholds are set forth in Riverside County's Environmental Assessment Checklist, and have been updated to reflect the 2018 updates to Section XV of Appendix G to the State CEQA Guidelines (listed above). Accordingly, the following threshold questions are used to evaluate the Project's impacts to public services:

- a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered <u>fire protection facilities</u> or the need for new or physically altered <u>fire protection facilities</u>, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for <u>fire protection facilities</u>?
- b. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered <u>sheriff facilities</u> or the need for new or physically altered <u>sheriff facilities</u>, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for <u>sheriff services</u>?
- c. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered <u>school facilities</u> or the need for new or physically altered <u>school facilities</u>, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for <u>school services</u>?
- d. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered <u>library facilities</u> or the need for new or physically altered <u>library facilities</u>, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for <u>library services</u>?
- e. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered <u>health care facilities</u> or the need for new or physically altered <u>health care facilities</u>, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for <u>health care services</u>?

The significance thresholds set forth in Riverside County's Environmental Assessment Checklist, as modified/updated per the 2018 updates to the State CEQA Guidelines, were used to evaluate the significance of the proposed Project's impacts on public services.



4.16.4 IMPACT ANALYSIS

<u>Threshold a.</u>:Would the project result in substantial adverse physical impacts associated with the provision
of new or physically altered fire protection facilities or the need for new or physically altered
fire protection facilities, the construction of which could cause significant environmental
impacts, in order to maintain acceptable service ratios, response times or other performance
objectives for fire protection facilities?

The Project, which would entail development of the 40.88-acre Project site with 591,203 s.f. warehouse building and the future development of three single-family homes on site, would place additional demand on the RCFD, which provides fire protection services in the Project area. Implementation of the Project would cumulatively affect the Department's ability to service the planned population. The Project would require an "Urban-Category II" level of service as defined by the Riverside County Fire Protection Master Plan. This classification requires a fire station be within 3.0 roadway miles of the Project site, and a full first alarm assignment team operating on the scene within 15 minutes of dispatch. The fire station that would serve the Project is Station 59 (Mead Valley), which is located approximately 2.7 roadway miles west of the Project site. The Project also could be served by Station 90 (North Perris City), which is located approximately 5.1 roadway miles east of the Project site. (Google Earth, 2022) Thus, the Project site is located within 3.0 roadway miles of the nearest fire station, and a full first alarm assignment team could operate on site within 15 minutes of dispatch. Thus, the RCFD would be able to meet the Urban-Category II Land Use protection goals of the Fire Protection Master Plan for the Project.

As a condition of Project approval, the proposed Project would be required to conform to all mandatory local, State, and federal laws, ordinances, and standards relating to fire safety. Among other items, these requirements include conformance with the Chapter 7A of the California Building Code, which requires that all buildings be constructed with fire retardant roofing material. The access routes in the local area would be required to be maintained throughout construction and buildout of the Project. Additionally, the Project would be subject to the fire code standards established as part of Riverside County Ordinance No. 787 (Fire Code Standards). The Project's building is required by law to include fire sprinklers. Based on the building type, it is highly likely that the building would be equipped with an Early Suppression, Fast Response (ESFR) fire sprinkler system. ESFR systems incorporate high volume, high-pressure sprinkler heads to provide necessary fire protection. While most other sprinkler systems are intended to control the growth of a fire, an ESFR sprinkler system is designed to suppress a fire. To suppress a fire does not necessarily mean that the system will extinguish the fire but rather it is meant to "knock" the fire back down to its original point of origin. ESFR systems provide buildings with a high margin of fire safety and also allow more time for emergency responders to reach a fire incident before a fire spreads from its point of origin.

Development of the proposed Project would nonetheless impact fire services by placing an additional demand on existing RCFD resources and personnel. As set forth by the Riverside County Fire Protection Master Plan, a new fire station and/or appropriate fire company is required for the development of 2,000 dwelling units or more, or for development of more than 3.0 million square feet of industrial or commercial uses. Although the Project would accommodate three residential lots, the Project also would result in the demolition of three existing homes on site, and thus the Project would not result in the need for a new fire station in the local area based on this standard. Moreover, the Mead Valley Fire Station (Fire Station 59) was constructed in 2006 to



serve the Project area, and would be able to provide fire protection services to the Project site without the need for new or expanded fire protection facilities. Notwithstanding, buildout of the Project would entail construction of a 591,203 s.f. warehouse building, which would accommodate approximately 574 employees. The Project could result in an increased number of emergency and public service calls due to the increased presence of structures, traffic, and employees. Although new fire protection facilities ultimately may be needed in the Project area to serve the Project and other future development in the area, it is not possible to identify environmental impacts that may be associated with the development of any new fire protection facilities until a specific proposal and design for the facility is prepared by the RCFD. Accordingly, impacts due to the construction of new or expanded fire protection facilities are too speculative for evaluation in this EIR (CEQA Guidelines § 15145). Environmental effects of such fire protection facilities and any associated mitigation would be identified through a future CEQA process required in association with any future proposals for new or expanded fire protection facilities.

The Project is required to adhere to Riverside County Ordinance No. 659, which requires payment of a Development Impact Fee (DIF) to assist the County in providing for fire protection facilities, including fire stations. Payment of the DIF fee would ensure that funds are available for capital improvements, such as land/equipment purchases and fire station construction. Accordingly, Project-related impacts to fire protection services are evaluated as less than significant and no mitigation beyond payment of DIF fees would be required.

 <u>Threshold b.</u>:
 Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered <u>sheriff facilities</u> or the need for new or physically altered <u>sheriff facilities</u>, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for <u>sheriff services</u>?

Buildout of the Project would result in the construction of a 591,203 s.f. warehouse building, which would accommodate approximately 574 employees. Although the Project would accommodate three residential lots, the Project also would result in the demolition of three existing homes on site, and thus the Project would not result in an increase in the site's residential population as compared to existing conditions. Development of the property and the introduction of a new warehouse building on site could result in an incremental increase in criminal activity such as burglaries, thefts, auto thefts, vandalism, etc. However, according to the RCSD, there is not a direct correlation between population growth, the number of crimes committed, and the number of RCSD personnel needed to respond to these increases. As the population and use of an area increases, however, additional financing of equipment and manpower needs are required to meet the increased demand. The proposed Project would result in an increase in the cumulative demand for services from the RCSD, which provides police protection services to the Project site. Specifically, the Project would generate a demand for up to approximately one new sworn officer (574 employees x 1.5 officers/1,000 population = 0.86 officers), based on the 1.5 per 1,000 population service standard (Riverside County, 2015a, Table 4.17-H). Staff necessary to support the additional deputy would include an appropriate level of civilian, investigation, and supervisory personnel. The proposed Project would not, however, in and of itself result in the need for new or expanded sheriff facilities to accommodate new personnel.

The Project is required to adhere to Riverside County Ordinance No. 659, which requires payment of a DIF to assist the County in providing for sheriff protection services, including new or expanded facilities. Payment



of the DIF fee would ensure that funds are available for capital improvements, such as land/equipment purchases and sheriff facilities construction. Accordingly, Project-related impacts to sheriff protection services are evaluated as less than significant and no mitigation beyond payment of DIF fees would be required.

Therefore, implementation of the Project would not result in the need for new or expanded sheriff facilities, and impacts would be less than significant. The Project's incremental demand for sheriff protection services also would be less than significant because the Project would be required to contribute DIF fees. Accordingly, a less-than-significant impact would occur with respect to sheriff protection services or facilities as a result of implementation of the proposed Project.

Threshold c.:Would the project result in substantial adverse physical impacts associated with the provision
of new or physically altered school facilities or the need for new or physically altered school
facilities, the construction of which could cause significant environmental impacts, in order
to maintain acceptable service ratios, response times or other performance objectives for
school services?

As previously indicated, the Project site is located within the VVUSD. Although the Project would accommodate three residential lots, the Project also would result in the demolition of three existing homes on site, such that there would be no net increase in demand for school services as compared to existing conditions. As such, the Project would not result in a direct demand for new or expanded school services in the local area. Notwithstanding, the Project would employ residents currently living in or moving to the area, which could place additional demand on school facilities in the surrounding areas. Although the VVUSD may need to construct new school facilities to meet the growing demand within this portion of unincorporated Riverside County, there are no current publicly-available plans detailing where such facilities would be built. The Project would not directly cause or contribute to the need for new or expanded school facilities, and it is not possible to identify environmental impacts that may be associated with the construction of new or expanded school facilities until a specific proposal and design for a new facility is prepared by the VVUSD, and an analysis of potential physical environmental impacts resulting from the construction and operation of new or expanded school facilities would be speculative in nature (see CEQA Guidelines § 15145). Environmental effects of such school facilities and any associated mitigation would be identified through a future CEQA process required in association with any future proposals for new or expanded school facilities. Any mitigation measures required for new or expanded school facilities could be funded, in part, from property taxes and/or through payment of school impact fees (as discussed below).

Although it is not possible to identify physical environmental effects that may result from new or expanded school facilities, the Project Applicant would be required to contribute fees to the VVUSD in accordance with Riverside County Ordinance No. 575. Pursuant to the Leroy F. Greene School Facilities Act of 1998, payment of school impact fees constitutes full and complete mitigation for Project-related impacts to school services. Although the Project would not result in a direct increase in demand for school services, mandatory payment of school impact fees still would be required and would ensure that the Project's impacts to school facilities and services would be less than significant. Accordingly, impacts would be less than significant and no mitigation beyond payment of fees would be required.



Threshold d.:Would the project result in substantial adverse physical impacts associated with the provision
of new or physically altered library facilities or the need for new or physically altered library
facilities, the construction of which could cause significant environmental impacts, in order
to maintain acceptable service ratios, response times or other performance objectives for
library services?

The Project would entail development of the 40.88-acre Project site with a proposed 591,203 s.f. warehouse building, which would accommodate approximately 574 employees. Although the Project would accommodate three residential lots, the Project also would result in the demolition of three existing homes on site, such that there would be no net increase in demand for library services from residential uses as compared to existing conditions. Thus, land uses proposed as part of the Project would not result in a direct increase in the County's population.

Although use of the internet has resulted in decreased demand being placed on library services nationwide, the County continues to maintain its standards for book titles and library square footage. Library services in Riverside County are provided by the RCPLS. Buildout of the Project would result in up to 574 new employees. Assuming that all of the jobs produced by the Project would consist of new residents within the County, in order to attain the RCPLS level of service standard of 2.5 titles-per-capita, the Project-generated employees would require an additional 1,435 titles (2.5 titles-per-capita x 574 employees = 1,435 titles). To attain the RCPLS standard of 0.5 s.f. of library space per capita, the Project would create the demand for 287 s.f. of additional library space (0.5 s.f. of library space per capita x 574 employees = 287 s.f.). However, these estimates are conservative in nature because the majority of jobs that would be generated by the Project likely would be filled by existing Riverside County residents, given the County's generally poor jobs-to-housing ratio. Thus, the Project's impacts to the local library system likely would be substantially less than described above. (Riverside County, 2015a, Table 4.17-W)

The provision of additional library space would be addressed through the County's compliance with the adopted level of service standards. Additionally, mandatory compliance with Riverside County Ordinance No. 659 would require the payment of impact fees. These fees would provide funding for library books and library expansion projects. Although new library facilities may be under consideration by the RCPLS in the Project area, it is not possible to identify environmental impacts that may be associated with the development of any new library facilities until a specific proposal and design for the facility is prepared by the RCPLS. Accordingly, impacts due to the construction of new or expanded library facilities are too speculative for evaluation in this EIR (CEQA Guidelines, 14 CCR § 15145). Environmental effects of such library facilities and any associated mitigation would be identified through a future CEQA process required in association with any future proposals for new or expanded library facilities. Any mitigation measures required for new or expanded library facilities could be funded, in part, from property taxes, including increased property taxes resulting from buildout of the Project site. As such, Project impacts to library facilities and resources are evaluated as less than significant.



Threshold e.:Would the project result in substantial adverse physical impacts associated with the provision
of new or physically altered <u>health care facilities</u> or the need for new or physically altered
<u>health care facilities</u>, the construction of which could cause significant environmental
impacts, in order to maintain acceptable service ratios, response times or other performance
objectives for <u>health care services</u>?

As previously indicated, the nearest medical facility to the Project site is the Kindred Hospital Riverside, located at 2224 Medical Center Drive in the City of Perris, or approximately 2.0 miles southeast of the Project site. The Project would result in approximately 574 new jobs, the majority of which are anticipated to be filled by existing County residents. Using a 1.9 hospital beds per 1,000 persons generation factor, and conservatively assuming all Project employees would consist of new residents within the County, the Project would generate the need for approximately one new hospital bed (574 x $1.9 \div 1,000 = 1.09$). However, as most of the future jobs on the Project site would be filled by existing County residents, the Project's conservatively estimated demand for health care services and hospital beds would not represent a new demand for such resources within the County.

The provision of private health care is largely based on economic factors and demand and is beyond the scope of analysis required for this EIR. However, EIR No. 521 concluded impacts associated with buildout of the Riverside County General Plan would be less than significant, and further notes that: "compliance with...existing General Plan policy and existing Mitigation Measures 4.15.7A and 4.15.7B from EIR No. 441, would further reduce or avoid the insignificant impacts..." (Riverside County, 2015a, p. 4.17-18). Mitigation Measure 4.15.7A requires the County to perform periodic medical needs assessments to evaluate the current medical demand and level of medical service provided within each area plan every three years. Mitigation Measure 4.15.7B requires the County to fund the new construction and/or expansion of existing medical facilities according to the level of demand for medical services based on the needs assessment required as part of Mitigation Measure 4.15.7A. Furthermore, mandatory compliance with County Ordinance No. 659 requires a DIF payment to the County that is partially allocated to public health services and facilities. While new or expanded health care facilities may ultimately be needed within the County due to the anticipated growth in population, it is not possible to identify environmental impacts that may be associated with the development of any new health care facilities until a specific proposal and design for the facility is prepared. Accordingly, impacts due to the construction of new or expanded health care facilities are too speculative for evaluation in this EIR (CEQA Guidelines § 15145). As such, impacts to public medical facilities and resources associated with the proposed Project would be less than significant.

4.16.5 CUMULATIVE IMPACT ANALYSIS

The cumulative study area for public services encompasses the service area of the RCFD, RCSD, VVUSD, and/or RCPLS, and assumes full buildout of the general plans for jurisdictions within these service areas.

Although the proposed Project would be adequately served by fire protection services based on the proximity and response times estimated from nearby fire station facilities, the Project would nonetheless result in an incremental increase in requests for service, which would affect the fire department's ability to provide acceptable levels of service. These impacts include an increased number of emergency and public service calls due to the increased presence of structures, increased traffic volumes, and increased population. When



considered in the context of on-going cumulative development throughout western Riverside County, such impacts would be cumulatively considerable. However, the proposed Project and all cumulative developments within unincorporated Riverside County would be required to contribute DIF fees pursuant to County Ordinance No. 659. Mandatory DIF fee contributions by the Project and cumulative developments would ensure that adequate funding is provided to the RCFD for the acquisition of additional facilities, equipment, and personnel. Accordingly, the proposed Project's impact to the RCFD is evaluated as less-than-cumulatively considerable.

Although the Project site would be adequately served by sheriff facilities, the increased population that would be generated by the Project, when considered in conjunction with other on-going development throughout western Riverside County, has the potential to adversely affect service response times. However, the proposed Project and all cumulative developments would be required to contribute DIF fees pursuant to County Ordinance No. 659, which would help to provide for adequate equipment and personnel in the Project area. Therefore, with mandatory payment of DIF fees, Project impacts to police protection services would be less-than-cumulatively considerable.

The proposed Project would entail development of the site a 591,203 s.f. warehouse building and would not result in a net increase in the number of residential dwelling units on site; therefore, the Project would not result in a direct demand for school services or new or expanded school facilities. Although the Project may indirectly result in an increase in the population within the VVUSD, the Project Applicant would be required to contribute fees in accordance with Riverside County Ordinance No. 575. Other cumulative developments, including both residential and non-residential developments, similarly would be required to contribute fees pursuant to Riverside County Ordinance No. 575, or similar ordinances within cities within the service area of these school districts. Pursuant to the Leroy F. Greene School Facilities Act of 1998, payment of school impact fees constitutes full and complete mitigation for Project-related impacts to school services. As such, and with mandatory fee payment, the Project's impacts to school services and facilities would be less-than-cumulatively considerable.

The Project would entail development of the Project site with 591,203 s.f. warehouse building and would not result in a net increase in the number of residential dwelling units on site; therefore, the Project would not result in a direct demand for library services. Although the Project may result in an indirect increase in the County's population, the Project is not expected to result in the need for new or expanded library services or facilities. Furthermore, it is not possible to identify environmental impacts that may be associated with such new or expanded library facilities until a specific proposal and design for such facilities are prepared by Riverside County. Accordingly, impacts due to the construction of new or expanded library facilities are too speculative for evaluation in this EIR (CEQA Guidelines § 15145). Environmental effects of such library facilities and associated mitigation would be identified through a future CEQA process required in association with any future proposals for new or expanded library facilities. However, the Project and all cumulative developments would contribute property taxes and would be required to contribute DIF fees to Riverside County pursuant to County Ordinance No. 659, which could be used for the purpose of acquiring book titles and/or additional library square footage. Any mitigation measures required for new or expanded library facilities also could be funded, in part, from property taxes allocated by Riverside County to such purposes. Therefore, because environmental impacts associated with new or expanded library facilities cannot be known at this time and would be determined in the future once Riverside County identifies a specific proposal for new



or expanded library facilities, Project impacts to library services and facilities are evaluated as less than significant on a cumulatively-considerable basis.

The proposed Project, when considered in conjunction with on-going growth and development in western Riverside County, would cumulatively impact the ability of local medical facilities that provide health services. However, the Project and all cumulative developments would be required to comply with County Ordinance No. 659, which requires a DIF payment to the County that is partially allocated to public health services and facilities. With mandatory compliance with Ordinance No. 659, the Project's impacts to health services and facilities would be less than significant on a cumulative basis.

4.16.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

<u>Threshold a: Less-than-Significant Impact</u>. Although the Project would place additional demand on the RCFD and incrementally contribute to a need for new or expanded fire protection facilities, the RCFD has not proposed to expand or construct a new fire station in the Project's service area. With payment of mandatory DIF fees, the proposed Project's potential direct and cumulatively-considerable impacts to the Riverside County Fire Department would be reduced to less-than-significant levels.

<u>Threshold b: Less-than-Significant Impact</u>. With payment of mandatory DIF fees, the proposed Project's potential direct and cumulatively-considerable impacts to the Riverside County Sheriff's Department would be reduced to less-than-significant levels, and the Project would not result in or require the construction of new police protection facilities that could result in a significant impact to the environment.

<u>Threshold c: Less-than-Significant Impact</u>. The Project would not directly generate a resident population, and thus would not directly impact school services in the local area. Although the Project may indirectly result in new residents within the service area of the VVUSD, and thus may indirectly result in an incremental increase in demand for new school facilities, there are no current publicly-available plans detailing where such facilities would be built. The payment of mandatory school impact fees would ensure that the Project would result in less-than-significant direct or cumulatively-considerable impacts to the ability of the VVUSD to provide for school services.

<u>Threshold d: Less-than-Significant Impact</u>. The Project would not directly generate a resident population, and thus would not directly impact library services in the local area. Although the Project may indirectly result in new residents within the local area, and thus could result in an incremental demand for increased library facilities, the County has no plans to expand or build new library facilities in the Project site vicinity. The Project would be required to contribute DIF fees, which would be used in part to provide for library space and/or new book volumes. Accordingly, with payment of DIF fees, Project impacts to library services and facilities are evaluated as less than significant on both a direct and cumulatively-considerable basis.

<u>Threshold e: Less-than-Significant Impact</u>. With payment of mandatory DIF fees, the Project would result in less-than-significant direct and cumulatively-considerable impacts to health services facilities, and the Project would not result in or require the construction of new health services facilities that could result in a significant impact to the environment.



4.16.7 COUNTY REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

Applicable County Regulations and Design Requirements

The following are applicable regulations and design requirements that apply to the proposed Project and that reduce or preclude public services impacts. Although compliance with mandatory regulatory requirements does not technically meet CEQA's definition for mitigation, they are specified herein as requirements for the Project.

- The Project is required to comply with the following applicable Mitigation Measures identified by Riverside County EIR No. 441 related to public services:
 - EIR No. 441 Mitigation Measure 4.15.2A: The County shall require as a part of the development review process, proponents of new businesses, recreational, and commercial land uses such as shopping centers, health clubs, large hotels over 200 rooms, convention centers, and commercial recreational activities be required to provide on-site security.
 - EIR No. 441 Mitigation Measure 4.15.2D: The County shall require the development applicant to pay the County Sheriff's established development mitigation fee prior to issuance of a certificate of occupancy on any structure as they are developed. The fees are for the acquisition and construction of public facilities.
- As a condition of Project approval, the proposed Project would be required to conform to all mandatory local, State, and federal laws, ordinances, and standards relating to fire safety. Among other items, these requirements include conformance with the Uniform Building Code Section 1503, which requires that all buildings be constructed with fire retardant roofing material. Access routes in the Project area would be required to be maintained throughout construction and buildout of the proposed Project.
- The Project would be required to adhere to Riverside County Ordinance No. 659, which requires payment of a DIF to assist the County in providing for fire protection facilities, including fire stations. Payment of the DIF fee would ensure that funds are available for capital improvements, such as land/equipment purchases and fire station construction.
- The Project would be required to adhere to Riverside County Ordinance No. 659, which requires payment of a DIF fee to assist the County in providing for sheriff protection facilities, including sheriff stations. Payment of the DIF fee would ensure that funds are available for additional sheriff personnel as well as capital improvements, such as land/equipment purchases and sheriff station construction.
- The Project is required to comply with Riverside County Ordinance No. 575, which requires mandatory payment of school impact fees pursuant to Public Education Code § 17072.10-18.
- The Project would be required to adhere to Riverside County Ordinance No. 659, which requires payment of a DIF fee to assist the County in providing for library facilities. Payment of the DIF fee would ensure that funds are available for capital improvements, such as land/equipment purchases and library construction or expansion.



• The Project would be required to adhere to Riverside County Ordinance No. 659, which requires payment of a DIF fee to assist the County in providing for public health facilities. Payment of the DIF fee would ensure that funds are available for capital improvements, such as land/equipment purchases and health facility construction.

Mitigation

Impacts would be less-than-significant; therefore, no mitigation is required.



4.17 <u>RECREATION</u>

This Subsection 4.17 provides an overview of the existing parks and recreational facilities that exist within the Project site's vicinity and that could potentially be directly or indirectly physically affected by implementation of the proposed Project. The analysis herein is based in part on the Riverside County General Plan Multipurpose Open Space Element and Healthy Communities Element. (Riverside County, 2021a)

4.17.1 EXISTING CONDITIONS

A. <u>Federal Parks</u>

The nearest federal park is the Cleveland National Forest, located approximately 12.7 miles southwest of the Project site. There are no other federal parks in the Project vicinity.

B. <u>State Parks</u>

The nearest State park to the Project site is the Lake Perris State Recreation Area (LPSRA), located approximately 4.1 miles northeast of the Project site. The LPSRA provides for recreational opportunities including fishing, water sports, bird watching, hiking, rock climbing, camping, horseback riding. There are no other State parks in the Project vicinity.

C. <u>Regional and Local Parks</u>

Paragon Park is the only park within a two-mile radius of the Project site, and is located approximately 1.8 miles east of the Project site. Recreational facilities available at Paragon Park include a skate park, full basketball court, handball court, picnic areas, tot lot, and a large open play field. (Google Earth, 2022)

D. <u>Regional Trails and Bikeway Systems</u>

The Mead Valley Area Plan (MVAP) identifies the County's long-term objectives for recreational trails and bikeways within the Mead Valley area. As shown on MVAP Figure 9, *Mead Valley Area Plan Trails and Bikeway System*, there are no trails planned along the roadway segments that abut the Project site. The nearest planned trails to the Project site occur along Seaton Avenue to the west of the Project site, and along Placentia Avenue to the south of the Project site. (Riverside County, 2021b, Figure 9) Regardless, the County is planning a comprehensive trail system in Mead Valley, including on roads that are not mapped by the MVAP for a trail.

4.17.2 APPLICABLE ENVIRONMENTAL REGULATIONS

The following is a brief description of the State and local environmental laws and related regulations related to recreation.

A. <u>State Regulations</u>

1. Quimby Act, California Government Code Section (§) 66477

The State of California's Quimby Act was established by the California Legislature for the purpose of preserving open space and providing park facilities for California's growing communities. The Quimby Act allows local agencies to establish ordinances requiring residential subdivisions to provide land or "in-lieu-of"



fees for park and recreation purposes. This State Act requires the dedication of land and/or imposes a requirement of fees for park and recreational purposes as a condition of approval of tentative tract map or parcel map. (CA Legislative Info, n.d.)

B. <u>Local Regulations</u>

1. Riverside County Ordinance No. 460

Riverside County Ordinance No. 460, § 10.35 (Park and Recreation Fees and Dedications) implements the Quimby Act by establishing a requirement for dedication of three acres of parkland per 1,000 residents, or payment of a fee in lieu of such dedication. An exception exists in cases where a Community Parks and Recreation Plan, as approved by the Board of Supervisors, applies and has determined that the amount of existing neighborhood and community park area exceeds that limit, in which case the Board may determine that the public interest, convenience, health, welfare, and safety requires that a higher standard, not to exceed five acres of land per 1,000 persons residing within the County, shall be devoted to neighborhood and community parks and Recreation Plans applicable to the Project area.

4.17.3 BASIS FOR DETERMINING SIGNIFICANCE

Section XVI of Appendix G to the California Environmental Quality Act (CEQA) Guidelines addresses typical adverse effects to parks and recreation, and includes the following threshold questions to evaluate a project's impacts to recreational resources:

- Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?
- Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

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

- 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); or
- d. Include the construction or expansion of a trail system.

The significance thresholds set forth in Riverside County's Environmental Assessment Checklist were used to evaluate the significance of the proposed Project's impacts on parks and recreation.



4.17.4 IMPACT ANALYSIS

<u>Threshold a</u>: Would the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

<u>Threshold d</u>: Would the Project include the construction or expansion of a trail system?

As part of the Project, a 10-foot-wide Community Trail and sidewalk are proposed along the Project site's frontages with Patterson Avenue and Walnut Street, and a sidewalk is proposed along Rider Street. Although the Project would result in the construction of trails on site, these trails would occur in areas already planned for physical disturbance as part of the Project, and there would be no impacts to the environment specifically related to the construction of proposed trails and pedestrian facilities that have not already been addressed throughout this EIR (e.g., for impacts to biological or cultural resources). As such, and assuming implementation of the mitigation measures identified throughout this EIR, impacts associated with proposed trails and pedestrian facilities and pedestrian facilities would be less than significant.

<u>Threshold b</u>: Would the Project include the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?

Although the Project would accommodate three residential lots that could be developed with residential uses in the future, the addition of three residential homes if ever built would be completely offset by the proposed demolition of the three existing homes in the southern portion of the Project site. The Project's proposed warehouse building would not directly or indirectly generate a population that would increase the use of existing neighborhood and regional parks or other recreational facilities, as a majority of the Project's future jobs are anticipated to be filled by existing or future planned residents within the County. Accordingly, implementation of the proposed Project would not result in the increased use or substantial physical deterioration of an existing neighborhood or regional park, and impacts would be less than significant.

<u>Threshold c</u>: Would the Project be located within a Community Service Area (CSA) or recreation and park district with a Community Parks and Recreation Plan (Quimby fees)?

The Project site is located within the Perris #89 CSA, which was established for the purposes of lighting and not recreational facilities (RCIT, n.d.). In addition, the Project site is not located within a Community Parks and Recreation Plan. Furthermore, the provisions of Section 10.35 of Riverside County Ordinance No. 460, which addresses parkland dedication and in-lieu fees, are not applicable to the proposed Project. Although the Project would accommodate three residential lots, the Project also would result in the demolition of three existing homes on site, such that the recreational demand for the Project site would be the same as compared to existing conditions. Furthermore, pursuant to § 10.35.F.4 of Ordinance No. 460, "[w]henever subsequent development occurs on property for which fees have been paid or land dedicated, no additional fees or dedication shall be required except as to any additional lots or dwelling units which were not subject to a prior fee or dedication requirement." Ordinance No. 460 was adopted in November 1959, while the existing homes on site were constructed some time between 1961 and 1967, indicating that park fees were previously paid for the existing residential uses on site. Therefore, the Project would not be subject to payment of in-lieu fees for recreational resources. Accordingly, impacts due to a conflict with a Community Parks and Recreation Plan



and due to the need for payment of in-lieu fees for parkland acquisition and construction would be less than significant.

4.17.5 CUMULATIVE IMPACT ANALYSIS

This cumulative impact analysis considers development of the proposed Project in conjunction with other development projects and planned development within two miles of the Project site. Although it is not anticipated that future Project employees would substantially utilize recreational facilities in the local area, this study area was selected because any use of local recreation facilities by future Project employees likely would occur in close proximity to the Project site.

As discussed under the analysis of Thresholds a. and d., cumulatively-considerable impacts associated with the construction of proposed trails and pedestrian facilities on site have been evaluated throughout this EIR under the appropriate subject heading (e.g., air quality, biological resources, etc.). Where cumulatively-considerable impacts have been identified associated with Project implementation, mitigation measures have been identified to reduce construction-related impacts to the maximum feasible extent. There are no components of the planned trails or pedestrian facilities on site that have not already been addressed and accounted for throughout this EIR for the Project site. Accordingly, cumulatively-considerable impacts due to the construction of on-site trails and pedestrian facilities would be less than significant.

Although the Project would accommodate three residential lots, the Project also would result in the demolition of three existing homes on site, such that the recreational demand for the Project site would not increase as compared to existing conditions. Thus, the Project would not generate a population that would directly increase the use of existing neighborhood and regional parks or other recreational facilities. Although there may be a nominal increase in the use of local recreation facilities from Project employees, Project employees are not expected to utilize local recreational facilities to the extent that physical deterioration would occur or be accelerated, even when considered in the context of cumulative developments in the area. Although other cumulative developments in the local area that involve residential use and that do not accommodate adequate recreational facilities may result in physical deterioration of existing recreational facilities, the Project's contribution to such effects would be de minimis and would be less than significant on both a direct and cumulatively-considerable basis.

The Project site is not located within a recreational-related CSA, and is not located within a park district with a Community Parks and Recreation Plan. The Project also would not be subject to payment of Quimby fees or fees pursuant to Section 10.35 of Riverside County Ordinance No. 460 because the Project would accommodate three residential lots and would result in the demolition of three existing homes on site. As discussed under the analysis of Threshold c. pursuant to § 10.35.F.4 of Ordinance No. 460 the Project would not be subject to payment of in-lieu fees for recreational resources. Accordingly, impacts due to a conflict with a CSA, due to Quimby fees, or due to a conflict with the park dedication requirements of Riverside County Ordinance No. 460 would be less-than-cumulatively considerable.

4.17.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

<u>Thresholds a. and d.: Less-than-Significant Impact</u>. The physical construction of the on-site trails and pedestrian facilities has been addressed under the relevant issue areas identified throughout this EIR (e.g., air



quality, biological resources, cultural resources, etc.). Under each of these topics, the Project impacts are determined to be less than significant, or mitigation measures have been identified to reduce impacts to the maximum feasible extent. There are no components of the planned trails or pedestrian facilities on site that have not already been addressed and accounted for throughout this EIR. Accordingly, Project impacts due to parkland development on site would be less than significant, requiring no mitigation beyond that which is identified in other portions of this EIR.

<u>Threshold b.: Less-than-Significant Impact</u>. Although the Project would accommodate three residential lots that could be developed with residential uses in the future, the addition of these three residential homes would be completely offset by the proposed demolition of the three existing homes in the southern portions of the Project site. The Project's proposed warehouse building would not directly or indirectly generate a population that would increase the use of existing neighborhood and regional parks or other recreational facilities, as a majority of the Project's future jobs are anticipated to be filled by existing or future planned residents within the County. Accordingly, implementation of the proposed Project would not result in the increased use or substantial physical deterioration of an existing neighborhood or regional park, and impacts would be less than significant.

<u>Threshold c.: Less-than-Significant Impact</u>. The Project site is not located within a CSA that was established for recreational facilities, the Project site is not located within a Community Parks and Recreation Plan, and the Project is not subject to payment of in-lieu fees (Quimby fees) for recreational facilities pursuant to § 10.35 of Riverside County Ordinance No. 460. Accordingly, impacts due to a conflict with a Community Parks and Recreation Plan and due to the need for payment of in-lieu fees for parkland acquisition and construction would be less than significant.

4.17.7 APPLICABLE REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

Impacts to recreation would be less than significant; thus, mitigation measures are not required.



4.18 TRANSPORTATION

The analysis and information in this Subsection is based in part on a technical studies prepared by Urban Crossroads, Inc. (herein, "Urban Crossroads"), entitled "Rider and Patterson Vehicle Miles Traveled (VMT) Analysis," dated September 26, 2022, and included as *Technical Appendix L1* to this EIR (Urban Crossroads, 2022). Additionally, and although not relied upon herein to evaluate the Project's impacts to the environment, the discussion within this Subsection also relies in part on a second technical report prepared by Urban Crossroads, entitled, "Rider and Patterson Business Center (PPT220004) Traffic Analysis" (herein, "TA"), dated January 23, 2023, and included as *Technical Appendix L2* (Urban Crossroads, 2023f). Refer to Section 7.0, *References*, for a complete list of reference sources.

On December 28, 2018, updates to the California Environmental Quality Act (CEQA) Guidelines were approved by the Office of Administrative Law (OAL). As part of the updates to the CEQA Guidelines, thresholds of significant for evaluation of impacts to transportation have changed. As required by Senate Bill (SB) 743, new Threshold b. of the CEQA Guidelines for Transportation requires an evaluation of impacts due to Vehicle Miles Traveled (VMT), which replaced the Level of Service (LOS) criteria (i.e., automobile delay) that has been utilized in the past to evaluate potential effects to transportation under CEQA. Pursuant to CEQA Guidelines Section 15064.3(a), "...a project's effect on automobile delay shall not constitute a significant environmental impact."

4.18.1 EXISTING CONDITIONS

A. <u>Existing Vehicle Miles Traveled (VMT)</u>

Urban Crossroads has obtained a VMT data table from County Staff for all TAZs within Riverside County that identifies VMT per capita and VMT per employee. The data utilizes the sub-regional Riverside Transportation Analysis Model (RIVTAM) to measure baseline VMT performance for individual Traffic Analysis Zones (TAZs). Utilizing the Western Riverside Council of Governments (WRCOG) Screening tool, it was determined that the Project resides in TAZ 3731, which is shown to generate 17.22 VMT per employee under existing conditions, whereas the existing Countywide average VMT per employee is 14.2 work VMT per employee and the existing Countywide average for residential uses is 15.2 VMT per capita. (Urban Crossroads, 2022, pp. 4-5)

B. <u>Existing Project Site Traffic</u>

Under existing conditions, a majority of the Project site is vacant and undeveloped, with exception of three existing single-family dwelling units in the southern portion of the Project site. These existing dwelling units are anticipated to generate approximately 28 daily vehicular trips, including 3 trips in the a.m. peak hour and 3 trips in the p.m. peak hour. (Urban Crossroads, 2023f, Table 4-2)

C. <u>Existing Roadway System</u>

Under existing conditions, the 40.88-acre Project site abuts Rider Street to the north, Patterson Avenue to the east, and Walnut Street to the south, while several local roadways terminate at the western Project boundary, including Sunny Canyon Street, Wildwood Lane, and Norrisgrove Drive. Pursuant to the Mead Valley Area Plan (MVAP) and Riverside County General Plan Circulation Element, Rider Street and Patterson Avenue



along the site's frontages are classified as a "Secondary (100' Right-of-Way [ROW])" facilities. These roadways typically have a 100-foot right-of-way and a 64-foot curb-to-curb measurement. Walnut Street, Sunny Canyon Street, Wildwood Lane, and Norrisgrove Drive are not classified by the MVAP or General Plan as Circulation Element Roadways. (Urban Crossroads, 2023f, p. 29)

Ramona Expressway/Cajalco Expressway, located approximately 0.6-mile north of the Project site, is classified by the MVAP and Circulation Element as an "Expressway (220' ROW)," which typically consists of six to eight-lane divided roadways (typically divided by a raised median) with a 220-foot right-of-way and a 134-foot curb-to-curb measurement. Expressway facilities are intended serve regional through-traffic. (Urban Crossroads, 2023f, p. 25)

Placentia Avenue between Harvill Avenue and I-215, located approximately 0.55-mile southeast of the Project site, is classified by the MVAP and Circulation Element as an "Arterial Highway (128' ROW)," which typically consists of six travel lanes that are intended primarily to serve through traffic. Access from abutting roadways is intended to be kept at a minimum. (Urban Crossroads, 2023f, p. 25)

Harvill Avenue, located approximately 0.2-mile east of the Project site, is classified by the MVAP and Circulation Element as a "Major (118' ROW)," which typically consist of four-lane roadways and may include a painted median, and typically have a 118-foot right-of-way and a 76-foot curb-to-curb measurement. These roadways typically direct traffic through major development areas. (Urban Crossroads, 2023f, p. 25)

Placentia Avenue, between Patterson Avenue and Harvill Avenue, is classified by the MVAP and Circulation Element as a "Secondary (100' ROW)," which is described above.

D. <u>Truck Routes</u>

The County of Riverside's General Plan does not provide designated truck routes, and the City of Perris' truck routes are shown on Exhibit 3-10 of the Project's TA (*Technical Appendix L2*). Trucks are prohibited on certain County roadways through the Municipal Code through weight restrictions. Truck routes for the proposed Project have been determined based on discussions with County staff and takes into consideration the approved truck routes within the adjacent City of Perris. These truck routes serve both the proposed Project and future cumulative development projects throughout the study area. Sensitive land uses have also been taken into consideration as part of determining the best routes for future trucks. (Urban Crossroads, 2023f, p. 36)

E. <u>Existing Transit Service</u>

The Project area is currently served by Riverside Transit Agency (RTA) with bus service along the I-215 Freeway and Cajalco Expressway/Ramona Expressway. RTA Route 27 runs along the I-215 Freeway and stops at Perris High School (on Nuevo Road) and runs between the Perris Station Transit Center and the Galleria at Tyler in the City of Riverside. RTA Route 41 runs along Ramona/Cajalco Expressway and has existing bus stops to the west and east of Harvill Avenue, which is located approximately 0.8-mile from the Project site. There are currently no transit routes or stops along the Harvill Avenue corridor near the proposed Project. The transit services are illustrated on Exhibit 3-9 of the Project's TA (*Technical Appendix L2*). As shown, the closest existing transit route that could potentially serve the site is along Cajalco Expressway. Transit service is reviewed and updated by RTA periodically to address ridership, budget, and community demand needs.



Changes in land use can affect these periodic adjustments which may lead to either enhanced or reduced service where appropriate. (Urban Crossroads, 2023f, p. 29)

F. <u>Existing Bicycle and Pedestrian Facilities</u>

The County of Riverside and City of Perris bike networks are shown on Exhibit 3-6 and Exhibit 3-7, respectively, of the Project's TA (*Technical Appendix L2*). As shown on Exhibit 3-6 of the Project's Traffic Analysis, there is a planned Regional Trail (Urban/Suburban) trail proposed along Placentia Avenue south of the Project site and Class II (on-street, striped) bike lane along Ramona Expressway/Cajalco Expressway. (Urban Crossroads, 2023f, p. 29)

Exhibit 3-8 of the Project's TA illustrates the existing crosswalks throughout the study area. As shown on Exhibit 3-8, there are pedestrian facilities in place in the vicinity of the Project site on either side of Harvill Avenue and along Martin Street on the south side of the roadway. Development of the proposed Project would connect to these existing pedestrian facilities to those to be constructed by the Project along its frontages on Perry Street, Martin Street, and Harvill Avenue. (Urban Crossroads, 2023f, p. 29)

4.18.2 APPLICABLE REGULATORY REQUIREMENTS

A. <u>State Regulations</u>

1. Assembly Bill 1358 (AB 1358) – Complete Streets Act

In September 2008, Governor Schwarzenegger signed into law Assembly Bill 1358 (AB 1358), the Complete Streets Act. AB 1358 requires that the legislative body of a city or county, upon any substantive revision of the circulation element of the general plan, modify the circulation element to plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways, defined to include motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation, in a manner that is suitable to the rural, suburban, or urban context of the general plan. By requiring new duties of local officials, AB 1358 imposes a State-mandated local program. AB 1358 required the Office of Planning and Research (OPR) to prepare or amend guidelines for a legislative body to accommodate the safe and convenient travel of users of streets, roads, and highways in a manner that is suitable to the rural, suburban, or urban context of the general plan, and in doing so to consider how appropriate accommodation varies depending on its transportation and land use context. AB 1358 authorized OPR, in developing these guidelines, to consult with leading transportation experts, including, but not limited to, bicycle transportation planners, pedestrian planners, public transportation planners, local air quality management districts, and disability and senior mobility planners. (CA Legislative Info, n.d.)

2. Statewide Transportation Improvement Program (STIP)

The Statewide Transportation Improvement Program (STIP) is a multi-year capital improvement program of transportation projects on and off the State Highway System, funded with revenues from the Transportation Investment Fund and other funding sources. STIP programming generally occurs every two years. The programming cycle begins with the release of a proposed fund estimate in July of odd-numbered years, followed by California Transportation Commission (CTC) adoption of the fund estimate in August (odd years). The fund estimate serves to identify the amount of new funds available for the programming of transportation projects. Once the fund estimate is adopted, Caltrans and the regional planning agencies prepare transportation



improvement plans for submittal by December 15th (odd years). Caltrans prepares the Interregional Transportation Improvement Plan (ITIP) and regional agencies prepare Regional Transportation Improvement Plans (RTIPs). Public hearings are held in January (even years) in both northern and southern California. The STIP is adopted by the CTC by April (even years). (Caltrans, n.d.)

3. Senate Bill 743 (SB 743)

Senate Bill 743 (SB 743, Steinberg, 2013), which was codified in Public Resources Code (PRC) Section (§) 21099, required changes to the implementing CEQA Guidelines regarding the analysis of transportation impacts. As one appellate court explained: "During the last 10 years, the Legislature has charted a course of long-term sustainability based on denser infill development, reduced reliance on individual vehicles and improved mass transit, all with the goal of reducing greenhouse gas emissions. Section 21099 is part of that strategy..." (*Covina Residents for Responsible Development v. City of Covina* (2018) 21 Cal.App.5th 712, 729.) Pursuant to § 21099, the criteria for determining the significance of transportation impacts must "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." (*Id.*, subd. (b)(1); see generally, adopted CEQA Guidelines, § 15064.3, subd. (b) [Criteria for Analyzing Transportation Impacts].) To that end, in developing the criteria, OPR has proposed, and the California Natural Resources Agency (CRNA) has certified and adopted, changes to the CEQA Guidelines that identify VMT as the most appropriate metric to evaluate a project's transportation impacts. With the CRNA's certification and adoption of the changes to the CEQA Guidelines, automobile delay, as measured by LOS and other similar metrics, generally no longer constitutes a significant environmental effect under CEQA as of July 1, 2020. (PRC § 21099, subd. (b)(3).) (OPR, 2018)

4. Senate Bill 325 (SB 325) - Transportation Development Act (TDA, Mills-Alquist-Deddeh Act)

The Mills-Alquist-Deddeh Act (SB 325) was enacted by the California Legislature to improve existing public transportation services and encourage regional transportation coordination. Known as the Transportation Development Act (TDA) of 1971, this law provides funding to be allocated to transit and non-transit related purposes that comply with regional transportation plans. TDA established two funding sources: the Local Transportation Fund (LTF), and the State Transit Assistance (STA) fund. Providing certain conditions are met, counties with a population under 500,000 (according to the 1970 federal census) may also use the LTF for local streets and roads, construction, and maintenance. The STA funding can only be used for transportation planning and mass transportation purposes. (Caltrans, n.d.)

5. Road Repair and Accountability Act of 2017 (Senate Bill 1 (SB 1))

On April 28, 2017, Governor Brown signed Senate Bill 1 (SB 1) (Chapter 5, Statutes of 2017), known as the Road Repair and Accountability Act of 2017. SB 1 augments the base of the State Transit Assistance program essentially doubling the funding for this program. To provide for SB 1 reporting and transparency, transit agencies are asked to work with Caltrans to report on planned expenditures for these augmented funds. (Caltrans, n.d.)



B. <u>Regional Regulations</u>

1. SCAG Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal)

The Southern California Association of Governments (SCAG) is a regional agency established pursuant to California Government Code § 6500, also referred to as the Joint Powers Authority law. SCAG is designated as a Council of Governments (COG), a Regional Transportation Planning Agency (RTPA), and a Metropolitan Planning Organization (MPO). The Project site is within SCAG's regional authority. On September 3, 2020, SCAG adopted the 2020-2045 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) ("RTP/SCS"; also referred to herein as "Connect SoCal") with goals to: 1) Encourage regional economic prosperity and global competitiveness; 2) Improve mobility, accessibility, reliability, and travel safety for people and goods; 3) Enhance the preservation, security, and resilience of the regional transportation system; 4) Increase person and goods movement and travel choices within the transportation system; 5) Reduce greenhouse gas emissions and improve air quality; 6) Support healthy and equitable communities; 7) Adapt to a changing climate and support an integrated regional development pattern and transportation network; 8) Leverage new transportation technologies and data-driven solutions that result in more efficient travel; 9) Encourage development of diverse housing types in areas that are supported by multiple transportation options; and 10) 10. Promote conservation of natural and agricultural lands and restoration of habitats (SCAG, 2020, p. 9). Performance measures and funding strategies also are included to ensure that the adopted goals are achieved through implementation of the RTP.

Connect SoCal includes long-range regional transportation plans, regional transportation improvement programs, regional housing needs allocations, and other plans for the region. Connect SoCal also provides objectives for meeting emissions reduction targets set forth by the California Air Resources Board (CARB); these objectives were provided in a direct response to Senate Bill 375 (SB 375) which was enacted to reduce greenhouse gas emissions from automobiles and light trucks through integrated transportation, land use, housing, and environmental planning (SCAG, 2020). Connect SoCal is updated periodically to allow for the consideration and inclusion of new transportation strategies and methods.

The Goods Movement Technical Report of Connect SoCal is applicable to the Project because the Project entails a use that is closely associated with, and relies directly on, the goods movement system (e.g., manufacturing, construction, retail trade, wholesale trade and transportation, and warehousing). In April 2018, SCAG published a document entitled, *Industrial Warehousing in the SCAG Region*. According to the document, the SCAG region is a vibrant hub for international and domestic trade because of its large transportation base and extensive multimodal transportation system. The SCAG region's freight transportation system includes warehouses and distribution centers; the Ports of Los Angeles, Long Beach, and Hueneme; airports; rail intermodal terminals; rail lines, and local streets, State highways, and interstates. Together the system enables the movement of goods from source to market, facilitating uninterrupted global commerce. The region is home to approximately 34,000 warehouses with 1.17 billion square feet (s.f.) of warehouse building space, and undeveloped land that could accommodate an additional 338 million s.f. of new warehouse building space. These regions attract robust logistics activities and are a major reason the region is a critical mode in the global supply chain. (SCAG, 2018, p. ES-1)



2. Riverside County Congestion Management Program (CMP)

The intent of a Congestion Management Program (CMP) is to more directly link land use, transportation, and air quality, thereby prompting reasonable growth management programs that will effectively utilize new transportation funds, alleviate traffic congestion and related deficiencies, and improve air quality. The Riverside County CMP became effective with the passage of Proposition 111 in 1990 and was updated most recently in 2019 as part of the Riverside County Long Range Transportation Study. The Riverside County Transportation Commission (RCTC) adopted the 2019 CMP for Riverside County in December 2019. There are no Study Area intersections identified as a Riverside County CMP facility. (Urban Crossroads, 2023f, p. 6)

C. <u>Western Riverside County Association of Governments Transportation Uniform Mitigation</u> <u>Fee</u>

The Western Riverside Council of Governments (WRCOG) established a consolidated Transportation Uniform Mitigation Fee (TUMF) program for all of western Riverside County, which commenced in 2003. The establishment of TUMF was based on the desire to establish a single, uniform fee program to mitigate the cumulative impacts of new development on the western Riverside County sub-region's arterial highway system rather than having multiple and potentially uncoordinated fee programs across the region. WRCOG is responsible for establishing and updating TUMF payment rates, based on a TUMF Program Nexus Study, which is periodically updated to consider the impact of future development on the subregion's system of highways and arterial roads. The most recent Nexus Study update was approved by the WRCOG Executive Committee in July 2017. The updated Nexus Study continues to demonstrate the relationship between the TUMF fee levels and the cost of anticipated improvements to the Regional System of Highways and Arterials (RSHA) necessitated by new development throughout western Riverside County. (WRCOG, 2018, p. 3)

D. <u>Local Regulations</u>

Ordinances specifically applicable to the circulation system are presented below (Riverside County, 2015a, p. 4.18-28):

- <u>Ordinance No. 413 Vehicle Parking</u>: Ordinance No. 413 establishes regulations to vehicle parking on Riverside County roadways.
- <u>Ordinance No. 452 Speed Limits</u>: Ordinance No. 452 pertains to prima facie speed limits on Riverside County roadways and establishes or amends prima facie speed limits on certain Riverside County roads.
- <u>Ordinance No. 460 Subdivision of Land</u>: Ordinance No. 460, in conjunction with the Subdivision Map Act, establishes regulations for the division of land and describes procedures. The ordinance also includes the provisions for the establishment of Road and Bridge Benefit Districts and associated fees.
- <u>Ordinance No. 461 Road Improvement Standards and Specifications</u>: Ordinance No. 461 adopts Road Improvement Standards and Specifications.



- <u>Ordinance No. 499 Encroachments in County Highways</u>: Ordinance No. 499, subject to the control of the Board of Supervisors, delegates to the Riverside County Transportation Director the administration of the use of county highways, including county roads, for excavations and encroachments; construction, operation, and maintenance of utility facilities; planting, maintenance, and removal of trees; and the issuance, modification, and revocation of permits for such uses.
- Ordinance No. 659 Development Mitigation Fee for Residential Development (DIF Program): Ordinance No. 659 establishes a development impact fee (DIF) for the development of infrastructure, including County roadways and the installation of traffic signals.
- Ordinance No. 671 Consolidated Fees for Land Use and Related Functions: Ordinance No. 671 establishes a consolidated fee program for land use and related functions. This is a deposit-based fee program and provides for unused fees to be refunded to the applicant.
- <u>Ordinance No. 748 Mitigation of Traffic Congestion Through Signalization</u>: Ordinance No. 748 establishes a fee program for the installation of traffic signals based on a priority list. The fee would also have a component for the installation of traffic signal interconnect, and a component for the application of intelligent transportation systems technologies.
- Ordinance No. 824 Western Riverside County Transportation Uniform Mitigation Fee (TUMF) <u>Program</u>: Ordinance No. 824 establishes a TUMF program for western Riverside County. The fees are collected by Riverside County and administered by WRCOG to make roadway improvements in the WRCOG area. TUMF funds are intended for use solely for the engineering, construction, and right-of- way acquisition for regional facilities. TUMF funds may not be used to defray operational and maintenance expenses. Facilities eligible for TUMF are designated by WRCOG and updated periodically. They include streets, arterials, and road improvements as defined in the ordinance.

4.18.3 BASIS FOR DETERMINING SIGNIFICANCE

A. <u>Thresholds of Significance</u>

Section XVII of Appendix G to the CEQA Guidelines addresses typical adverse effects related to transportation, and includes the following threshold questions to evaluate a project's impacts to transportation:

- Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?
- Would the project conflict with or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?
- Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
- Would the project result in inadequate emergency access or access to nearby uses?

The following thresholds are derived from Riverside County's Environmental Assessment Checklist, which incorporate the current Appendix G thresholds pursuant to the 2018 changes to the CEQA Guidelines, in order to evaluate the significance of the proposed Project's impacts on transportation. The proposed Project would result in a significant impact to transportation if the Project or any Project-related component would:

- a. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities;
- b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b);
- *c.* Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment);
- d. Cause an effect upon, or a need for new or altered maintenance of roads;
- e. Cause an effect upon circulation during the project's construction;
- f. Result in inadequate emergency access or access to nearby uses;
- g. Include the construction or expansion of a bike system or bike lanes; or

The significance thresholds set forth in Riverside County's Environmental Assessment Checklist, as modified/updated per the 2018 updates to the CEQA Guidelines, were used to evaluate the significance of the proposed Project's impacts on transportation.

B. <u>Thresholds of Significance for Vehicle Miles Travelled (VMT)</u>

1. Screening Thresholds

The County Guidelines describe that a project may be determined to have a less-than-significant impact and may be screened out of requiring a project level VMT analysis if it meets at least one of the following County Screening Criteria: Small Projects Screening; High Quality Transit Areas (HQTA) Screening; Local Serving Retail; Affordable Housing; Local Essential Service; or Map-Based Screening. A land use project only needs to meet one of these criteria to result in a less than significant impact. The below three screening criteria were selected for further review and analysis based on their applicability to the Project. (Urban Crossroads, 2022, p. 2)

2. VMT Metric and Significance Threshold

As stated in the County Guidelines, for industrial land use projects that do not meet any of the screening criteria, the analysis should utilize the efficiency metric of VMT per employee. The County Guidelines indicate the following significance threshold for other employment (i.e, non-office) land uses: (Urban Crossroads, 2022, p. 4)

"A project would result in a significant project generated VMT impact if its VMT exceeds the existing county-wide average Work VMT per employee." For the County of Riverside, the countywide average Work VMT per employee is **14.2 Work VMT per employee**."



3. VMT Modeling

The County's Guidelines identify Riverside Transportation Analysis Model (RIVTAM) as the appropriate tool for conducting VMT analysis for land development projects in the County of Riverside. RIVTAM is a useful tool to estimate VMT as it considers interaction between different land uses based on socio-economic data such as population, households, and employment. RIVTAM is a travel forecasting model that represents a sub-area (Riverside County) of the SCAG regional traffic model. RIVTAM was designed to provide a greater level of detail and sensitivity in the Riverside County area as compared to the regional SCAG model. (Urban Crossroads, 2022, p. 4)

4.18.4 IMPACT ANALYSIS

Threshold a: Would the Project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

This response provides an analysis of the Project's potential to result in a conflict with plans, programs, ordinances, or policies that address the circulation system, including transit, roadway, bicycle, and pedestrian facilities. A project that generally conforms with, and does not obstruct, applicable plans, programs, ordinances, and policies is considered to be consistent with such plans, programs, ordinances, and policies. The transportation plans, policies, programs, ordinances, and standards that are relevant to the Project are identified in the analysis below.

<u>Connect SoCal</u>

As previously noted, SCAG has published a draft 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), referred to as "Connect SoCal." Connect SoCal seeks to improve mobility, promote sustainability, facilitate economic development, and preserve the quality of life for the residents in the region. The long-range visioning plan balances future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health. The goals included in Connect SoCal are pertinent to the proposed Project. These goals are meant to provide guidance for considering the proposed Project within the context of regional goals and policies. An analysis of the Project's consistency with the relevant goals of Connect SoCal is presented below in Table 4.18-1, *Analysis of Consistency with Connect SoCal Goals*. As indicated, the Project would not conflict with any Connect SoCal goals, and no impact would occur.

Goal	Goal Statement	Project Consistency Discussion
1.	Encourage regional economic prosperity and global competitiveness.	<u>Consistent.</u> This policy would be implemented by the cities and counties within the SCAG region as part of comprehensive local and regional planning efforts. The Project would support this goal by providing employment-generating land uses (i.e., warehouse uses) in a portion of the County that has a low jobs-to-housing ratio.
2.	Improve mobility, accessibility, reliability, and travel safety for people and goods.	<u>Consistent.</u> The Project's TA (EIR <i>Technical Appendix L2</i>) identify requires transportation facility improvements, fee payments, and fair-share contributions. Mandatory compliance with the

 Table 4.18-1
 Analysis of Consistency with Connect SoCal Goals



Goal	Goal Statement	Project Consistency Discussion
		recommendations of the Project's TA, as would be required as conditions of Project approval, would ensure that the Project does not degrade mobility, accessibility, reliability, or travel safety for people and goods.
3.	Enhance the preservation, security, and resilience of the regional transportation system.	<u>Consistent.</u> This policy would be implemented by the cities and counties within the SCAG region as part of comprehensive local and regional planning efforts. There are no components of the proposed Project that would adversely affect the preservation, security, or resilience of the regional transportation system, and the Project Applicant would contribute fees towards regional improvements required in the Project vicinity. Furthermore, the Project would entail roadway and intersection improvements consistent with the County General Plan Circulation Element, Mead Valley Area Plan (MVAP), and the Riverside County Road Standards (Ordinance No. 461).
4.	Increase person and goods movement and travel choices within the transportation system.	<u>Consistent.</u> This policy would be implemented by the cities and counties within the SCAG region as part of the overall planning and maintenance of the regional transportation system. The Project would expand facilities for goods movement in the local area, and would construct or contribute fees towards regional transportation improvements. Additionally, the intensity of the proposed Project would facilitate expanded transit service in the local area.
5.	Reduce greenhouse gas emissions and improve air quality.	<u>Consistent.</u> This policy would be implemented by the cities and counties within the SCAG region as part of comprehensive transportation planning efforts. The Project would entail development of one 591,203 s.f. light industrial warehouse building in a portion of Riverside County that experiences a relatively low jobs-to-housing ratio; thus, the Project would serve to reduce worker commute times in the local area by providing jobs in close proximity to housing. Additionally, and as discussed in EIR Subsections 4.3, <i>Air Quality</i> , and 4.8, <i>Greenhouse Gas Emissions</i> , the Project would be required to implement mitigation measures to reduce air quality and greenhouse gas emissions to below a level of significance.
6.	Support healthy and equitable communities.	<u>Consistent.</u> An analysis of the Project's environmental impacts is provided throughout this EIR, and mitigation measures are specified where warranted. Air quality is addressed in EIR Subsection 4.3, <i>Air Quality</i> , which identifies mitigation measures to reduce air quality emissions to below a level of significance. Additionally, the Project would implement trails, sidewalks, and bike lane improvements along the Project site's frontages with abutting roadways in a manner that is consistent with Riverside County General Plan. The Project study area is within the service area of the Riverside Transit Authority (RTA), a public transit agency serving various jurisdictions within Riverside County. The Project would not conflict with any existing or planned RTA routes,

Table 4.18-1 Analysis of Consistency with Connect SoCal Goals



Goal	Goal Statement	Project Consistency Discussion
		and in fact the intensity of the proposed Project would help support a future expansion of transit routes in the local area. Additionally, the Project would be consistent with or otherwise would not conflict with any applicable General Plan policies or requirements, including policies and requirements included in the General Plan's Healthy Communities Element, as demonstrated in EIR <i>Technical</i> <i>Appendix N</i> . Thus, the Project would facilitate the establishment of healthy and equitable communities.
7.	Adapt to a changing climate and support an integrated regional development pattern and transportation network.	<u>Consistent.</u> This policy would be implemented by the cities and counties within the SCAG region as part of comprehensive transportation planning efforts. As indicated in EIR Subsection 4.8, <i>Greenhouse Gas Emissions</i> , the Project would be conditioned to ensure full compliance with the Riverside County CAP, thereby demonstrating that the Project would assist the County in meeting its greenhouse gas reduction targets. The Project also would be conditioned to construct transportation improvements and/or contribute fees towards improving the regional transportation network.
8.	Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	Not Applicable. This policy provides guidance to the County to leverage new transportation technologies and data-driven solutions that result in more efficient travel. There are no components of the proposed Project that would preclude the County's ability to implement this goal.
9.	Encourage development of diverse housing types in areas that are supported by multiple transportation options.	Not Applicable. This policy would be implemented by the cities and counties within the SCAG region as part of comprehensive transportation planning efforts. The Project's TPM will establish 3 residential lots but residential home construction is not proposed on the lots, and therefore has no potential to conflict with this goal.
10.	Promote conservation of natural and agricultural lands and restoration of habitats.	<u>Consistent.</u> As indicated in EIR Subsection 4.4, <i>Biological</i> <i>Resources</i> , none of the vegetation communities identified on site or within the Project's off-site improvement areas are considered sensitive. Additionally, as discussed in EIR Subsection 4.2, <i>Agriculture and Forestry Resources</i> , the Project site is not mapped as containing any Prime Farmland, Statewide Important Farmland, or Unique Farmland. Additionally, the Project site is designated by the Riverside County General Plan for future development with urban land uses, and therefore the Project site is not suitable for conservation as agricultural land.

Table 4.18-1 Analysis of Consistency with Connect SoCal Goals

(SCAG, 2020, p. 9)

Riverside County Congestion Management Program

The intent of a Congestion Management Program (CMP) is to more directly link land use, transportation, and air quality, thereby prompting reasonable growth management programs that will effectively utilize new transportation funds, alleviate traffic congestion and related deficiencies, and improve air quality. The County



of Riverside CMP became effective with the passage of Proposition 111 in 1990 and most recently updated in 2019 as part of the Riverside County Long Range Transportation Study. The Riverside County Transportation Commission (RCTC) adopted the 2019 CMP for the County of Riverside in December 2019. There are no study area intersections identified as a Riverside County CMP intersection (Urban Crossroads, 2023f, p. 6). Accordingly, the Project would not result in a conflict with the Riverside County CMP and impacts would be less than significant.

<u>Riverside County General Plan Circulation Element</u>

The Riverside County General Plan Circulation Element establishes several goals and policies related to transportation network that are applicable to development projects. As indicated in the analysis presented in the Project's General Plan Consistency Analysis, included as EIR *Technical Appendix N*, the Project would not conflict with any applicable policies or requirements of the Riverside County General Plan Circulation Element, including policies and requirements related to transit, roadway, bicycle, and pedestrian facilities. Accordingly, impacts due to a conflict with the General Plan Circulation Element would be less than significant.

<u>Threshold b:</u> Would the Project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

As previously noted, changes to the CEQA Guidelines were adopted in December 2018, which require all lead agencies to adopt VMT as a replacement for automobile delay-based LOS as the measure for identifying transportation impacts for land use projects. This statewide mandate went into effect July 1, 2020, consistent with SB 743. To comply with SB 743 the County of Riverside adopted their *Transportation Analysis Guidelines for Level of Service Vehicle Miles Traveled* in December 2020 (herein, "County Guidelines"). The adopted County Guidelines have been utilized to conduct an analysis of the Project's impacts due to VMT. (Urban Crossroads, 2022, p. 2)

A. <u>Screening Criteria</u>

The County Guidelines describe that a project may be determined to have a less than significant impact and may be screened out of requiring a project level VMT analysis if it meets at least one of the previously mentioned County Screening Criteria. The below three screening criteria were selected for further review and analysis based on their applicability to the Project. (Urban Crossroads, 2022, p. 2)

• <u>Small Project Screening</u>. Projects that generate fewer than 110 daily vehicle trips or projects that are below 3,000 Metric Tons of Carbon Dioxide Equivalent (MTCO₂e) per year are considered to have a less-than-significant impact due to VMT. Based on County guidelines, total daily vehicle trips generated by an industrial warehouse greater than 500,000 s.f. would exceed the County's 110 daily vehicle trip threshold. Additionally, County guidelines identify that warehouse buildings (without refrigeration) below 208,000 square feet in total building size are expected to generate fewer than 3,000 MTCO₂e per year and would be considered less than significant. The Project proposes square footages above the County's available sizes for screening purposes for the warehousing component, and therefore the Project does not meet this threshold. County Guidelines identify single family dwelling unit projects having fewer than 110 units are expected to generate fewer than 3,000 MTCO₂e per year.



Because the Project's proposed TPM would establish three residential lots in the western portion of the Project site, the residential component of the Project would meet the screening threshold. Thus, Small Project/Low GHG Emissions based screening criteria is met only for the residential component, and is not met for the Project's warehousing component. (Urban Crossroads, 2022, pp. 2-3)

- <u>High-Quality Transit Areas (HQTA) Screening</u>. The County Guidelines indicate that projects located within a Transit Priority Area (TPA) (i.e. within ½ mile of an existing "major transit stop" or an existing stop along a "high-quality transit corridor") may be presumed to have a less than significant impact. The Project site is not located within ½-mile of an existing major transit stop, or along a high-quality transit corridor; thus, this screening threshold is not met for either the residential or the warehousing components of the Project. (Urban Crossroads, 2022, p. 3)
- <u>Map-Based Screening</u>. County Guidelines indicate that "residential and office projects that locate in areas with low VMT, and that incorporate similar features (i.e., density, mix of uses, transit accessibility), will tend to exhibit similarly low VMT." County Guidelines also state that the use of map-based screening for low VMT generating areas is also applicable for other employment uses, such as the Project's industrial development. Urban Crossroads obtained a VMT data table from County Staff for all traffic analysis zones (TAZs) within Riverside County that identifies VMT per capita and VMT per employee for the purposes of identifying of low VMT areas. The data utilizes the subregional Riverside Transportation Analysis Model (RIVTAM) to measure baseline VMT performance for individual TAZs, and a comparison was made to the applicable impact threshold (e.g., VMT per employee for office or industrial land uses and VMT per capita for residential land uses). The Project is located within TAZ 3731, which is shown to generate 17.22 VMT per employee (Warehouse) and 16.38 VMT per capita (Residential). The County threshold is 14.2 VMT per employee (Warehouse) and 15.2 VMT per capita (Residential). As such, the map-based screening criteria is not met for the residential or the warehousing components of the Project. (Urban Crossroads, 2022, pp. 3-4)

Because the residential component of the Project (the three residential lots that would be established in the western portion of the Project site) meets the Small Project screening criteria, it is not subject to further VMT analysis. However, the industrial warehousing component was not found to meet any of the above-described available screening criteria as outlined in the County Guidelines. Therefore, further VMT analysis only is required for the warehousing component of the Project and is discussed below. (Urban Crossroads, 2022, p. 4)

B. <u>VMT Analysis</u>

Provided below is an analysis of the Project's warehousing uses and its potential effects on VMT. As previously noted, impacts due to VMT would be considered significant if the Project's work VMT per employee exceeds the Countywide average of 14.2 VMT per employee.

1. Project Land Use Conversion

In order to evaluate Project Work VMT per employee, land use information such as building square footage must first be converted into a RIVTAM compatible dataset. The RIVTAM model utilizes socio-economic data ("SED"; e.g., population, households, employment, etc.) instead of land use information for purposes of commute VMT estimation. Project employees are estimated by taking total building square footage divided by



an appropriate employment factor based on standard employment factors outlined by the County of Riverside's General Plan. According to Appendix E to the County's General Plan, light industrial uses generate approximately one employee per 1,030 s.f. of building area. As such, the Project would provide jobs for approximately 574 employees (591,203 s.f. \div 1,030 s.f./employee = 573.9 employees). (Riverside County, 2021a, Appendix E, Table E-5)

2. Project's Work VMT and Comparison to Impact Threshold

For industrial land uses the efficiency metric VMT per employee is used to evaluate Project Work VMT. VMT per employee is derived by dividing Project-generated VMT by the number of estimated Project employees to obtain the efficiency metric of Work VMT per employee. Table 4.18-2, *Project Work VMT Per Employee*, presents Work VMT for the Project's TAZ for baseline conditions, the estimated number of Project employees, and the resulting efficiency metric Work VMT per employee. As shown, the Project would generate approximately 16.8 work VMT per employee. (Urban Crossroads, 2022, p. 5)

ProjectHome-based Work VMT9,642Employment574Work VMT per Employee16.8

Table 4.18-2 Project Work VMT Per Employee

(Urban Crossroads, 2022, Table 2)

Table 4.18-3 *Project VMT Per Employee Comparison*, provides the comparison between Project VMT per employee and the County's significance threshold of 14.2 VMT per employee. As shown, the Project-generated Work VMT per employee of 16.8 would exceed the County's adopted threshold of 14.2 by approximately 18.3%. Therefore, the Project would conflict with or be inconsistent with CEQA Guidelines § 15064.3(b), which represents a significant of the proposed Project. (Urban Crossroads, 2022, p. 5)

Table 4.18-3 Project VMT Per Employee Comparison

	Baseline
County Threshold	14.2
Project	16.8
Percent Above Threshold	+18.31%
Potentially Significant?	Yes
(Urban Crossroads, 2022, Table 3)	

3. Project's Total VMT Calculation and Comparison to Impact Threshold

Urban Crossroads also analyzed the Project's total VMT for all vehicle types (i.e., both passenger cars and trucks) and all trip purposes. Total VMT is estimated utilizing total vehicle trips consistent with the Project's greenhouse gas analysis (EIR *Technical Appendix G*) multiplied by the average trip length for each vehicle type. Average vehicle trip length for passenger cars is obtained from RIVTAM's Origin/Destination (OD) trip matrices. The OD method for calculating VMT sums all weekday VMT generated by trips with at least one trip end in the study area and tracks those trips to their estimated origins/destinations. The average trip length



for passenger cars as obtained from RIVTAM is 15.14 miles. The average trip length for light heavy-duty trucks (LHDT) and heavy heavy-duty trucks (HHDT) is obtained from the South Coast Air Quality Management District's (SCAQMD) Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce emissions (WAIRE) Program. SCAQMD's Rule 2305 is based on a 15.3-mile trip length for LHDT and 39.9-mile trip length for HHDT. Table 4.18-4, *Project Total VMT*, indicates that the Project's total VMT is 22,261 miles. (Urban Crossroads, 2022, pp. 5-6)

Table 4.18-4 Project Total VMT

	Project
Automobile VMT	15,685
Truck VMT	6,576
Total VMT	22,261
(Urban Crossroads, 2022, Table 4)	1

VMT per Service Population (SP) is calculated by utilizing the total VMT for the Project divided by the Project warehousing component's SP, which in this case is the number of Project employees. Table 4.18-5, *Project Total VMT Per SP*, shows the Project's total VMT per SP. (Urban Crossroads, 2022, p. 6)

Table 4.18-5 Project Total VMT Per SP

	Project
SP	574
Total VMT	22,261
Total VMT per SP	38.78
(Urban Crossroads, 2022, Table 5)	

Table 4.18-6, *Project VMT Per SP Comparison*, compares the Project's total VMT per SP to the applicable regional impact threshold. Although not specified by County Guidelines, consistent with other impact thresholds already utilized by the County, it is reasonable to assume that a project with a total VMT per SP that exceeds the existing jurisdictional average total VMT per SP would result in a potentially significant impact. Because County Guidelines do not utilize the VMT per SP metric and would therefore not include an associated impact threshold for this metric, a suitable impact threshold was instead obtained from information previously published by the WRCOG. The average VMT per SP for the RIVTAM base year model for the unincorporated WRCOG region is 37.87.

Table 4.18-6 Pro	oject VMT Per S	P Comparison
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	Baseline
Regional Threshold	37.87
Project	38.78
Percent Above Threshold	+2.40%
Potentially Significant?	Yes
(Urban Crossroads, 2022, Table 6)	



As shown, the Project generated VMT per SP (38.78) would exceed the WRCOG threshold of 37.87 by 2.40%. Therefore, the Project would conflict with or be inconsistent with CEQA Guidelines § 15064.3(b), which represents a significant of the proposed Project. (Urban Crossroads, 2022, p. 6)

Threshold c: Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?

Roadway improvements proposed as part of the Project would be limited to frontage improvements along Rider Street, Patterson Avenue, and Walnut Street. All physical improvements planned as part of the Project would be in conformance with applicable Riverside County standards, and there are no components of the Project's proposed frontage improvements that would create hazards due to a geometric design feature. No impact would occur.

Under existing conditions, land uses surrounding the Project site include residential uses to the north; residential, church, and warehouse uses to the east; residential uses to the south; and an existing mediumdensity residential community to the west. Although the Project's truck traffic has the potential to conflict with traffic from residential uses, particularly residential uses to the west and south, the Project has been designed to locate the access driveways into the site along Patterson Avenue and Rider Street, and away from the existing residential uses to the west and south. The Project's truck traffic primarily would be routed to the I-215 along Patterson Avenue via Patterson Avenue, and to Harvill Avenue via Rider Street. No Project traffic would be routed to the west on Walnut Street. Furthermore, the Project area already is developed with a number of warehouses, all of which also generate truck traffic. Therefore, the Project would not substantially increase hazards due to incompatible uses, and impacts would be less than significant.

Threshold d: Would the Project cause an effect upon, or a need for new or altered maintenance of roads?

Implementation of the proposed Project would generate traffic along local roadways, and therefore would incrementally increase the need for maintenance of local roadway facilities. Although the Project would result in the increased maintenance of roadways and would increase traffic on existing and planned roadways, any incremental increase in the need to maintain public roadway facilities would be offset by tax revenue generated by the Project's proposed land uses. There are no components of the proposed Project that would result in or require a substantial increase in expenditures by Riverside County for public road maintenance such that environmental impacts would result. As such, Project impacts would be less than significant.

<u>Threshold e:</u> Would the Project cause an effect upon circulation during the Project's construction?

As part of the Project, improvements would be made to roadways abutting the Project site, including Rider Street, Patterson Avenue, and Walnut Street. The Project has the potential to adversely impact circulation in the local area during the construction of proposed improvements to these roadways. This is conservatively evaluated as a significant impact for which mitigation would be required in the form of a traffic control plan for implementing developments.



Threshold f: Would the Project result in inadequate emergency access or access to nearby uses?

Under long-term operating conditions, the Project would have no effect on emergency access in the local area, and impacts would be less than significant. However, during proposed frontage improvements to Rider Street, Patterson Avenue, and Walnut Street, there is a potential that the Project could adversely affect emergency access or access to nearby uses. This is conservatively evaluated as a significant impact for which mitigation would be required in the form of a traffic control plan for implementing developments.

Threshold g: Would the Project include the construction or expansion of a bike system or bike lanes?

As part of the Project, frontage improvements would occur along Patterson Avenue, Walnut Street, and Rider Street, with a sidewalk and community trail proposed along Patterson Avenue and Walnut Street and a sidewalk proposed along Rider Street. Impacts associated with the construction of these trail segments are inherent to the Project's construction phase, and have been evaluated throughout this EIR under the appropriate subject heading (e.g., biological resources, etc.). There would be no impacts to the environment specifically related to the construction of the Project's frontage improvements that have not already been evaluated and mitigated for throughout this EIR. Accordingly, impacts would be less than significant.

4.18.5 CUMULATIVE IMPACT ANALYSIS

This cumulative impact analysis considers development of the proposed Project in conjunction with other development projects and planned development that would occur with buildout of the Riverside County General Plan and the general plans of local jurisdictions within the County, and that are within the study area identified by the Project's TA (*Technical Appendix L2*).

The analysis of Threshold a. demonstrates that the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Specifically, there are no components of the Project that would conflict with Connect SoCal, the Riverside County CMP, or the Riverside County General Plan Circulation Element. Accordingly, the Project has no potential to result in cumulatively-considerable impacts due to a conflict with a program, plan, ordinance, or policy addressing the circulation system.

As indicated under the analysis of Threshold b., the Project would generate approximately 16.8 VMT per employee, which would exceed the County threshold by 18.31%, representing a significant impact. The Project's total VMT per SP would be approximately 38.78, which would exceed the identified threshold of significance of 37.87 by 2.40%, also representing a significant impact. As other projects within the cumulative study area also have the potential to result in impacts due to VMT, the Project's impacts due to VMT would be cumulatively considerable.

As indicated under the analysis of Threshold c., all physical improvements planned as part of the Project would be in conformance with applicable Riverside County standards. Other cumulative developments would similarly be required to demonstrate to Riverside County that no unsafe geometric design features would result. Additionally, the Project's land uses are generally compatible with existing and planned uses in the surrounding area, and Project-related truck traffic would be routed away from Walnut Street which abuts



existing residential uses. Accordingly, cumulatively-considerable impacts due to a geometric design feature or incompatible use would be less than significant.

Tax revenue generated by the Project and cumulative developments would offset any increased need for roadway maintenance as a result of new development within Riverside County. There are no components of the proposed Project or other cumulative developments within the Project vicinity that would result in or require a substantial increase in expenditures by Riverside County for public road maintenance such that environmental impacts would result. As such, impacts would be less-than-cumulatively considerable.

As indicated under the analysis of Threshold e., construction activities associated with the Project have the potential to affect circulation during improvements along Rider Street, Patterson Avenue, and Walnut Street. As other cumulative developments in the local area similarly could result in road closures or other adverse effects to circulation, the Project's potential near-term impacts during improvements to Rider Street, Patterson Avenue, and Walnut Street would be cumulatively considerable.

As discussed under the analysis of Threshold f., under long-term operating conditions, the Project would have no effect on emergency access in the local area, and impacts would be less than significant. However, during proposed improvements to Rider Street, Patterson Avenue, and Walnut Street, there is a potential that the Project could adversely affect emergency access or access to nearby uses. As other cumulative developments similarly could obstruct emergency access in the local area, Project impacts would be cumulatively considerable.

As discussed under the analysis of Threshold g., as part of the Project, frontage improvements would occur along Patterson Avenue, Walnut Street, and Rider Street, with a sidewalk and community trail proposed along Patterson Avenue and Walnut Street and a sidewalk proposed along Rider Street. Cumulatively-considerable impacts associated with the construction of these trail segments are inherent to the Project's construction phase, and have been evaluated throughout this EIR under the appropriate subject heading (e.g., biological resources, etc.). Where impacts were identified, mitigation measures have been identified to reduce impacts to the maximum feasible extent. Accordingly, cumulatively-considerable impacts associated with the construction of the proposed community trail would be less than significant.

4.18.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

<u>Threshold a: Less-than-Significant Impact.</u> The proposed Project would be fully consistent with Connect SoCal, the Riverside County CMP, and the Riverside County General Plan Circulation Element. There are no components of the proposed Project that would conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, or pedestrian facilities. Impacts would be less than significant.

<u>Threshold b.: Significant Direct and Cumulatively-Considerable Impact</u>. The Project would generate approximately 16.8 VMT per employee, which would exceed the County threshold by 18.31%. The Project's total VMT per SP would be approximately 38.78, which would exceed the identified threshold of significance of 37.87 by 2.40%. Therefore, the Project would conflict with or be inconsistent with CEQA Guidelines § 15064.3(b), which represents a significant of the proposed Project.


<u>Threshold c.: Less-than-Significant Impact</u>. All physical improvements planned as part of the Project would be in conformance with applicable Riverside County standards. Although the Project's truck traffic has the potential to conflict with traffic from residential uses, particularly residential uses to the west and south, the Project has been designed to locate the access driveways into the site along Patterson Avenue and Rider Street, and away from the existing residential uses to the west and south. Furthermore, the Project area already is developed with a number of warehouses, all of which also generate truck traffic. Therefore, the Project would not substantially increase hazards due to incompatible uses, and impacts would be less than significant.

<u>Threshold d.: Less-than-Significant Impact</u>. Although the Project would result in the increased maintenance of roadways and would increase traffic on existing and planned roadways, any incremental increase in the need to maintain public roadway facilities would be offset by tax revenue generated by the Project's proposed land uses. There are no components of the proposed Project that would result in or require a substantial increase in expenditures by Riverside County for public road maintenance such that environmental impacts would result. As such, Project impacts would be less than significant.

<u>Threshold e.: Significant Direct and Cumulatively-Considerable Impact</u>. As part of the Project, improvements would be made to roadways abutting the Project site, including Rider Street, Patterson Avenue, and Walnut Street. The Project has the potential to adversely impact circulation in the local area during the construction of proposed improvements to these roadways. This is conservatively evaluated as a significant impact for which mitigation would be required in the form of a traffic control plan for implementing developments.

<u>Threshold f.: Significant Direct and Cumulatively-Considerable Impact</u>. Under long-term operating conditions, the Project would have no effect on emergency access in the local area, and impacts would be less than significant. However, during proposed frontage improvements to Rider Street, Patterson Avenue, and Walnut Street, there is a potential that the Project could adversely affect emergency access or access to nearby uses. This is conservatively evaluated as a significant impact for which mitigation would be required in the form of a traffic control plan for implementing developments.

<u>Threshold g.: Less-than-Significant Impact</u>. As part of the Project, frontage improvements would occur along Patterson Avenue, Walnut Street, and Rider Street, with a sidewalk and community trail proposed along Patterson Avenue and Walnut Street and a sidewalk proposed along Rider Street. Impacts associated with the construction of these trail segments are inherent to the Project's construction phase, and have been evaluated throughout this EIR under the appropriate subject heading (e.g., biological resources, etc.). There would be no impacts to the environment specifically related to the construction of the Project's frontage improvements that have not already been evaluated and mitigated for throughout this EIR. Accordingly, impacts would be less than significant.

4.18.7 APPLICABLE REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

Applicable Regulations and Design Requirements

The following are applicable regulations and design requirements that apply to the proposed Project and that reduce or preclude transportation impacts. Although compliance with mandatory regulatory requirements does not technically meet CEQA's definition for mitigation, they are specified herein as requirements for the Project.



- Prior to issuance of building permits, the Project Applicant shall pay appropriate Development Impact Fee Program (DIF) fees at the rates then in effect in accordance with Riverside County Ordinance No. 659.
- Prior to final building inspection, the Project Applicant shall pay appropriate Western Riverside County Transportation Uniform Mitigation Fee Program Ordinance (TUMF) fees at the rates then in effect in accordance with Riverside County Ordinance No. 824.

Mitigation

- MM 4.18-1 Prior to the issuance of grading permits or improvement plans affecting public streets, the Project Applicant shall prepare and Riverside County shall approve a temporary traffic control plan. The temporary traffic control plan shall comply with the applicable requirements of the California Manual on Uniform Traffic Control Devices (CMUTD). A requirement to comply with the temporary traffic control plan shall be noted on all grading and building plans and also shall be specified in bid documents issued to prospective construction contractors.
- MM 4.18-2 Required Commute Trip Reduction Program: Future building lease or sales agreements shall include a requirement to implement a voluntary program to discourage single-occupancy vehicle trips for employees and encourage alternative modes of transportation such as carpooling, taking transit, walking, and biking. Examples of potential Commute Trip Reduction (CTR) program features include the following:
 - a. Designated Employee Transportation Coordinator (ETC): Identify an Employee Transportation Coordinator (ETC) as part of future site operations. The role of ETC is to provide education and point of contact for commute-related questions and commuter benefits.
 - b. Marketing of Commuter Benefits for Employees: Provide commuter benefit materials to new hires. Additionally, provide an on-site message board (physical or digital) to educate employees of commuter benefits.
 - c. Pre-Tax Transit Pass Benefits: Provide employees access to WageWorks (or comparable) to purchase transit passes or other approved commuter expenses pre-tax.
 - d. Bicycle Parking: Provide on-site secure bike parking facilities and storage lockers.
 - e. Carpool and Vanpool Ride-Matching Services: Provide information about Waze Carpool and other carpool/vanpool ride-matching services to employees.
 - f. Preferential Parking: Provide preferential carpool/vanpool parking spaces to encourage carpooling, vanpools, and clean air electric vehicles.
 - g. Guaranteed Ride Home (GRH) Program. Establish a GRH program for employees that arrive to work by carpool, vanpool, or transit and need to leave work early or are unable to use normal commute accommodations. The GRH Program can be provided via local transportation network companies.



4.18.8 SIGNIFICANCE OF IMPACTS AFTER MITIGATION

Threshold b.: Significant and Unavoidable Direct and Cumulatively-Considerable Impact. As the future building tenants are not known for the Project, the effectiveness of any potential commute trip reduction measure may be limited. In addition to specific tenancy considerations, locational context is also a major factor relevant to the potential application and effectiveness of Transportation Demand Management (TDM) measures. A project may only realize a quantifiable reduction in commute VMT under the most favorable circumstances and ideal local conditions when implementing trip reduction measures. In practical terms, ideal conditions are rarely realized due to variables such as locational context limitations (i.e., non-urban areas). Additionally, to achieve ideal conditions a project must achieve one hundred percent employee participation, and maximum employee eligibility, which are not generally expected. This is more difficult to presume since future building tenants are not known at this time. Although the Project's VMT, the effectiveness of commute trip reduction measures such as those listed in Mitigation Measure MM 4.18-2, which would serve to reduce the Project's VMT, the effectiveness of commute trip reduction measures such as those listed in Mitigation Measure MM 4.18-2 cannot be guaranteed to reduce Project VMT to a level of less than significant. No additional feasible mitigation measures are available to measurable reduce the Project's VMT impact is considered significant and unavoidable.

<u>Threshold e.: Less-than-Significant Impact with Mitigation Incorporated</u>. Mitigation Measure MM 4.18-1 requires the Project Applicant to prepare and obtain Riverside County approval of a temporary traffic control plan prior to issuance of grading permits or improvement plans affecting Rider Street, Patterson Avenue, pr Walnut Street. Implementation of the required mitigation would ensure that Project-related construction activities would not substantially affect circulation during the Project's construction. With implementation of the required mitigation, impacts would be reduced to less-than-significant levels.

<u>Threshold f.: Less-than-Significant Impact with Mitigation Incorporated</u>. Mitigation Measure MM 4.18-1 requires the Project Applicant to prepare and obtain Riverside County approval of a temporary traffic control plan prior to issuance of grading permits or improvement plans affecting Rider Street, Patterson Avenue, or Walnut Street. With implementation of the required mitigation, the Project would not result in inadequate emergency access or access to nearby uses during construction of improvements along Martin Street. Accordingly, with implementation of the required mitigation, impacts would be reduced to less-than-significant levels.



4.19 TRIBAL CULTURAL RESOURCES

The analysis in this Subsection 4.19 is based in part on a site-specific Cultural Resources Assessment (herein, "CRA") prepared by BFSA Environmental Services (BFSA), entitled, "A Phase I Cultural Resources Assessment for the Rider and Patterson Project," dated November 17, 2022, and included as *Technical Appendix D* to this EIR (BFSA, 2022a). All references used in this subsection are included in EIR Section 7.0, *References*. It should be noted that confidential information has been redacted from *Technical Appendix D* for purposes of public review. In addition, much of the written and oral communication between Native American tribes, unincorporated Riverside County, and BFSA is considered confidential in respect to places that have traditional tribal cultural significance (Gov. Code § 65352.4), and although relied upon in part to inform the preparation of this EIR subsection, those communications are treated as confidential and are not available for public review. Under existing law, environmental documents must not include information about the location of archaeological sites or sacred lands or any other information that is exempt from public disclosure pursuant to the Public Records Act (CCR § 15120(d)).

4.19.1 EXISTING CONDITIONS

Refer to Subsection 4.5, *Cultural Resources*, for a description of the pre/protohistoric period setting for the Inland Empire region and the Mead Valley area of unincorporated Riverside County.

A. <u>Project Site Conditions</u>

BFSA Principal Investigator Brian F. Smith directed the pedestrian surveys of the Project on January 27, 2022 and October 5, 2022, with the assistance of Senior Field Archaeologist Clarence Hoff. In addition, Armando Lerma, a representative from the Pechanga Band of Luiseño Mission Indians, and Frankie Morrero, a representative from the Soboba Band of Luiseño Indians, voluntarily participated in the survey of the Project site. In general, the Project site topography was noted as relatively flat and heavily modified. Evidence of machine-fractured granite was visible across most of the Project site. During the survey, ground visibility was characterized as moderate to good due to past development, residential structures, and limited vegetation (more than 70 percent). Dirt mounds, ripped granitic outcrops, and piles of broken bedrock were identified, which indicate a high level of previous disturbance across the Project site. The survey did not identify any prehistoric sites. (BFSA, 2022a, pp. 4.0-2 - 4.0-3)

4.19.2 REGULATORY SETTING

A. <u>State Regulations</u>

1. Traditional Tribal Cultural Places Act (Senate Bill 18, "SB 18")

Senate Bill 18 (SB 18) requires local (city and county) governments to consult with California Native American tribes to aid in the protection of traditional tribal cultural places ("cultural places") through local land use planning. SB 18 also requires the Governor's Office of Planning and Research (OPR) to include in the General Plan Guidelines advice to local governments for how to conduct these consultations (OPR, 2005).

The intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places. The purpose of involving tribes at these early planning stages is to allow consideration of cultural places in the



context of broad local land use policy, before individual site-specific, project-level land use decisions are made by a local government.

SB 18 requires local governments to consult with tribes prior to making certain planning decisions and to provide notice to tribes at certain key points in the planning process. These consultation and notice requirements apply to adoption and amendment of both general plans (defined in Government Code § 65300 et seq.) and specific plans (defined in Government Code § 65450 *et seq.*). Although SB 18 does not specifically mention consultation or notice requirements for adoption or amendment of specific plans, existing state planning law requires local governments to use the same processes for adoption and amendment of specific plans as for general plans (see Government Code § 65453). Therefore, where SB 18 requires consultation and/or notice for a general plan adoption or amendment, the requirement extends also to a specific plan adoption or amendment.

2. Assembly Bill 52 (AB 52)

California Assembly Bill 52 (AB 52) (2014) Chapter 532 amended Section 5097.94 of, and added Sections 21073, 21074, 21080.3.1, 21080.3.2, 21802.3, 21083.09, 21084.2 and 21084.3 to the California Public Resources Code, relating to Native Americans. AB 52 was approved on September 25, 2014. The legislature added new requirements regarding tribal cultural resources in Assembly Bill 52 (AB 52). By including tribal cultural resources early in the CEQA process, the legislature intended to ensure that local and Tribal governments, public agencies, and project proponents would have information available, early in the project planning process, to identify and address potential adverse impacts to tribal cultural resources (OPR, 2017a). By taking this proactive approach, the legislature also intended to reduce the potential for delay and conflicts in the environmental review process.

The Public Resources Code now establishes that "[a] project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment." (Pub. Resources Code, § 21084.2.) To help determine whether a project may have such an effect, the Public Resources Code requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project. That consultation must take place prior to the determination of whether a negative declaration, mitigated negative declaration, or environmental impact report is required for a project (Pub. Resources Code, § 21080.3.1.).

If a lead agency determines that a project may cause a substantial adverse change to tribal cultural resources, the lead agency must consider measures to mitigate that impact. Public Resources Code § 20184.3 (b)(2) provides examples of mitigation measures that lead agencies may consider to avoid or minimize impacts to tribal cultural resources.

Section 21074 of the Public Resources Code defines "tribal cultural resources." In brief, in order to be considered a "tribal cultural resource," a resource must be either:

(1) listed, or determined to be eligible for listing, on the national, state, or local register of historic resources, or



(2) a resource that the lead agency chooses, in its discretion, to treat as a tribal cultural resource.

In the latter instance, the lead agency must determine that the resource meets the criteria for listing in the state register of historic resources. In applying those criteria, a lead agency must consider the value of the resource to the tribe. (OPR, 2017a)

3. State Health and Safety Code

California Health and Safety Code (HSC) § 7050.5(b) requires that excavation and disturbance activities must cease "In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery..." until the coroner can determine regarding the circumstances, manner, and cause of any death. The coroner is then required to make recommendations concerning the treatment and disposition of the human remains. Further, this section of the code makes it a misdemeanor to intentionally disturb, mutilate or remove interred human remains. § 7051 specifies that the removal of human remains from "internment or a place of storage while awaiting internment" with the intent to sell them or to dissect them with "malice or wantonness" is a public offense punishable by imprisonment in a state prison. Lastly, HSC §§ 8010-8011 establish the California Native American Graves Protection and Repatriation Act consistent with the federal law addressing the same. The Act stresses that "all California Indian human remains and cultural items are to be treated with dignity and respect." It encourages voluntary disclosure and return of remains and cultural items by publicly funded agencies and museums in California. It also outlines the need for aiding California Indian tribes, including non-federally recognized tribes, in filing repatriation claims.

4.19.3 Basis for Determining Significance

The Project would result in a significant impact to tribal cultural resources if the Project or any Project-related component would:

- a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
 - i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or
 - ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.



4.19.4 IMPACT ANALYSIS

Threshold a:Would the project cause a substantial adverse change in the significance of a tribal cultural
resource, defined in Public Resources Code section 21074 as either a site, feature, place,
cultural landscape that is geographically defined in terms of the size and scope of the
landscape, sacred place, or object with cultural value to a California Native American tribe,
and that is: (i) Listed or eligible for listing in the California Register of Historical Resources,
or in a local register of historical resources as defined in Public Resources Code section
5020.1(k), or (ii) a resource determined by the lead agency, in its discretion and supported
by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of
Public Resources Code Section 5024.1?

No prehistoric resource sites, features, places, or landscapes were identified on the surface of the Project site during field work conducted by BFSA in 2022 that are either listed or eligible for listing in the California Register of Historic Places. To be eligible for the Register, (Pub. Res. Code SS5024.1, Title 14 CCR, Section 4852), a resource must include the following:

- *A.* Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
- B. Is associated with the lives of persons important in our past;
- *C.* Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- *D*. Has yielded, or may be likely to yield, information important in prehistory or history.

No resources were identified on the Project site that meet any of the four criteria listed above to be eligible for the California Register and no prehistoric resource sites or isolates were found on the Project site. Furthermore, no substantial evidence was presented to or found by Riverside County led to the identification of any obvious known and physically identifiable resources on the Project site that in the County's discretion had the potential to be considered a tribal cultural resource. Tribal cultural resources, however, include resources with inherent tribal values that are difficult to identify through the same means as archaeological resources. These resources can be identified and understood through direct consultation with the tribes who attach tribal value to the resource. Tribal cultural resources may include Native American archaeological sites, but they may also include other types of resources such as a cultural landscape. Also relevant is the category termed "traditional cultural property" which is typically associated with cultural resource management performed under federal auspices. "Traditional" in this context refers to those beliefs, customs, and practices of a living community of people that have been passed down through the generations, usually orally or through practice. The traditional cultural significance of a historic property, then, is derived from the role the property plays in a community's historically rooted beliefs, customs, and practices. A traditional cultural property can be defined, generally, as one that is eligible for inclusion in the National Register of Historic Places (NRHP) because of its association with cultural practices or beliefs of a living community that (a) are rooted in that community's history, and (b) are important in maintaining the continuing cultural identity of the community. A landscape can be a traditional cultural property and by extension a tribal cultural resource, 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 having cultural affiliation.

As part of the AB 52 and SB 18 consultation processes required by State law, Riverside County sent notification of the Project to Native American tribes with possible traditional or cultural affiliation to Project site.

A. <u>AB 52</u>

In compliance with AB52, notices regarding the Project were mailed to all requesting tribes on March 1, 2022. No response was received from the Santa Rosa Band of Cahuilla Indians, Ramona Band of Cahuilla Mission Indians, Pala Band of Mission Indians, Cahuilla Band of Indians, or the Colorado River Indian Tribe. The Quechan Indian Nation responded in an email dated March 02, 2022, deferring consultation to closer tribes.

The Pechanga Band of Luiseño Indians responded in an emailed letter dated March 25, 2022, requesting consultation. In the letter the Pechanga Tribe stated that "the Project area is part of 'Ataaxum (Luisefio), and therefore the Tribe's, aboriginal territory as evidenced by the existence of cultural resources, named places, t6ota yixelval (rock art, pictographs, petroglyphs), and an extensive 'Ataaxum artifact record in the vicinity of the Project. This culturally sensitive area is affiliated with the Pechanga Band of Luisefio Indians because of the Tribe's cultural ties to this area as well as our extensive history with the County and other projects within the area." The Project documents were provided to the Pechanga Band of Luiseño Indians on November 18, 2022, and the Project's draft conditions of approval were sent to them on August 11, 2022. Consultation was concluded on January 19, 2023.

The Rincon Band of Luiseno Indians requested consultation on April 12, 2022. The County sent Project documents to the Rincon Band of Luiseno Indians on August 11, 2022, and consultation was concluded by the tribe on September 1, 2022.

The Agua Caliente Band of Cahuilla Indians requested to consult on April 8, 2022. The County sent Project documents to the Agua Caliente Band of Cahuilla Indians on August 11, 2022. The tribe concluded consultation on August 22, 2022.

B. <u>SB18</u>

The Traditional Tribal Cultural Places Bill of 2004 (SB18) requires local governments to consult with Native American representatives during the project planning process. The intent of this legislation is to encourage consultation and assist in the preservation of "Native American places of prehistoric, archaeological, cultural, spiritual, and ceremonial importance." It further allows for tribal cultural places to be included in open space planning. Because there is a General Plan Amendment as part of the proposed Project, a tribal consultation list and sacred lands file search request was sent to the Native American Heritage Commission (NAHC) on March 2, 2022. A response was received on April 15,



2022, with contact information for 18 tribal contacts. The Riverside County Planning Department sent letters to 10 tribes on March 1, 2022, and to two additional tribes on April 18, 2022.

The Torres Martinez Band of Desert Cahuilla Indians responded in an email dated April 19, 2022, deferring consultation to the Soboba Band. The Pechanga Band of Luiseño Indians responded in an emailed letter dated March 25, 2022, requesting consultation. The letter stated that the Project is situated within a Traditional Cultural Property (TCP). The County sent Project documents to the tribe on November 18, 2022, and the Project's draft conditions of approval were sent to them on August 11, 2022. Consultation was concluded on January 19, 2023.

The Soboba Band of Mission Indians requested to consult under SB18 on August 9, 2022. The County sent Project documents to the tribe on August 11, 2022, and consultation was concluded on January 19, 2023.

Aside from unanticipated subsurface resources being potentially found during Project-related grading activities, no specific impacts to Tribal Cultural Resources were identified by any or the tribes; therefore, there will be no impacts in this regard. However, the Project will be required to adhere to State Health and Safety Code Section 7050.5 in the unlikely 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), human 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 State Law and a standard condition of approval and is not considered a mitigation measure for the purposes of the Project.

In addition, CEQA requires the Lead Agency to address any unanticipated cultural resources discoveries during Project construction. Therefore, mitigation measures contained in EIR Subsection 4.5, *Cultural Resources*, dictates the procedures to be followed should any unanticipated cultural resources be identified during ground disturbing activities. This is a standard condition of approval and is not considered a mitigation measure for Tribal Cultural Resources for purposes of this Project.

4.19.5 CUMULATIVE IMPACT ANALYSIS

The potential for Project construction to result in cumulatively-considerable impacts to tribal, religious, and cultural resources were analyzed in conjunction with other projects located in western Riverside County that occur in the same tribal influence areas as the Project site. The other development projects within these areas would have a similar potential to uncover unanticipated subsurface cultural resources during construction activities. All projects are required to adhere to State Health and Safety Code Section 7050.5 in the unlikely event that human remains are encountered and by ensuring that no further disturbances 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), human remains are required be left in place and free from disturbance until a final decision as to the treatment and their disposition has been made. This is State Law and a standard condition of approval for all projects. Therefore, the potential for the Project to significantly impact tribal cultural resources is a less-than-significant cumulatively-considerable impact for which mitigation is not required.



4.19.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

<u>Threshold a. & b.: Less-than-Significant Impact.</u> The Project site does not contain any known tribal cultural resources. In the unlikely event that human remains are encountered during Project construction, mandatory compliance with State Health and Safety Code Section 7050.5 is required, which is a mandatory requirement and is not considered mitigation.

4.19.7 APPLICABLE REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

Applicable Regulations and Design Requirements

The following are regulations and design requirements that apply to the proposed Project and that reduce or preclude impacts to cultural resources. Although compliance with mandatory regulatory requirements does not technically meet CEQA's definition for mitigation, they are specified herein as requirements for the Project.

- Unless otherwise required by law, the site of any reburial of Native American human remains or associated grave goods shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act. The Coroner, pursuant to the specific exemption set forth in California Government Code Section 6254 (r), parties, and Lead Agencies, will be asked to withhold public disclosure information related to such reburial, pursuant to the specific exemption set forth in California Government Code 6254 (r).
- In the event that human remains are encountered during ground-disturbing construction activities on site or within the Project's off-site improvement areas, compliance with California Health and Safety Code § 7050.5 and Public Resources Code § 5097 et. seq. shall be required. State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the Riverside County Coroner has made the necessary findings as to origin. Further, pursuant to Public Resource Code Section 5097.98(b) remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. The County Coroner shall determine that no investigation of the cause of death is required, and determine if the remains are of Native American origin. In the event that the remains are determined to be of Native American origin, the Native American Heritage Commission (NAHC) shall be contacted within the period specified by law (24 hours). Subsequently, the Native American Heritage Commission shall identify the "Most Likely Descendant." The Most Likely Descendant shall then make recommendations and engage in consultation concerning the treatment of the remains as provided in Public Resources Code Section 5097.98. If the NAHC is unable to identify a Most Likely Descendant, or if the Most Likely Descendant failed to make a recommendation within 48 hours after being notified by the NAHC, or the Project Applicant rejects the recommendation of the Most Likely Descendent, the Project Applicant shall rebury the Native American human remains and associated grave goods on the property in a location not subject to further ground disturbance. Evidence of compliance with this mitigation measure, if human remains are found, shall be provided to Riverside County upon the completion of a treatment plan and final report detailing the significance and treatment finding.



Mitigation

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



4.20 UTILITIES AND SERVICE SYSTEMS

This Subsection 4.20 evaluates the Project's potential to result in impacts on existing utilities and service systems and/or impacts to the environment that could result from the Project's proposed utilities and service system improvements. The analysis is based in part upon the Eastern Municipal Water District (EMWD) 2020 Urban Water Management Plan (UWMP), dated July 1, 2021, which is herein incorporated by reference and is available for public review at the EMWD, 2270 Trumble Rd, Perris, CA 92570 (EMWD, 2021a). The analysis in this Subsection also is based in part on a Water Supply Assessment (WSA) prepared by EMWD, entitled, "Water Supply Assessment Report – Rider and Patterson," dated February 15, 2023, and included as *Technical Appendix O* to this EIR (EMWD, 2023). Refer to Section 7.0, *References*, for a complete list of reference sources.

4.20.1 EXISTING CONDITIONS

The Project site is located within the service boundaries of the EMWD for water and sewer service, Southern California Edison for electricity, and the Southern California Gas Company (SoCal Gas) for natural gas, with numerous service providers for cable television and telephone services. Solid waste hauling service for the Project site is provided by Waste Management of the Inland Empire (WMIE).

A. <u>Water Service and Supply</u>

Water service to the Project area is provided by the EMWD. EMWD provides potable water, recycled water, and wastewater services to an area of approximately 555 square miles in western Riverside County. The service area includes seven incorporated cities in addition to unincorporated areas of Riverside County. EMWD provides both retail and wholesale water service covering a total population of over 800,000. EMWD is both a retail and wholesale agency. (EMWD, 2021a, pp. E-2 and 3-2)

EMWD has a diverse portfolio of local and imported supplies. Local supplies include recycled water, potable groundwater, and desalinated groundwater. EMWD works diligently with other stakeholders to protect the quality and integrity of the groundwater basins. These efforts include recharging the basins with imported water and limiting native groundwater production when appropriate. EMWD has developed plans to expand groundwater recharge to improve reliability for its customers during normal and dry year demand periods. In addition to the production of potable groundwater, EMWD treats brackish groundwater at two locations, with a third desalter that came online during 2021. These local supplies help EMWD meet regional goals for supply reliability and help limit the impact of imported water shortages. In addition to local supplies, EMWD receives imported water from the Metropolitan Water District (MWD) in three forms: delivered directly as potable water, delivered to EMWD as raw water and then treated at EMWD's two local filtration plants, or delivered to EMWD service area is imported by MWD. EMWD has been able to maintain a balance of local and imported water even as new connections have been added. This has been accomplished through the implementation of local supply projects and increased water use efficiency. (EMWD, 2021a, p. 6-2)

Groundwater is pumped from the Hemet/San Jacinto and West San Jacinto areas of the San Jacinto Groundwater Basin. Groundwater in portions of the West San Jacinto Basin is high in salinity and requires desalination for potable use. EMWD owns and operates two desalination plants that convert brackish



groundwater from the West San Jacinto Basin into potable water. EMWD also owns, operates, and maintains its own recycled water system that consists of four Regional Water Reclamation Facilities and several storage ponds spread throughout EMWD's service area that are all connected through the recycled water system. EMWD's goal is to beneficially use 100 percent of the recycled water it produces. (EMWD, 2021a, p. 3-2)

Potable imported water is treated and delivered to EMWD directly from MWD's two large filtration plants. The Henry J. Mills (Mills) Water Treatment Plant treats water from Northern California and provides it to EMWD through two connection points located in the northeast portion of EMWD's service area. The Robert F. Skinner (Skinner) Water Treatment Plant treats a blend of Colorado River water and water from Northern California and provides it to EMWD through a connection point in the southwest portion of EMWD's service area. (EMWD, 2021a. p. 3-3)

EMWD owns and operates two microfiltration plants that filter raw imported water delivered through Metropolitan, removing particulate contaminants to achieve potable water standards. The two treatment plants, the Perris Water Filtration Plant and the Hemet Water Filtration Plant, are located in Perris and Hemet, respectively. Raw water from Metropolitan is also used for groundwater replenishment in the eastern part of EMWD. EMWD and others can extract this water at a later date for beneficial uses. Untreated water from MWD used for agricultural purposes is delivered in the northeast for use by EMWD retail and wholesale accounts and in the south for Rancho California Water District (RCWD) agricultural accounts. (EMWD, 2021a. p. 3-3)

EMWD produces potable and brackish groundwater from the San Jacinto Groundwater Basin that underlies the EMWD service area. EMWD's groundwater wells pump primarily from the eastern portion of EMWD, with the largest amount of production taking place around the cities of Hemet and San Jacinto. EMWD owns and operates two desalination plants in Sun City, the Menifee Desalter and the Perris I Desalter, which treat brackish groundwater through reverse osmosis to achieve potable water standards. (EMWD, 2021a. p. 3-3)

In addition to the potable water system, EMWD maintains a regional recycled water system that provides tertiary-treated recycled water to customers for agricultural, landscape irrigation, environmental, and industrial use. EMWD's recycled water system consists of four regional water reclamation facilities (RWRFs) that treat municipal sewage and produce water for recycling. The four RWRFs, the San Jacinto Valley RWRF, the Moreno Valley RWRF, the Temecula Valley RWRF, and the Perris Valley RWRF, are spread throughout EMWD's service area. A network of pipelines connects the four RWRFs, as well as several distribution storage ponds, to manage the delivery of recycled water. (EMWD, 2021a. p. 3-3)

EMWD's primary retail customers can be divided into residential, commercial, industrial, institutional, landscape and agricultural irrigation sectors. Although the residential sector is by far EMWD's largest customer segment, each market segment plays a role in the growth and development of EMWD's service area. EMWD wholesales water to seven different agencies. The demand from each agency differs based on its need each year. These demands can be unstable at times as these agencies use water from EMWD to supplement their system when their local facilities are inadequate or fail. EMWD will also provide backup for the North Perris Water System if an emergency should occur. Under the Hemet/San Jacinto Groundwater Management Area Water Management Plan (HSJ Management Plan), EMWD is responsible for providing water to recharge the groundwater basin. A portion of the water supplied will be SWP water imported through Metropolitan to



meet the requirements of the Soboba Band of Luiseño Indians Water Settlement Agreement and to improve the reliability of groundwater in the area. Individual agencies, including EMWD, will be able to extract their allotted amount of the recharged water from the basin. A portion of the water EMWD wholesales to Lake Hemet Municipal Water District (LHMWD) is raw water for agricultural uses. This water is needed especially when surface water is not available to LHMWD in dry years. Water use for 2020 is shown in Table 4.20-1, *EMWD Actual Demands for Potable and Raw Water (2020)*.

Table 4.20-1 EN	WWD Actual Demands for Potable	and Raw Water (2020)
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USE TYPE	ADDITIONAL DESCRIPTION	LEVEL OF TREATMENT WHEN DELIVERED	2020 VOLUME
Single Family		Drinking Water	52,162
Multi-Family		Drinking Water	6,535
Commercial		Drinking Water	4,267
Industrial		Drinking Water	571
Institutional/Governmental		Drinking Water	1,629
Landscape		Drinking Water	8,155
Agricultural irrigation		Drinking Water	1,114
Agricultural irrigation		Raw Water	446
Other		Drinking Water	1,287
Non-Revenue	System losses & unbilled, authorized consumption	Drinking Water	8,507
		τοτΑ	L: 84,673
Groundwater Recharge	Imported water recharge to the Hemet/San Jacinto Basin	Raw Water	6,467
Sales/Transfers/Exchanges to Other Agencies	City of Perris Water System	Drinking Water	1,685
Sales/Transfers/Exchanges to Other Agencies	Western Municipal Water District Murrieta Division	Drinking Water	1,809
Sales/Transfers/Exchanges to Other Agencies	Nuevo Water Company	Drinking Water	409
Sales/Transfers/Exchanges to Other Agencies	Rancho California Water District	Drinking Water	11,105
Sales/Transfers/Exchanges to Other Agencies	Rancho California Water District	Raw Water	13,923
Sales/Transfers/Exchanges to Other Agencies	City of Hemet	Drinking Water	0
Sales/Transfers/Exchanges to Other Agencies	City of San Jacinto	Drinking Water	0
Sales/Transfers/Exchanges to Other Agencies	Lake Hemet Municipal Water District	Raw Water	986
		τοτα	L: 36,384

(EMWD, 2021a, Tables 4-1 and 4-2)

Projected demands for EMWD were developed using information about planned development and land use. To track new developments, EMWD updates a Geographic Information System (GIS) database that tracks proposed development quarterly. Currently, EMWD is tracking the status of over 800 proposed projects and over 125,000 equivalent dwelling units. Growth rates were based on a forecast of future population prepared by the Southern California Association of Governments (SCAG). EMWD's growth forecasts include both the retail and wholesale service areas. EMWD's retail demand projections include the water savings needed to meet the Water Conservation Act of 2009, Senate Bill (SB) X7-7 requirements. Demand forecasts for wholesale customers are developed from growth projections and through collaboration with sub agencies. Wholesale demand projections are based on communications with sub agencies and respective growth projections for those agencies. Projected total demands for water within the EMWD through 2045 are shown in Table 4.20-2, *Summary of Total EMWD System Water Demands*. (EMWD, 2021a, p. 4-3)

	Actual Water Use - AFY			Projected Water Use - AFY					
Category	2005	2010	2015	2020	2025	2030	2035	2040	2045
Retail	85,000	78,200	68,900	75,000	95,200	100,400	106,000	110,100	113,800
Wholesale	29,300	27,100	21,700	36,384	58,200	52,400	54,400	56,700	58,800
Other	47,300	36,600	55,200	50,700	51,400	58,000	56,200	61,900	66,600
Total	161,600	141,900	145,800	162,084	204,800	210,800	216,600	228,700	239,200

Table 4.20-2 Summary of Total EMWD System Water Demands

(EMWD, 2023, Table 9)

EMWD has developed a number of local supplies to offset imported water demand including recycled water, groundwater, and desalinated groundwater. EMWD's planned supply projects will increase supply reliability to mitigate against impacts to supply during dry and multi-dry years. Table 4.20-3, *EMWD Projected Retail Water Supplies – Average Year Hydrology*, and Table 4.20-4, *EMWD Projected Wholesale Water Supplies – Average Year Hydrology*, summarize EMWD's total projected water supplies. (EMWD, 2021a, p. 6-23; EMWD, 2023, p. 6)

B. <u>Sewer Service and Treatment</u>

EMWD is responsible for all wastewater collection and treatment in its service area. It has five operational RWRFs located throughout EMWD. Inter-connections between the local collection systems serving each treatment plant allow for operational flexibility, improved reliability, and expanded deliveries of recycled water. All of EMWD's RWRFs produce tertiary effluent, suitable for all permitted uses, including irrigation of food crops and full-body contact. The five RWRFs currently have a combined capacity of 78,000,000 gallons per day (gpd), or approximately 87,371 acre-feet per year (AFY), as summarized in Table 4.20-5, *Wastewater Treatment Capacity*. (EMWD, n.d.)

Collectively, the RWRFs within EMWD collect and treat approximately 50.4 million gpd of wastewater, and have a capacity to treat approximately 78.0 million gpd. Sewer flows from the Project site would be treated by either the Moreno Valley RWRF or the Perris Valley RWRF, which have a combined daily capacity of 38.0 million gpd and typical daily flows of 27.0 million gpd. (EMWD, n.d.)

C. <u>Stormwater Drainage</u>

Under existing condition, offsite runoff enter the project site at several locations. The largest tributary area is from offsite areas located south of Walnut Street, while additional offsite areas enter the project site from three



Туре	Source	2025	2030	2035	2040	2045
Imported	Metropolitan Water District	66,447	72,147	70,247	74,747	78,847
Groundwater	San Jacinto Groundwater Basin	18,753	18,753	18,753	18,753	18,753
Desalination	San Jacinto Groundwater Basin	13,400	13,400	13,400	13,400	13,400
Other	Purified Water Replenishment	4,000	4,000	12,000	12,000	12,000
Recycled Water	Regional Water Reclamation Facilities	39,230	44,920	42,200	47,500	51,800
	Total	141,830	153,220	156,600	166,400	174,800

Table 4.20-3 EMWD Projected Retail Water Supplies – Average Year Hydrology

1. Imported water total represents planned EMWD purchases, not the maximum volume of water available from MWD.

2. Groundwater total includes only 7,303 AFY of pumping from the adjudicated Hemet/San Jacinto Management Plan Area, which is EMWD's long term adjusted base production right. EMWD is also able to pump a portion of water recharged under the Soboba Settlement Agreement that is not used by the Soboba Tribe. EMWD is also able to carry over production rights into future years. As of the end of calendar year 2021, EMWD has accrued a carry-over credit balance of over 26,000 acre-feet.

3. Purified Water Replenishment is a planned indirect potable reuse project.

 Recycled water supply total excludes volumes to be recharged under Purified Water Replenishment to avoid double counting as well as projected losses due to evaporation and incidental storage pond percolation.
 (EMWD, 2023, Table 4)

(EMWD, 2023, Table 4)

Table 4.20-4 EMWD Projected Wholesale	Water Supplies – Average Year Hydrology
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Туре	Source	2025	2030	2035	2040	2045
Imported	Metropolitan Water District	50,700	44,900	46,900	49,200	51,300
Imported	Soboba Settlement Water	7,500	7,500	7,500	7,500	7,500
Recycled Water	Regional Water Reclamation Facilities	4,770	5,180	5,600	5,600	5,600
	Total	62,970	57,580	60,000	62,300	64,400

1. Imported water total represents planned EMWD purchases, not the maximum volume of water available from MWD.

2. Under the Soboba Settlement Agreement, MWD must provide an annual average of 7,500 AFY of recharge water, however, this water can be pre- or post-delivered based on supply availability and coordination between MWD and EMWD.

3. Due to the interconnected nature of EMWD's recycled water system, losses can be hard to allocate between retail and wholesale service – for simplicity, all recycled water losses are excluded from wholesale and shown in the retail table instead.

(EMWD, 2023, Table 5)



Facility	Typical Daily Flows (gpd)	Current Capacity (gpd)	Planned Capacity (gpd)
Moreno Valley Regional Water Reclamation Facility ¹	11,500,000	16,000,000	18,000,000
Perris Valley Regional Water Reclamation Facility	15,500,000	22,000,000	100,000,000
San Jacinto Valley Regional Water Reclamation Facility	7,000,000	14,000,000	27,000,000
Sun City Regional Water Reclamation Facility	2,400,000	3,000,000	15,000,000+
Temecula Valley Regional Water Reclamation Facility	14,000,000	23,000,000	28,000,000
Totals:	50,400,000	78,000,000	188,000,000+

 Table 4.20-5
 Wastewater Treatment Capacity

1. The EMWD has the ability to divert about 2,000,000 gpd from the Moreno Valley Regional Water Reclamation Facility to the Perris Valley Regional Water Reclamation Facility.

(EMWD, n.d.)

existing streets to the west. Runoff from the Project site generally drains to the northeasterly corner of the site via natural drainage courses. The total peak runoff at the northeast corner of the Project site during peak 100-year storm events is approximately 134.1 cubic feet per second (cfs). (Thienes, 2022a)

D. <u>Solid Waste Collection and Disposal</u>

Solid waste collection and disposal is provided by the Riverside County Department of Waste Resources (RCDWR) through a franchise agreement with a private company, WMIE. Waste within the Project area is sent to transfer stations and landfills managed by the RCDWR and WMIE. Solid Waste from the Project site would be taken to the Moreno Valley Transfer Station (MVTS) before being loaded into larger trucks and transferred to either the El Sobrante Landfill, Lamb Canyon Landfill, or the Badlands Landfill for disposal. The following is a description of these facilities:

- <u>El Sobrante Landfill</u>. The El Sobrante Landfill is located in the southeast area of the City of Corona at 10910 Dawson Canyon Road and accessed from Interstate-15 (I-15) at Temescal Canyon Road. The landfill is operated and owned by USA Waste Services of California, Inc. of which WMIE is a subsidiary. The existing landfill encompasses 1,322 acres, of which 486 acres are permitted for refuse disposal. The landfill is currently permitted to receive 16,054 tons per day (tpd), and data from December 2022 shows that the El Sobrante Landfill received an average of 9,291.25 tpd (including an average of 3,080.38 tons per day for in-County waste) (RCDWR, 2022a). If needed, 5,000 tpd must be reserved for waste produced within Riverside County, leaving the maximum commitment of non-Riverside County waste at 11,054 tpd. As of April 1, 2018, the landfill had a total remaining disposal capacity of 143,977,170 cubic yards. The El Sobrante Landfill is projected to reach capacity in 2051. (CalRecycle, n.d.)
- <u>Lamb Canyon Landfill</u>. The Lamb Canyon Landfill is located between the City of Beaumont and the City of San Jacinto at 16411 Lamb Canyon Road (State Route 79), south of Interstate 10 and north of Highway 74. The landfill is owned and operated by RCDWR. The landfill encompasses approximately 703.4 acres, of which approximately 144.6 acres are permitted for waste disposal. The landfill is currently permitted to receive 5,000 tpd and had an estimated total disposal capacity of approximately 39.7 million cubic yards. Data from December 2022 shows that the Lamb Canyon Landfill received a daily average of approximately 1,890.14 tpd (including 1,854.32 tpd of in-County



waste) (RCDWR, 2022b). As of January 8, 2015 (the most recent date for which data are available), the landfill had a total remaining capacity of approximately 19.2 million cubic yards. The current landfill remaining disposal capacity is estimated to last until approximately April 2032. (CalRecycle, n.d.)

• <u>Badlands Landfill</u>. The Badlands Landfill is located northeast of the City of Moreno Valley at 31125 Ironwood Avenue and accessed from State Highway 60 at Theodore Avenue. The landfill is owned and operated by RCDWR. The existing landfill encompasses 278 acres, of which 150 acres are permitted for refuse disposal. The landfill is currently permitted to receive 4,800 tpd. Data from January 2023 shows that the Badlands Landfill received an average of 3,166.88 tpd (including 2,555.44 tpd of in-County waste) (RCDWR, 2023). As of December 18, 2020, the landfill had a total remaining disposal capacity of approximately 7.8 million cubic yards. The Badlands Landfill is projected to reach capacity at the earliest in 2026. (CalRecycle, n.d.)

4.20.2 APPLICABLE REGULATORY REQUIREMENTS

The following is a brief description of the federal, State, and local environmental laws and related regulations related to utilities and service systems.

A. <u>Federal Regulations</u>

1. Applicable Water Supply Regulations

Clean Water Act

The Clean Water Act (CWA) establishes the basic structure for regulating discharges of pollutants into the waters of the United States and regulating quality standards for surface waters. The basis of the CWA was enacted in 1948 and was called the Federal Water Pollution Control Act, but the Act was substantially reorganized and expanded in 1972. "Clean Water Act" became the Act's common name with amendments in 1972. Under the CWA, the Environmental Protection Agency (EPA) has implemented pollution control programs such as setting wastewater standards for industry, and also has set water quality standards for all contaminants in surface waters. The CWA made it unlawful to discharge any pollutant from a point source into navigable waters, unless a permit was obtained. EPA's National Pollutant Discharge Elimination System (NPDES) permit program controls discharges. Point sources are discrete conveyances such as pipes or man-made ditches. Individual homes that are connected to a municipal system, use a septic system, or do not have a surface discharge do not need an NPDES permit; however, industrial, municipal, and other facilities must obtain permits if their discharges go directly to surface waters. (EPA, 2022e)

Safe Drinking Water Act

The Safe Drinking Water Act (SDWA) was established to protect the quality of drinking water in the U.S. This law focuses on all waters actually or potentially designed for drinking use, whether from above ground or underground sources. The Act authorizes EPA to establish minimum standards to protect tap water and requires all owners or operators of public water systems to comply with these primary (health-related) standards. The 1996 amendments to SDWA require that EPA consider a detailed risk and cost assessment, and best available peer-reviewed science, when developing these standards. State governments, which can be approved to implement these rules for EPA, also encourage attainment of secondary standards (nuisance-



related). Under the Act, EPA also establishes minimum standards for state programs to protect underground sources of drinking water from endangerment by underground injection of fluids. (EPA, 2022j)

2. Applicable Energy Conservation Regulations

United States Department of Energy/Federal Energy Regulatory Commission

The United States Department of Energy (DOE) is the federal agency responsible for establishing policies regarding energy conservation, domestic energy production and infrastructure. The Federal Energy Regulatory Commission (FERC) is an independent federal agency, officially organized as part of the DOE which is responsible for regulating interstate transmission of natural gas, oil and electricity, reliability of the electric grid and approving of construction of interstate natural gas pipelines and storage facilities. The Energy Policy Act of 2005 has also granted FERC with additional responsibilities of overseeing the reliability of the nation's electricity transmission grid and supplementing state transmission siting efforts in national interest electric transmission corridors.

FERC has authority to oversee mandatory reliability standards governing the nation's electricity grid. FERC has established rules on certification of an Electric Reliability Organization (ERO) which establishes, approves and enforces mandatory electricity reliability standards. The North American Electric Reliability Corporation (NERC) has been certified as the nation's ERO by FERC to enforce reliability standards in all interconnected jurisdictions in North America. Although FERC regulates the bulk energy transmission and reliability throughout the United States, the areas outside of FERC's jurisdictional responsibility include state level regulations and retail electricity and natural gas sales to consumers which falls under the jurisdiction of state regulatory agencies.

The Federal Communications Commission (FCC) requires all new cellular tower construction to be approved by the state or local authority for the proposed site and comply with FCC rules involving environmental review. Additionally, the Telecommunications Act of 1996 requires construction of new cellular towers to comply with the local zoning authority. (FERC, n.d.)

B. <u>State Regulations</u>

1. Applicable Water Supply Regulations

Water Conservation in Landscaping Act

The Water Conservation in Landscaping Act was established to ensure adequate water supplies are available for future uses. To promote the conservation and efficient use of water, the Act requires local agencies to adopt a water efficient landscape ordinance. When such an ordinance had not been adopted, a finding as to why (based on the climatic, geologic, or topographical conditions) such an ordinance is not necessary, must be adopted. In the absence of such an ordinance or findings, the policies and requirements contained in the "model" ordinance drafted by the State of California shall apply within the affected jurisdiction. (CA Legislative Info, n.d.)



Water Recycling in Landscaping Act

In 2000, Senate Bill 2095 (Water Recycling in Landscaping Act) was approved by Governor Davis requiring any local public or private entity that produces recycled water and determines that within 10 years it will provide recycled water within the boundaries of a local agency, to notify the local agency of that fact. In turn, local agencies are required to adopt and enforce within 180 days a specified recycled water ordinance, unless the local agency adopted a recycled water ordinance or other regulation requiring the use of recycled water in its jurisdiction prior to January 1, 2001. (CA Legislative Info, n.d.)

Urban Water Management Planning Act

The Urban Water Management Planning Act (UWMP Act) was proposed and adopted to ensure that water planning is conducted at the local level, as the State of California recognized that two water agencies in the same region could have very different impacts from a drought. The UWMP Act requires water agencies to develop UWMPs over a 20-year planning horizon, and further required UWMPs to be updated every five years. UWMPs are exempt from compliance with CEQA. (DWR, 2016, p. 1-2)

The UWMPs provide a framework for long term water planning and inform the public of a supplier's plans for long-term resource planning that ensures adequate water supplies for existing and future demands. This part of the California Water Code (CWC) requires urban water suppliers to report, describe, and evaluate:

- Water deliveries and uses;
- Water supply sources;
- Efficient water uses;
- Demand management measures; and
- Water shortage contingency planning. (DWR, 2016, p. 1-3)

The UWMP Act has been modified over the years in response to the State's water shortages, droughts, and other factors. A significant amendment was made in 2009, after the drought of 2007-2009 and as a result of the governor's call for a statewide 20 percent reduction in urban water use by the year 2020. This was the Water Conservation Act of 2009, also known as SB X7-7. This Act required agencies to establish water use targets for 2015 and 2020 that would result in statewide savings of 20 percent by 2020. Beginning in 2016, retail water suppliers are required to comply with the water conservation requirements in SB X7-7 in order to be eligible for State water grants or loans. Retail water agencies are required to set targets and track progress toward decreasing daily per capita urban water use in their service area, which will assist the State in meeting its 20 percent reduction goal by 2020. (DWR, 2016, p. 1-2)

Government Code § 66473.7(b)(2) (Senate Bill 221)

Under Senate Bill (SB) 221, approval by a city or county of certain residential subdivisions requires an affirmative written verification of sufficient water supply. SB 221 is intended as a 'fail safe' mechanism to ensure that collaboration on finding the needed water supplies to serve a new large subdivision occurs before construction begins. SB 221 requires the legislative body of a city or county or the advisory agency, to the extent that it is authorized by local ordinance to approve, conditionally approve, or disapprove a tentative map, must include as a condition in any tentative map that includes a subdivision a requirement that a sufficient



water supply shall be available. Proof of the availability of a sufficient water supply must be requested by the subdivision applicant or local agency, at the discretion of the local agency, and id based on written verification from the applicable public water system within 90 days of a request. SB 221 does not apply to any residential project proposed for a site that is within an urbanized area and has been previously developed for urban uses, or where the immediate contiguous properties surrounding the residential project site are, or previously have been, developed for urban uses, or housing projects that are exclusively for very low and low-income households. (DWR, 2003; CA Legislative Info, n.d.)

<u>California Senate Bill 610</u>

The CWC §§ 10910 through 10915 were amended by the enactment of SB 610 in 2002. SB 610 requires an assessment of whether available water supplies are sufficient to serve the demand generated by a proposed project, as well as the reasonably foreseeable cumulative demand in the region over the next 20 years under average normal year, single dry year, and multiple dry year conditions. Under SB 610, water assessments must be furnished to local governments for inclusion in any environmental documentation for certain projects (as defined in CWC § 10912 [a]) subject to CEQA. (DWR, 2003; CA Legislative Info, n.d.) For the purposes of SB 610, "project" means any of the following:

- (1) A proposed residential development of more than 500 dwelling units.
- (2) A proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space.
- (3) A proposed commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space.
- (4) A proposed hotel or motel, or both, having more than 500 rooms.
- (5) A proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area.
- (6) A mixed-use project that includes one or more of the projects specified in this subdivision.
- (7) A project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500-dwelling unit project. (DWR, 2003; CA Legislative Info, n.d.)

Because the Project includes a 591,203 s.f. light industrial warehouse building that would generate 504 employees, a water supply assessment was not required for the proposed Project.

□ California Water Code § 10610 et seq. (Senate Bill 901)

Signed into law on October 16, 1995, Senate Bill (SB) 901 required every urban water supplier to identify as part of its urban water management plan, the existing and planned sources of water available to the supplier over a prescribed 5-year period. The code requires the water service purveyor to assess the projected water demand associated with a proposed project under environmental review. Later provisions of SB 901 required compliance in the event that the proposed Project involved the adoption of a specific plan, amendment to, or revision of the land use element of a general plan or specific plan that would result in a net increase in the state population density. Upon completion of the water assessment, cities and counties may agree or disagree with the conclusions of the water service purveyors, but cannot approve projects in the face of documented water shortfalls without first making certain findings. (CA Legislative Info, n.d.)



Executive Order B-29-15

Executive Order (EO) B-29-15 ordered the State Water Resources Control Board (SWRCB) to impose restrictions to achieve a 25-percent reduction in potable urban water usage through February 28, 2016; directed the California Department of Water Resources (DWR) to lead a statewide initiative, in partnership with local agencies, to collectively replace 50 million square feet of lawns and ornamental turf with drought tolerant landscapes; and directed the California Energy Commission to implement a statewide appliance rebate program to provide monetary incentives for the replacement of inefficient household devices. (SWRCB, 2020)

Executive Order B-37-16

Signed on May 9, 2016, EO B-37-16 established a new water use efficiency framework for California. The order bolstered the state's drought resilience and preparedness by establishing longer-term water conservation measures that include permanent monthly water use reporting, new urban water use targets, reducing system leaks and eliminating clearly wasteful practices, strengthening urban drought contingency plans, and improving agricultural water management and drought plans. (SWRCB, 2020)

Executive Order B-40-17

Signed on April 7, 2017, EO B-40-17 ended the drought state of emergency in all California counties except Fresno, Kings, Tulare, and Tuolumne, where emergency drinking water projects will continue to help address diminished groundwater supplies. It maintains water reporting requirements and prohibitions on wasteful practices. The order was built on actions taken in Executive Order B-37-16, which remains in effect. In a related action, state agencies, including the DWR, released a plan to continue making water conservation a way of life. (SWRCB, 2020)

Sustainable Groundwater Management Act (SGMA)

The Sustainable Groundwater Management Act (SGMA) established a new structure for managing California's groundwater resources at a local level by local agencies. SGMA required, by June 30, 2017, the formation of locally-controlled groundwater sustainability agencies (GSAs) in the State's high- and medium-priority groundwater basins and subbasins (basins). A GSA is responsible for developing and implementing a groundwater sustainability plan (GSP) to meet the sustainability goal of the basin to ensure that it is operated within its sustainable yield, without causing undesirable results. The GSP Emergency Regulations for evaluating GSPs, the implementation of GSPs, and coordination agreements were adopted by DWR and approved by the California Water Commission on May 18, 2016. (DWR, n.d.)

Senate Bill 610 (SB 610)

SB 610, codified in CWC §§ 10910-10915, specifies the requirements for water supply assessments (WSAs) and their role in the CEQA process, and defines the role UWMPs play in the WSA process. SB 610 requires that, for projects subject to CEQA that meet specific size criteria, the water supplier prepare WSAs that determine whether the water supplier has sufficient water resources to serve the projected water demands associated with the projects. SB 610 provides specific guidance regarding how future supplies are to be calculated in the WSAs where an applicable UWMP has been prepared. Specifically, a WSA must identify existing water supply entitlements, water rights, or water service contracts held by the public water system, and prior years' actual water deliveries received by the public water system. In addition, the WSA must address



water supplies over a 20-year period and consider normal, single-dry, and multiple-dry year conditions. In accordance with SB 610, projects for which a WSA must be prepared are those subject to CEQA that meet any of the following criteria:

- Residential developments of more than 500 dwelling units;
- Shopping centers or business establishments employing more than 1,000 persons or having more than 500,000 square feet of floor space;
- Commercial office buildings employing more than 1,000 persons or having more than 250,000 square feet of floor space;
- Hotels, motels, or both, having more than 500 rooms;
- Industrial, manufacturing, or processing plants, or industrial parks planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area
- Mixed-use projects that include one or more of the projects specified in this subdivision; or
- Projects that would demand an amount of water equivalent to or greater than the amount of water required by a 500-dwelling-unit project. (CWC § 912, CEQA Guidelines § 15155(a).

The WSA must be approved by the public water supplier serving the project at a regular or special meeting and must be incorporated into the CEQA document. The lead agency must then make certain findings related to water supply based on the WSA.

In addition, under SB 610, a water supplier responsible for the preparation and periodic updating of an UWMP must describe the water supply projects and programs that may be undertaken to meet the total project water use of the service area. If groundwater is identified as a source of water available to the supplier, the following additional information must be included in the UWMP: (1) a groundwater management plan; (2) a description of the groundwater basin(s) to be used and the water use adjudication rights, if any; (3) a description and analysis of groundwater use in the past 5 years; and (4) a discussion of the sufficiency of the groundwater that is projected to be pumped by the supplier. (OPR, 2017c, p. 69)

□ <u>Senate Bill 606 (SB 606)</u>

SB 606 would require an urban retail water supplier to calculate an urban water use objective no later than November 1, 2023, and by November 1 every year thereafter, and its actual urban water use by those same dates. The bill would require an urban retail water supplier to submit a report to the department for these purposes by those dates. SB 606 would authorize the board to issue information orders, written notices, and conservation orders to an urban retail water supplier that does not meet its urban water use objective, as specified. The bill would authorize the board to waive these requirements for a period of up to 5 years, as specified. SB 606 would impose civil liability for a violation of an order or regulation issued pursuant to these provisions, as specified. The bill would also authorize the board to issue a regulation or informational order requiring a wholesale water supplier, urban retail water supplier, or distributor of a public water supply to provide a monthly report relating to water production, water use, or water conservation. (SWRCB, n.d.)



Assembly Bill 1668 (AB 1668)

AB 1668 requires the SWRCB, in coordination with the Department of Water Resources, to adopt long-term standards for the efficient use of water, as provided, and performance measures for commercial, industrial, and institutional water use on or before June 30, 2022. The bill, until January 1, 2025, establishes 55 gallons per capita daily as the standard for indoor residential water use. Beginning January 1, 2025, the bill establishes the greater of 52.5 gallons per capita daily or a standard recommended by the SWRCB and beginning January 1, 2030, the bill establishes the greater of 50 gallons per capita daily or a standard recommended by the SWRCB. AB 1668 imposes civil liability for a violation of an order or regulation issued pursuant to these provisions, as specified. (SWRCB, n.d.)

<u>California Plumbing Code</u>

Title 24, Part 5 of the California Code of Regulations establishes the California Plumbing Code. The California Plumbing Code sets forth efficiency standards (i.e., maximum flow rates) for all new federally-regulated plumbing fittings and fixtures, including showerheads and lavatory faucets. The 2022 California Plumbing Code, which is based on the 2021 Uniform Plumbing Code, was published by the California Building Standards Commission on July 1, 2022 and will go into effect on January 1, 2023. (CBSC, 2022)

California Code of Regulations (CCR) Title 20 and 24

Title 20 includes state and federal minimum efficiency requirements for energy and water use in regulated appliances. These appliances include, but are not limited to, water heaters, furnaces, heat pumps, air conditioners, refrigerators, pumps, lamps and ballasts, computers, spray sprinkler bodies and showerheads. Manufacturers are responsible for certifying regulated appliances to the California Energy Commission's Modernized Appliance Efficiency Database System. This serves as the manufacturer's claim that it has met all applicable requirements, including testing, and marking products. (CCR, n.d.)

Title 24 of the California Code of Regulations is a broad set of requirements for energy conservation, green design, construction and maintenance, fire and life safety, and accessibility that apply to the structural, mechanical, electrical, and plumbing systems in a building. Title 24 was published by the California Building Standards Commission and applies to all buildings in California. Title 24 receives updates every three years with the latest revisions being in 2019. Title 24 energy compliance requirements apply to new construction and any new installations or retrofits in existing buildings. Older buildings do not have to upgrade their systems, but if they choose to renovate, their new systems must meet Title 24 standards. (CBCS, 2022)

<u>California Water Plan</u>

The California Water Plan is the State's strategic plan for sustainably managing and developing water resources for current and future generations. Required by CWC § 10005(a), it presents the status and trends of California's water-dependent natural resources; water supplies; and agricultural, urban, and environmental water demands for a range of plausible future scenarios. The plan is updated every five years; provides a way for various groups to collaborate on findings and recommendations and make informed decisions regarding California's water future; can't mandate actions or authorize spending for specific actions; doesn't make project- or site-specific recommendations nor include environmental review or documentation as would be



required by CEQA; and requires policy- and law-makers to take definitive steps to authorize the specific actions proposed in the plan and appropriate funding needed for their implementation.

California Water Plan Update 2018 (Update 2018) provides recommended actions, funding scenarios, and an investment strategy to bolster efforts by water and resource managers, planners, and decision-makers to overcome California's most pressing water resource challenges. It reaffirms State government's unique role and commitment to sustainable, equitable, long-term water resource management; it also introduces implementation tools to inform sound decision-making. The plan's broad and diverse portfolio of recommended actions address California's critical, systemic, and institutional challenges. (DWR, 2018)

<u>California Water Action Plan</u>

The California Water Action Plan is a roadmap for the State's journey towards sustainable water management. The first California Water Action Plan was released in January 2014 under Governor Brown's administration and updated in 2016. The California Water Action Plan discusses the challenges to water in California: uncertain water supplies, water scarcity/drought, declining groundwater supplies, poor water quality, declining native fish species and loss of wildlife habitat, floods, supply disruptions, and population growth and climate change further increasing the severity of these risks. (CDFW, n.d.)

2. Applicable Solid Waste Regulations

<u>California Solid Waste Integrated Waste Management Act (AB 939, 1989)</u>

The Integrated Waste Management Act (IWMA) established an integrated waste management hierarchy to guide the California Integrated Waste Management Board (CIWMB) and local agencies in implementation, in order of priority: (1) source reduction, (2) recycling and composting, and (3) environmentally safe transformation and land disposal (it should be noted that the CIWMB no longer exists, and its duties have been assumed by CalRecycle). As part of the IWMA, the CIWMB was given a purpose to mandate the reduction of disposed waste. (CalRecycle, n.d.) The IWMA also required, among other items, each county to prepare, adopt, and submit to the Board an Integrated Waste Management Plan (IWMP) and each city or county plan to include an implementation schedule which shows diversion of 50 percent of all solid waste by January 1, 2000 through source reduction, recycling, and composting activities. (CalRecycle, n.d.)

Waste Reuse and Recycling Act (AB 1327)

The Waste Reuse and Recycling Act (WRRA) required the CIWMB to approve a model ordinance for adoption by any local government for the transfer, receipt, storage, and loading of recyclable materials in development projects by March 1, 1993. The WRRA also required local agencies to adopt a local ordinance by September 1, 1993 or allow the model ordinance to take effect. The WRRA requires all development projects that are commercial, industrial, institutional, or marina in nature and where solid waste is collected and loaded, to provide an adequate area for collecting and loading recyclable materials over the lifetime of the project. The area is required to be provided before building permits are issued. (CalRecycle, n.d.)

Mandatory Commercial Recycling Program (AB 341)

Assembly Bill (AB) 341 (Chapter 476, Statutes of 2011 [Chesbro, AB 341]) directed CalRecycle to develop and adopt regulations for mandatory commercial recycling. CalRecycle initiated formal rulemaking with a 45-



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day comment period beginning Oct. 28, 2011. The final regulation was approved by the Office of Administrative Law on May 7, 2012. AB-341 was designed to help meet California's recycling goal of 75% by the year 2020. AB 341 requires all commercial businesses and public entities that generate 4 cubic yards or more of waste per week to have a recycling program in place. In addition, multi-family apartments with five or more units are also required to form a recycling program. (CalRecycle, n.d.)

California Green Building Standards Code (CAL Green; Part 11 of Title 24, California Code of Regulations)

The current edition of CalGreen became effective on January 1, 2023. CALGreen is applicable to the planning, design, operation, construction, use, and occupancy of every newly constructed building or structure throughout the State of California (including residential structures and elementary schools). The purpose of the CALGreen Code is to "improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices in the following categories: (1) Planning and design; (2) Energy efficiency; (3) Water efficiency and conservation; (4) Material conservation and resource efficiency; and (5) Environmental air quality." The CALGreen Code is not intended to substitute or be identified as meeting the certification requirements of any green building program that is not established and adopted by the California Building Standards Commission (CBSC). § 5.408.3 of the CALGreen Code requires that 100 percent of trees, stumps, rocks, and associated vegetation and soils resulting from land clearing shall be reused or recycled. For a phased project, such material may be stockpiled on-site until the storage site is developed. Unless otherwise noted in the regulation, all newly constructed buildings in California are subject of the requirements of the CALGreen Code. (CBSC, 2022)

Senate Bill 1374 (SB 1374)

Signed in 2002, the Construction and Demolition Waste Materials Diversion Requirements (SB 1374) were codified in Public Resources Code Section 42919. SB 1374 requires that jurisdictions include in their annual AB 939 report a summary of the progress made in diverting construction and demolition waste. The legislation also required that CalRecycle adopt a model ordinance for diverting 50 to 75 percent of all construction and demolition waste from landfills. The model ordinance was adopted by CalRecycle on March 16, 2004. (CA Legislative Info, n.d.)

Assembly Bill 1826 (AB 1826)

AB 1826 requires jurisdictions to implement an organic waste recycling program for businesses, including outreach, education, and monitoring of affected businesses. Additionally, each jurisdiction is to identify a multitude of information, including barriers to siting organic waste recycling facilities, as well as closed or abandoned sites that might be available for new organic waste recycling facilities. AB 1826 defines "organic waste" as food waste, green waste, landscape and pruning waste, non-hazardous wood waste, and food-soiled paper waste that is mixed in with food waste. It also defines a "business" as a commercial or public entity, including, but not limited to, a firm, partnership, proprietorship, joint stock company, corporation, or association that is organized as a for-profit or nonprofit entity, or a multifamily residential dwelling consisting of five or more units. As of January 1, 2017, businesses that generate 4 cubic yards or more of organic waste per week are subject to this requirement. Commencing January 1, 2019, businesses that generate 4 cubic yards or more of commercial solid waste per week also are required to arrange for organic waste recycling services.



CalRecycle may reduce this triggering threshold for organics recycling to 2 cubic yards or more of commercial solid waste per week as of January 1, 2020. (CA Legislative Info, n.d.)

Zero Waste California

Zero Waste California is a state program launched by CalRecycle in 2002 to promote a new vision for the management of solid waste by maximizing existing recycling and reuse efforts, while ensuring that products are designed for the environment and have the potential to be repaired, reused, or recycled. The Zero Waste California program promotes the goals of market development, recycled product procurement, and research and development of new and sustainable technologies. (CalRecycle, n.d.)

3. Applicable Energy Conservation Regulations

California Energy Efficiency Standards for Residential and Nonresidential Buildings (24 CA. Code Regs. 6)

The Building Energy Efficiency Standards were first adopted in 1976 and have been updated periodically since then as directed by statute. In 1975 the Department of Housing and Community Development adopted rudimentary energy conservation standards under their State Housing Law authority that were a precursor to the first generation of the Standards. However, the Warren-Alquist Act was passed one year earlier with explicit direction to the Energy Commission (formally titled the State Energy Resources Conservation and Development Commission) to adopt and implement the Standards. The Energy Commission's statute created separate authority and specific direction regarding what the Standards are to address, what criteria are to be met in developing the Standards, and what implementation tools, aids, and technical assistance are to be provided. (CBSC, 2022)

The Standards contain energy and water efficiency requirements (and indoor air quality requirements) for newly constructed buildings, additions to existing buildings, and alterations to existing buildings. Public Resources Code (PRC) §§ 25402 subdivisions (a)-(b) and 25402.1 emphasize the importance of building design and construction flexibility by requiring the Energy Commission to establish performance standards, in the form of an "energy budget" in terms of the energy consumption per square foot of floor space. For this reason, the Standards include both a prescriptive option, allowing builders to comply by using methods known to be efficient, and a performance option, allowing builders complete freedom in their designs provided the building achieves the same overall efficiency as an equivalent building using the prescriptive option. Reference Appendices are adopted along with the Standards that contain data and other information that helps builders comply with the Standards. (CBSC, 2022)

The 2022 update to the Building Energy Efficiency Standards focuses on several key areas to improve the energy efficiency of newly constructed buildings and additions and alterations to existing buildings. The most significant efficiency improvements to the residential Standards include the introduction of photovoltaic into the prescriptive package, improvements for attics, walls, water heating, and lighting. The most significant efficiency improvements to the nonresidential Standards include alignment with the ASHRAE 90.1 2017 national standards. The 2022 Standards also include changes made throughout all of its sections to improve the clarity, consistency, and readability of the regulatory language. (CBSC, 2022)



PRC § 25402.1 also requires the Energy Commission to support the performance standards with compliance tools for builders and building designers. The Alternative Calculation Method (ACM) Approval Manual adopted by regulation as an appendix of the Standards establishes requirements for input, output, and calculational uniformity in the computer programs used to demonstrate compliance with the Standards. From this, the Energy Commission develops and makes publicly available free, public domain building modeling software in order to enable compliance based on modeling of building efficiency and performance. The ACM Approval Manual also includes provisions for private firms seeking to develop compliance software for approval by the Energy Commission, which further encourages flexibility and innovation. (CBSC, 2022)

<u>California Solar Rights and Solar Shade Control Acts</u>

The Solar Rights Act sets parameters for establishing solar easements, prohibits ordinances and private covenants which restrict solar systems, and requires communities to consider passive solar and natural heating and cooling opportunities in new construction. This Act is applicable to all California cities and counties. California's solar access laws appear in the state's Civil, Government, Health and Safety, and PRCs. California PRC § 25980 sets forth the Solar Shade Control Act, which encourages the use of trees and other natural shading except in cases where the shading may interfere with the use of active and passive solar systems. (EPIC, 2014; EPIC, 2010)

<u>Alternative Fuels Plan</u>

On September 24, 2009, the California Air Resources Board (CARB) adopted amendments to the "Pavley" regulations that reduce greenhouse gas (GHG) emissions in new passenger vehicles from 2009 through 2016. These amendments are part of California's commitment toward a nation-wide program to reduce new passenger vehicle GHGs from 2012 through 2016. CARB's September amendments will cement California's enforcement of the Pavley rule starting in 2009 while providing vehicle manufacturers with new compliance flexibility. The amendments will also prepare California to harmonize its rules with the federal rules for passenger vehicles. (CARB, n.d.)

The U.S. EPA granted California the authority to implement GHG emission reduction standards for new passenger cars, pickup trucks, and sport utility vehicles On June 30, 2009. The first California request to implement GHG standards for passenger vehicles, known as a waiver request, was made in December 2005, and was denied by the U.S. EPA in March 2008. That decision was based on a finding that California's request to reduce GHG emissions from passenger vehicles did not meet the Clean Air Act requirement of showing that the waiver was needed to meet "compelling and extraordinary conditions." (CARB, n.d.)

The ARB's Board originally approved regulations to reduce GHGs from passenger vehicles in September 2004, with the regulations to take effect in 2009. These regulations were authorized by the 2002 legislation Assembly Bill 1493 (Pavley). (CARB, n.d.)

The regulations had been threatened by automaker lawsuits and were stalled by the U.S. EPA's delay in reviewing and then initially denying California's waiver request. The parties involved entered a May 19, 2009 agreement to resolve these issues. With the granting of the waiver on June 30, 2009, it is expected that the Pavley regulations will reduce GHG emissions from California passenger vehicles by about 22 percent in 2012 and about 30 percent in 2016, all while improving fuel efficiency and reducing motorists' costs. (CARB, n.d.)



The CARB has adopted a new approach to passenger vehicles – cars and light trucks – by combining the control of smog-causing pollutants and greenhouse gas emissions into a single coordinated package of standards. The new approach also includes efforts to support and accelerate the numbers of plug-in hybrids and zero-emission vehicles in California. (CARB, n.d.)

<u>California Independent System Operator (ISO)</u>

The California ISO is an independent public benefit corporation responsible for operating California's longdistance electric transmission lines. The California ISO is led by a five-member board appointment by the Governor and is also regulated by FERC. While transmission owners and private electric utilities own their lines, the California ISO operates the transmission system independently to ensure that electricity flows comply with federal operational standards. The California ISO analyzes current and future electrical demand and plans for any needed expansion or upgrade of the electric transmission system. (California ISO, n.d.)

<u>California Public Utilities Commission (CPUC)</u>

The CPUC establishes policies and rules for electricity and natural gas rates provided by private utilities in California such as Southern California Edison (SCE) and Southern California Gas Company (SoCalGas). Public owned utilities such as the Los Angeles Department of Water and Power (LADWP) do not fall under the CPUCs jurisdiction. The Digital Infrastructure and Video Competition Act of 2006 (DIVCA) established the CPUC as the sole cable/video TV franchising authority in the State of California. DIVCA took effect January 1, 2007.

The CPUC is overseen by five commissioners appointed by the Governor and confirmed by the state Senate. The CPUC's responsibilities include regulating electric power procurement and generation, infrastructure oversight for electric transmission lines and natural gas pipelines and permitting of electrical transmission and substation facilities. (CPUC, n.d.)

<u>California Energy Commission (CEC)</u>

The CEC is a planning agency which provides guidance on setting the state's energy policy. Responsibilities include forecasting electricity and natural gas demand, promoting and setting energy efficiency standards throughout the state, developing renewable energy resources and permitting thermal power plants 50 megawatts and larger. The CEC also has regulatory specific regulatory authority over publicly owned utilities to certify, monitor and verify eligible renewable energy resources procured. (CEC, n.d.)

Senate Bill 1389 (SB 1389)

Senate Bill (SB) 1389 (PRC §§ 25300–25323), adopted in 2002, requires the development of an integrated plan for electricity, natural gas, and transportation fuels. Under the bill, the CEC must adopt and transmit to the Governor and Legislature an Integrated Energy Policy Report every two years. In 2018, the CEC decided to write the Integrated Energy Policy Report in two volumes. The Volume I, which was published on August 1, 2018, highlights the implementation of California's innovative policies and the role they have played in moving toward a clean energy economy. Volume II, which was adopted in February 2019, identifies several key energy issues and actions to address these issues and ensure the reliability of energy resources. (CA Legislative Info, n.d.)



4.20.3 BASIS FOR DETERMINING SIGNIFICANCE

A. <u>Thresholds of Significance</u>

According to Section XIX of Appendix G to the State CEQA Guidelines, the proposed Project would result in a significant impact to utilities and service systems if the Project or any Project-related component would:

- Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects;
- Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years;
- Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments;
- Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals; or
- Fail to comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

The following thresholds are derived from Riverside County's Environmental Assessment Checklist, as modified by the 2018 updates to Appendix G to the State CEQA Guidelines, in order to evaluate the significance of the proposed Project's impacts on utilities and service systems. The proposed Project would result in a significant impact to utilities and service systems if the Project or any Project-related component would:

- a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage systems, whereby the construction or relocation would cause significant environmental effects;
- b. Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years;
- c. Require or result in the construction of new wastewater treatment facilities, including septic systems, or expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects;
- d. Result in a determination by the wastewater treatment provider that serves or may service the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments;
- e. Generate solid waste in excess of State or Local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals;



- f. Fail to comply with federal, state, and local management and reduction statutes and regulations related to solid wastes including the CIWMP (County Integrated Waste Management Plan);
- g. Impact the following facilities requiring or resulting in the construction of new facilities or the expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects:
 - 1. Electricity;
 - 2. Natural gas;
 - 3. Communications systems;
 - 4. Street lighting;
 - 5. Maintenance of public facilities, including roads; or
 - 6. Other governmental services.

The significance thresholds set forth in Riverside County's Environmental Assessment Checklist, as modified/updated per the 2018 updates to the State CEQA Guidelines, were used to evaluate the significance of the proposed Project's impacts to utilities and service systems.

4.20.4 IMPACT ANALYSIS

<u>Threshold a.</u>: Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage systems, whereby the construction or relocation would cause significant environmental effects?

A. <u>Water Service and Facilities</u>

Under existing conditions, there is a 14-inch water main located within the existing improved right-of-way (ROW) of Patterson Avenue and a 12-inch water main within the existing improved ROW for Rider Street. As part of the Project, a 2-inch domestic water line would connect to the existing 14-inch main in Patterson Avenue, while 6-inch and 12-inch fire service lines are proposed to connect to the existing 14-inch main in Patterson Avenue and the 12-inch domestic water line in Rider Street. Impacts associated with the above-described Project-related water facilities are inherent to the Project's construction phase, and impacts have been evaluated throughout this EIR under the appropriate subject headings (e.g., air quality, biological resources, etc.). Where significant direct or cumulative impacts are identified, mitigation measures have been imposed to reduce the Project's impacts to the maximum feasible extent. There are no environmental impacts that would occur specifically related to the Project's proposed water improvements. As such, with the mitigation measures specified in this EIR, Project impacts due to water improvements would be less than significant.

B. <u>Wastewater Facilities</u>

Under existing conditions, there is an 8-inch sewer main that extends easterly from Wildwood Lane, which extends northerly through the site near the western Project boundary, then to the east, and then north to an



existing 8-inch sewer main located within Rider Street. In addition, there is an existing 8-inch sewer main within Walnut Street. As part of the Project, there would be no change to the existing sewer main within Walnut Street. The existing 8-inch sewer main that extends from Wildwood Lane to Walnut Street would be removed as part of the Project, and a new 8-inch sewer line would be constructed from an existing manhole at the easterly end of Wildwood Lane, which would extend northerly along the western Project boundary and would connect to the existing 8-inch sewer main in Rider Street approximately 284 feet west of the existing sewer connection. Impacts associated with the proposed sewer improvements are inherent to the Project's construction phase, and impacts have been evaluated throughout this EIR under the appropriate subject headings (e.g., air quality, biological resources, etc.). Where significant direct or cumulative impacts are identified, mitigation measures have been imposed to reduce the Project's impacts to the maximum feasible extent. There are no environmental impacts that would occur specifically related to the Project's proposed sewer improvements that have not already been addressed by this EIR. As such, with the mitigation measures specified in this EIR, Project impacts due to sewer improvements would be less than significant.

C. <u>Wastewater Treatment</u>

Wastewater generated by the Project would be conveyed to either the Moreno Valley RWRF or the Perris Valley RWRF for treatment. As previously indicated, combined these RWRFs have a daily capacity of 38.0 million gpd and typical daily flows of 27.0 million gpd. (EMWD, n.d.) As shown in Table 4.20-6, *Project-Related Wastewater Generation*, at buildout the Project conservatively is estimated to generate approximately 61,320 gpd of wastewater requiring treatment, based on the rates used in EIR No. 521, which was prepared in conjunction with Riverside County's 2015 General Plan Update. The Project's conservatively estimated wastewater generation would represent approximately 1.4% of the current available treatment capacity at the Moreno Valley RWRF, and approximately 0.9% of the current available treatment capacity at the Perris Valley RWRF. Accordingly, the Project would not result in or require the expansion of the existing facilities at the Moreno Valley or Perris Valley RWRFs, and impacts would therefore be less than significant. (Riverside County, 2015a, Table 4.19-BJ)

Land Use	Acreage	Generation Factors	Wastewater Generation (gpd)
Industrial	40.88 acres	1,500 gpd/acre ¹	61,320
Total:			61,320

Table 4.20-6 Project-Related Wastewater Generation

Note: The data in Table 4.20-6 conservatively includes the portions of the Project site that are planned for future development with three single-family residences, and therefore overstates the Project's wastewater generation. Residential uses are excluded from Table 4.20-6 because the Project would not result in a net increase in the number of residential dwelling units on site as compared to existing conditions and therefore would not result in an increase in the amount of wastewater generated by residential uses on site.

(Riverside County, 2015a, Table 4.19-BJ)

D. <u>Stormwater Drainage System</u>

As previously discussed, under existing condition, offsite runoff enter the project site at several locations. The largest tributary area is from offsite areas located south of Walnut Street, while additional offsite areas enter the project site from three existing streets to the west. Runoff from the Project site generally drains to the northeasterly corner of the site via natural drainage courses. (Thienes, 2022a)



Drainage improvements proposed as part of the Project would continue to convey offsite tributary flows. However, with the proposed improvements, offsite flows would be intercepted by catch basins at the respective streets and then conveyed northerly through a separate storm drain to the proposed extension of the storm drain system within Rider Street. The proposed offsite storm drain would collect runoff from Walnut Street, Sunny Canyon Street, Wildwood Lane, and Norrisgrove Drive, then continue northerly to Rider Street. (Thienes, 2022a)

For onsite runoff, the south half of the proposed building and the southerly truck yard, plus a portion of the westerly offsite berm between the site and the residential neighborhood further, would drain to catch basins in the truck yard. Runoff from these areas would then be conveyed to a proposed 96-inch corrugated metal pipe (CMP) system within the truck yard for underground detention, in order to reduce proposed condition runoff to existing condition discharge rates from the site. Discharge from the 96-inch CMP system would be conveyed northerly via a proposed private storm drain to the north-easterly water quality basin for treatment, then further north via a proposed lateral to the extended Rider Street storm drain. (Thienes, 2022a)

The easterly parking lot would drain to catch basins in the parking lot. Runoff would then be conveyed to a proposed 96-inch CMP system within the parking lot for underground detention. Similarly, discharge from the 96-inch CMP system would be conveyed northerly to the water quality basin, then further north to the extended Rider Street storm drain. (Thienes, 2022a)

The north half of the proposed building and the northerly truck yard, plus a portion of the westerly offsite berm between the site and the residential neighborhood further west would drain to catch basins in the truck yard. Runoff from these areas would then be conveyed to a proposed 90-inch CMP system within the truck yard for underground detention. Discharge from the 90-inch CMP system would be conveyed easterly via another proposed private storm drain to the water quality basin, then further north to the extended Rider Street storm drain. (Thienes, 2022a)

The northerly drive aisle (north of the site's northerly truck yard) and the northerly frontage landscape, plus a smaller portion of the westerly offsite berm would drain to catch basins in the drive aisle and frontage landscape, respectively. Runoff would then be conveyed easterly via another proposed private storm drain to the water quality basin and then, similarly, further north to the extended Rider Street storm drain. (Thienes, 2022a)

Impacts associated with the above-described drainage system are inherent to the Project's construction phase, and impacts have been evaluated throughout this EIR under the appropriate subject headings (e.g., air quality, biological resources, etc.). Where significant direct or cumulative impacts are identified, mitigation measures have been imposed to reduce the Project's impacts to the maximum feasible extent. There are no environmental impacts that would occur specifically related to the Project's proposed storm drainage improvements. As such, with the mitigation measures specified in this EIR, Project impacts due to stormwater drainage improvements would be less than significant.



<u>Threshold b.</u>: Would the Project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?

The EMWD is responsible for supplying water services in the Project area. According to EMWD's 2020 UWMP, which provides a framework for long-term water planning and informs the public of the EMWD's plans to ensure adequate water supplies through the year 2045. The UWMP also establishes a water use target that aids in meeting the State's goal of reducing per capita water use by 20% by 2020. EMWD's UWMP identifies current and future water demands and supplies, and provides a planning framework for water-related management decisions.

EMWD's 2020 UWMP anticipated that the 40.88-acre Project site would be developed with Medium Density Residential (MDR) land uses, consistent with the Project site's adopted General Plan and Mead Valley Area Plan (MVAP) land use plans. As shown in Table 4.20-7, *EMWD 2022 UWMP Estimated Water Demand for Project Site*, the EMWD 2020 UWMP anticipated that the Project site would generate a demand for 83,324 gpd, or approximately 93.40 AFY. (EMWD, 2023, p. 18)

Table 4.20-7 EMWD 2022 UWMP Estimated Water Demand for Project Site

Land Use Category		Average Day Demand (gpd)	Annual Demand (AFY)	
Medium Density Residential		83,324	93.40	
	Total	83,324	93.40	
(E) (UUD) (2022) = 1.1 + 1.0)				

(EMWD, 2023, Table 10)

As part of the Project, the Project site would be developed with a 591,203 s.f. warehouse building and would accommodate future development of three residential dwelling units. As shown in Table 4.20-8, *Project-Specific Water Demand Estimate*, based on the Project's proposed land uses the Project is anticipated to generate a demand for approximately 23,804 gpd, or approximately 26.68 AFY. Comparing the 2020 UWMP water demand estimates for the Project site as presented in Table 4.20-7 with the Project's estimated demand shown in Table 4.20-8 demonstrates that the Project would result in a reduced demand for water supplies as compared to the Project site's adopted land uses and as compared to the land use assumptions used in the 2020 UWMP. Specifically, the Project would result in a demand for water that is approximately 28.5% of the water demand assumed for the Project site by the 2020 UWMP. (EMWD, 2023, p. 18)

Table 4.20-8	Project-Specific Water Demand Estimate
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Land Use Category	Average Day Demand (gpd)	Annual Demand (AFY)
Warehouse	22,484	25.20
Medium Density Residential	1,320	1.48
Total	23,804	26.68

(EMWD, 2023, Table 11)

EMWD's 2020 UWMP includes an evaluation of EMWD's water supply reliability under a range of potential hydrologic conditions. The results for normal year conditions are shown in Table 4.20-9, *Retail Supply and Demand Comparison – Normal Year (AFY)*, and Table 4.20-10, *Wholesale Supply and Demand Comparison*



- Normal Year (AFY) for EMWD's retail and wholesale service respectively. The single dry year evaluation is documented in Table 4.20-11, *Retail Supply and Demand Comparison – Single Dry Year (AFY)*, Table 4.20-12, *Wholesale Supply and Demand Comparison – Single Dry Year (AFY)*, and the results of the multiple dry year evaluation are shown in Table 4.20-13, *Retail Supply and Demand Comparison – Multiple Dry Years (AFY)*, and Table 4.20-14, *Wholesale Supply and Demand Comparison – Multiple Dry Years (AFY)*, and Table 4.20-14, *Wholesale Supply and Demand Comparison – Multiple Dry Years (AFY)*. The supply totals shown in the tables reflect EMWD's planned production and not EMWD's supply capacity. Under drought conditions, EMWD may increase local supply production, pump from stored water supplies, or purchase additional imported water from MWD if necessary. (EMWD, 2023, p. 19)

 Table 4.20-9
 Retail Supply and Demand Comparison – Normal Year (AFY)

	2025	2030	2035	2040	2045
Supply Totals	145,930	157,320	168,900	178,700	187,100
Demand Totals	145,930	157,320	168,900	178,700	187,100
Difference	0	0	0	0	0

(EMWD, 2023, Table 12)

Table 4.20-10 Wholesale Supply and Demand Comparison – Normal Year (AFY)

2025	2030	2035	2040	2045
62,970	57,580	60,000	62,300	64,400
62,970	57,580	60,000	62,300	64,400
0	0	0	0	0
	2025 62,970 62,970 0	2025 2030 62,970 57,580 62,970 57,580 0 0	2025 2030 2035 62,970 57,580 60,000 62,970 57,580 60,000 0 0 0	2025 2030 2035 2040 62,970 57,580 60,000 62,300 62,970 57,580 60,000 62,300 0 0 0 0

(EMWD, 2023, Table 13)

Table 4.20-11	Retail Supply and Dema	nd Comparison – Single	e Dry Year (AFY)
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	2025	2030	2035	2040	2045
Supply Totals	151,130	162,820	174,700	184,700	193,300
Demand Totals	151,130	162,820	174,700	184,700	193,300
Difference	0	0	0	0	0

(EMWD, 2023, Table 14)

Table 4.20-12 Wholesale Supply and Demand Comparison – Single Dry Year (AFY)

	2025	2030	2035	2040	2045
Supply Totals	64,770	59 <i>,</i> 080	61,600	63 <i>,</i> 600	65 <i>,</i> 900
Demand Totals	64,770	59 <i>,</i> 080	61,600	63,600	65,900
Difference	0	0	0	0	0

(EMWD, 2023, Table 15)



		2025	2030	2035	2040	2045
	Supply Totals	151,130	162,820	174,700	184,700	193,300
First Year	Demand Totals	151,130	162,820	174,700	184,700	193,300
	Difference	0	0	0	0	0
Cocord	Supply Totals	132,700	143,300	153,700	162,500	170,300
Second	Demand Totals	132,700	143,300	153,700	162,500	170,300
rear	Difference	0	0	0	0	0
	Supply Totals	134,900	145,500	155,500	164,100	171,900
Third Year	Demand Totals	134,900	145,500	155,500	164,100	171,900
	Difference	0	0	0	0	0
	Supply Totals	137,100	147,600	157,400	165,700	173,500
Fourth Year	Demand Totals	137,100	147,600	157,400	165,700	173,500
	Difference	0	0	0	0	0
	Supply Totals	140,200	150,800	160,000	168,000	175,800
Fifth Year	Demand Totals	140,200	150,800	160,000	168,000	175,800
	Difference	0	0	0	0	0

Table 4.20-13	Retail Supply and Demand Comparison – Multiple Dry Years (AFY)
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(EMWD, 2023, Table 16)

Table 4.20-14	Wholesale Supply	and Demand Com	parison – Multiple Dr	y Years (AFY)
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		2025	2030	2035	2040	2045
	Supply Totals	64,770	59,080	61,600	63,600	65,900
First Year	Demand Totals	64,770	59,080	61,600	63,600	65,900
	Difference	0	0	0	0	0
Coord	Supply Totals	63,200	59,100	61,400	63,400	65,600
Second	Demand Totals	63,200	59,100	61,400	63,400	65 <i>,</i> 600
real	Difference	0	0	0	0	0
	Supply Totals	62,100	59,600	61,800	63,900	66,000
Third Year	Demand Totals	62,100	59 <i>,</i> 600	61,800	63,900	66,000
	Difference	0	0	0	0	0
	Supply Totals	61,000	60,100	62,200	64,300	66,400
Fourth Year	Demand Totals	61,000	60,100	62,200	64,300	66,400
	Difference	0	0	0	0	0
Fifth Year	Supply Totals	59,800	60,600	62,600	64,700	66,900
	Demand Totals	59 <i>,</i> 800	60,600	62,600	64,700	66,900
	Difference	0	0	0	0	0

(EMWD, 2023, Table 17)

EMWD relies on MWD and local resources to meet the needs of its growing population. MWD demonstrated in the 2020 MWD UWMP that with the addition of all water supplies, existing and planned, MWD has the ability to meet all of its member agencies' projected supplemental demand through 2045, even under a repeat


of historic multiple-year drought scenarios. Based on present information and the assurance that MWD is engaged in identifying solutions that, when combined with the rest of its supply portfolio, will ensure a reliable long-term water supply for its member agencies, EMWD has determined that it will be able to provide adequate water supplies to meet the potable water demand for the proposed Project as part of its existing and future demands. Additionally, the Project would not require or result in the construction of new water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Therefore, impacts associated with the Project's water demand would be less than significant. (EMWD, 2023, p. 23)

<u>Threshold c.</u>: Would the Project require or result in the construction of new wastewater treatment facilities, including septic systems, or expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects?

No septic systems are proposed as part of the Project. As discussed under the analysis of Threshold a., the Project would be provided sanitary sewer service by the EMWD. A description of proposed sewer improvements is provided in EIR subsection 3.5.4.G, and are described in detail under the analysis of Threshold a. Impacts associated with the Project's proposed sewer improvements are inherent to the Project's construction phase, and impacts have been evaluated throughout this EIR under the appropriate subject headings (e.g., air quality, biological resources, etc.). Where significant direct or cumulative impacts are identified, mitigation measures have been imposed to reduce the Project's impacts to the maximum feasible extent. There are no environmental impacts that would occur specifically related to the Project's proposed sewer improvements that have not already been addressed in pertinent sections of this EIR. Additionally, the analysis of Threshold a. demonstrates that the EMWD would not need to expand any wastewater treatment facilities as a result of the proposed Project. As such, with the mitigation measures specified in this EIR, Project impacts due to the proposed construction of sewer facilities would be less than significant.

<u>Threshold d.</u>: Would the Project result in a determination by the wastewater treatment provider that serves or may service the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

As discussed under the analysis of Threshold a., wastewater generated by the Project would be conveyed to either the Moreno Valley RWRF or the Perris Valley RWRF for treatment for treatment. As previously shown in Table 4.20-6, at buildout the Project is conservatively estimated to generate approximately 60,750 gpd of wastewater requiring treatment. The Project's wastewater generation would represent approximately 1.4% of the current available treatment capacity at the Moreno Valley RWRF, and approximately 0.9% of the current available treatment capacity at the Perris Valley RWRF. Accordingly, the Project would not result in or require the expansion of the existing facilities at either the Moreno Valley RWRF or the Perris Valley RWRF, and impacts would therefore be less than significant.



<u>Threshold e.</u>: Would the Project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Solid waste generated by the Project would be disposed of at either the El Sobrante Landfill, Lamb Canyon Landfill, or Badlands Landfill. As previously indicated, the El Sobrante Landfill is currently permitted to receive 16,054 tpd, while the average daily tonnage in December 2022 was 9,291.25 tpd. The Lamb Canyon Landfill is permitted to receive 5,000 tpd, while data from December 2022 shows that the Lamb Canyon Landfill received a daily average of approximately 1,890.14 tpd. The Badlands Landfill is permitted to receive 4,800 tpd, while in January 2023 the Badlands Landfill received an average of 3,166.88 tpd. (RCDWR, 2022a; RCDWR, 2022b; RCDWR, 2023)

As shown in Table 4.20-8, *Project Solid Waste Generation*, buildout and occupancy of the Project is estimated to produce approximately 17.5 tpd of solid waste, or approximately 6,385 tons per year (tpy). Per the Riverside CIWMP, which applies to the Project, up to 50% of its solid waste would need to be diverted from area landfills. In conformance with the CIWMP, the Project Applicant is required to work with future contract refuse haulers to implement recycling and waste reduction programs for solid wastes.

Table 4.20-1	5 Project Solid	Waste Generation
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Land Use	Square Footage (s.f.)	Generation Factors	Total Solid Waste Generated (tpy)	Average Solid Waste per Day (tpd)
Industrial	591,203 s.f.	10.8 tons/1,000 s.f.	6,385 tpy	17.5 tpd
Totals:	181,495 s.f.		6,385 tpy	17.5 tpd

1. "Industrial" includes both Light Industrial and Business Park land uses. (Riverside County, 2015a, Table 4.17-N)

Based on the average daily tonnage received at these landfills in June 2022, the Project's daily generation of solid waste would represent 0.26% of the existing excess capacity at the El Sobrante Landfill, 0.56% of the existing excess capacity at the Lamb Canyon Landfill, and 1.07% of the existing excess capacity at the Badlands Landfill. Because the Project would generate a relatively small amount of solid waste per day as compared to the permitted daily capacities and average daily tonnage for the El Sobrante Landfill, Lamb Canyon Landfill, and Badlands Landfill, it is anticipated that these regional landfill facilities would have sufficient daily capacity to accept solid waste generated by the Project. As such, because regional solid waste facilities would have adequate capacity to handle solid waste generated by the Project's construction and operational phases, impacts would be less than significant.

<u>Threshold f.</u>: Would the Project comply with federal, state, and local management and reduction statutes and regulations related to solid wastes including the CIWMP (County Integrated Waste Management Plan)?

The proposed Project would be regulated by the Riverside CIWMP (RCWRMD, 1996). The CIWMP outlines goals, policies, and programs Riverside County and its cities would implement to create an integrated and cost-effective waste management system that complies with the provisions of AB 939 and its diversion mandates. Additionally, AB 341 made a legislative declaration that it is the policy goal of the State that not less than 75%



of solid waste generated be source reduced, recycled, or composted by the year 2020, although the California Department of Resources Recycling and Recovery may not establish or enforce a diversion rate greater than the 50% as set forth by the CIWMP (per PRC § 41780.01[b]).

The proposed Project would be regulated by the RCDWR and would be required to comply with the CIWMP's requirement to divert up to 50% of its solid waste from area landfills. In conformance with the CIWMP, the Project Applicant is required to work with future contract refuse haulers to implement recycling and waste reduction programs for solid wastes. Implementation of a waste disposal strategy for the proposed Project would assist Riverside County in achieving the mandated goals of the IWMA by developing feasible waste programs that encourage source reduction, recycling, and composting. The RCDWR is specifically charged with the responsibility of implementing programs that ensure that unincorporated Riverside County achieves 50% diversion of solid waste from landfill disposal as well as monitoring and reporting unincorporated Riverside County's compliance with the CIWMP and AB 939. With mandatory compliance to AB 939, AB 341, and RCDWR's programs and policies, the Project would result in a less-than-significant impact due to a conflict with federal, State, and local management and reduction statutes and regulations related to solid wastes, including the CIWMP.

<u>Threshold g.</u> :	Would the Project impact the following facilities requiring or resulting in the construction of new facilities or the expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects:
	1. Electricity;
	2. Natural Gas;
	3. Communications systems;
	4. Street lighting;
	5. Maintenance of public facilities, including roads; or
	6. Other governmental services?
Electric servic	e is currently available to the proposed Project site through Southern California Edison, although

Electric service is currently available to the proposed Project site through Southern California Edison, although existing facilities would need to be expanded as necessary to provide service to the Project. However, the Project area already is served by existing electrical lines; therefore, the construction of electricity facilities as necessary to serve the proposed Project would occur within the areas already planned for impact by the Project or within existing, improved roadways. Therefore, the construction of electrical facilities necessary to serve the proposed Project would not result in any significant impacts to the environment that are not already addressed by this EIR. No additional mitigation would be required.

There are no anticipated capacity restrictions which could limit the ability of the SoCal Gas Company to provide service to the proposed Project. Points of connection to SoCal Gas Company main lines would be resolved as the proposed Project and other projects planned for the area commence their utility design and interconnection plans. It is anticipated that construction of any off-site natural gas utility connections would occur within existing disturbed public rights-of-way. As such, the construction of these utility connections is



evaluated under the appropriate subject headings within this EIR, and no new impacts would occur specifically related to natural gas service that have not already been addressed.

Due to long-range planning efforts by the energy purveyors, Project implementation is not anticipated to result in the need for the construction or expansion of off-site gas generation facilities, although some new distribution lines would be necessary (as discussed above). Any future need for regional energy facilities related to cumulative growth in the service areas of SoCal Gas would be determined by the service agencies as part of their long-range growth projections. Accordingly, provision of gas service to the proposed Project site would not result in any significant environmental impacts not already addressed under relevant sections of this EIR.

Points of connection to telecommunication facilities would be resolved as the proposed Project and other projects planned for the area commence their utility design and interconnection plans. It is anticipated that any off-site construction of communication utility connections would occur within existing disturbed public rights-of-way. As such, the construction of communication utility connections is evaluated under the appropriate subject headings within this EIR. No environmental impacts would occur from the provision of these utilities, as all lines would be installed within the disturbance areas of existing roadway rights-of-way and/or on site within areas already planned for physical impacts as part of the Project.

The Project would require a number of drainage features on site, as described in detail under the analysis of Threshold a. The proposed drainage improvements would be located in areas anticipated to be impacted by the Project, which have been evaluated throughout this EIR, and mitigation is identified where necessary to reduce impacts to a level below significance. Therefore, the construction of stormwater drainage facilities needed to serve the Project would not result in any impacts to the environment beyond what is evaluated, disclosed, and mitigated by other sections of this EIR. Additional mitigation would not be required.

The Project would provide street lighting as required by Riverside County in accordance with Ordinance No. 461 (Roadway Standards) and Ordinance No. 460 (Subdivision of the Land). All physical environmental impacts associated with street lighting and maintenance would occur within the boundaries of the on- and offsite improvement areas, the impacts of which are described throughout this EIR. Therefore, no additional impacts to the environment would occur that are not already addressed by this EIR, and additional mitigation would not be required.

Implementation of the proposed Project would result in minor improvements to Rider Street, Patterson Avenue, and Walnut Street along the Project site's frontages with these roadways. As Rider Street and Patterson Avenue are largely improved under existing conditions, the Project would only result in a nominal increase in the need for maintenance along these roadways. The Project would result in improvements to Walnut Street, which currently exists as a dirt roadway along the Project's frontage, resulting in the need for increased maintenance by the County. Maintenance of the public roadways abutting the Project site would not result in any significant impacts to the environment. Impacts associated with the proposed improvements to these roadways already are evaluated in appropriate sections of this EIR, and any identified impacts have been mitigated to the maximum feasible extent. Maintenance of the major roadway facilities within the Project site would be funded through the Project developer's payment of Development Impact Fees (DIF) and future building owners' payment of property taxes. Therefore, the maintenance of roadways proposed by the Project



would not result in any new impacts to the environment beyond that which is already disclosed and mitigated by this EIR, and a less-than-significant impact would occur.

No known other facilities would require off-site construction or maintenance as a result of the proposed Project.

Based on the foregoing analysis, impacts associated with the construction or expansion of utility facilities would be less than significant or otherwise mitigated to the maximum feasible extent by this EIR. No additional mitigation would be required.

4.20.5 CUMULATIVE IMPACT ANALYSIS

The cumulative study area used for the analysis of water and wastewater includes areas within EMWD's service area for water and wastewater services, and is based on the buildout of the Riverside County General Plan and the general plans of cities within EMWD service area. The cumulative study area for solid waste comprises western Riverside County, as all areas of western Riverside County are served by WMIE, and is based on the buildout of the Riverside County. For the Riverside County General Plan and the general plans of cities within western Riverside County. For the remaining issue areas, the cumulative impact analysis considers development of the Project in conjunction with other development projects and planned development in the vicinity of the Project site.

As discussed under the analysis of Threshold a., the Project would require a number of improvements related to water, wastewater treatment, and storm drainage systems, although such improvements are inherent to the Project's construction phase. Cumulatively-considerable impacts associated with Project construction activities have been evaluated throughout this EIR, and where necessary mitigation measures have been identified to reduce the Project's cumulatively-considerable effects to the maximum feasible extent. There are no components of the Project's proposed water, wastewater, or storm drainage systems that could result in impacts not already evaluated by other sections of this EIR. Accordingly, impacts associated with the construction of new or expanded water, wastewater treatment, and stormwater drainage systems would be less-than-cumulatively considerable.

The analysis of Threshold b. demonstrates that the EMWD would have sufficient water supplies available to serve the Project as well as other reasonably foreseeable future development during normal, dry, and multiple dry years. The EMWD UWMP and the Project's WSA (*Technical Appendix O*) evaluate the water demands of both the Project and other cumulative developments within EMWD's service area, and the Project is well below the growth assumptions utilized in the EMWD for the Project site. Because the UWMP demonstrates that the EMWD has the capacity to serve future development within its service area, cumulatively-considerable impacts to water supply would be less than significant.

As discussed under the analysis of Thresholds c. and d., the Project would require a number of improvements to provide sewer service to the Project site, although impacts associated with such improvements are inherent to the Project's construction phase. Cumulatively-considerable impacts associated with Project construction activities have been evaluated throughout this EIR, and where necessary mitigation measures have been identified to reduce the Project's cumulatively-considerable effects to the maximum feasible extent. There are no components of the Project's proposed wastewater improvements that would result in impacts not already



evaluated by other sections of this EIR. Accordingly, impacts associated with the construction of new or expanded wastewater treatment conveyance facilities would be less-than-cumulatively considerable.

The Project's wastewater generation would represent approximately 1.4% of the current available treatment capacity at the Moreno Valley RWRF, and approximately 0.9% of the current available treatment capacity at the Perris Valley RWRF. Accordingly, the Project would not result in or require the expansion of the existing facilities at either of these RWRFs. Although the Project and other cumulative developments ultimately would contribute to the need for expanded capacity at these RWRFs, impacts associated with such expansion would be subject to CEQA once plans for such expansion have been prepared by the EMWD. As no such plans are currently available, it would be speculative to evaluate potential cumulatively-considerable impacts associated with the proposed expansion (CEQA Guidelines § 15145). As such, Project impacts due to wastewater capacity would be less-than-cumulatively considerable.

As previously discussed in the analysis provided under Threshold e., solid waste generated by construction and operation of the Project would represent nominal proportions of the daily disposal capacity at the El Sobrante Landfill, Lamb Canyon Landfill, and/or Badlands Landfill. The landfills are currently projected to remain open until as far into the future as 2051 (El Sobrante Landfill) and have sufficient daily capacity to handle solid waste generated by the Project and other cumulative developments both during construction and long-term operation. The Project would not directly result in the need for expanded solid waste disposal facilities, as the El Sobrante Landfill, Lamb Canyon Landfill, and Badlands Landfill have sufficient existing capacity to handle solid waste generated by the Project. Rather, the Project's incremental contribution to solid waste generation may contribute to an ultimate need for expanding the solid waste disposal facilities that would serve the Project and/or the construction of additional solid waste disposal facilities. Moreover, it is possible that as other developments in the region are proposed, the RCDWR and WMIE may opt to construct new solid waste disposal facilities to serve those developments, and such facilities may or may not receive solid waste generated by the Project. Although the Project has the potential to cumulatively contribute to the demand for new or expanded solid waste disposal facilities, the construction of which could significantly impact the environment, it is too speculative for evaluation in the absence of a proposed expansion or development plan (CEQA Guidelines, 14 CCR § 15145). Therefore, the Project's cumulatively-considerable impacts to solid waste disposal facilities are evaluated as less than significant.

The Project would adhere to regulations set forth by local and State regulations (including AB 341 and AB 939) during both construction and long-term operations. Other cumulative developments would also be required to comply with such regulations. As such, the Project as well as other cumulative developments in the area would not result in cumulative impacts with respect to compliance with federal, State, and local statutes and regulations related to solid wastes. Impacts would be less-than-cumulatively considerable.

Cumulative impacts associated with the provision of facilities for electricity, natural gas, communications systems, stormwater drainage, street lighting, maintenance of facilities, construction of off-site sewer and water lines, and other governmental services are inherent to the Project's construction phase and have been evaluated throughout the appropriate issue areas in this EIR. In all cases, where cumulatively-considerable impacts associated with any Project component are identified, mitigation measures have been imposed to reduce such impacts to the maximum feasible extent. Accordingly, cumulatively-considerable impacts associated with the provision of utility facilities to serve the proposed Project would be less than significant.



4.20.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

<u>Threshold a.: Less-than-Significant Impact</u>. Although the Project would require construction of new or expanded water, wastewater conveyance, and stormwater drainage systems, impacts associated with the construction of such facilities have been evaluated throughout this EIR under the appropriate subject headings (e.g., air quality, biological resources, etc.). Where significant direct or cumulative impacts are identified, mitigation measures have been imposed to reduce the Project's impacts to the maximum feasible extent. There are no environmental impacts that would occur specifically related to the Project's proposed water, sewer, and drainage improvements that have not already been addressed. As such, with the mitigation measures specified in this EIR, Project impacts due to water, sewer, and drainage improvements would be less than significant. Additionally, the Project's wastewater generation would represent approximately 1.4% of the current available treatment capacity at the Moreno Valley RWRF, and approximately 0.9% of the current available treatment capacity at the Moreno Valley RWRF or the Perris Valley RWRF, and impacts would therefore be less than significant.

<u>Threshold b.: Less-than-Significant Impact</u>. The UWMP and the Project's WSA (*Technical Appendix O*) demonstrate that the EMWD would have sufficient water supplies even during single and multiple dry years to meet the projected demand within its district through year 2045. Because the Project's anticipated water demand would be substantially less than the demand projections identified by the 2020 UWMP for the Project site, it can be concluded that the EMWD would have sufficient water supplies to serve the Project based on existing entitlements and resources. Additionally, the Project would not require or result in the construction of new water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Therefore, impacts associated with the Project's water demand would be less than significant.

<u>Threshold c.: Less-than-Significant Impact</u>. Impacts associated with the Project's proposed sewer improvements are inherent to the Project's construction phase, and impacts have been evaluated throughout this EIR under the appropriate subject headings (e.g., air quality, biological resources, etc.). Where significant direct or cumulative impacts are identified, mitigation measures have been imposed to reduce the Project's impacts to the maximum feasible extent. There are no environmental impacts that would occur specifically related to the Project's proposed sewer improvements that have not already been addressed in pertinent sections of this EIR. As such, with the mitigation measures specified in this EIR, Project impacts due to proposed sewer improvements would be less than significant.

<u>Threshold d.: Less-than-Significant Impact</u>. The Project's wastewater generation would represent approximately 1.4% of the current available treatment capacity at the Moreno Valley RWRF, and approximately 0.9% of the current available treatment capacity at the Perris Valley RWRF. Accordingly, the Project would not result in or require the expansion of the existing facilities at the Moreno Valley RWRF or the Perris Valley RWRF, and impacts would therefore be less than significant.

<u>Threshold e.: Less-than-Significant Impact</u>. Regional solid waste facilities would have adequate capacity to handle solid waste generated by the Project's construction and operational phases. The Project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure,



or otherwise impair the attainment of solid waste reduction goals. Accordingly, impacts would be less than significant.

<u>Threshold f.: Less-than-Significant Impact</u>. With mandatory compliance to AB 939, AB 341, and RCDWR's programs and policies, the Project would not result in a significant impact due to noncompliance with regulations related to solid waste. A less-than-significant impact would occur.

<u>Threshold g.: Less-than-Significant Impact</u>. Impacts associated with the construction or expansion of utility facilities would be less than significant or otherwise mitigated to the maximum feasible extent by this EIR. No additional mitigation would be required.

4.20.7 COUNTY REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

Applicable County Regulations and Design Requirements

The following are regulations and design requirements that apply to the proposed Project and that reduce or preclude impacts associated with utilities and service systems. Although compliance with mandatory regulatory requirements does not technically meet CEQA's definition for mitigation, they are specified herein as requirements for the Project.

- The Project is required to comply with the provisions of the California IWMA of 1989 (AB 939) which mandates a reduction of disposed waste throughout California.
- The Project is required to comply with the provisions of the California Solid Waste Reuse and Recycling Act (AB 1327) which developed a model ordinance for adoption of recyclable materials in development projects. AB 1327 requires all development projects that are commercial, industrial, institutional, or marina in nature and where solid waste is collected and loaded, to provide an adequate area for collecting and loading recyclable materials over the lifetime of the project. The area is required to be provided before building permits are issued.
- The Project is required to comply with the provisions of the Mandatory Commercial Recycling Program (AB 341): AB 341 made a legislative declaration that it is the policy goal of the State that not less than 75% of solid waste generated be source reduced, recycled, or composted by the year 2020, and required by the California Department of Resources, Recycling, and Recovery, by January 1, 2014, to provide a report to the Legislature that provides strategies to achieve that policy goal and also includes other specified information and recommendations.
- The Project would be subject to the following applicable standard conditions of approval imposed on the Project by the RCDWR:
 - Prior to issuance of a building permit, a Waste Recycling Plan (WRP) shall be submitted to the Riverside County Department of Waste Resources for approval. At a minimum, the WRP must identify the materials (i.e., cardboard, concrete, asphalt, wood, etc.) that will be generated by construction and development, the projected amounts; the measures/methods that will be taken to recycle, reuse, and/or reduce the amount of material; the facilities and/or haulers that will be



utilized; and the targeted recycling or reduction rate. During Project construction, the Project site shall have, at a minimum, two bins: one for waste disposal and the other for the recycling of Construction and Demolition (C&D) materials. Additional bins are encouraged to be used for further source separation of C&D recyclable materials. Accurate record keeping (receipts) for recycling of C&D recyclable materials and solid waste disposal must be kept. Arrangements can be made through the franchise hauler.

- Prior to final building inspection, evidence (i.e., receipts or other type of verification) to demonstrate Project compliance with the approved WRP shall be presented by the Project proponent to the Planning Division of the Riverside County Department of Waste Resources in order to clear the project for occupancy permits. Receipts must clearly identify the amount of waste disposed and Construction and Demolition (C&D) materials recycled.
- Hazardous materials are not accepted at Riverside County landfills. In compliance with federal, State, and local regulations and ordinances, any hazardous waste generated in association with the Project shall be disposed of at a permitted Hazardous Waste disposal facility. Hazardous waste materials include, but are not limited to, paint, batteries, oil, asbestos, and solvents.

Mitigation

The mitigation measures identified throughout this EIR for Project-related construction impacts (e.g., air quality, biological resources, etc.) shall apply. Project impacts to utilities and service systems would be less than significant; therefore, no additional mitigation is required related to utilities and service system improvements proposed as part of the Project.



4.21 WILDFIRE

4.21.1 EXISTING CONDITIONS

A. <u>Fire Hazard Classification</u>

Under existing conditions, portions of the areas surrounding the Project site are undeveloped and contain natural vegetation. According to Riverside County Geographic Information Systems (GIS), the Project site and areas surrounding the Project site to the north, east, south, and west are classified as having a "Very High" susceptibility to wildfire hazards (RCIT, n.d.).

B. <u>Topography</u>

The topography of the Project site slopes gently downwards from the southwest corner to the northeast corner of the site, with elevations on site ranging from approximately 1,602 feet above mean sea level (amsl) at the Project's southwest corner to approximately 1,533 feet amsl near the northeast corner of the property.

C. <u>Existing Vegetation</u>

Under existing conditions, a majority of the Project site consists of undeveloped land that was previously used for stockpiling of earthwork materials for an adjacent development, which is covered by natural vegetation that is routinely disced for fire abatement purposes. In the southern portions of the Project site are three existing residential homes and ancillary structures, with numerous ornamental trees present within and around the residential parcels.

4.21.2 APPLICABLE REGULATORY REQUIREMENTS

The following is a brief description of the federal, State, and local environmental laws and related regulations related to wildfire hazards.

A. <u>Wildland Fire Hazards Regulations and Plans</u>

1. Federal Regulations

Healthy Forests Restoration Act of 2003

On August 22, 2002, President Bush established the Healthy Forests Initiative, directing the Departments of Agriculture and the Interior, and the Council on Environmental Quality, to improve regulatory processes to ensure more timely decisions, greater efficiency, and better results in reducing the risk of catastrophic wildland fires. On June 5, 2003, the Departments of Agriculture and the Interior adopted two new categorical exclusions from documentation in an environmental assessment or environmental impact statement (EIS): an exclusion for hazardous-fuel reduction and another for rehabilitation of resources and infrastructure damaged by wildfire (68 FR 33814). (DOI, n.d.)

2. State Regulations

Public Resources Code (PRC) Sections (§) 4290-4299

These sections establish minimum statewide fire safety provisions pertaining to: roads for fire equipment access; signs identifying streets, roads, and buildings; minimum private water supply reserves for emergency



fire use; and fire fuel breaks and greenbelts. With certain exceptions, all new construction after July 1, 1991 in potential wildland fire areas is required to meet these statewide standards. The state requirements, however, do not supersede more restrictive local regulations. (CA Legislative Info, n.d.)

As defined by the California Department of Forestry and Fire Protection (CalFire), wildland areas defined as State Responsibility Areas (SRAs) may contain substantial wildfire risks and hazards. They consist of lands exclusive of cities, and federal lands regardless of ownership. The primary financial responsibility for preventing and suppressing fires within wildlands belongs to the State of California. However, it is not the State of California's responsibility to provide fire protection services to buildings or structures located within the wildlands unless CalFire has entered into a cooperative agreement with a local agency for those purposes pursuant to PRC Section 4142. As such, wildland areas require disclosure of these fire hazards in real estate transactions, and owners of properties in wildland areas are subject to PRC § 4291 maintenance requirements. The law requires CalFire every five years (1991, 1996, 2001, etc.) to provide maps identifying the boundaries of lands classified as SRAs to the Riverside County Assessor. (CA Legislative Info, n.d.)

<u>PRC § 4213 – Fire Prevention Fees</u>

Pursuant to PRC § 4213, in July of 2011, the State of California began assessing an annual "Fire Prevention Fee" for all habitable structures within SRAs to pay for fire prevention services. SRAs are the portions of California where the State of California is financially responsible for the prevention and suppression of wildfires. The SRA does not include lands within incorporated city boundaries, Tribal or federally owned land. As a result of Assembly Bill (AB) 398, California Global Warming Solutions Act of 2006, the fire prevention fee was suspended as of July 1, 2017. (CA Legislative Info, n.d.)

<u>California Government Code (CGC) § 51178</u>

This section specifies that the Director of CalFire, in cooperation with local fire authorities, shall identify areas that are Very High Fire Hazard Severity Zones (VHFHSZ) in Local Responsibility Areas (LRAs), based on consistent statewide criteria, and the expected severity of fire hazard. Per CGC § 51178, a local agency may, at its discretion, exclude from the requirements of § 51182 an area within its jurisdiction that has been identified as a VHFHSZ, if it provides substantial evidence in the record that the requirements of § 51182 are not necessary for effective fire protection within the area. Alternatively, local agencies may include areas not identified as VHFHSZ by CalFire, following a finding supported by substantial evidence in the record that the requirements of § 51182 are not agency for effective fire protection within the new area. According to § 51182, such changes made by a local agency shall be final and shall not be rebuttable by CalFire. (CA Legislative Info, n.d.)

<u>California Code of Regulations (CCR) Title 14 – Natural Resources</u>

These regulations constitute the basic wildland fire protection standards of the California Board of Forestry and Fire Protection (BFFP). They were prepared and adopted to establish minimum wildfire protection standards in conjunction with building, construction, and development within SRAs. Among other things, Title 14 requires the design, and construction of structures, subdivisions, and developments in an SRA provide for basic emergency access and perimeter wildfire protection measures (fire fuel modification zones, etc.). (CCR, n.d.)



□ <u>CCR Title 24, Parts 2 and 9 – Fire Codes</u>

Part 2 of Title 24 of the CCR refers to the California Building Code, which contains complete regulations and general construction building standards of state adopting agencies, including administrative, fire and life safety, and field inspection provisions. Part 2 was updated in 2008 to reflect changes in the base document from the Uniform Building Code to the International Building Code. Part 9 refers to the California Fire Code, which contains other fire safety-related building standards. In particular, Chapter 7A, "Materials and Construction Methods for Exterior Wildfire Exposure," in the 2010 California Building Code addresses fire safety standards for new construction. In addition, Section 701A.3.2, "New Buildings Located in Any Fire Hazard Severity Zone," states: (CBSC, 2022)

"New buildings located in any Fire Hazard Severity Zone within State Responsibility Areas, any Local Agency Very-High Fire Hazard Severity Zone, or any Wildland-Urban Interface Fire Area designated by the enforcing agency for which an application for a building permit is submitted on or after January 1, 2008, shall comply with all sections of this chapter."

B. <u>Local Regulations</u>

1. Riverside County Ordinance No. 787 – Fire Code Standards

This ordinance addresses implementation of the California Fire Code, based on the International Code Council. The codes prescribe performance characteristics and materials to be used to achieve acceptable levels of fire protection and include the Wildland-Urban Interface (WUI) fire area building standards mentioned above. Collectively, the ordinance establishes the requirements and standards for fire hazard reduction regulations within Riverside County (including additions and deletions to the California Fire Code) to fully protect the health, safety, and welfare of existing and future residents and workers of Riverside County. (Riverside County, n.d.)

Among other things, this ordinance assures that structural and nonstructural architectural elements of the building do not: a) impede emergency egress for fire safety staffing/ personnel, equipment, and apparatus; nor b) hinder evacuation from fire, including potential blockage of stairways or fire doors. In addition, for the purposes of California Fire Code implementation, the ordinance also adds a statement noting: "In accordance with Government Code §§ 51175 through 51189, Very High Fire Hazard Severity Zones are designated as shown on a map titled Very High Fire Hazard Severity Zones, dated April 8, 2010, and retained on file at the office of the Fire Chief and supersedes other maps previously adopted by Riverside County designating high fire hazard areas." It also defines a "hazardous fire area" as: "private or public land not designated as State or local fire hazard severity zone (FHSZ) which is covered with grass, grain, brush or forest and situated in a location that makes suppression difficult resulting in great damage. Such areas are designated on Hazardous Fire Area maps filed with the office of the Fire Chief." (Riverside County, 2015a, p. 4.13-49)

2. Riverside County Ordinance No. 695 – Hazardous Vegetation

Hillsides throughout Riverside County are predominantly mapped as having a substantial fire risk; thus, much of Riverside County is subject to PRC §§ 4291-4299 and Riverside County Ordinance No. 695. This ordinance requires property owners in such areas to reduce fire danger through mowing and other fuel modification methods. This ordinance affects anyone who "owns, leases, controls, operates, or maintains any building or



structure in, upon, or adjoining any mountainous area or forest-covered lands, brush-covered lands, or grass-covered lands or any land covered with flammable material." (Riverside County, 2015a, p. 4.13-50)

Among other measures, Ordinance No. 695 requires the abatement of "hazardous vegetation," which is defined in the ordinance as vegetation that is flammable and endangers the public safety by creating a fire hazard. The type of abatement can depend on the location, terrain, and vegetation present, but typically includes the mowing or discing (plowing up) of vegetation, such as seasonal and recurrent weeds, stubble, brush, dry leaves, and tumbleweeds. Abatement is generally required along roadways and habitable structures either on or adjacent to the property. (Riverside County, 2015a, pp. 4.13-50 to 4.13-51)

Prior to development, Riverside County requires a development within a high fire hazard area (SRA or VHFHSZ Local Responsibility Area [LRA]) to design and implement fuel modification programs for the interface between developed and natural areas within and adjacent to the proposed project area. Such fuel modification plans shall be subject to approval by the Riverside County Fire Department (RCFD). The fuel modification programs shall be achieved through graduated transition from native vegetation to irrigated landscape. The program shall also establish parameters for the percent, age, extent, and nature of native plant removal necessary to achieve Riverside County fire prevention standards to protect human lives and property, while preserving as much natural habitat as practicable. (Riverside County, 2015a, p. 4.13-51)

4.21.3 BASIS FOR DETERMINING SIGNIFICANCE

Section XX of Appendix G to the California Environmental Quality Act (CEQA) Guidelines identifies the following threshold questions for evaluating impacts due to wildfire:

- If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?
- If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risk, and thereby expose project occupants to pollutant concentrations for a wildfire or the uncontrolled spread of a wildfire?
- If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?
- If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

The following thresholds are derived from Riverside County's Environmental Assessment Checklist and are supplemented by the thresholds listed in Appendix G to the CEQA Guidelines, in order to evaluate the significance of the proposed Project's impacts due to wildfires. The proposed Project would result in a significant impact due to wildfires if the Project or any Project-related component would:



- a. Substantially impair an adopted emergency response plan or emergency evacuation plan;
- b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire;
- c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment;
- d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes; or
- e. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

The significance thresholds set forth in Riverside County's Environmental Assessment Checklist, as modified/updated per the 2018 updates to the CEQA Guidelines, were used to evaluate the significance of the proposed Project's impacts due to wildfires.

4.21.4 IMPACT ANALYSIS

Threshold a.: Would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?

The Project site does not contain any emergency facilities, nor does it serve as an emergency evacuation route. Additionally, there are no emergency response plans or emergency evacuation plans in effect in the local area. During construction and long-term operation of the Project, adequate emergency access for emergency vehicles would be required to be maintained along public streets that abut the Project site. Furthermore, improvements planned as part of the Project are not anticipated to adversely affect traffic operations in the local area, including along nearby segments of Rider Street, Patterson Avenue, or Walnut Street. As part of the County's discretionary review process, Riverside County reviewed the Project's application materials to ensure that appropriate emergency ingress and egress would be available to and from the Project site and that circulation on the Project site was adequate for emergency vehicles. Accordingly, implementation of the proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan, and impacts would be less than significant.

<u>Threshold b.</u>: Due to slope, prevailing winds, and other factors, would the Project exacerbate wildfire risks, and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

<u>Threshold e.</u>: Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

Implementation of the proposed Project would result in the conversion of a largely undeveloped property that contains three single-family dwelling units to a proposed light industrial warehouse development that includes a 591,203 s.f. building area, along with hardscape and landscape areas. The Project also would accommodate



three single-family lots, although no dwelling units are proposed on these lots. As compared to existing conditions, particularly on the portions of the Project site proposed for warehouse development, the Project would reduce the potential for wildfire hazards on site, and there are no components of the proposed Project that have a potential to exacerbate wildfire risks.

As previously indicated, according to Riverside County GIS, the Project site and areas surrounding the Project site are classified as having a "Very High" susceptibility to wildfire hazards (RCIT, n.d.). However, the Project has been designed to provide appropriate setbacks from undeveloped areas containing natural vegetation that could expose the Project site to wildfire hazards. Lands to the immediate west of the Project site are developed with medium density residential land uses, hardscape, and irrigated landscaping, and the Project would accommodate an irrigated landscaped berm that would serve as a buffer between the residential uses to the west and the proposed warehouse building on site; thus, the risk of wildfires from the immediate west would be negligible.

Additionally, the Project has been designed to accommodate appropriate setbacks from surrounding lands containing natural vegetation that could be subject to wildfire hazards. Specifically, the proposed warehouse building would be set back from the proposed right-of-way (ROW) of Walnut Street by more than 200 feet, from the proposed ROW for Patterson Avenue by more than 185 feet, and from the proposed ROW for Rider Street by more than 285 feet. Areas between the proposed building and the ROW for these roadways would consist of hardscape areas (e.g., travel aisles, parking areas, and truck docking areas), along with ornamental landscaping consisting of trees, shrubs, and groundcover. In addition to these on-site setbacks, the proposed building also would be buffered from surrounding areas by Rider Street, Patterson Avenue, and Walnut Street, all of which would be improved along the Project's frontage to include hardscape (e.g., curbs, gutters, sidewalks, and asphalt paving) as well as ornamental irrigated landscaping. With the improvements proposed as part of the Project, the improved portions of Rider Street and Patterson Avenue would be more than 65 feet wide, while the improved portions of Walnut Street would be approximately 50 feet in width. In total, the distance between the proposed building and the natural vegetation in the surrounding areas that could be subject to wildfire hazards would be approximately 250 feet along the southern side of the building.

Additionally, the three proposed residential lots would be located near the central portion of the western Project site boundary. No residential homes are proposed on these lots but should the lots ever develop as residential homes, appropriate fire protection would be required on the lots as part of their development pursuant to Building Code requirements. The nearest lot to Walnut Avenue would be located approximately 623 feet north of the Walnut Avenue ROW. The nearest lot to Rider Street would immediately abut Rider Street. Thus, the southerly and central residential lots would be adequately buffered to the south from very high fire hazard areas, and the northerly lot would abut a paved public street.

According to Section 405 of the Riverside County Fire Protection and Emergency Medical Master Plan, property owners are required to maintain an effective fire break involving the removal of all hazardous flammable materials or growth within an area no less than 30 feet from improved areas (i.e., buildings), and the Riverside County Fire Chief may require a distance of up to 100 feet to be cleared if warranted (Riverside County, 1986, Section 405). The proposed setbacks and roadway areas of between 250 and 350 feet in width for the proposed warehouse use would exceed the requirements of the Riverside County Fire Protection and



Emergency Medical Master Plan, thereby ensuring that future development on site would not be subject to, and would not exacerbate, wildfire risks. The proposed residential lots would be set back from very high fire hazard areas to the north by the paved Rider Street ROW and vacant properties north of Rider Street are required to be regularly disked to reduce wildland fire hazards. To the east would be an irrigated landscaped slope. To the south is Walnut Avenue and south of Walnut Avenue vacant properties are required to be regularly disked to reduce wildland fire hazards. Thus, the proposed residential lots also would not exacerbate or be subject to wildfire risks, and impacts would be less than significant.

Based on the foregoing analysis, the Project would not exacerbate wildfire risks and would not expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Additionally, the Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Accordingly, impacts would be less than significant.

<u>Threshold c.</u>: Would the Project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

As noted under the analysis of Thresholds b. and e., improvements proposed as part of the Project would provide for a setback between the proposed building and areas subject to wildland fire hazards ranging in width from 250 feet to 350 feet for the proposed warehouse building, while the future residential uses would not be subject to wildland fire hazards. Areas located between the proposed building and areas subject to wildfire hazards would consist of parking areas and drive aisles; ornamental vegetation; and improved roadways (i.e., Rider Street, Patterson Avenue, and Walnut Street). These areas would consist of vegetation irrigated with an automatic irrigation system, and thus would not exacerbate fire risk in the local area. Impacts associated with development of the Project site, including the construction of parking and landscaped areas on site and improvements to abutting roadways, are inherent to the Project's construction phase, and impacts associated with such features have been evaluated throughout this EIR under the appropriate subject heading (e.g., biological resources, etc.). There are no impacts to the environment that could result from the planned improvements that have not already been evaluated and mitigated to below a level of significance. Accordingly, the Project would not require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment not already addressed by this EIR, and impacts would therefore be less than significant.

<u>Threshold d.</u>: Would the Project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Under existing and proposed conditions, the Project site exhibits little topographic variation, and development on site as proposed would be landscaped with a variety of trees, shrubs, and groundcover irrigated with an automatic irrigation system. Thus, improvements proposed as part of the Project would not result in an increase in wildfire hazard-related risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Areas surrounding the Project site are identified as having a "Very High" susceptibility to wildfire hazards; however, there are no large slopes on any of the lands



immediately surrounding the Project site. As such, the Project site is not subject to landslides or slope instability that may occur in the surrounding area as a result of wildfires. Moreover, improvements proposed as part of the Project would provide for a setback between the proposed building and areas subject to wildland fire hazards ranging in width from 250 feet to 350 feet (refer to the discussion and analysis of Threshold b. and e.) for the proposed warehouse building, while the future residential uses would not be subject to wildland fire hazards. Therefore, the Project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes, and impacts would be less than significant.

4.21.5 CUMULATIVE IMPACT ANALYSIS

The cumulative study area for the issue of wildfire includes areas within a five-mile radius of the Project site. This study area is appropriate for analysis because fire events located more than five miles from the Project site are unlikely to affect the Project, and any fires starting in the Project area likely would not affect lands located more than five miles away.

The Project site does not contain any emergency facilities nor does it serve as an emergency evacuation route, and the Project would not serve as an evacuation route under long-term conditions. During construction and at Project build-out, the proposed Project would be required to maintain adequate access for emergency vehicles. Other cumulative developments similarly would be required to accommodate emergency access and facilities. As such, cumulatively-considerable impacts would be less than significant.

As indicated under the analysis of Thresholds b. and e., the proposed warehouse building would be set back from areas subject to wildland fire hazards by between 250 feet and 350 feet from the proposed warehouse building, while the future residential uses would not be subject to wildland fire hazards. There are no components of the proposed Project that would exacerbate wildland fire hazards in the local area, and the buffers accommodated by the Project between the proposed warehouse building and areas subject to wildfires would ensure the Project does not expose people or structures to a significant risk of loss, injury, or death involving wildland fire hazards. Other developments within the cumulative study area would similarly be required to address fire hazards as appropriate and to provide measures to avoid or reduce the potential risk of wildfire in the region. As such, Project impacts due to wildfire hazards would be less-than-cumulatively considerable.

As discussed under the analysis of Threshold c., improvements proposed as part of the Project would provide for a setback between the proposed building and areas subject to wildland fire hazards ranging in width from 250 feet and 350 feet from the proposed warehouse building, while the future residential uses would not be subject to wildland fire hazards. Areas located between the proposed warehouse building and areas subject to wildfire hazards would consist of parking areas and drive aisles; ornamental vegetation; and improved roadways (i.e., Rider Street, Patterson Avenue, and Walnut Street). These areas would consist of irrigated vegetation, and thus would not exacerbate fire risk in the local area. Impacts associated with development of the Project site, including the construction of parking and landscaped areas on site and improvements to abutting roadways, are inherent to the Project's construction phase, and cumulatively-considerable impacts associated with Project implementation have been evaluated throughout this EIR under the appropriate subject headings (e.g., biological resources, etc.). The Project would not result in any cumulatively-considerable



impacts associated with the Project's proposed buffer from wildland fire hazard areas that have not already been addressed by this EIR. Accordingly, cumulatively-considerable impacts would be less than significant.

Under existing and proposed conditions, the Project site exhibits little topographic variation, and development on site as proposed would not involve any uses containing natural vegetation or other features subject to wildland fire hazards. Moreover, improvements proposed as part of the Project would provide for a setback between the proposed building and areas subject to wildland fire hazards ranging in width from 250 feet to 350 feet from the proposed warehouse building (refer to the discussion and analysis of Threshold b. and e.), while the future residential uses would not be subject to wildland fire hazards. As such, the Project has no potential to cumulatively contribute to impacts associated with the exposure of people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Cumulatively-considerable impacts would not occur.

4.21.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

<u>Threshold a.: Less-than-Significant Impact</u>. The Project site and surrounding areas are not identified as evacuation routes, and there are no adopted emergency response plans or emergency evacuation plans applicable to the Project area. During construction and at Project build-out, the proposed Project would be required to maintain adequate access for emergency vehicles. Accordingly, the Project would not impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan, and impacts would be less than significant.

<u>Threshold b. and e.: Less-than-Significant Impact</u>. The Project would provide for a setback between the proposed warehouse building and areas subject to wildland fire hazards ranging in width from 250 feet to 350 feet, while the future residential uses would not be subject to wildland fire hazards. Landscaped areas of the Project would consist of a variety of trees, shrubs and groundcover irrigated with an automatic irrigation system, and thus would not exacerbate wildfire risks in the local area. The proposed setbacks and roadway areas of between 250 and 350 feet in width would exceed the requirements of the Riverside County Fire Protection and Emergency Medical Master Plan, thereby ensuring that future development on site would not be subject to, and would not exacerbate, wildfire risks. Accordingly, the Project would not exacerbate wildfire risks, and thereby would not expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Additionally, the Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Impacts would be less than significant.

<u>Threshold c.: Less-than-Significant Impact</u>. The Project would provide for a setback between the proposed warehouse building and areas subject to wildland fire hazards ranging in width from 250 feet to 350 feet, while the future residential uses would not be subject to wildland fire hazards. Areas located between the proposed warehouse building and areas subject to wildfire hazards would consist of parking areas and drive aisles; ornamental vegetation; and improved roadways (i.e., Rider Street, Patterson Avenue, and Walnut Street). Ornamental vegetation would be irrigated with an automatic irrigation system, and thus would not exacerbate fire risk in the local area. Impacts associated with development of the Project site, including the construction of parking and landscaped areas on site and improvements to abutting roadways, are inherent to the Project's construction phase, and impacts associated with such features have been evaluated throughout this EIR under the appropriate subject heading (e.g., biological resources, etc.). Accordingly, the Project would not exacerbate



fire risk or involve improvements that may result in temporary or ongoing impacts to the environment that have not already been addressed throughout this EIR, and impacts would therefore be less than significant.

Threshold d.: Less-than-Significant Impact. Under existing and proposed conditions, the Project site exhibits little topographic variation, and development on site as proposed would not involve features subject to wildland fire hazards. Landscaped areas proposed for the Project site would be irrigated with an automatic irrigation system, and thus would not exacerbate fire risk in the local area. Thus, improvements proposed as part of the Project would not result in an increase in wildfire hazard-related risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Areas surrounding the Project site are identified as having a "Very High" susceptibility to wildfire hazards; however, there are no large slopes on any of the lands immediately surrounding the Project site. As such, the Project site is not subject to landslides or slope instability that may occur in the surrounding area as a result of wildfires. Moreover, improvements proposed as part of the Project would provide for a setback between the proposed warehouse building and areas subject to wildland fire hazards ranging in width from 250 feet to 350 feet (refer to the discussion and analysis of Threshold b. and e.), while the future residential uses would not be subject to wildland fire hazards. Therefore, the Project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes, and impacts would be less than significant.

4.21.7 COUNTY REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

Significant impacts would not occur; therefore, mitigation measures are not required.



5.0 OTHER CEQA CONSIDERATIONS

5.1 <u>SIGNIFICANT ENVIRONMENTAL EFFECTS WHICH CANNOT BE AVOIDED IF THE PROPOSED</u> <u>PROJECT IS IMPLEMENTED</u>

The California Environmental Quality Act (CEQA) Guidelines require that an EIR disclose the significant environmental effects of a project which cannot be avoided if the proposed project is implemented (CEQA Guidelines § 15126[b]). As described in detail in Section 4.0 of this EIR, the proposed Project is anticipated to result in several impacts to the environment that cannot be reduced to below a level of significance after the implementation of relevant standard conditions of approval, compliance with applicable laws and regulations, and application of feasible mitigation measures. The significant environmental effects of the proposed Project that cannot be feasibly mitigated are as follows:

Transportation: Significant and Unavoidable Direct and Cumulatively-Considerable Impact. The Project would generate approximately 16.8 Vehicle Miles Traveled (VMT) per employee, which would exceed the County threshold of 14.2 VMT per employee by 18.31%. The Project's total VMT per Service Population (SP) would be approximately 38.78, which would exceed the identified threshold of significance of 37.87 by 2.40%. Therefore, the Project would conflict with or be inconsistent with CEQA Guidelines § 15064.3(b), which represents a significant of the proposed Project. As the future building tenants are not known for the Project, the effectiveness of any potential commute trip reduction measure may be limited. In addition to specific tenancy considerations, locational context is also a major factor relevant to the potential application and effectiveness of Transportation Demand Management (TDM) measures. A project may only realize a quantifiable reduction in commute VMT under the most favorable circumstances and ideal local conditions when implementing trip reduction measures. In practical terms, ideal conditions are rarely realized due to variables such as locational context limitations (i.e., non-urban areas). Additionally, to achieve ideal conditions a project must achieve one hundred percent employee participation, and maximum employee eligibility, which are not generally expected. This is more difficult to presume since future building tenants are not known at this time. Although the Project would be subject to compliance with Mitigation Measure MM 4.18-2, which would serve to reduce the Project's VMT, the effectiveness of commute trip reduction measures such as those listed in Mitigation Measure MM 4.18-2 cannot be guaranteed to reduce Project VMT to a level of less than significant. No additional feasible mitigation measures are available to measurable reduce the Project's VMT. Therefore, the Project's VMT impact is considered significant and unavoidable.

5.2 <u>SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL IMPACTS WHICH WOULD BE INVOLVED IN THE</u> <u>PROPOSED ACTION SHOULD IT BE IMPLEMENTED</u>

The CEQA Guidelines require EIRs to address any significant irreversible environmental changes that would be involved in the proposed action should it be implemented (CEQA Guidelines § 15126.2(c)). An environmental change would fall into this category if: a) the project would involve a large commitment of nonrenewable resources; b) the primary and secondary impacts of the project would generally commit future generations to similar uses; c) the project involves uses in which irreversible damage could result from any



potential environmental accidents; or d) the proposed consumption of resources is not justified (e.g., the project results in the wasteful use of energy).

Determining whether the proposed Project may result in significant irreversible environmental changes requires a determination of whether key non-renewable resources would be degraded or destroyed in such a way that there would be little possibility of restoring them. Natural resources in the form of construction materials and energy resources would be used in the construction of the proposed Project, but development of the Project site as proposed would have no measurable adverse effect on the availability of such resources, including resources that may be non-renewable (e.g., fossil fuels). Construction and operation of the proposed Project would not involve the use of large sums or sources of non-renewable energy. Additionally, the Project is required by law to comply with the California Green Building Standards Code (CALGreen), compliance with which reduces a building operation's energy volume that is produced by fossil fuels. The Project would be subject to regulations to reduce the Project's reliance on non-renewable energy sources. The Project also would be subject to the Energy Independence and Security Act of 2007, which contains provisions designed to increase energy efficiency and availability of renewable energy. The Project also would be subject to California Energy Code, or Title 24, which contains measures to reduce natural gas and electrical demand, thus requiring less non-renewable energy resources. As more fully documented in EIR Subsection 4.6, *Energy*, the Project would avoid the inefficient, wasteful, and unnecessary consumption of energy during Project construction, operation, maintenance, and/or removal. With mandatory compliance to the energy efficiency regulations and mitigation measures, the Project would not involve the use of large sums or sources of nonrenewable energy.

EIR Subsection 4.9, *Hazards and Hazardous Materials*, provides an analysis of the proposed Project's potential to transport or handle hazardous materials which, if released into the environment, could result in irreversible damage. As concluded in the analysis, compliance with federal, State, and local regulation related to hazardous materials would be required of all contractors working on the property during the Project's construction and of all the future occupants of the Project's buildings. As such, construction and long-term operation of the proposed Project would not have the potential to cause significant irreversible damage to the environment, including damage that may result from upset or accident conditions.

5.3 GROWTH INDUCING IMPACTS OF THE PROPOSED PROJECT

CEQA requires a discussion of the ways in which the proposed Project would be growth inducing. The CEQA Guidelines identify a project as growth inducing if it would foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment (CEQA Guidelines § 15126.2(d)). New employees and new residential developments represent direct forms of growth. These direct forms of growth have a secondary effect of expanding the size of local markets and including additional economic activity in the area.

A project could indirectly induce growth at the local level by increasing the demand for additional goods and services associated with an increase in population or employment and thus reducing or removing the barriers to growth. This typically occurs in suburban or rural environments where population or employment growth results in increased demand for service and commodity markets responding to the new population of residents or employees. Economic growth likely would take place as a result of the proposed Project's operation as a



light industrial development. The Project's construction- and operational-related employees would purchase goods and services in the region, but any secondary increase in employment associated with meeting these goods and services needs would be marginal, accommodated by existing goods and service providers, and highly unlikely to result in any new physical impacts to the environment. Therefore, while the Project would create economic opportunities by introducing new job opportunities to the Project site, this change would not induce substantial new growth in the region.

Under CEQA, growth inducement is not considered necessarily detrimental, beneficial, or of significance to the environment. Typically, growth-inducing potential of a project would be considered significant if it fosters growth or a concentration of population in excess of what is assumed in pertinent master plans, land use plans, or in projections made by regional planning agencies such as the Southern California Association of Governments (SCAG). Significant growth impacts also could occur if a project provides infrastructure or service capacity to accommodate growth beyond the levels currently permitted by local or regional plans and policies. In general, growth induced by a project is considered a significant impact if it directly or indirectly affects the ability of agencies to provide needed public services, or if it can be demonstrated that the potential growth significantly affects the environment in some other way.

Areas surrounding the Project site are primarily characterized by residential uses and undeveloped, planned industrial development to the north; residential uses and undeveloped, planned industrial development to the south; residential uses, a church, a building used for fencing supply materials, and undeveloped, planned industrial development to the east; and residential, a private daycare, and undeveloped lands to the west. The southern portion of the Project site is developed with three large-lot single-family homes. Development of the Project site with a 591,203 square feet (s.f.) light industrial warehouse building and three residential dwelling units would not directly induce surrounding properties to develop, because undeveloped areas in the immediate Project vicinity already are designated by the Riverside County General Plan for future development with light industrial uses. Furthermore, roadway and utility improvements proposed as part of the Project have been designed to serve the proposed Project, and would not remove infrastructure-related obstacles to development of other off-site properties. Additionally, with improvements, fee payments, and fair-share monetary contributions, as would be imposed as conditions of approval for the Project based on the results of the sitespecific Traffic Impact Analysis (EIR Technical Appendix L2), all roadways that would serve the Project would have the capacity to accommodate Project and cumulative traffic. Based on the analysis provided in EIR Subsection 4.20, Utilities and Service Systems, the Project would be adequately served by water service, sewer service, drainage facilities, and other utilities and service systems. Accordingly, the growth-inducing impacts of the Project would be less than significant. The Project is not expected to induce growth of land use changes on other parcels in the vicinity, as other lands surrounding the site are either already developed or planned to be developed consistent with their general plan land use designations.

Furthermore, the proposed Project's improvements to the public infrastructure, including roads, drainage infrastructure, and other utility improvements are consistent with Riverside County's General Plan and would not indirectly induce substantial and unplanned population growth in the local area.



5.4 EFFECTS FOUND NOT TO BE SIGNIFICANT DURING THE INITIAL STUDY PROCESS

An Initial Study was not prepared and was not required for the Project. In accordance with CEQA requirements, this Project EIR evaluates all of the environmental topics contained in Appendix G to the CEQA Guidelines, as well as the supplemental topics and thresholds of significance included in Riverside County's Environmental Assessment Checklist.



6.0 ALTERNATIVES

CEQA Guidelines § 15126.6(a) describes the scope of analysis that is required when evaluating alternatives to proposed projects, as follows:

"An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selection of a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason."

As discussed in Section 4.0 of this EIR, the Project would result in significant adverse environmental effects under two environmental issue areas that cannot be mitigated to below a level of significance after the implementation of Project design features, mandatory regulatory requirements, and feasible mitigation measures. The unavoidable significant impacts are as follows:

Traffic Noise: Significant and Unavoidable Direct and Cumulatively-Considerable Impact. Potential mitigation measures were considered and were found to be infeasible for reducing the Project's off-site traffic noise level increase (when considering traffic noise in isolation of other noise sources) affecting three residential lots on the segment of Patterson Avenue north of Placentia Avenue. Potential mitigation considered included the use of rubberized asphalt hot mix pavement and the installation of off-site noise barriers adjacent to the impacted roadway segment. While rubberized asphalt could provide some nominal noise reduction, rubberized asphalt is only effective in the reduction of tire-on-pavement noise at higher speeds and would not materially reduce the Project's traffic noise increase. Because the use of rubberized asphalt would not materially lower off-site traffic noise levels at potentially affected receptors, rubberized asphalt is not considered effective and feasible as mitigation. Regarding the potential installation of noise barriers at the impacted residential lots, the barriers would need to be high enough and long enough to block the line-of-sight from the noise source (at 11.5 feet high for trucks) to the receiver and it is not practical given the need for driveway openings and the usability of front and side yards to construct 11.5 foot-high uninterrupted barriers at this off-site location along Patterson Avenue. Further, the significant impact is identified for traffic noise in isolation of other noise sources and the existing ambient noise levels at the affected residential lots currently exceed the calculated existing traffic noise levels, so it expected that the noise-sensitive land uses adjacent to Patterson Avenue would not perceive a significant traffic noise level increase even though one is calculated by noise modeling to occur.



Transportation: Significant and Unavoidable Direct and Cumulatively-Considerable Impact. The Project would generate approximately 16.8 Vehicle Miles Traveled (VMT) per employee, which would exceed the County threshold of 14.2 VMT per employee by 18.31%. The Project's total VMT per Service Population (SP) would be approximately 38.78, which would exceed the identified threshold of significance of 37.87 by 2.40%. Therefore, the Project would conflict with or be inconsistent with CEQA Guidelines § 15064.3(b), which represents a significant of the proposed Project. As the future building tenants are not known for the Project, the effectiveness of any potential commute trip reduction measure may be limited. In addition to specific tenancy considerations, locational context is also a major factor relevant to the potential application and effectiveness of Transportation Demand Management (TDM) measures. A project may only realize a quantifiable reduction in commute VMT under the most favorable circumstances and ideal local conditions when implementing trip reduction measures. In practical terms, ideal conditions are rarely realized due to variables such as locational context limitations (i.e., non-urban areas). Additionally, to achieve ideal conditions a project must achieve one hundred percent employee participation, and maximum employee eligibility, which are not generally expected. This is more difficult to presume since future building tenants are not known at this time. Although the Project would be subject to compliance with Mitigation Measure MM 4.18-2, which would serve to reduce the Project's VMT, the effectiveness of commute trip reduction measures such as those listed in Mitigation Measure MM 4.18-2 cannot be guaranteed to reduce Project VMT to a level of less than significant. No additional feasible mitigation measures are available to measurable reduce the Project's VMT. Therefore, the Project's VMT impact is considered significant and unavoidable.

6.1 ALTERNATIVES UNDER CONSIDERATION

In compliance with State CEQA Guidelines Section 15126.6(a), an EIR must describe "a range of reasonable alternatives to the project, or to the location of the project which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project." The EIR need not consider every conceivable alternative; rather it must consider a reasonable range of potentially feasible alternatives to the project, or to the location of the project, which would avoid or substantially lessen significant effects of the project, even if "these alternatives would impede to some degree the attainment of the project objectives, or would be more costly" (CEQA Guidelines Section 15126.6(b)).

The State CEQA Guidelines Section 15126.6(e) requires that an EIR include an alternative that describes what would reasonably be expected to occur on the Project site in the foreseeable future if the Project were not approved, based on current plans and consistent with available infrastructure and community services (i.e., "No Project" Alternative). For projects that include a revision to an existing land use plan, the "No Project" Alternative may be the continuation of the existing land use plan into the future. For projects other than a land use plan (for example, a development project on an identifiable property), the "No Project" Alternative is considered to be a circumstance under which the project does not proceed (CEQA Guidelines Section 15126(e)(3)(A-B)). For the alternatives analysis in this EIR, the potential scenario where the Project site remains in its current largely undeveloped condition is considered to be the "No Development Alternative (NDA)," while the potential scenario where the existing General Plan land use plan is implemented is considered to be the "No Project Alternative (NPA)."



The following scenarios are identified by Riverside County as potential alternatives to implementation of the proposed Project. The Small Building Alternative (SBA) is considered the Environmentally Superior Alternative pursuant to CEQA Guidelines § 15126.6.

6.1.1 NO DEVELOPMENT ALTERNATIVE (NDA)

The No Development Alternative (NDA) considers no new development/disturbance on the Project site beyond that which occurs under existing conditions. As such, the southern portions of the Project site would continue to be used for residential uses on approximately 6.1 acres, while the remaining 34.8 acres of the Project site would continue to consist of vacant and undeveloped land. Under the NDA, no improvements would be made to the Project site and none of the Project's roadway, utility, or other infrastructure improvements would occur. This Alternative was selected by the Lead Agency to compare the environmental effects of the proposed Project with an alternative that would leave the Project site in its existing condition.

6.1.2 NO PROJECT ALTERNATIVE (NPA)

The No Project Alternative (NPA) assumes development of the 40.88-acre Project site in accordance with the Project site's adopted General Plan and Mead Valley Area Plan (MVAP) land use designation of "Medium Density Residential (MDR)." Under this alternative, the approximately 6.1 acres of the Project site that are developed with residential uses would continue to be developed with the existing residential uses and ancillary structures. The approximately 34.8 acres of the Project site that are undeveloped would be developed with MDR land uses. According to Appendix E to the Riverside County General Plan, the mid-point density for the MDR land use designation is 3.5 dwelling units per acre (du/ac). Thus, under the NPA the 34.8 acres of the Project site that are currently undeveloped would be developed with 122 residential dwelling units (34.8 acres x 3.5 du/acre = 121.8 du). In consideration of the three existing residential units, a total of 125 dwelling units would be constructed or would continue operation on the Project site under the NPA. As also noted in Appendix E to the General Plan, the average household size in the MVAP area is 3.79; thus, under the NPA the Project site would have a total future population of approximately 474 persons (125 du x 3.79 persons/du = 473.75 persons), or an increase of approximately 463 persons as compared to existing conditions. All remaining components of Project, including proposed infrastructure and roadway improvements, would otherwise be similar to the proposed Project. This Alternative was selected by the Lead Agency to compare the environmental effects of the proposed Project with an alternative that would allow for buildout of the Project site in accordance with the site's existing General Plan and MVAP land use designations.

6.1.3 REDUCED PROJECT ALTERNATIVE (RPA)

The Reduced Project Alternative (RPA) assumes the Project site would be developed with three residential dwelling units and a warehouse building, but the proposed warehouse building would be reduced in size from approximately 591,203 s.f. under the proposed Project to approximately 394,135 s.f. under the RPA (representing a reduction in building area by approximately 33%). All other components of the RPA would be the same as the proposed Project, including proposed infrastructure and roadway improvements. This alternative was selected by the Lead Agency in order to evaluate an alternative that would reduce the Project's significant and unavoidable impacts to transportation, which in turn also would reduce the Project's less-thansignificant impacts due to air quality and greenhouse gas (GHG) emissions.



6.1.4 SMALL BUILDING ALTERNATIVE

Pursuant to the County's Transportation Analysis Guidelines for Level of Service and Vehicle Miles Traveled (December 2020), general light industrial developments with less than 179,000 s.f. of building area are presumed to result in a less-than-significant transportation impact due to VMT. Thus, this alternative was selected to allow the Lead Agency (Riverside County) to consider a design for the Project site that would avoid the Project's significant and unavoidable impact due to VMT. The Small Building Alternative (SBA) assumes the Project site would be developed with three residential lots and a warehouse building, but the proposed warehouse building would be reduced in size from approximately 591,203 s.f. under the proposed Project to approximately 175,000 s.f. under the SBA (representing a reduction in building area by approximately 70%). The portions of the warehouse lot not used for the building would be used for parking and trailer storage. All other components of the SBA would be the same as the proposed Project, including proposed infrastructure and roadway improvements. This alternative was selected by the Lead Agency in order to evaluate an alternative that would avoid the Project's significant and unavoidable impacts due to air quality and greenhouse gas (GHG) emissions. The SBA is identified as the Environmentally Superior Alternative.

6.2 ALTERNATIVES CONSIDERED AND REJECTED

An EIR is required to identify any alternatives that were considered by the Lead Agency but were rejected as infeasible. Among the factors described by State CEQA Guidelines § 15126.6 in determining whether to exclude alternatives from detailed consideration in the EIR are: a) failure to meet most of the basic project objectives, b) infeasibility, or c) inability to avoid significant environmental impacts. With respect to the feasibility of potential alternatives to the proposed Project, State CEQA Guidelines § 15126.6(f)(1) notes:

"Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries...and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site..."

In determining an appropriate range of alternatives to be evaluated in this EIR, a number of possible alternatives were initially considered and, for a variety of reasons, rejected. Alternatives were rejected because either: 1) they could not accomplish the basic objectives of the Project, 2) they would not have resulted in a reduction of significant adverse environmental impacts, and/or 3) they were considered infeasible to construct or operate. A summary of the alternatives that were considered buy rejected are described below.

6.2.1 ALTERNATIVE SITES

CEQA does not require that an analysis of alternative sites always be included in an EIR. However, if the surrounding circumstances make it reasonable to consider an alternative site, then this alternative should be considered and analyzed in the EIR. In making the decision to include or exclude analysis of an alternative site, the *"key question and first step in analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR" (State CEQA Guidelines § 15126.6(f) (2)).*



Based on a review of aerial photography, the Riverside County General Plan land use map and a list of approved/pending development proposals within Riverside County and nearby jurisdictions, there are no other available, undeveloped properties of similar size (i.e., approximately 40.88 acres) that are zoned for and adjacent to other properties designated for urban development and that would reduce or avoid the Project's significant and unavoidable impacts. Furthermore, and based on the analysis presented in EIR Section 4.0, *Environmental Analysis*, the proposed Project only would result in significant and unavoidable impacts to Transportation due to VMT. Given the Project site's close proximity to regional transportation corridors (i.e., I-15), development of the Project site at an alternative location could result in an increase in VMT if developed on a property located further from regional transportation facilities. As noted above, only locations that would avoid or substantially lessen a Project's significant environmental effects need to be considered in an EIR. Accordingly, because development of the Project site at an alternative site location would not reduce or avoid the Project's significant and unavoidable impacts due to VMT, a more detailed analysis of alternative site locations is not warranted.

6.3 <u>ALTERNATIVE ANALYSIS</u>

The discussion on the following pages compares the environmental impacts expected from each alternative considered by the Lead Agency relative to the impacts of the Project. A conclusion is provided for each topic as to whether the alternative results in one of the following: (1) reduction of elimination of the Project's impact, (2) a greater impact than would occur under the Project, (3) the same impact as the Project, or (4) a new impact in addition to the Project's impacts. Table 6-1, *Alternatives to the Project – Comparison of Environmental Impacts*, at the end of this Section compares the impacts of the alternatives against those of the Project and identifies the ability of the alternative to meet the basic objectives of the Project. As previously listed in EIR Section 3.0, the underlying purpose and goal of the proposed Project is to develop an underutilized property in the community of Mead Valley with an economically viable, employment-generating use that is compatible with the surrounding area. The following objectives are intended to achieve these underlying purposes:

- A. To attract economic investment to the Mead Valley community of Riverside County to support the growing goods movement supply chain.
- B. To develop supply chain uses in close proximity to designated truck routes and the State highway system to avoid or shorten vehicular trip lengths on other roadways.
- C. To expand economic development, facilitate job creation, and increase the tax base for Riverside County by accommodating and diversifying facilities needed to support the goods movement supply chain.
- D. To develop a warehouse building in the Mead Valley community of unincorporated Riverside County that is designed to meet contemporary industry standards and be economically competitive with similar buildings in the local area and region.
- E. To attract new employment-generating businesses to unincorporated Riverside County, thereby growing the economy and providing a more equal jobs-housing balance in the local area that will reduce the need for members of the local workforce to commute outside the area for employment.



- F. To develop a use that has architectural design and operational characteristics that are compatible with other existing and planned developments in the local area.
- G. To provide a physical buffer between warehousing and residential land uses consisting of a berm, landscaping, and fencing, to aid in visual screening and compatible land use transitions in Mead Valley.
- H. To complete unfinished streets in a Mead Valley residential subdivision.

6.3.1 NO DEVELOPMENT ALTERNATIVE (NDA)

The No Development Alternative (NDA) considers no new development/disturbance on the Project site beyond that which occurs under existing conditions. As such, the southern portions of the Project site would continue to be used for residential uses on approximately 6.1 acres, while the remaining 34.8 acres of the Project site would continue to consist of vacant and undeveloped land. Under the NDA, no improvements would be made to the Project site and none of the Project's roadway, utility, or other infrastructure improvements would occur. This Alternative was selected by the Lead Agency to compare the environmental effects of the proposed Project with an alternative that would leave the Project site in its existing condition.

A. <u>Aesthetics</u>

The NDA considers no development or disturbance on the Project site beyond that which occurs under existing conditions. As such, approximately 6.1 acres of the Project site would continue to be developed with three residential dwelling units, while the remaining approximately 34.8 acres of the Project site would remain vacant and undeveloped. Thus, the Project's less-than-significant impacts to scenic vistas would be avoided under this alternative. The Project site is not visible from any officially-designated scenic highways, although the Project site is visible from I-215, a County-Eligible scenic highway; thus, impacts to scenic highways would be less than significant and would be reduced in comparison to the proposed Project. Although the Project is not expected to degrade the existing visual character or quality of the site or its surroundings, implementation of the NDA would retain the site's existing visual character and impacts would be reduced in comparison to the Project. Although the Project Nos. 655 and 915 and would result in less-than-significant light and glare impacts, no new lighting sources or sources of potential glare would occur on site under the NDA; thus, impacts associated with light and glare would be reduced in comparison to the proposed Project.

B. <u>Agriculture and Forestry Resources</u>

Under the NDA, no new development would occur on site. Because the Project site does not contain any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, neither the Project nor the NDA would result in impacts to Important Farmland types, and the level of impact would be similar. The NDA would not result in a change to the zoning classification of A-1-1 that is assigned to two parcels, and as such would result in reduced impacts due to a conflict with agricultural zoning, although impacts would be less than significant under both the Project and NDA. Neither the Project or NDA conflict with a Williamson Act Contract; thus, impacts would be less than significant and would be similar under the Project and NDA. Under the NDA, the existing three residential uses in the southern portions of the Project site would remain on site, while the Project would include three residential lots in the western portion of the Project site; thus, both the



Project and NDA would involve non-agricultural uses within 300 feet of agriculturally zoned property, although mandatory compliance with Ordinance No. 625 would ensure that impacts would be less than significant and the level of impact would be similar. There are no components of the Project or NDA that would involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use; thus, impacts would be less than significant, and the level of impact would be similar. Neither the Project nor the NDA would result in impacts to forestry resources, and the level of impact would be the same.

C. <u>Air Quality</u>

With implementation of the NDA, there would be no new development on site. As such, the Project's nearterm construction- and operational-related air quality emissions would be completely avoided under this alternative. Thus, implementation of the NDA would avoid the Project's less-than-significant impact (with mitigation) due to a conflict with the SCAQMD AQMP. The NDA also would avoid the Project's less-thansignificant impact (with mitigation) due to construction-related emissions of VOCs, and would avoid the Project's less-than-significant impacts due to operational emissions. Implementation of the NDA also would avoid the Project's less-than-significant impacts due to construction- and operational-source LSTs, CO "hot spots," and due to cancer and non-cancer health risks. The NDA also would avoid the Project's less-thansignificant impacts due to the emission of objectionable odors.

D. <u>Biological Resources</u>

Under the NDA, there would be no new construction or development on the Project site. Because the majority of the Project site would be left in an undeveloped state in perpetuity, the NDA would completely avoid the Project's less-than-significant impacts (after mitigation) due to a conflict with the Multiple Species Habitat Conservation Plan (MSHCP) and Stephens' Kangaroo Rat Habitat Conservation Plan (SKR HCP). Implementation of the NDA also would completely avoid the Project's less-than-significant impacts (after mitigation) due to a potential conflict with the MSHCP, including the Project's impacts to 0.35-acre of riparian/riverine resources, due to construction-related nighttime lighting, and due to impacts to the burrowing owl. The NDA also would avoid the Project's less-than-significant impacts (after mitigation) to the burrowing owl, impacts to sensitive birds, and impacts to nesting birds regulated by the MBTA and CFGC. The NDA also would allow for increased wildlife movement in the local area as compared to the Project; thus, implementation of the NDA would avoid the Project's less-than-significant impacts to wildlife movement corridors. The NDA would avoid the Project's less-than-significant impacts to non-sensitive vegetation communities, and also would avoid the Project's less-than-significant impacts (after mitigation) to 0.13-acre of southern willow scrub, which is considered sensitive riparian habitat. The NDA also would avoid the Project's less-than-significant impacts (after mitigation) to areas considered jurisdictional by the Regional Water Quality Control Board (RWQCB), California Department of Fish and Wildlife (CDFW), and/or the MSHCP, including impacts to 0.14-acre of RWQCB jurisdictional area and 0.35-acre of CDFW/MSHCP jurisdictional areas, of which 0.13-acre consists of vegetated riparian habitat. Neither the Project nor the NDA would conflict with the County's Oak Tree Management Guidelines or Riverside County Ordinance No. 559; thus, no impact would occur, and the level of impact would be similar.



E. <u>Cultural Resources</u>

Under the NDA, there would be no new construction or development on the Project site. Although the Project would not result in impacts to any known historical resources, the NDA would nonetheless avoid the Project's less-than-significant impacts (after mitigation) to subsurface historical resources that may be encountered during grading activities. Similarly, although there are no known significant archaeological resources on site, the NDA would avoid the Project's less-than-significant (after mitigation) impacts to subsurface archaeological resources that may be impacted during site grading operations. Additionally, because there would be no new grading on site, the NDA would avoid the Project's less-than-significant impacts to buried human remains that may be uncovered during site grading activities. Thus, impacts to cultural resources would be reduced under the NDA in comparison to the Project.

F. <u>Energy</u>

Under the NDA, there would be no increase in demand from the Project site for energy resources. As such, the NDA would avoid the Project's less-than-significant impacts due to the wasteful, inefficient, or unnecessary consumption of energy resources. Neither the Project nor the NDA would conflict with a State or local plan for renewable energy or energy efficiency, although impacts would be reduced under the NDA in comparison to the Project because the NDA would not result in an increase in use of energy resources.

G. <u>Geology and Soils</u>

Under the NDA, there would be no new construction or development on the Project site. Thus, with exception of potential erosion impacts, the NDA would completely avoid the Project's less-than-significant impacts (after mitigation) to geology and soils. Because there would be no new development on the Project site under the NDA, the site would remain in its current, largely unvegetated state. In the absence of stabilizing vegetation, the NDA would result in increased impacts due to erosion and sedimentation in the near term as compared to the proposed Project. In the long-term, it is expected that the Project site ultimately would be covered with natural vegetation, thereby reducing the site's erosion potential as compared to existing conditions. However, in comparison to the proposed Project, which would develop the site with impervious surfaces and landscaped areas, the risk of erosion under the NDA would be increased in the long term as compared to the proposed Project.

H. <u>Greenhouse Gas Emissions</u>

Under the NDA, there would be no new construction or development on the Project site. As such, there would be no increase in GHG emissions from the Project site under the NDA. Accordingly, the NDA would completely avoid the Project's less-than-significant impacts (after mitigation) due to GHG emissions. Similarly, the Project's less-than-significant impacts due to a conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs also would be avoided with implementation of the NDA.

I. <u>Hazards and Hazardous Materials</u>

Because no development would occur under the NDA, the NDA would have no potential to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, and would have no potential to create a significant hazard to the public or the environment through reasonably



foreseeable upset and accident conditions involving the release of hazardous materials into the environment; thus, no impact would occur, and impacts would be reduced in comparison to the proposed Project. There are no existing or proposed schools within 0.25-mile of the Project site; thus, no impact would occur under the Project or the NDA, although impacts would be reduced under the NDA because no new sources of potential hazardous materials would be introduced on site. Because the Project site is not located on any list of hazardous materials sites complied pursuant to Government Code Section 65962.5, neither the Project nor the NDA have the potential to create a significant hazard to the public or the environment due to existing site conditions, and the level of impact would be similar. Additionally, since no new development would occur on site, the NDA also would completely avoid the Project's less-than-significant impacts due to a conflict with the March Air Reserve Base (MARB) Airport Land Use Compatibility Plan (ALUCP). The Project site is not within two miles of a private airstrip; thus, no private airport-related impacts would occur under the Project or NDA, although the level of impact would be reduced under the NDA because the NDA would not introduce any new residents or workers to the Project site. Neither the Project nor the NDA has the potential to impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan; thus, no impact would occur under the Project or NDA, and the level of impact would occur under the Project or NDA, and the level of impact would be curved and project or NDA, and the level of impact to the Project site. Neither the Project nor the NDA has the potential to impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan; thus, no impact would occur under the Project or NDA, and the level of impact would be similar.

J. <u>Hydrology and Water Quality</u>

With respect to water quality, the NDA would not involve any new development on site. With the exception of erosion potential on site, the NDA would result in reduced impacts to hydrology and water quality as compared to the proposed Project's less-than-significant water quality impacts. While the risk of erosion would increase during construction of the proposed Project, under long-term operating conditions the Project would result in the introduction of impervious surfaces and landscaped areas; thus, long-term operational erosion impacts would be increased under the NDA due to the lack of vegetative cover on portions of the Project site. While the Project would result in less-than-significant impacts due to groundwater recharge, impacts to groundwater recharge would be reduced under the NDA because there would be no new impervious surfaces on site. Although the Project would result in less-than-significant impacts to the site's existing drainage pattern, because there would be no changes to the site's drainage patterns under the NDA, impacts would be reduced in comparison to the proposed Project. Similarly, although the Project would not exceed the capacity of any existing or planned stormwater drainage systems, because there would be no changes to site drainage under the NDA, impacts would be reduced in comparison to the Project. The Project site is not subject to flood hazards under existing conditions; thus, impacts under the NDA and proposed Project would be similar and would be less than significant. The Project site is not subject to inundation from tsunamis or seiches; thus, impacts would be less than significant and would be similar under the Project and NDA.

K. Land Use and Planning

The NDA would not be consistent with the land use designations applied to the property by the Riverside County General Plan and MVAP. Impacts would be slightly increased in comparison to the proposed Project. Neither the Project nor the NDA would conflict with Connect SoCal. Additionally, neither the Project nor the NDA would disrupt or divide the physical arrangement of an established community. Thus, impacts would be less than significant and the level of impact would be similar.



L. <u>Mineral Resources</u>

The Project site does not contain any known mineral resources that would be of value to the region or the residents of the State. Accordingly, no impacts to mineral resources would occur under the Project or the NDA, and the level of impact would be similar. Additionally, neither the Project nor the NDA would represent an incompatible land use located adjacent to a State classified or designated area or existing surface mine, and neither the NDA nor the Project would expose people or property to hazards from proposed, existing, or abandoned quarries or mines. No impacts would occur, and the level of impact would be similar.

M. <u>Noise</u>

The Project site is located outside of areas subject to public and private airport-related noise levels exceeding 60 dBA CNEL; thus, impacts due to airport-related noise would be less than significant under both the Project and the NDA. The NDA would avoid the Project's less-than-significant impacts due to construction-related and operational noise levels and would avoid the Project's significant impact due to traffic-related noise affecting the roadway segment of Patterson Avenue north of Placentia Avenue because there would be no new development and no increase in traffic generated by the site under the NDA. Additionally, the NDA would avoid the Project's less-than-significant impacts due to construction-related vibration, and also would avoid the Project's less-than-significant impacts due to operational-related vibration.

N. <u>Paleontological Resources</u>

Under the NDA, there would be no new construction or development on site. Therefore, the NDA would avoid the Project's less-than-significant construction-related impacts (after mitigation) to paleontological resources that may be buried beneath the site's surface.

O. <u>Population and Housing</u>

Although the Project would result in the elimination of the existing three residences on site, the Project also would accommodate three residential lots. Thus, impacts due to the elimination of existing housing would be less than significant under the Project and NDA, although impacts would be reduced under the NDA since the NDA would not involve the demolition of the existing homes and the construction of three new homes on site. Additionally, because the NDA would not generate any new residents or employees, the NDA also would avoid the Project's less-than-significant impacts due to the \potential indirect demand for new housing. Although the Project would result in less-than-significant impacts due to substantial unplanned population growth, the NDA would not result in any new development on site; thus, impacts under the NDA would be reduced in comparison to the proposed Project.

P. <u>Public Services</u>

There would be no new development on site under the NDA; thus, the NDA would avoid the Project's lessthan-significant impacts to fire protection, police protection, school services, library services, and health services.



Q. <u>Recreation</u>

The Project does not include a net increase in the number of residential dwelling units on site that may generate a population that would increase the use of existing neighborhood and regional parks or other recreational facilities. Likewise, the NDA would not result in any new development on site and thus would not generate any increase in demand for recreational resources, nor would any recreational resources be constructed on site under the NDA. Therefore, impacts to recreation would be similar under the Project and the NDA, although impacts due to the construction of recreational facilities (i.e., trails) under the proposed Project would be completely avoided under the NDA.

R. <u>Transportation</u>

Under the NDA, there would be no new development on site, and the Project site only would generate minor amounts of traffic associated with the existing three residential dwelling units on site. As such, the NDA would completely avoid the Project's less-than-significant impacts due to a conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. In addition, because no new traffic would be generated under the NDA, the NDA would avoid the Project's significant and unavoidable impacts due to employee-related VMT and due to the Project's VMT per SP. Additionally, there would be no new land uses introduced on site under the NDA, nor would the NDA result in any changes to existing circulation facilities; thus, the NDA would avoid the Project's less-than-significant impacts due to a substantial increase in hazards from a geometric design feature or incompatible uses. Additionally, because there would be no development on site under the NDA, the NDA would completely avoid the Project's less-than-significant impacts due to inadequate emergency access.

S. <u>Tribal Cultural Resources</u>

There would be no new development on site under the NDA. Accordingly, the NDA would avoid the Project's less-than-significant impacts to tribal cultural resources.

T. <u>Utilities and Service Systems</u>

Under the NDA, there would be no increased demand for water, wastewater treatment, or stormwater drainage; thus, the NDA would avoid the Project's less-than-significant impacts due to the construction of such facilities and due to the provision of water or wastewater treatment services. There would be no increase in demand for water resources under the NDA; thus, the NDA would avoid the Project's less-than-significant impacts to water supply. Additionally, the NDA would avoid the Project's less-than-significant impacts due to the construction of wastewater conveyance facilities on and off site, and would avoid the Project's less-than-significant impacts due to the construction of wastewater treatment capacity. There would be no increase in solid waste generated on site; thus, the NDA would avoid the Project's less-than-significant impacts. There are no components of the NDA or the proposed Project that would conflict with federal, State, and local management and reduction statutes and regulations related to solid wastes, including the County Integrated Waste Management Plan (CIWMP); thus, impacts would be less than significant impacts due to the construction of facilities for electricity, natural gas, communication systems, and street lighting, and due to increased roadway maintenance.



U. <u>Wildfire</u>

Under the NDA, there would be no new development on site. Although impacts due to wildfire would be less than significant under the proposed Project, under the NDA the Project site would remain in its existing condition, and ultimately would consist of natural vegetation that could serve as potential fuel for future wildfires in the local area; thus, impacts due to wildland fire hazards would be increased under the NDA as compared to the proposed Project.

V. <u>Conclusion</u>

Implementation of the NDA would result in no physical environmental impacts beyond those that have historically occurred on the property. Almost all effects of the proposed Project would be avoided or lessened by the selection of the NDA, although a few increased impacts, such as sedimentation and wildfire hazard impacts and a conflict with the site's General Plan and MVAP land use designation, would be increased under this alternative. Because this alternative would avoid most of the Project's impacts, it warrants consideration as the "environmentally superior alternative." However, pursuant to CEQA Guidelines § 15126.6(e)(2), if a no project alternative is identified as the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives. Accordingly, the RPA, as discussed in subsection 6.3.3, is identified as the environmentally superior alternative.

The NDA would fail to meet all of the Project's objectives. Specifically, the NDA would not attract economic investment to the Mead Valley community of Riverside County to support the growing goods movement supply chain. The NDA also would not develop supply chain uses in close proximity to designated truck routes and the State highway system to avoid or shorten vehicular trip lengths on other roadways. In addition, the NDA would fail to expand economic development, facilitate job creation, and would fail to increase the tax base for Riverside County by accommodating and diversifying facilities needed to support the goods movement supply chain. The NDA also would not develop a warehouse building in the Mead Valley community of unincorporated Riverside County that is designed to meet contemporary industry standards and be economically competitive with similar buildings in the local area and region. The NDA would not attract new employment-generating businesses to unincorporated Riverside County, thereby growing the economy and providing a more equal jobs-housing balance in the local area that will reduce the need for members of the local workforce to commute outside the area for employment. The NDA would fail to develop a use that has architectural design and operational characteristics that are compatible with other existing and planned developments in the local area. In addition, the NDA would not accommodate a physical buffer and berm between warehousing and residential land uses, to aid in compatible land use transitions in Mead Valley. Because no roadway improvements would occur under the NDA, the NDA also would not complete unfinished streets in a Mead Valley residential subdivision.

6.3.2 NO PROJECT ALTERNATIVE (NPA)

The No Project Alternative (NPA) assumes development of the 40.88-acre Project site in accordance with the Project site's adopted General Plan and MVAP land use designation of "Medium Density Residential (MDR)." Under this alternative, the approximately 6.1 acres of the Project site that are developed with residential uses would continue to be developed with the existing residential uses and ancillary structures. The approximately 34.8 acres of the Project site that are undeveloped would be developed with MDR land uses. According to Appendix E to the Riverside County General Plan, the mid-point density for the MDR land use designation is



3.5 dwelling units per acre (du/ac). Thus, under the NPA the 34.8 acres of the Project site that are currently undeveloped would be developed with 122 residential dwelling units (34.8 acres x 3.5 du/acre = 121.8 du). In consideration of the three existing residential units, a total of 125 dwelling units would be constructed or would continue operation on the Project site under the NPA. As also noted in Appendix E to the General Plan, the average household size in the MVAP area is 3.79; thus, under the NPA the Project site would have a total future population of approximately 474 persons (125 du x 3.79 persons/du = 473.75 persons), or an increase of approximately 463 persons as compared to existing conditions. All remaining components of Project, including proposed infrastructure and roadway improvements, would otherwise be similar to the proposed Project. This Alternative was selected by the Lead Agency to compare the environmental effects of the proposed Project with an alternative that would allow for buildout of the Project site in accordance with the site's existing General Plan and MVAP land use designations.

A. <u>Aesthetics</u>

Under the NPA, the undeveloped portions of the Project site would be developed with MDR land uses in lieu of a 591,203 s.f. warehouse building with three residential lots. The Project site is not visible from any officially-designated scenic highways, although the Project site is visible from I-215, a County-Eligible scenic highway; thus, impacts to scenic highways would be less than significant, and the level of impact would be similar given that both the Project and NPA would develop the Project site with urban uses. Neither the Project nor the NPA would degrade the existing visual character or quality of the site or its surroundings, although the level of impact would be increased under the Project due to the proposed warehouse building. Both the Project and NPA would be subject to compliance with Riverside County Ordinance Nos. 655 and 915, which would result in similar less-than-significant lighting impacts.

B. <u>Agriculture and Forestry Resources</u>

Both the Project and NPA would result in full development of the undeveloped portions of the Project site. The Project site does not contain any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, and as such neither the Project nor the NPA would result in impacts to Important Farmland types and the level of impact would be the same. Under the NPA, there would be no change of zone affecting the three existing residential lots on the Project site; thus, the NPA would avoid the Project's less-than-significant impact due to a conflict with existing agricultural zoning. Neither the Project nor the NPA would conflict with any existing agricultural uses in the surrounding area, resulting in similar less-than-significant impacts. Neither the Project nor the NPA would conflict with an agricultural preserve or Williamson Act Contract. Both the Project and NPA would involve non-residential development within 300 feet of agriculturally-zoned property, although impacts would be less than significant and similar with mandatory compliance with Riverside County Ordinance No. 625. There are no components of the Project or NPA that would involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use; thus, impacts would be less than significant and the level of impact would be similar. Neither the Project nor the NPA would result in impacts to forestry resources, and the level of impact would be the same.

C. <u>Air Quality</u>

Under the NPA, the undeveloped portions of the Project site would be developed with MDR land uses in lieu of three residential lots and a 591,203 s.f. warehouse building. Due to the reduced intensity of construction


activities under the NPA, the NPA would avoid the Project's less-than-significant impact (after mitigation) due to construction-related emissions of VOCs, and also would avoid the Project's less-than-significant impact (after mitigation) due to a conflict with the SCAQMD AQMP. Neither the Project nor the NPA would result in operational air quality emissions exceeding the SCAQMD Regional Thresholds, although impacts would be reduced under the NPA because the NPA would generate approximately 28.7% less traffic than the Project. Neither the Project nor the NPA would exceed any of the SCAQMD construction- or operational-related LSTs, although impacts would be reduced under the NPA due to the lack of heavy truck trips associated with this alternative. Neither the Project nor the NPA would result in or contribute to a CO "hot spot," although impacts would be reduced under the NPA due to the reduction in traffic. The NPA would not involve heavy truck trips that could produce diesel particulate matter; thus, the NPA would avoid the Project's less-than-significant impacts due to cancer and non-cancer health risks. Neither the Project nor the NPA would be associated with the generation of odors affecting a substantial number of people; thus, impacts would be less than significant, although the level of impact would be reduced under the NPA due to the lack of heavy truck traffic.

D. <u>Biological Resources</u>

The Project site would be fully graded under both the Project and NPA, although no new grading would occur on the existing residential lots in the southern portions of the Project site. However, the NPA would not involve any nighttime construction activities, which would occur under the proposed Project during construction of the proposed warehouse building. Both the Project and NPA would require mitigation to reduce impacts due to a conflict with the MSHCP to below a level of significance, including impacts due to permanent impacts to 0.35-acre of riparian/riverine resources and potential impacts to the burrowing owl; however, because no nighttime construction would occur under the NPA, the NPA would avoid the Project's less-than-significant impact (after mitigation) due to construction-related nighttime lighting. Both the Project and NPA would result in less-than-significant impacts (after mitigation) to the burrowing owl and nesting birds, although impacts would be slightly reduced under the NPA because the southern portions of the Project site would not be subject to new development under this alternative. Both the Project and NPA would result in less-than-significant impacts to wildlife movement corridors and wildlife nursery sites, and the level of impact would be the same. Both the NPA and the Project would result in similar impacts to approximately 0.13-acre of southern willow scrub, impacts to which would be mitigated to less-than-significant levels. Both the Project and NPA would result in similar impacts to 0.14-acre of RWQCB jurisdictional area and 0.35-acre of CDFW/MSHCP jurisdictional areas, of which 0.13-acre consists of vegetated riparian habitat, and mitigation would be required to reduce these impacts to less-than-significant levels. Neither the Project nor the NPA would conflict with the Riverside County Oak Tree Management Guidelines or Riverside County Ordinance No. 559, resulting in no impacts under the Project or NPA.

E. <u>Cultural Resources</u>

Under the NPA, the southern approximately 6.1 acres of the Project site would not be subject to grading or disturbance. Thus, the NPA would result in reduced impacts in comparison to the Project's potential to uncover previously-undiscovered subsurface historical resources, archaeological resources, and human remains, although mitigation measures would be required under both the Project and NPA to ensure impacts to cultural resources are reduced to less-than-significant levels.



F. <u>Energy</u>

Under the NPA, there would be a slight reduction in the amount of building area on site as compared to the Project; however, the construction of an additional 122 homes on site is anticipated to result in an increased demand for construction-related power, electricity, and fuel as compared to development of a single 591,203 s.f. warehouse building. Under long-term operating conditions, as compared to the Project the NPA would result in reduced annual fuel consumption and a reduced demand for electricity; however, because the warehouse building under the proposed Project would not involve the consumption of natural gas, the NPA would result in an increased demand for natural gas as compared to the Project. However, neither the Project nor the NPA would result in the wasteful, inefficient, or unnecessary consumption of energy resources, resulting in similar less-than-significant impacts due to energy consumption. Neither the Project nor the NPA would conflict with or obstruct a federal or State plan for renewable energy or energy efficiency; thus, impacts would be less than significant, and the level of impact would be similar.

G. <u>Geology and Soils</u>

Under the NPA, the southern approximately 6.1 acres of the Project site would not be subject to grading or disturbance. Thus, the NPA would result in reduced impacts to geology and soils. Both the Project and the NPA would be subject to mitigation in order to reduce impacts to geology and soils to less-than-significant levels.

H. <u>Greenhouse Gas Emissions</u>

In comparison to the proposed Project, the NPA would result in a substantial reduction in the level of GHG emissions because the NPA would generate approximately 28.7% less traffic than the Project, although mitigation requiring compliance with the Riverside County CAP Update would be required under both the Project and NPA.

I. <u>Hazards and Hazardous Materials</u>

Under the NPA, the Project site would be developed with an additional 122 homes in lieu of the Project's proposed 591,203 s.f. warehouse building. Accordingly, the NPA would have a reduced potential to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, and would have reduced impacts due to the creation of 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; thus, the NPA would result in reduced impacts in comparison to the Project due to hazardous materials. There are no existing or proposed schools within 0.25-mile of the Project site; thus, no impact would occur under the Project or the NPA, although impacts would be reduced under the NPA because residential uses generate less hazardous materials as compared to light industrial warehouse uses. Because the Project site is not located on any list of hazardous materials sites complied pursuant to Government Code Section 65962.5, neither the Project nor the NPA have the potential to create a significant hazard to the public or the environment due to existing site conditions, and the level of impact would be similar. Additionally, because less intense development would occur on site, the NPA also would reduce the Project's less-than-significant impacts due to a conflict with the MARB ALUCP. The Project site is not within two miles of a private airstrip; thus, no airport-related impacts would occur under the Project or NPA, although the level of impact would be reduced under the NPA because the NPA would involve less intense uses on site as



compared to the Project. Neither the Project nor the NPA has the potential to impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan; thus, no impact would occur under the Project or NPA, and the level of impact would be similar.

J. <u>Hydrology and Water Quality</u>

With respect to water quality, under the NPA, the southern approximately 6.1 acres of the Project site would not be subject to grading or disturbance. Thus, the NPA would result in reduced impacts to hydrology and water quality during construction, although impacts would be less than significant under both the Project and NPA. While the Project would result in less-than-significant impacts due to groundwater recharge, impacts to groundwater recharge would be reduced under the NPA because there would be less areas of impervious surfaces on site. Although the Project would result in less-than-significant impacts to the site's existing drainage pattern, because there would be fewer changes to the drainage patterns on portions of the Project site under the NPA, impacts would be reduced in comparison to the proposed Project. Similarly, although the Project would not exceed the capacity of any existing or planned stormwater drainage systems, because there would be fewer changes to site drainage under the NPA, impacts would be reduced in comparison to the Project. The Project site is not subject to flood hazards under existing conditions; thus, impacts under the NPA and proposed Project would be similar and would be less than significant. The Project site is not subject to inundation from tsunamis or seiches; thus, impacts would be less than significant and would be similar under the Project and NPA.

K. Land Use and Planning

The NPA would implement the Project site's existing General Plan and MVAP land use designation of MDR. Although both the Project and NPA would be consistent with the General Plan and MVAP, assuming approval of the Project's General Plan Amendment No. 220003, because the NPA would implement the site's existing planned land uses, impacts would be reduced in comparison to the Project. Additionally, neither the Project nor the NPA would disrupt or divide the physical arrangement of an established community. Thus, impacts would be less than significant and the level of impact would be similar.

L. <u>Mineral Resources</u>

The Project site does not contain any known mineral resources that would be of value to the region or the residents of the State. Accordingly, no impacts to mineral resources would occur under the Project or the NPA, and the level of impact would be similar. Additionally, neither the Project nor the NPA would represent an incompatible land use located adjacent to a State classified or designated area or existing surface mine, and neither the NPA nor the Project would expose people or property to hazards from proposed, existing, or abandoned quarries or mines. No impacts would occur, and the level of impact would be similar.

M. <u>Noise</u>

The Project site is located outside of the 60 dBA CNEL noise level contour boundaries for the MARB/IPA; thus, neither the Project nor the NPA would be subject to substantial airport-related noise. Under the NPA, the Project site would be developed with an additional 122 homes in lieu of the Project's proposed 591,203 s.f. warehouse building. The level of construction activities on site would be similar under the Project and NPA, and construction-related noise impacts would be less than significant and the level of impact would be



similar. However, because no warehouse building would be constructed on site under the NPA, the NPA would result in reduced noise impacts associated with site operations and traffic-related noise, although operational noise impacts would be less than significant under both the Project and NPA. The Project's traffic-related noise impact on Patterson Avenue would be reduced to less than significant due to the elimination of Project-related truck traffic. Neither the Project nor the NPA would result in construction- or operational-related sources of vibration; thus, impacts would be less than significant, although the level of impact would be slightly reduced under the NPA because there would be no heavy truck trips on site under long-term operational conditions.

N. <u>Paleontological Resources</u>

Under the NPA, the southern approximately 6.1 acres of the Project site would not be subject to grading or disturbance. As such, the NPA would result in reduced impacts to previously-undiscovered subsurface paleontological resources, although mitigation would be required under both the NPA and Project in order to reduce impacts to paleontological resources to below a level of significance.

O. <u>Population and Housing</u>

Under the NPA, the Project site would be developed with an additional 122 homes in lieu of the Project's proposed 591,203 s.f. warehouse building. Thus, the NPA would avoid the Project's less-than-significant impacts due to the demolition of the three existing homes on site. Because the NPA would result in the introduction of 122 additional homes onsite, the NPA would avoid the Project's less-than-significant impacts due to the demand for affordable housing. The NPA also would be fully consistent with the site's adopted General Plan and MVAP land use designation of MDR; thus, the NPA would result in reduced impacts due to substantial unplanned population growth, although impacts would be less than significant under both the Project and NPA.

P. <u>Public Services</u>

Under both the Project and NPA, the Project site would be developed with urban uses. Thus, impacts to fire protection, sheriff services, and health services would be similar under the Project and NPA, and impacts would be less than significant with payment of DIF fees. Due to the increase in the number of residents on site under the NPA, the NPA would result in increased impacts to school and library services, although impacts would be less than significant under both the Project and NPA with payment of school impact and DIF fees.

Q. <u>Recreation</u>

Under the NPA, the Project site would be developed with an additional 122 homes in lieu of the Project's proposed 591,203 s.f. warehouse building. Planned trail and sidewalk improvements would be similar under the Project and NPA; thus, impacts would be similar and would be less than significant with implementation of the mitigation measures identified throughout this EIR. However, because no recreational facilities would be accommodated on site under the NPA, the NPA would result in increased impacts as compared to the Project due to the increased use of existing park facilities that could result in physical deterioration of the facility, although impacts would be less than significant under both the NPA and Project. The Project site is not located within a recreational-related CSA. However, pursuant to § 10.3 of Ordinance No. 460, the NPA would be subject to payment of in-lieu fees for park services. With mandatory payment of fees, impacts from parkland



demand would be less than significant, although the level of impact would be increased as compared to the Project.

R. <u>Transportation</u>

Neither the Project nor the NPA would conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; thus, impacts would be less than significant, and the level of impact would be similar. Both the Project and NPA would result in significant and unavoidable impacts due to VMT; however, because this portion of Riverside County suffers from a poor jobs-to-housing ratio, and because the NPA would not include any employment-generating land uses, impacts due to VMT would be increased under the NPA as compared to the proposed Project. Roadway improvements under the NPA and Project would be similar, and neither the Project nor the NPA would substantially increase hazards due to a geometric design feature; however, because the NPA would not involve the use of heavy trucks under long-term operations, the NPA would result in reduced impacts from hazards due to incompatible use. Additionally, neither the Project nor the NPA would result in impacts due to inadequate emergency access, and the level of impact would be the same.

S. <u>Tribal Cultural Resources</u>

Under the NPA, the southern approximately 6.1 acres of the Project site would not be subject to grading or disturbance. Thus, the NPA would result in reduced impacts associated with the potential but unlikely discovery of human remains in comparison to the Project, although mandatory compliance with regulatory requirements would be required under both the Project and NPA to ensure impacts to tribal cultural resources are less-than-significant levels.

T. <u>Utilities and Service Systems</u>

Under the NPA, the Project site would be developed with an additional 122 homes in lieu of the Project's proposed 591,203 s.f. warehouse building. Both the Project and NPA would result in similar less-thansignificant impacts due to the construction of infrastructure on-site and in surrounding roadways for water, sewer, and drainage. The NPA would result in the generation of less than half of the amount of wastewater that would be generated under the Project; thus, the NPA would result in reduced impacts to wastewater treatment capacity, although impacts would be less than significant under both the Project and NPA. According to water demand estimates used in Riverside County EIR No. 521 (SCH No. 2009041065), residential uses within the County are anticipated to result in a demand for approximately 1.01 acre-feet per year (AFY) per dwelling unit, or approximately 902 gallons per day. Thus, the NPA would result in a demand for approximately 110,044 gpd of water, while the Project would result in a demand for 83,324 gpd. As such, impacts to water supplies would be increased under the NPA, although impacts would be less than significant under both the Project and NPA. According to solid waste generation rates from EIR No. 521, residential uses generate substantially less solid waste than light industrial uses; thus, impacts to solid waste would be reduced under the NPA as compared to the Project, although impacts would be less than significant under both the Project and NPA. Neither the Project nor NPA would conflict with the CIWMP or AB 939; thus, impacts due to a conflict with management and reduction statutes and regulations related to solid waste would be less than significant, and the level of impact would be similar. Impacts due to the construction of other infrastructure, such as electricity and natural gas, would be similar under the Project and NPA, and the level of impact would be less than significant.



U. <u>Wildfire</u>

Under the NPA, the Project site would be developed with an additional 122 homes in lieu of the Project's proposed 591,203 s.f. warehouse building. Residential units along the perimeter of the Project site would be in close proximity to off-site areas surrounding the Project site that are classified as having a "very high" susceptibility to wildfire hazards, whereas the Project's proposed warehouse building would be separated from "very high" fire hazards by buffers exceeding 100 feet in width. Thus, impacts due to wildfire hazards would be increased under the NPA as compared to the Project, and additional mitigation measures would be required under the NPA to reduce wildfire hazard impacts to less-than-significant levels.

V. <u>Conclusion</u>

In comparison to the proposed Project, the NPA would result in reduced impacts under the issue areas of aesthetics, agriculture/forestry resources, air quality, biological resources, cultural resources, energy (long-term operational-related energy consumption), geology/soils, GHG emissions, hazards/hazardous materials, hydrology/water quality, land use/planning, noise, paleontological resources, population/housing, tribal cultural resources, and utilities/service systems (wastewater generation and solid waste generation). The NPA would result in the same or similar impacts as the proposed Project under the issue areas of mineral resources and public services (fire protection, sheriff services, and health services). As compared to the Project, the NPA would result in increased impacts to the environment under the issue areas of energy (construction-related energy consumption), public services (schools and libraries), recreation, transportation (VMT impacts), utilities/service systems (water demand), and wildfire.

The NPA would fail to meet most of the Project's objectives. Specifically, the NPA would not attract economic investment to the Mead Valley community of Riverside County to support the growing goods movement supply chain. The NPA also would not develop supply chain uses in close proximity to designated truck routes and the State highway system to avoid or shorten vehicular trip lengths on other roadways. The NPA would not expand economic development, facilitate job creation, or increase the tax base for Riverside County by accommodating and diversifying facilities needed to support the goods movement supply chain. The NPA also would not develop a warehouse building in the Mead Valley community of unincorporated Riverside County that is designed to meet contemporary industry standards and be economically competitive with similar buildings in the local area and region. Additionally, the NPA would not attract new employment-generating businesses to unincorporated Riverside County, thereby growing the economy and providing a more equal jobs-housing balance in the local area that will reduce the need for members of the local workforce to commute outside the area for employment. The NPA would, however, meet the Project's objective to develop a use that has architectural design and operational characteristics that are compatible with other existing and planned developments in the local area. The NPA would not meet the Project's objective to provide a physical buffer between warehousing and residential land uses, to aid in compatible land use transitions in Mead Valley. The NPA would, however, meet the Project's objective to complete unfinished streets in a Mead Valley residential subdivision.

6.3.3 REDUCED PROJECT ALTERNATIVE (RPA)

The Reduced Project Alternative (RPA) assumes the Project site would be developed with three residential dwelling units and a warehouse building, but the proposed warehouse building would be reduced in size from approximately 591,203 s.f. under the proposed Project to approximately 394,135 s.f. under the RPA



(representing a reduction in building area by approximately 33%). All other components of the RPA would be the same as the proposed Project, including proposed infrastructure and roadway improvements. This alternative was selected by the Lead Agency in order to evaluate an alternative that would reduce the Project's significant and unavoidable impacts to transportation, which in turn also would reduce the Project's less-thansignificant impacts due to air quality and greenhouse gas (GHG) emissions.

A. <u>Aesthetics</u>

Under the RPA, there would be approximately 33% less light industrial building area as compared to the Project. Thus, the Project's less-than-significant impacts to scenic vistas would be reduced under this alternative. The Project site is not visible from any officially-designated scenic highways, although the Project site is visible from I-215, a County-Eligible scenic highway; thus, impacts to scenic highways would be less than significant and would be reduced in comparison to the proposed Project. Although the Project is not expected to degrade the existing visual character or quality of the site or its surroundings, due to the reduction in building area the RPA would result in reduced impacts due to changes to the site's visual character. Although the Project would be subject to compliance with Riverside County Ordinance Nos. 655 and 915 and would result in less-than-significant light and glare impacts, because the RPA and would include less building area and thus fewer lighting elements than the proposed Project, impacts due to new lighting sources or sources of potential glare would be reduced in comparison to the proposed Project.

B. <u>Agriculture and Forestry Resources</u>

Both the Project and RPA would result in similar physical impacts due to construction activities. The Project site does not contain any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, and as such neither the Project nor the RPA would result in impacts to Important Farmland types and the level of impact would be the same. Both the Project and the RPA would require a change of zone to accommodate the proposed warehouse building, thus impacts due to a conflict with existing agricultural zoning would be similar under the Project and RPA and would be less than significant with approval of a change of zone. Neither the Project nor the RPA would conflict with any existing agricultural uses in the surrounding area, resulting in similar less-than-significant impacts. Neither the Project and RPA would conflict with an agricultural preserve or Williamson Act Contract. Both the Project and RPA would involve non-residential development within 300 feet of agriculturally-zoned property, although impacts would be less than significant and similar with mandatory compliance with Riverside County Ordinance No. 625. There are no components of the Project or RPA that would involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use; thus, impacts would be less than significant and the level of impact would be similar. Neither the Project nor the RPA would result in impacts to forestry resources, and the level of impact would be the same.

C. <u>Air Quality</u>

With implementation of the RPA, there would be reduced air quality emissions during both construction and operations as compared to the Project. Due to the reduction in building area, the RPA would result in reduced impacts due to construction-related emissions, and would avoid the Project's less-than-significant impact (after mitigation) due to construction-related emissions of VOCs. As such, the RPA also would avoid the Project's less-than-significant impact (after mitigation) due to a conflict with the SCAQMD AQMP. The RPA would result in fewer emissions under long-term operating conditions, although operational air quality impacts would



be less than significant under both the Project and RPA. The Project's less-than-significant impacts due to localized air quality emissions, including diesel particulate matter emissions and associated health risk impacts, also would be reduced with implementation of the RPA. In addition, due to the reduction in building area under the RPA, implementation of the RPA also would reduce the Project's less-than-significant impacts due to the emission of objectionable odors.

D. <u>Biological Resources</u>

The Project site would be fully graded under both the Project and RPA. Both the Project and RPA would require mitigation to reduce impacts due to a conflict with the MSHCP to below a level of significance, including impacts due to nighttime lighting during construction, permanent impacts to 0.35-acre of riparian/riverine resources and potential impacts to the burrowing owl. Both the Project and RPA would result in less-than-significant impacts (after mitigation) to the burrowing owl and nesting birds, and the level of impact would be similar. Both the Project and RPA would result in less-than-significant impacts to wildlife nursery sites, and the level of impact would be the same. Both the RPA and the Project would result in similar impacts to approximately 0.13-acre of southern willow scrub, impacts to which would be mitigated to less-than-significant levels. Both the Project and RPA would result in similar impacts to 0.14-acre of RWQCB jurisdictional area and 0.35-acre of CDFW/MSHCP jurisdictional areas, of which 0.13-acre consists of vegetated riparian habitat, and mitigation would be required to reduce these impacts to less-than-significant levels. Neither the Project nor the RPA would conflict with the Riverside County Oak Tree Management Guidelines or Riverside County Ordinance No. 559, resulting in no impacts under the Project or RPA.

E. <u>Cultural Resources</u>

The Project site would be fully graded under both the Project and RPA. Thus, both the Project and RPA would require mitigation to reduce impacts to previously-undiscovered subsurface historical resources and archaeological resources, and compliance with regulatory requirements would be mandatory to address the potential discovery of human remains, and the level of impact would be the same.

F. <u>Energy</u>

Under the RPA, there would be approximately 33% less warehouse building area. As such, the RPA would result in reduced demands for energy resources during construction and long-term operation as compared to the Project, although neither the Project nor RPA would result in significant impacts due to the wasteful, inefficient, or unnecessary consumption of energy resources. Neither the Project nor the RPA would conflict with or obstruct a federal or State plan for renewable energy or energy efficiency; thus, impacts would be less than significant, and the level of impact would be similar.

G. <u>Geology and Soils</u>

The Project site would be fully graded under both the Project and RPA. As such, impacts to geology and soils would be similar under the Project and RPA, and would be reduced to less-than-significant levels with the implementation of mitigation requiring compliance with a County-approved geotechnical study.



H. <u>Greenhouse Gas Emissions</u>

Under the RPA, there would be approximately 33% less warehouse building area. As such, the RPA would result in fewer GHG emissions under construction and long-term operations as compared to the Project, although impacts due to GHG emissions would be less than significant under both the Project and RPA with implementation of mitigation requiring compliance with the County's CAP Update. Neither the Project nor the RPA would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, resulting in less-than-significant and similar levels of impacts.

I. <u>Hazards and Hazardous Materials</u>

Under the RPA, there would be approximately 33% less warehouse building area as compared to the Project. Accordingly, the RPA would have a reduced potential to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, and would have reduced impacts due to the creation of 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; thus, the RPA would result in reduced impacts in comparison to the Project due to hazardous materials. There are no existing or proposed schools within 0.25-mile of the Project site; thus, no impact would occur under the Project or the RPA, although impacts would be reduced under the RPA due to the reduction in warehouse building area. Because the Project site is not located on any list of hazardous materials sites complied pursuant to Government Code Section 65962.5, neither the Project nor the RPA have the potential to create a significant hazard to the public or the environment due to existing site conditions, and the level of impact would be similar. Additionally, because less intense development would occur on site, the RPA also would reduce the Project's less-than-significant impacts due to a conflict with the MARB ALUCP. The Project site is not within two miles of a private airstrip; thus, no airport-related impacts would occur under the Project or RPA, although the level of impact would be reduced under the RPA because the RPA would involve less warehouse building area on site as compared to the Project. Neither the Project nor the RPA has the potential to impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan; thus, no impact would occur under the Project or RPA, and the level of impact would be similar.

J. <u>Hydrology and Water Quality</u>

The Project site would be fully graded and developed under both the Project and RPA. Thus, the RPA would result in similar less-than-significant impacts to hydrology and water quality during construction and long-term operations as compared to the proposed Project. The RPA would result in slightly less areas of impervious surfaces, and as such impacts to groundwater recharge would be slightly reduced under the RPA. Both the Project and RPA would result in similar less-than-significant impacts to the site's existing drainage pattern. Similarly, neither the Project nor the RPA would result in impacts due to exceeding the capacity of any existing or planned stormwater drainage systems, and the level of impact would be similar. The Project site is not subject to flood hazards under existing conditions; thus, impacts due to flood hazards under the RPA and proposed Project would be similar and would be less than significant. The Project site is not subject to inundation from tsunamis or seiches; thus, impacts would be less than significant and would be similar under the Project and RPA.



K. Land Use and Planning

Neither the Project nor the RPA would cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect; thus, impacts would be less than significant, and the level of impact would be the same. Similarly, neither the Project nor the RPA would disrupt or divide the physical arrangement of an established community; thus, impacts would be less than significant, and the level of impact would be the same.

L. <u>Mineral Resources</u>

The Project site does not contain any known mineral resources that would be of value to the region or the residents of the State. Accordingly, no impacts to mineral resources would occur under the Project or the RPA, and the level of impact would be similar. Additionally, neither the Project nor the RPA would represent an incompatible land use located adjacent to a State classified or designated area or existing surface mine, and neither the RPA nor the Project would expose people or property to hazards from proposed, existing, or abandoned quarries or mines. No impacts would occur, and the level of impact would be similar.

M. <u>Noise</u>

The Project site is located outside of the 60 dBA CNEL noise level contour boundaries for the MARB/IPA; thus, neither the Project nor the RPA would be subject to substantial airport-related noise. Under the RPA, the Project site would be developed with approximately 33% less warehouse building area. Due to the reduction in building area, construction-related noise impacts would be reduced under the RPA, although impacts would be less than significant under both the RPA and proposed Project. Under long-term operating conditions, the RPA would result in reduced noise impacts due to the reduction in warehouse building area and associated reduction in vehicular traffic. Operational noise impacts from stationary sources would be less than significant under both the off-site traffic noise impact to residential uses located on Patterson Avenue north of Placentia Avenue would be significant under both the Project and the RPA. Neither the Project nor the RPA would result in significant construction- or operational-related sources of vibration; thus, impacts would be less than significant, although the level of impact would be slightly reduced under the RPA because there would be less warehouse building area.

N. <u>Paleontological Resources</u>

The Project site would be fully graded under both the Project and RPA. Thus, both the Project and RPA would require mitigation to reduce impacts to previously-undiscovered subsurface paleontological resources, and the level of impact would be the same.

O. <u>Population and Housing</u>

Both the Project and RPA would result in the demolition of the existing three homes on site, but would accommodate three residential lots. Thus, impacts due to the displacement of existing people or housing would be similar under the Project and RPA, and would be less than significant. Due to the reduction in warehouse building area, the RPA would result in reduced impacts due to the demand for affordable housing, although impacts would be less than significant under both the Project and RPA. Similarly, due to the reduction in warehouse building area, the RPA would result in reduced impacts due to substantial unplanned population growth, although impacts would be less than significant under both the Project and RPA.



P. <u>Public Services</u>

Under the RPA, there would be approximately 33% less warehouse building area as compared to the Project. As such, implementation of the RPA would result in reduced impacts in comparison to the Project to fire protection services, sheriff services, schools, libraries, and health services, although impacts would be less than significant under both the Project and RPA with the payment of school impact and DIF fees.

Q. <u>Recreation</u>

Both the Project and RPA would result in similar trail and sidewalk improvements; thus, impacts due to the construction of recreational facilities would be less than significant and would be similar under the Project and RPA. However, due to the reduction in the number of employees on site under the RPA, the RPA would result in reduced impacts due to the physical deterioration of existing recreational facilities, although impacts would be less than significant under both the Project and RPA.

R. <u>Transportation</u>

Neither the Project nor the RPA would conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; thus, impacts would be less than significant, and the level of impact would be similar. Both the Project and RPA would result in significant and unavoidable impacts due to VMT; however, because the RPA would result in less warehouse building area and thus fewer employees, impacts due to VMT would be reduced under the RPA in comparison to the Project. Roadway improvements under the RPA and Project would be similar, and neither the Project nor the RPA would substantially increase hazards due to a geometric design feature. Although the RPA would result in significant hazards potential due to incompatible uses because trucks would circulate to designated truck routes. Additionally, neither the Project nor the RPA would result in impacts due to inadequate emergency access, and the level of impact would be the same.

S. <u>Tribal Cultural Resources</u>

The Project site would be fully graded under both the Project and RPA. Thus, both the Project and RPA would require mandatory compliance with regulatory requirements to address the potential but unlikely potential of human remains discovery during Project-related ground disturbance. Impacts would be less than significant with mandatory regulatory requirements compliance, and the level of impact would be the same.

T. <u>Utilities and Service Systems</u>

Under the RPA, there would be approximately 33% less warehouse building area as compared to the Project. Both the Project and RPA would result in similar less-than-significant impacts due to the construction of infrastructure on-site and in surrounding roadways for water, sewer, and drainage. The RPA would result in the generation of less wastewater than would be generated under the Project; thus, the RPA would result in reduced impacts to wastewater treatment capacity, although impacts would be less than significant under both the Project and RPA. Due to the reduction in warehouse building area, the RPA also would result in reduced impacts to water supplies, although the level of impact would be less than significant under both the Project and RPA. Similarly, impacts to solid waste would be reduced under the RPA as compared to the Project, although impacts would be less than significant under both the Project and RPA. Neither the Project nor RPA



would conflict with the CIWMP or AB 939; thus, impacts due to a conflict with management and reduction statutes and regulations related to solid waste would be less than significant, and the level of impact would be similar. Impacts due to the construction of other infrastructure, such as electricity and natural gas, would be similar under the Project and RPA, and the level of impact would be less than significant.

U. <u>Wildfire</u>

Both the Project and RPA would accommodate a minimum 100-foot buffer between the proposed warehouse building and off-site areas classified as having a "very high" susceptibility to wildfire hazards; thus, impacts due to wildfire hazards would be less than significant under both the Project and RPA, and the level of impact would be similar.

V. <u>Conclusion</u>

In comparison to the proposed Project, the RPA would result in reduced impacts under the issue areas of aesthetics, air quality, energy, GHG emissions, hazards/hazardous materials, hydrology/water quality, noise, population/housing, public services, recreation, transportation, and utilities/service systems. The RPA would result in the same or similar impacts as the proposed Project under the issue areas of agriculture/forestry resources, biological resources, cultural resources, geology/soils, land use/planning, mineral resources, paleontological resources, tribal cultural resources, and wildfire. In comparison to the Project, the RPA would not result in any increased impacts to the environment.

The RPA generally would meet the Project's objectives, although to a lesser extent than the proposed Project. Due to the reduction in warehouse building area, the RPA would be less effective than the proposed Project in meeting the Project's objective to attract economic investment to the Mead Valley community of Riverside County to support the growing goods movement supply chain. Similarly, the RPA would be less effective than the proposed Project in meeting the Project's objective to develop supply chain uses in close proximity to designated truck routes and the State highway system to avoid or shorten vehicular trip lengths on other roadways. Likewise, the RPA would be less effective in meeting the Project's objective to expand economic development, facilitate job creation, and increase the tax base for Riverside County by accommodating and diversifying facilities needed to support the goods movement supply chain. The RPA would, however, meet the Project's objective to develop a warehouse building in the Mead Valley community of unincorporated Riverside County that is designed to meet contemporary industry standards and be economically competitive with similar buildings in the local area and region. Due to the reduction in warehouse building area, the RPA also would be less effective than the Project in meeting the Project's objective to attract new employmentgenerating businesses to unincorporated Riverside County, thereby growing the economy and providing a more equal jobs-housing balance in the local area that will reduce the need for members of the local workforce to commute outside the area for employment. The RPA would meet the Project's objective to develop a use that has architectural design and operational characteristics that are compatible with other existing and planned developments in the local area, would meet the Project's objective to provide a physical buffer between warehousing and residential land uses, to aid in compatible land use transitions in Mead Valley, and would meet the Project's objective to complete unfinished streets in a Mead Valley residential subdivision.



6.3.4 SMALL BUILDING ALTERNATIVE (SBA)

Pursuant to the County's Transportation Analysis Guidelines for Level of Service and Vehicle Miles Traveled (December 2020), general light industrial developments with less than 179,000 s.f. of building area are presumed to result in a less-than-significant transportation impact due to VMT. Thus, this alternative was selected to allow the Lead Agency (Riverside County) to consider a design for the Project site that would avoid the Project's significant and unavoidable impact due to VMT. The Small Building Alternative (SBA) assumes the Project site would be developed with three residential lots and a warehouse building, but the proposed warehouse building would be reduced in size from approximately 591,203 s.f. under the proposed Project to approximately 175,000 s.f. under the SBA (representing a reduction in building area by approximately 70%). The portions of the warehouse lot not used for the building would be used for parking and trailer storage. All other components of the SBA would be the same as the proposed Project, including proposed infrastructure and roadway improvements. This alternative was selected by the Lead Agency in order to evaluate an alternative that would avoid the Project's significant and unavoidable impacts due to air quality and greenhouse gas (GHG) emissions. The SBA is identified as the Environmentally Superior Alternative.

A. <u>Aesthetics</u>

Under the SBA, there would be approximately 70% less light industrial building area as compared to the Project. Thus, the Project's less-than-significant impacts to scenic vistas would be reduced under this alternative. The Project site is not visible from any officially-designated scenic highways, although the Project site is visible from I-215, a County-Eligible scenic highway; thus, impacts to scenic highways would be less than significant and would be reduced in comparison to the proposed Project. Although the Project is not expected to degrade the existing visual character or quality of the site or its surroundings, due to the reduction in building area the SBA would result in reduced impacts due to changes to the site's visual character. Although the Project would be subject to compliance with Riverside County Ordinance Nos. 655 and 915 and would result in less-than-significant light and glare impacts, because the SBA and would include less building area and thus fewer lighting elements than the proposed Project, impacts due to new lighting sources or sources of potential glare would be reduced in comparison to the proposed Project.

B. <u>Agriculture and Forestry Resources</u>

Both the Project and SBA would result in similar physical impacts due to construction activities. The Project site does not contain any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, and as such neither the Project nor the SBA would result in impacts to Important Farmland types and the level of impact would be the same. Both the Project and the SBA would require a change of zone to accommodate the proposed warehouse building, thus impacts due to a conflict with existing agricultural zoning would be similar under the Project and SBA and would be less than significant with approval of a change of zone. Neither the Project nor the SBA would conflict with any existing agricultural uses in the surrounding area, resulting in similar less-than-significant impacts. Neither the Project and SBA would conflict with an agricultural preserve or Williamson Act Contract. Both the Project and SBA would involve non-residential development within 300 feet of agriculturally-zoned property, although impacts would be less than significant and similar with mandatory compliance with Riverside County Ordinance No. 625. There are no components of the Project or SBA that would involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use; thus, impacts would be less than



significant and the level of impact would be similar. Neither the Project nor the SBA would result in impacts to forestry resources, and the level of impact would be the same.

C. <u>Air Quality</u>

With implementation of the SBA, there would be reduced air quality emissions during both construction and operations as compared to the Project. Due to the approximately 70% reduction in building area, the SBA would result in reduced impacts due to construction-related emissions, and would avoid the Project's less-than-significant impact (after mitigation) due to construction-related emissions of VOCs. As such, the SBA also would avoid the Project's less-than-significant impact (after mitigation) due to construction-related emissions of VOCs. As such, the SBA also would avoid the Project's less-than-significant impact (after mitigation) due to a conflict with the SCAQMD AQMP. The SBA would result in fewer emissions under long-term operating conditions, although operational air quality impacts would be less than significant under both the Project and SBA. The Project's less-than-significant impacts due to localized air quality emissions, including diesel particulate matter emissions and associated health risk impacts, also would be reduced with implementation of the SBA. In addition, due to the reduction in building area under the SBA, implementation of the SBA also would reduce the Project's less-than-significant impacts due to the emission of objectionable odors.

D. <u>Biological Resources</u>

The Project site would be fully graded under both the Project and SBA. Both the Project and SBA would require mitigation to reduce impacts due to a conflict with the MSHCP to below a level of significance, including impacts due to nighttime lighting during construction, permanent impacts to 0.35-acre of riparian/riverine resources and potential impacts to the burrowing owl. Both the Project and SBA would result in less-than-significant impacts (after mitigation) to the burrowing owl and nesting birds, and the level of impact would be similar. Both the Project and SBA would result in less-than-significant impacts to wildlife nursery sites, and the level of impact would be the same. Both the SBA and the Project would result in similar impacts to approximately 0.13-acre of southern willow scrub, impacts to which would be mitigated to less-than-significant levels. Both the Project and SBA would result in similar impacts to 0.14-acre of RWQCB jurisdictional area and 0.35-acre of CDFW/MSHCP jurisdictional areas, of which 0.13-acre consists of vegetated riparian habitat, and mitigation would be required to reduce these impacts to less-than-significant levels. Neither the Project nor the SBA would conflict with the Riverside County Oak Tree Management Guidelines or Riverside County Ordinance No. 559, resulting in no impacts under the Project or RPA.

E. <u>Cultural Resources</u>

The Project site would be fully graded under both the Project and SBA. Thus, both the Project and SBA would require mitigation to reduce impacts to the potential discovery of previously-undiscovered subsurface historical resources and archaeological resources, and compliance with regulatory requirements would be mandatory to address the potential discovery of human remains, and the level of impact would be the same.

F. <u>Energy</u>

Under the SBA, there would be approximately 70% less warehouse building area. As such, the SBA would result in reduced demands for energy resources during construction and long-term operation as compared to the Project, although neither the Project nor SBA would result in significant impacts due to the wasteful,



inefficient, or unnecessary consumption of energy resources. Neither the Project nor the SBA would conflict with or obstruct a federal or State plan for renewable energy or energy efficiency; thus, impacts would be less than significant, and the level of impact would be similar.

G. <u>Geology and Soils</u>

The Project site would be fully graded under both the Project and SBA. As such, impacts to geology and soils would be similar under the Project and SBA, and would be reduced to less-than-significant levels with the implementation of mitigation requiring compliance with a County-approved geotechnical study.

H. <u>Greenhouse Gas Emissions</u>

Under the SBA, there would be approximately 70% less warehouse building area. As such, the SBA would result in fewer GHG emissions under construction and long-term operations as compared to the Project, although impacts due to GHG emissions would be less than significant under both the Project and SBA with implementation of mitigation requiring compliance with the County's CAP Update. Neither the Project nor the SBA would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG emissions, resulting in less-than-significant and similar levels of impacts.

I. <u>Hazards and Hazardous Materials</u>

Under the SBA, there would be approximately 70% less warehouse building area as compared to the Project. Accordingly, the SBA would have a reduced potential to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, and would have reduced impacts due to the creation of 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; thus, the SBA would result in reduced impacts in comparison to the Project due to hazardous materials. There are no existing or proposed schools within 0.25-mile of the Project site; thus, no impact would occur under the Project or the SBA, although impacts would be reduced under the SBA due to the reduction in warehouse building area. Because the Project site is not located on any list of hazardous materials sites complied pursuant to Government Code Section 65962.5, neither the Project nor the SBA have the potential to create a significant hazard to the public or the environment due to existing site conditions, and the level of impact would be similar. Additionally, because less intense development would occur on site, the SBA also would reduce the Project's less-than-significant impacts due to a conflict with the MARB ALUCP. The Project site is not within two miles of a private airstrip; thus, no airport-related impacts would occur under the Project or SBA, although the level of impact would be reduced under the SBA because the SBA would involve less warehouse building area on site as compared to the Project. Neither the Project nor the SBA has the potential to impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan; thus, no impact would occur under the Project or SBA, and the level of impact would be similar.

J. <u>Hydrology and Water Quality</u>

The Project site would be fully graded and developed under both the Project and SBA. Thus, the SBA would result in similar less-than-significant impacts to hydrology and water quality during construction and long-term operations as compared to the proposed Project. The SBA would result in slightly less areas of impervious surfaces, and as such impacts to groundwater recharge would be slightly reduced under the SBA. Both the



Project and SBA would result in similar less-than-significant impacts to the site's existing drainage pattern. Similarly, neither the Project nor the SBA would result in impacts due to exceeding the capacity of any existing or planned stormwater drainage systems, and the level of impact would be similar. The Project site is not subject to flood hazards under existing conditions; thus, impacts due to flood hazards under the SBA and proposed Project would be similar and would be less than significant. The Project site is not subject to inundation from tsunamis or seiches; thus, impacts would be less than significant and would be similar under the Project and SBA.

K. Land Use and Planning

Neither the Project nor the SBA would cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect; thus, impacts would be less than significant, and the level of impact would be the same. Similarly, neither the Project nor the SBA would disrupt or divide the physical arrangement of an established community; thus, impacts would be less than significant, and the level of impact would be the same.

L. <u>Mineral Resources</u>

The Project site does not contain any known mineral resources that would be of value to the region or the residents of the State. Accordingly, no impacts to mineral resources would occur under the Project or the SBA, and the level of impact would be similar. Additionally, neither the Project nor the SBA would represent an incompatible land use located adjacent to a State classified or designated area or existing surface mine, and neither the SBA nor the Project would expose people or property to hazards from proposed, existing, or abandoned quarries or mines. No impacts would occur, and the level of impact would be similar.

M. <u>Noise</u>

The Project site is located outside of the 60 dBA CNEL noise level contour boundaries for the MARB/IPA; thus, neither the Project nor the SBA would be subject to substantial airport-related noise. Under the SBA, the Project site would be developed with approximately 70% less warehouse building area. Due to the reduction in building area, construction-related noise impacts would be reduced under the SBA, although impacts would be less than significant under both the SBA and proposed Project. Under long-term operating conditions, the SBA would result in reduced noise impacts due to the reduction in warehouse building area and associated reduction in vehicular traffic. Operational noise impacts from stationary and traffic-related sources would be less than significant under both the Project and SBA and the SBA would reduce the Project's significant and unavoidable traffic-related noise impact to residential land uses on Patterson Avenue north of Placentia Avenue to below a level of significance. Neither the Project nor the SBA would result in significant construction- or operational-related sources of vibration; thus, impacts would be less than significant, although the level of impact would be slightly reduced under the RPA because there would be less warehouse building area.

N. <u>Paleontological Resources</u>

The Project site would be fully graded under both the Project and SBA. Thus, both the Project and SBA would require mitigation to reduce impacts to previously-undiscovered subsurface paleontological resources, and the level of impact would be the same.



O. <u>Population and Housing</u>

Both the Project and SBA would result in the demolition of the existing three homes on site, but would accommodate three residential lots. Thus, impacts due to the displacement of existing people or housing would be similar under the Project and SBA, and would be less than significant. Due to the reduction in warehouse building area, the SBA would result in reduced impacts due to the demand for affordable housing, although impacts would be less than significant under both the Project and the SBA. Similarly, due to the reduction in warehouse building area, the SBA would result in reduced impacts due to substantial unplanned population growth, although impacts would be less than significant under both the Project and SBA.

P. <u>Public Services</u>

Under the SBA, there would be approximately 70% less warehouse building area as compared to the Project. As such, implementation of the SBA would result in reduced impacts in comparison to the Project to fire protection services, sheriff services, schools, libraries, and health services, although impacts would be less than significant under both the Project and SBA with the payment of school impact and DIF fees.

Q. <u>Recreation</u>

Both the Project and SBA would result in similar trail and sidewalk improvements; thus, impacts due to the construction of recreational facilities would be less than significant and would be similar under the Project and SBA. However, due to the reduction in the number of employees on site under the SBA, the SBA would result in reduced impacts due to the physical deterioration of existing recreational facilities, although impacts would be less than significant under both the Project and SBA.

R. <u>Transportation</u>

Neither the Project nor the SBA would conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; thus, impacts would be less than significant, and the level of impact would be similar. The Project would result in significant and unavoidable impacts due to VMT; however, because the SBA would result in 175,000 s.f. of building space, which is less than the 179,000 s.f. of building space the County considers as having a potential to result in a significant VMT impact, the SBA would reduce the Project's VMT impact to less than significant. Roadway improvements under the SBA and Project would be similar, and neither the Project nor the SBA would substantially increase hazards due to a geometric design feature. Although the SBA would generate fewer heavy trucks under long-term operations as compared to the Project, the SBA would not result in significant hazards potential due to incompatible use because trucks would circulate to designated truck routes. Additionally, neither the Project nor the SBA would result in impacts due to inadequate emergency access, and the level of impact would be the same.

S. <u>Tribal Cultural Resources</u>

The Project site would be fully graded under both the Project and SBA. Thus, both the Project and SBA would require mandatory compliance with regulatory requirements to address the unlikely potential of human remains discovery during Project-related ground disturbance. Impacts would be less than significant with mandatory regulatory requirements compliance, and the level of impact would be the same.



T. <u>Utilities and Service Systems</u>

Under the SBA, there would be approximately 70% less warehouse building area as compared to the Project. Both the Project and SBA would result in similar less-than-significant impacts due to the construction of infrastructure on-site and in surrounding roadways for water, sewer, and drainage. The SBA would result in the generation of less wastewater than would be generated under the Project; thus, the SBA would result in reduced impacts to wastewater treatment capacity, although impacts would be less than significant under both the Project and SBA. Due to the reduction in warehouse building area, the SBA also would result in reduced impacts to water supplies, although the level of impact would be less than significant under both the Project and SBA. Similarly, impacts to solid waste would be reduced under the SBA as compared to the Project, although impacts would be less than significant under both the Project and SBA. Neither the Project nor the SBA would conflict with the CIWMP or AB 939; thus, impacts due to a conflict with management and reduction statutes and regulations related to solid waste would be less than significant, and the level of impact would be similar. Impacts due to the construction of other infrastructure, such as electricity and natural gas, would be similar under the Project and SBA, and the level of impact would be less than significant.

U. <u>Wildfire</u>

Both the Project and SBA would accommodate a minimum 100-foot buffer between the proposed warehouse building and off-site areas classified as having a "very high" susceptibility to wildfire hazards; thus, impacts due to wildfire hazards would be less than significant under both the Project and RPA, and the level of impact would be similar.

V. <u>Conclusion</u>

In comparison to the proposed Project, the SBA would result in reduced impacts under the issue areas of aesthetics, air quality, energy, GHG emissions, hazards/hazardous materials, hydrology/water quality, noise, population/housing, public services, recreation, transportation, and utilities/service systems. The RPA would result in the same or similar impacts as the proposed Project under the issue areas of agriculture/forestry resources, biological resources, cultural resources, geology/soils, land use/planning, mineral resources, paleontological resources, tribal cultural resources, and wildfire. In comparison to the Project, the RPA would not result in any increased impacts to the environment and would reduce the Project's VMT impact to less than significant.

The SBA generally would meet the Project's objectives, although to a lesser extent than the proposed Project. Due to the reduction in warehouse building area, the SBA would be less effective than the proposed Project in meeting the Project's objective to attract economic investment to the Mead Valley community of Riverside County to support the growing goods movement supply chain. Similarly, the SBA would be less effective than the proposed Project in meeting the Project's objective to develop supply chain uses in close proximity to designated truck routes and the State highway system to avoid or shorten vehicular trip lengths on other roadways. Likewise, the SBA would be less effective in meeting the Project's objective to expand economic development, facilitate job creation, and increase the tax base for Riverside County by accommodating and diversifying facilities needed to support the goods movement supply chain. The SBA would, however, meet the Project's objective to develop a warehouse building in the Mead Valley community of unincorporated Riverside County that is designed to meet contemporary industry standards and be economically competitive with similar buildings in the local area and region. Due to the reduction in warehouse building area, the SBA



also would be less effective than the Project in meeting the Project's objective to attract new employmentgenerating businesses to unincorporated Riverside County, thereby growing the economy and providing a more equal jobs-housing balance in the local area that will reduce the need for members of the local workforce to commute outside the area for employment. The SBA would meet the Project's objective to develop a use that has architectural design and operational characteristics that are compatible with other existing and planned developments in the local area, would meet the Project's objective to provide a physical buffer between warehousing and residential land uses, to aid in compatible land use transitions in Mead Valley, and would meet the Project's objective to complete unfinished streets in a Mead Valley residential subdivision.

6.3.5 Environmentally Superior Alternative

CEQA Guidelines § 15126.6 requires the identification of the environmentally superior alternative. As discussed herein, implementation of the NDA would result in no physical environmental impacts beyond those that have historically occurred on the property. Because the NDA would avoid most of the Project's impacts, it warrants consideration as the "environmentally superior alternative." However, pursuant to CEQA Guidelines § 15126.6(e)(2), if a no project alternative is identified as the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives. Accordingly, and because the NPA also comprises a "no project alternative" pursuant to CEQA Guidelines § 15126.6€(3), the Small Building Alternative (SBA), as discussed above in subsection 6.3.3, is identified as the Environmentally Superior Alternative pursuant to CEQA Guidelines § 15126.6.



Table 6-1 Alternatives to the Project – Comparison of Environmental Impacts

		Level of Impact Com	npared to the Proposed Proj	ect/Compliance with Pro	ject Objectives
Environmental Topic/Project Objective	Proposed Project Significance of Impacts After Mitigation	No Development Alternative (NDA)	No Project Alternative (NPA)	Reduced Project Alternative (RPA)	Small Building Alternative (SBA)
Aesthetics	Less than Significant	Reduced	Reduced	Reduced	Reduced
Agriculture and Forestry Resources	Less than Significant	Reduced	Similar	Similar	Similar
Air Quality	Less than Significant	Reduced	Reduced	Reduced	Reduced
Biological Resources	Less than Significant	Reduced	Reduced	Similar	Similar
Cultural Resources	Less than Significant	Reduced	Reduced	Similar	Similar
Energy	Less than Significant	Reduced	Reduced	Reduced	Reduced
Geology and Soils	Less than Significant	Reduced	Reduced	Similar	Similar
Greenhouse Gas Emissions	Less than Significant	Reduced	Reduced	Reduced	Reduced
Hazards and Hazardous	Less than Significant	Reduced	Reduced	Reduced	Reduced
Materials					
Hydrology and Water Quality	Less than Significant	Most Issues: Reduced Erosion/Siltation: Increased	Reduced	Similar	Similar
Land Use and Planning	Less than Significant	Increased	Reduced	Similar	Similar
Mineral Resources	Less than Significant	Similar	Similar	Similar	Similar
Noise	Significant and Unavoidable Direct and Cumulatively-Considerable Impacts (Traffic Noise on One Roadway Segment)	Reduced	Reduced	Reduced	Reduced
Paleontological Resources	Less than Significant	Reduced	Reduced	Similar	Similar
Population and Housing	Less than Significant	Reduced	Reduced	Reduced	Reduced
Public Services	Less than Significant	Reduced	Increased	Reduced	Reduced
Recreation	Less than Significant	Reduced	Increased	Reduced	Reduced
Transportation	Significant and Unavoidable Direct and Cumulatively-Considerable Impacts	Reduced to Less-than- Significant Levels	VMT Impacts: Increased Other Impacts: Similar or Reduced	Reduced, but not to Less- than-Significant	Reduce to Less-than- Significant
Tribal Cultural Resources	Less than Significant	Reduced	Reduced	Similar	Similar
Utilities and Service Systems	Less than Significant	Reduced	Reduced	Reduced	Reduced
Wildfire	Less-than-Significant	Increased	Increased	Similar	Similar
Objective A: To attract economic investment to the Mead Valley community of Riverside County to support the growing goods movement supply chain		No	No	Yes, but less effectively	Yes, but less effectively
Objective B: To develop supply chain uses in close proximity to designated truck routes and the State highway system to avoid or shorten vehicular trip lengths on other roadways.		No	No	Yes, but less effectively	Yes, but less effectively
Objective C: To expand economic development, facilitate job creation, and increase the tax base for Riverside County by accommodating and diversifying facilities needed to support the goods movement supply chain.		No	No	Yes, but less effectively	Yes, but less effectively
Objective D: To develop a warehouse building in the Mead Valley community of unincorporated Riverside County that is designed to meet		No	No	Yes	Yes



		Level of Impact Co	mpared to the Proposed Proj	ect/Compliance with Pro	ect Objectives
Environmental Topic/Project Objective	Proposed Project Significance of Impacts After Mitigation	No Development Alternative (NDA)	No Project Alternative (NPA)	Reduced Project Alternative (RPA)	Small Building Alternative (SBA)
contemporary industry standards and similar buildings in the local area ar	d be economically competitive with nd region.				
Objective E: To attract new employment-generating businesses to unincorporated Riverside County, thereby growing the economy and providing a more equal jobs-housing balance in the local area that will reduce the need for members of the local workforce to commute outside the area for employment.		No	No	Yes, but less effectively	Yes, but less effectively
Objective F: To develop a use that has architectural design and operational characteristics that are compatible with other existing and planned developments in the local area.		No	Yes	Yes	Yes
Objective G : To provide a physical buffer between warehousing and residential land uses, consisting of a berm, landscaping, and fencing to aid in visual screening and compatible land use transitions in Mead Valley.		No	No	Yes	Yes
Objective H: To complete unfinished streets in a Mead Valley residential subdivision.		No	Yes	Yes	Yes



7.0 REFERENCES

7.1 PERSONS CONTRIBUTING TO EIR PREPARATION

7.1.1 COUNTY OF RIVERSIDE PLANNING DEPARTMENT

- Evan Langan, Principal Planner
- Darren Edgington, Environmental Project Manager

7.1.2 T&B PLANNING, INC.

- Tracy Zinn, AICP, Principal
- Jerrica Harding, AICP, Senior Associate
- Tracy Chu, Assistant Project Manager
- Andrea Halfhill, Environmental Analyst
- Cristina Maxey, GIS/Graphics Manager
- Rhea Smith, GIS/Graphics Technician

7.2 DOCUMENTS APPENDED TO THIS EIR

The following reports, studies, and supporting documentation were used in preparing the Rider and Patterson Business Center EIR and are bound separately as Technical Appendices. A copy of the Technical Appendices is available for review at the County of Riverside Planning Department, 4080 Lemon Street, 12th Floor, Riverside, CA 92501.

Appendix A:	Notice of Preparation (NOP), and Written Comments on the NOP
Appendix B1:	Urban Crossroads, 2023a. Air Quality Impact Analysis. February 15, 2023
Appendix B2:	Urban Crossroads, 2023b. Mobile Source Health Risk Assessment. February 15, 2023
Appendix C1:	Glenn Lukos Associates, 2023a. Biological Technical Report. August 14, 2023
Appendix C2:	Glenn Lukos Associates, 2022. Jurisdictional Delineation for the Rider Street and Patterson Avenue Project, Located in the Community of Mead Valley, Riverside County, California. December 19, 2022.
Appendix C3:	Glenn Lukos Associates, 2023b. Determination of Biologically Equivalent or Superior Preservation (DBESP) Analysis. August 14, 2023.
Appendix D:	BFSA Environmental Services, 2022a. A Phase I Cultural Resources Assessment for the Rider and Patterson Project. November 17, 2022.
Appendix E:	Urban Crossroads, 2023c. Energy Analysis. February 15, 2023

Appendix F:	Southern California Geotechnical, 2022. Geotechnical Investigation. March 23, 2022.
Appendix G:	Urban Crossroads, 2023d. Greenhouse Gas Analysis. February 15, 2023
Appendix H:	Hazard Management Consulting, Inc., 2022. Phase I Environmental Site Assessment. February 9, 2022.
Appendix I1:	Thienes Engineering, 2022a. Preliminary Hydrology Calculations. October 26, 2022.
Appendix I2:	Thienes Engineering, 2022b. Project Specific Preliminary Water Quality Management Plan (P-WQMP). November 6, 2022.
Appendix J:	Urban Crossroads, 2023e. Noise and Vibration Analysis. November 21, 2023
Appendix K:	BFSA Environmental Services, 2022b. Paleontological Assessment for the Rider and Patterson Project. November 17, 2022.
Appendix L1:	Urban Crossroads, 2022. <i>Rider and Patterson Vehicle Miles Traveled (VMT) Analysis</i> . September 26, 2022.
Appendix L2:	Urban Crossroads, 2023g. Rider and Patterson Business Center (PPT220004) Traffic Impact Analysis. January 23, 2023.
Appendix M:	Written Correspondence EMWD, Will Serve Letter. October 25, 2022. Riverside County Airport Land Use Commission Development Review. February 9, 2023.
Appendix N.	T&B Planning, Inc. 2023. General Plan Consistency Analysis for the Rider and Patterson Business Center. November 17, 2022.
Appendix O.	EMWD, 2023. Water Supply Assessment Report; Rider and Patterson. February 15, 2023.

7.3 DOCUMENTS INCORPORATED BY REFERENCE

The following reports, studies, and supporting documentation were used in the preparation of this EIR and are incorporated by reference within this EIR. A copy of the following reports, studies, and supporting documentation is a matter of public record, and for convenience, these materials are generally available to the public at the website, webpage, or physical locations listed herein. All of the cited material is on file with the Riverside County Planning Department, 4080 Lemon Street, Riverside, CA 92501.



<u>Cited As:</u> <u>Citation:</u>

Riverside County, 2015a	Riverside County, 2015a. <i>County of Riverside, Volume 1: Draft Program EIR No. 521</i> . February 2015. Accessed September 12, 2022. Available on-line: https://planning.rctlma.org/Portals/14/genplan/general_plan_2015/DEIR%20521/DEIR%20No.%20 521.pdf
Riverside County, 2015b	Riverside County Planning Department, 2015b. <i>General Plan Amendment No.960 EIR No.521 CAP</i> . February 2015. Accessed September 12, 2022. Available on-line: https://planning.rctlma.org/General-Plan-Zoning/General-Plan/Riverside-County-General-Plan-2015/General-Plan-Amendment-No960-EIR-No521-CAP-February-2015
Riverside County, 2021a	Riverside County, 2021a. <i>Riverside County General Plan</i> . December 8, 2015 and September 28, 2021. Accessed September 12, 2022. Available on-line: <u>https://planning.rctlma.org/General-PlanZoning/General-Plan</u>

7.4 DOCUMENTS, WEBSITES AND PERSONS CONSULTED

<u>Cited As:</u>	<u>Citation:</u>
Agricultural Commissioner, 2021	Agricultural Commissioner, 2021. <i>Riverside County Agriculture Production Report 2020</i> . November 4, 2021. Accessed September 12, 2022. Available on-line: <u>https://storymaps.arcgis.com/stories/e4a55c77740c47bdabd6170a3914d583</u>
ALUC, 2014	Riverside County Airport Land Use Commission (ALUC), 2014. <i>March Air Reserve</i> <i>Base/Inland Port Airport Land Use Compatibility Plan</i> . November 13, 2014. Accessed December 5, 2022. Available on-line: <u>https://www.rcaluc.org/Portals/13/PDFGeneral/plan/2014/17%20-</u> <u>%20Vol.%201%20March%20Air%20Reserve%20Base%20Final.pdf</u>
ALUC, 2010	Airport Land Use Commission, 2010. <i>Riverside County Airport Land use Compatibility Plan</i> <i>Policy Document – PV Perris Valley Airport</i> . July 2010. Accessed September 12, 2022. Available on-line: <u>https://www.rcaluc.org/Portals/13/19%20-</u> %20Vol.%201%20Perris%20Valley%20(Final-Mar.2011).pdf?ver=2016-08-15-155627-183
BSC, n.d.	Building Standards Commission (BSC), n.d. <i>California Building Standards Code</i> . Accessed December 13, 2022. Available on-line: <u>https://www.dgs.ca.gov/BSC/Codes</u>
CAB, n.d.	California Architects Board (CAB), n.d. <i>Essential Services Building Seismic Safety Act</i> (<i>ESBSSA</i>). Accessed September 12, 2022. Available on-line: https://www.cab.ca.gov/general_information/esbssa.shtml
CA Legislative Info., n.d.	California Legislative Information (CA Legislative Info.), n.d. <i>Aeronautics Act</i> . Accessed September 12, 2022. Available on-line: <u>https://leginfo.legislature.ca.gov/faces/codes_displayexpandedbranch.xhtml?tocCode=PUC÷</u> <u>ision=9.&title=∂=1.&chapter=&article=</u>
CA Legislative Info., n.d.	California Legislative Information, n.d. <i>California Water Code</i> . Accessed September 12, 2022. Available on-line:



<u>Cited As:</u>	<u>Citation:</u>
	http://leginfo.legislature.ca.gov/faces/codesTOCSelected.xhtml?tocCode=WAT&tocTitle=+Wat er+Code+-+WAT
CA Legislative Info., n.d.	California Legislative Information, n.d. <i>Hazardous Waste Control</i> . Accessed September 12, 2022. Available on-line: https://leginfo.legislature.ca.gov/faces/codes_displayexpandedbranch.xhtml?tocCode=HSC÷ ision=20.&title=∂=&chapter=6.5.&article=
CA Legislative Info., n.d.	California Legislative Information, n.d. <i>Health and Safety Code Division 20, Chapter 6.6,</i> <i>Section 25249.5.</i> Accessed September 12, 2022. Available on-line: <u>https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=HSC&division=20.&</u> <u>title∂&chapter=6.6.&article</u>
CA Legislative Info., n.d.	California Legislative Information, n.d. <i>Health and Safety Code, Division 20, Chapter 6.95,</i> <i>Section 25500</i> . Accessed September 12, 2022. Available on-line: <u>https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=HSC&division=20.&</u> <u>title=∂=&chapter=6.95.&article=1</u> .
CA Legislative Info., n.d.	California Legislative Information, n.d. <i>PRC Division 13, Environmental Quality</i> . Accessed September 12, 2022. Available on-line: <u>https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PRC&sectionNum</u> =21096.
CA Legislative Info., n.d.	California Legislative Information, n.d. <i>Senate Bill No. 375</i> . Accessed September 12, 2022. Available on-line: <u>https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=200720080SB375</u>
CA Legislative Info., n.d.	California Legislative Information, n.d. <i>HSC Part 1.5</i> . Accessed December 1, 2022. Available on-line: <u>https://leginfo.legislature.ca.gov/faces/codes_displayexpandedbranch.xhtml?tocCode=HSC÷</u> <u>ision=13.&title=∂=1.5.&chapter=&article=</u>
CA Legislative Info., n.d.	California Legislative Information, n.d. <i>Senate Bill 330</i> . Accessed December 1, 2022. Available on-line: <u>https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201920200SB330</u>
CA Legislative Info., n.d.	California Legislative Information, n.d. <i>CA Gov. Code § 51200, et seq.</i> Accessed September 12, 2022. Available on-line: https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=GOV&division=1.&t itle=5.∂=1.&chapter=7.&article=1.
CA Legislative Info., n.d.	California Legislative Information, n.d. <i>HSC 7050.5</i> . Accessed September 12, 2022. Available on-line: <u>https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=HSC&sectionNu</u> <u>m=7050.5</u>
CA Legislative Info., n.d.	California Legislative Information, n.d. <i>Public Resources Code, Section 5097.98</i> . Accessed September 12, 2022. Available on-line:



<u>Cited As:</u>	<u>Citation:</u>
	https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PRC§ionNum =5097.98.
CA Legislative Info., n.d.	California Legislative Information, n.d. ARTICLE 1.7. Disclosure of Natural and Environmental Hazards, Right-to-Farm, and Other Disclosures Upon Transfer of Residential Property. Accessed September 12, 2022. Available on-line: <u>https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=1103.2.&lawCode=CIV</u>
CA Legislative Info., n.d.	California Legislative Information, n.d. <i>The Alquist-Priolo Earthquake Fault Zoning Act.</i> Accessed September 12, 2022. Available on-line: <u>https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?division=2.&chapter=7.5.&law</u> <u>Code=PRC</u>
CA Legislative Info., n.d.	California Legislative Information, n.d. <i>Assembly Bill 16</i> . Accessed September 12, 2022. Available on-line: <u>http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=200120020AB16</u>
CA Legislative Info., n.d.	California Legislative Information, n.d. <i>CA Gov. Code Section 51178</i> . Accessed September 12, 2022. Available on-line: https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV§ionNu m=51178
CA Legislative Info., n.d.	California Legislative Information, n.d. <i>Chapter 6.8, Very High Fire Hazard Severity Zones</i> . Accessed September 12, 2022. Available on-line: <u>https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV&sectionNu</u> <u>m=51182</u> .
CA Legislative Info., n.d.	California Legislative Information, n.d. <i>PRC Article 3, Section 4127</i> , Accessed September 12, 2022. Available on-line: https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PRC§ionNum=4127.
CA Legislative Info., n.d.	California Legislative Information, n.d. <i>PRC Article 1, Section 4102</i> . Accessed September 12, 2022. Available on-line: https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PRC§ionNum =4102
CA Legislative Info., n.d.	California Legislative Information, n.d. <i>PRC Sections 4290-4299</i> . Accessed September 12, 2022. Available on-line: https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=PRC&division=4.&ti tle=∂=2.&chapter=2.&article=
CA Legislative Info., n.d.	California Legislative Information, n.d. <i>Senate Bill 50</i> . Accessed September 12, 2022. Available on-line: <u>http://www.leginfo.ca.gov/pub/97-98/bill/sen/sb_0001-</u> 0050/sb 50 bill 19980827 chaptered.pdf



<u>Cited As:</u>	<u>Citation:</u>
CA Legislative Info., n.d.	California Legislative Information, n.d. <i>Quimby Act (Gov Code 66477)</i> . Accessed September 12, 2022. Available on-line: https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=66477.&lawCode=GOV
CA Legislative Info., n.d.	California Legislative Information, n.d. <i>Assembly Bill No. 1358</i> . Accessed September 12, 2022. Available on-line: <u>http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=200720080AB1358</u>
CA Legislative Info., n.d.	California Legislative Info, n.d. <i>Assembly Bill No, 1826.</i> Accessed September 12, 2022. Available on-line: <u>https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201320140AB1826</u>
CA Legislative Info., n.d.	California Legislative Info, n.d. Assembly Bill No. 2515 (Water Conservation in Landscaping Act). Accessed September 12, 2022. Available on-line: https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201520160AB2515
CA Legislative Info., n.d.	California Legislative Info, n.d. <i>Public Resources Code, Division 15, Chapter 4, Section 25300.</i> Accessed September 12, 2022. Available on-line: <u>https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=PRC&division=15.&</u> <u>title=∂=&chapter=4.&article=</u>
CA Legislative Info., n.d.	California Legislative Info, n.d. <i>SB 610</i> . Accessed September 12, 2022. Available on-line: http://www.leginfo.ca.gov/pub/01-02/bill/sen/sb_0601- 0650/sb_610_bill_20011009_chaptered.html
CA Legislative Info., n.d.	California Legislative Info, n.d. Senate Bill 2095 (Water Recycling in Landscaping Act). Accessed September 12, 2022. Available on-line: http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=199920000SB2095
CA Legislative Info., n.d.	California Legislative Info, n.d. <i>Senate Bill 221 (Gov. Code Section 66473.7)</i> . Accessed September 12, 2022. Available on-line: http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=66473.7.&lawC ode=GOV
CA Legislative Info., n.d.	California Legislative Info, n.d. <i>Senate Bill 901</i> . Accessed September 12, 2022. Available on- line: <u>http://leginfo.legislature.ca.gov/faces/codes_displayexpandedbranch.xhtml?tocCode=WAT÷</u> <u>ision=6.&title=∂=2.6.&chapter=&article=</u>
CA Legislative Info., n.d.	California Legislative Info, n.d. <i>Senate Bill No. 1374</i> . Accessed September 12, 2022. Available on-line: <u>https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=200120020SB1374</u>
CA Legislative Info, n.d.	California Legislative Info, n.d. <i>PRC 4213</i> . Accessed December 8, 2022. Available on-line: <u>https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PRC&sectionNum</u> =4213.



<u>Cited As:</u>	<u>Citation:</u>
CA Legislative Info, n.d.	California Legislative Info, n.d. <i>FISH AND GAME CODE – FGC DIVISION 4. BIRDS AND MAMMALS [3000 - 4903]</i> . Accessed December 19, 2022. Available on-line: https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?division=4.&chapter=1.∂=2.&lawCode=FGC
CalEPA, n.d.	California Environmental Protection Agency (CalEPA), n.d. Unified Program. Accessed September 12, 2022. Available on-line: <u>https://calepa.ca.gov/cupa/</u>
CalEPA, 2022	California Environmental Protection Agency, (CalEPA) 2022. <i>SB535 Disadvantaged Communities (2022 Update)</i> . Accessed December 23, 2022. Available on-line at: https://experience.arcgis.com/experience/1c21c53da8de48f1b946f3402fbae55c/page/SB-535-Disadvantaged-Communities/
CAL FIRE, n.d.	California Department of Forestry and Fire Protection (CAL FIRE), n.d. <i>Forest Practice</i> . Accessed September 12, 2022. Available on-line: <u>https://www.fire.ca.gov/programs/resource-management/forest-practice/</u>
California Energy Commission, 2020a	California Energy Commission, 2020a. <i>Electric Utility Service Areas, California 2020</i> . May 21, 2020. Accessed September 12, 2022. Available on-line: <u>https://cecgis-caenergy.opendata.arcgis.com/pages/pdf-maps</u>
California Energy Commission, 2020b	California Energy Commission, 2020b. <i>Natural Gas Utility Service Area, California 2020</i> . March 13, 2020. Accessed September 12, 2022. Available on-line: <u>https://cecgis-caenergy.opendata.arcgis.com/pages/pdf-maps</u>
California ISO, n.d.	California Independent System Operator (ISO), n.d. <i>California ISO</i> . Accessed September 12, 2022. Available on-line: <u>https://www.caiso.com/Pages/default.aspx</u>
CalRecycle, n.d.	CalRecycle, n.d. <i>History of California Solid Waste Law, 1985-1989</i> . Accessed November 22, 2022. Available on-line: <u>https://www.calrecycle.ca.gov/laws/legislation/calhist/1985to1989</u>
CalRecycle, n.d.	CalRecycle, n.d. <i>History of California Solid Waste Law, 1990-1994</i> . Accessed November 22, 2022. Available on-line: <u>https://www.calrecycle.ca.gov/Laws/Legislation/calhist/1990to1994</u>
CalRecycle, n.d.	CalRecycle, n.d. <i>Mandatory Commercial Recycling</i> . Accessed November 22, 2022. Available on-line: <u>https://www.calrecycle.ca.gov/Recycle/Commercial/</u>
CalRecycle, n.d.	CalRecycle, n.d. <i>SWIS for Badlands Landfill</i> . Accessed November 22, 2022. Available on-line: <u>https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2245?siteID=2367</u>
CalRecycle, n.d.	CalRecycle, n.d. <i>SWIS Info for El Sobrante</i> . Accessed November 22, 2022. Available on-line: <u>https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2280?siteID=2402</u>
CalRecycle, n.d.	CalRecycle, n.d. <i>SWIS info for Lamb Canyon</i> . Accessed November 22, 2022. Available on-line: <u>https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2246?siteID=2368</u>



<u>Cited As:</u>	<u>Citation:</u>
CalRecycle, n.d.	CalRecycle, n.d. Zero Waste. Accessed November 22, 2022. Available on-line: <u>https://www.calrecycle.ca.gov/zerowaste</u>
CARB, n.d.	California Air Resources Board, n.d. <i>AB 32 Climate Change Scoping Plan</i> . Accessed December 8, 2022. Available on-line: <u>https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan</u>
CARB, n.d.	California Air Resources Board, n.d. <i>CA's GHG Vehicle Emission Standards under AB 1493 (Pavley)</i> . Accessed December 8, 2022. Available on-line: <u>https://ww2.arb.ca.gov/californias-greenhouse-gas-vehicle-emission-standards-under-assembly-bill-1493-2002-pavley</u>
CARB, n.d.	California Air Resources Board, n.d. <i>Community Air Protection Program</i> . Accessed December 8, 2022. Available on-line: <u>https://ww2.arb.ca.gov/capp/about</u>
CARB, n.d.	California Air Resources Board, n.d. <i>Sustainable Communities & Climate Protection Program</i> . Accessed December 8, 2022. Available on-line: <u>https://ww2.arb.ca.gov/our-work/programs/sustainable-communities-climate-protection-program/about</u>
CARB, n.d.	California Air Resources Board, n.d. <i>Truck and Bus Regulation</i> . Accessed December 8, 2022. Available on-line: <u>https://ww2.arb.ca.gov/our-work/programs/truck-and-bus-regulation/about</u>
CARB, 2007	California Air Resources Board, 2007. <i>Staff Report: California 1990 Greenhouse Gas Emissions Level and 2020 Emissions Limit.</i> November 16, 2007. Accessed December 8, 2022. Available on-line: <u>https://www.arb.ca.gov/cc/inventory/pubs/reports/staff_report_1990_level.pdf</u>
CARB, 2012	California Air Resources Board, 2012. <i>Air Quality Plans</i> . Accessed December 8, 2022. Available on-line: <u>https://ww2.arb.ca.gov/our-work/topics/air-quality-plans</u>
CARB, 2018	California Air Resources Board, 2012. <i>AB 32 Global Warming Solutions Act of 2006</i> . Accessed December 8, 2022. Available on-line: <u>https://ww2.arb.ca.gov/resources/fact-sheets/ab-32-global-</u>
CARB, 2021	warming-solutions-act- California Air Resources Board, 2021. Advanced Clean Trucks Fact Sheet. August 20, 2021. Accessed December 8, 2022. Available on-line: <u>https://ww2.arb.ca.gov/sites/default/files/2020-06/200625factsheet_ADA.pdf</u>
CA State Library, 2005	CA State Library, 2005. <i>Executive Order S-3-05</i> . June 2, 2005. Accessed December 8, 2022. Available on-line: <u>https://www.library.ca.gov/wp-content/uploads/GovernmentPublications/executive-order-proclamation/5129-5130.pdf</u>
CA State Library, 2007	CA State Library, 2007. <i>Executive Order S-01-07</i> . January 22, 2007. Accessed December 8, 2022. Available on-line: <u>https://www.library.ca.gov/Content/pdf/GovernmentPublications/executive-order-proclamation/5107-5108.pdf</u>
CA State Library, 2008	CA State Library, 2008. <i>Executive Order S-14-08</i> . November 17, 2008. Accessed December 8, 2022. Available on-line: <u>https://www.library.ca.gov/Content/pdf/GovernmentPublications/executive-order-proclamation/38-S-14-08.pdf</u>



<u>Cited As:</u>	<u>Citation:</u>
CA State Library, 2015	CA State Library, 2015. <i>Executive Order B-30-15</i> . April 29, 2015. Accessed December 8, 2022. Available on-line: <u>https://www.library.ca.gov/Content/pdf/GovernmentPublications/executive-order-proclamation/39-B-30-15.pdf</u>
CBSC, 2022	California Department of General Services, Building Standards Commission (CBSC), 2022. Guide to Title 24 California Building Standards Code. Accessed December 1, 2022. Available on-line: <u>https://www.dgs.ca.gov/BSC/Resources/Page-Content/Building-Standards-</u> <u>Commission-Resources-List-Folder/GuidebooksTitle-24</u>
CCR, n.d.	California Code of Regulations (CCR), n.d. <i>CCR</i> , <i>PRC</i> § 5097.5. No date. Accessed October 6, 2022. Available on-line at: <u>https://codes.findlaw.com/ca/public-resources-code/prc-sect-5097-5.html</u>
CCR, n.d.	California Code of Regulations, n.d. <i>CCR</i> , <i>PRC § 30244</i> . No date. Accessed October 6, 2022.
CCR, n.d.	California Code of Regulations, n.d. § 4308. Archaeological Features. No date. Accessed October 6, 2022. Available on-line at: https://govt.westlaw.com/calregs/Document/I6449566A5B4D11EC976B000D3A7C4BC3?view Type=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&context Data=(sc.Default)
CCR, n.d.	California Code of Regulations, n.d. <i>California Code, Health and Safety Code - HSC § 13143.9</i> . Accessed December 1, 2022. Available on-line: <u>https://codes.findlaw.com/ca/health-and-safety-code/hsc-sect-13143-9.html</u>
CCR, n.d.	California Code of Regulations, n.d. <i>California Code, Vehicle Code - VEH § 32000.5</i> . Accessed December 1, 2022. Available on-line: <u>https://codes.findlaw.com/ca/vehicle-code/veh-sect-32000-5.html</u>
CCR, n.d.	California Code of Regulations, n.d. <i>PRC Section 4213</i> . Accessed December 1, 2022. Available on-line: <u>https://codes.findlaw.com/ca/public-resources-code/prc-sect-4213.html</u>
CCR, n.d.	California Code of Regulations, n.d. <i>CCR Title 14</i> . Accessed December 1, 2022. Available on- line: <u>https://govt.westlaw.com/calregs/Index?bhcp=1&transitionType=Default&contextData=%28sc.</u> <u>Default%29</u>
CCR, n.d.	California Code of Regulations, n.d. <i>Title 20. Public Utilities and Energy</i> . Accessed December 1, 2022. Available on-line: https://govt.westlaw.com/calregs/Browse/Home/California/CaliforniaCodeofRegulations?guid=I 237B3BF0D44E11DEA95CA4428EC25FA0&originationContext=documenttoc&transitionTyp e=Default&contextData=(sc.Default)
CDC, n.d.	California Department of Conservation, n.d. 2014-2016 Farmland Conversion Report. Accessed September 12, 2022. Available on-line: <u>https://www.conservation.ca.gov/dlrp/fmmp/Pages/2014-2016 Farmland_Conversion_Report.aspx</u>
CDC, n.d.	California Department of Conservation, n.d. 2014-2016 Farmland Conversion Report. Accessed September 12, 2022. Available on-line:



<u>Cited As:</u>	<u>Citation:</u>
	https://www.conservation.ca.gov/dlrp/fmmp/Pages/2014- 2016_Farmland_Conversion_Report.aspx
CDC, n.d.	California Department of Conservation, n.d. <i>Mineral Land Classification Map (Plate 7.18)</i> . Accessed December 1, 2022. Available on-line: <u>https://filerequest.conservation.ca.gov/RequestFile/59302</u>
CDC, 2004	California Department of Conservation, 2004. <i>A Guide to the Farmland Mapping and Monitoring Program, 2004 Edition.</i> 2004. Accessed September 12, 2022. Available on-line: <u>https://www.co.monterey.ca.us/Home/ShowDocument?id=44176</u>
CDC, 2019	California Department of Conservation, 2019. <i>Williamson Act Program</i> . 2019. Accessed September 12, 2022. Available on-line: <u>https://www.conservation.ca.gov/dlrp/lca</u>
CDC, 2021	California Department of Conservation, 2021. <i>Riverside County Important Farmland 2018</i> . January 2021. Accessed December 1, 2022. Available on-line: <u>https://filerequest.conservation.ca.gov/RequestFile/2825794</u>
CDFW, n.d.	California Department of Fish and Wildlife (CDFW), n.d. <i>Lake and Streambed Alteration Program</i> . Accessed December 1, 2022. Available on-line: <u>https://www.wildlife.ca.gov/conservation/lsa</u>
CDFW, n.d.	California Department of Fish and Wildlife, n.d. <i>California Water Action Plan</i> . Accessed November 11, 2022. Available on-line: <u>https://wildlife.ca.gov/Conservation/Watersheds/Instream-Flow/Action-Plan</u>
CDFW, n.d.	California Department of Fish and Wildlife, n.d. <i>Threatened and Endangered Species</i> . Accessed December 19, 2022. Available on-line: <u>https://www.wildlife.ca.gov/Conservation/CESA</u>
CDFW, n.d.	California Department of Fish and Wildlife, n.d. <i>Natural Community Conservation Planning</i> (<i>NCCP</i>). Accessed December 19, 2022. Available on-line: <u>https://www.wildlife.ca.gov/conservation/planning/nccp</u>
CDFW, n.d.	California Department of Fish and Wildlife, n.d. <i>California Laws Protecting Native Plants</i> . Accessed December 19, 2022. Available on-line: <u>https://www.wildlife.ca.gov/Conservation/Plants/Laws</u>
CEC, n.d.	California Energy Commission, n.d. <i>Building Energy Efficiency Standards - Title 24</i> . Accessed December 8, 2022. Available on-line: <u>https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards</u>
CEC, n.d.	California Energy Commission, n.d. <i>Emission Performance Standard - SB 1368</i> . Accessed December 8, 2022. Available on-line: <u>https://www.energy.ca.gov/rules-and-regulations/energy-suppliers-reporting/emission-performance-standard-sb-1368</u>
CEC, n.d.	California Energy Commission, n.d. <i>Integrated Energy Policy Report - IEPR</i> . Accessed December 8, 2022. Available on-line: <u>https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report</u>



<u>Cited As:</u>	<u>Citation:</u>
CEC, 2017	California Energy Commission, 2017. <i>Renewables Portfolio Standard Eligibility</i> . January 2017. Accessed December 8, 2022. Available on-line: <u>https://efiling.energy.ca.gov/getdocument.aspx?tn=217317</u>
CEC, 2018	California Energy Commission, 2018. 2019 Building Energy Efficiency Standards for Residential and Nonresidential Buildings. December 2018. Accessed December 8, 2022. Available on-line: <u>https://www.energy.ca.gov/sites/default/files/2021-06/CEC-400-2018-020-CMF_0.pdf</u>
CDC, 2021	California Department of Conservation, 2021. <i>Riverside County Important Farmland 2018</i> . January 2021. Accessed December 1, 2022. Available on-line: <u>https://filerequest.conservation.ca.gov/RequestFile/2825794</u>
CEC, n.d.	California Energy Commission (CEC), n.d. <i>California Energy Commission</i> . Accessed November 11, 2022. Available on-line: <u>https://www.energy.ca.gov</u> /
CPUC, n.d.	California Public Utilities Commission (CPUC), n.d. <i>What is the California Public Utilities Commission?</i> Accessed December 2, 2022. Available on-line: <u>https://www.cpuc.ca.gov/-/media/cpuc-website/about-cpuc/documents/transparency-and-reporting/fact_sheets/cpuc_overview_english_030122.pdf</u>
DOJ, 2015	United States Department of Justice (DOJ), 2015. <i>Massachusetts V. EPA, 549 U.S. 497</i> . August 10, 2021. Accessed December 1, 2022. Available on-line: <u>https://www.justice.gov/enrd/massachusetts-v-epa</u>
DOI, n.d.	United States Department of the Interior (DOI), Bureau of Land Management, n.d. <i>Healthy</i> <i>Forests Restoration Act of 2003</i> . Accessed December 1, 2022. Available on-line: <u>https://www.blm.gov/or/resources/forests/files/HFRA_Law.pdf</u>
DTSC, n.d.	Department of Toxic Substances Control (DTSC), n.d. <i>Official California Code of Regulations</i> (<i>CCR</i>), <i>Title 22</i> , <i>Division 4.5</i> . Accessed December 1, 2022. Available on-line: <u>https://dtsc.ca.gov/title22/</u>
DWR, n.d.	California Department of Water Resources (DWR), n.d. SGMA Groundwater Management. Accessed December 1, 2022. Available on-line: <u>https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management</u>
DWR, 2003	California Department of Water Resources, 2003. <i>Guidebook for Implementation of SB 610 and SB 221</i> . October 8, 2003. Accessed December 1, 2022. Available on-line: http://sntbberry.cityofsanteeca.gov/sites/FanitaRanch/Public/Remainder%20of%20the%20Record/(2)%20Reference%20Documents%20from%20EIR%20&%20Technical%20Reports/Tab%20}185%20-%202003-10%20CDWR%20Guidebook%20for%20Impl%20SB%20610.pdf
DWR, 2016	California Department of Water Resources, 2016. <i>Guidebook for Urban Water Suppliers</i> . Accessed December 1, 2022. Available on-line: <u>https://cawaterlibrary.net/wp-content/uploads/2017/06/UWMP_Guidebook_Mar_2016_FINAL.pdf</u>
DWR, 2018	California Department of Water Resource, 2018. <i>Update 2018</i> . Accessed December 1, 2022. Available on-line: https://water.ca.gov/Programs/California-Water-Plan/Update-2018



<u>Cited As:</u>	<u>Citation:</u>
DWR, 2020	California Department of Water Resources, 2020. <i>Statewide map of SGMA Basin Prioritization Results</i> . May 1, 2020. Accessed December 1, 2022. Available on-line: https://water.ca.gov/Programs/Groundwater-Management/Basin-Prioritization
EMWD, n.d.	Eastern Municipal Water District (EMWD), n.d. <i>Wastewater Service</i> . Accessed September 12, 2022. Available on-line: <u>https://www.emwd.org/wastewater-service</u>
EMWD, 1995 EMWD, 2021a	Eastern Municipal Water District, 1995. San Jacinto Groundwater Management Area. 1995. Eastern Municipal Water District, 2021a. 2020 Urban Water Management Plan. July 1, 2021. Accessed September 12, 2022. Available on-line: <u>https://www.emwd.org/sites/main/files/file-attachments/urbanwatermanagementplan_0.pdf?1625160721</u>
EMWD, 2021b	Eastern Municipal Water District, 2021b. <i>West Jacinto Groundwater Management Area 2020</i> <i>Annual Report</i> . May 2021. Accessed December 1, 2022. Available on-line: <u>https://www.emwd.org/sites/main/files/file-attachments/west_san_jacinto_2018_annual_report</u> <u>final.pdf?1594356029</u>
EPA, n.d.	United States Environmental Protection Agency (EPA), n.d. <i>Wetland Regulatory Authority</i> . Accessed December 19, 2022. Available on-line: <u>https://www.epa.gov/sites/default/files/2015-03/documents/404_reg_authority_fact_sheet.pdf</u>
EPA, 2022a	United States Environmental Protection Agency (EPA), 2022a. <i>Summary of the Clean Air Act</i> . September 12, 2022. Accessed December 8, 2022. Available on-line: <u>https://www.epa.gov/laws-regulations/summary-clean-air-act</u>
EPA, 2022b	United States Environmental Protection Agency, 2022b. 1990 Clean Air Act Amendment Summary: Title I. November 28, 2022. Accessed December 8, 2022. Available on-line: https://www.epa.gov/clean-air-act-overview/1990-clean-air-act-amendment-summary-title-i
EPA, 2022c	United States Environmental Protection Agency, 2022c. 1990 Clean Air Act Amendment Summary: Title II. November 3, 2022. Accessed December 8, 2022. Available on-line: https://www.epa.gov/clean-air-act-overview/1990-clean-air-act-amendment-summary-title-ii
EPA, 2022d	United States Environmental Protection Agency, 2022d. <i>National Emission Standards for</i> <i>Hazardous Air Pollutants Compliance Monitoring</i> . March 1, 2022. Accessed December 8, 2022. Available on-line: <u>https://www.epa.gov/compliance/national-emission-standards-hazardous-air-pollutants-compliance-monitoring</u>
EPA, 2022e	United States Environmental Protection Agency, 2022e. <i>Summary of Clean Water Act.</i> July 6, 2022. Accessed December 1, 2022. Available on-line: <u>https://www.epa.gov/laws-regulations/summary-clean-water-act</u>
EPA, 2022f	United States Environmental Protection Agency, 2022f. <i>CERCLA Summary</i> . September 12, 2022. Accessed December 1, 2022. Available on-line: <u>https://www.epa.gov/laws-regulations/summary-comprehensive-environmental-response-compensation-and-liability-act</u>
EPA, 2022g	United States Environmental Protection Agency, 2022g. <i>Summary of RCRA</i> . September 12, 2022. Accessed December 1, 2022. Available on-line: <u>https://www.epa.gov/laws-regulations/summary-resource-conservation-and-recovery-act</u>



<u>Cited As:</u>	<u>Citation:</u>
EPA, 2022h	United States Environmental Protection Agency, 2022h. <i>Summary of the Toxic Substances Control Act</i> . October 4, 2022. Accessed December 1, 2022. Available on-line: https://www.epa.gov/laws-regulations/summary-toxic-substances
EPA, 2022i	United States Environmental Protection Agency, 2022i. <i>Summary of the Noise Control Act</i> . September 12, 2022. Accessed December 15, 2022. Available on-line: https://www.epa.gov/laws-regulations/summary-noise-control-act
EPA, 2022j	United States Environmental Protection Agency, 2022j. <i>Summary of the Safe Drinking Water</i> <i>Act.</i> September 12, 2022. Accessed December 1, 2022. Available on-line: <u>https://www.epa.gov/laws-regulations/summary-safe-drinking-water-act</u>
EPIC, 2010	Energy Policy Initiatives Center (EPIC), 2010. <i>California's Solar Shade Control Act</i> . March 2010. Accessed December 1, 2022. Available on-line: https://www.sandiego.edu/law/documents/centers/epic/100329_SSCA_Final_000.pdf
EPIC, 2014	Energy Policy Initiatives Center, 2014. <i>California's Solar Rights Act</i> . December 2014. Accessed December 1, 2022. Available on-line: https://www.sandiego.edu/law/documents/centers/epic/Solar%20Rights%20Act- A%20Review%20of%20Statutes%20and%20Relevant%20Cases.pdf
FAA, 2022	Federal Aviation Administration (FAA), 2022. <i>Notification of Proposed Construction or Alteration on Airport Part 77</i> . November 16, 2022. Accessed December 1, 2022. Available on- line: <u>https://www.faa.gov/airports/central/engineering/part77/</u>
FEMA, 2008	Federal Emergency Management Agency (FEMA), 2008. <i>FIRM</i> . 2008. Accessed December 1, 2022. Available on-line: https://msc.fema.gov/portal/search?AddressQuery=moreno%20valley%2C%20ca
FEMA, 2021	Federal Emergency Management Agency, 2021. <i>Executive Order 11988</i> . October 20, 2021. Accessed December 1, 2022. Available on-line: <u>https://www.fema.gov/glossary/executive-order-11988</u>
FEMA, 2022	Federal Emergency Management Agency, 2022. <i>National Flood Insurance Program - Program Description</i> . March 9, 2022. Accessed December 1, 2022. Available on-line: <u>https://www.fema.gov/flood-insurance</u>
FEMA, 2022b	Federal Emergency Management Agency, 2022b. <i>Descriptions of All Policies</i> . March 25, 2022. Accessed December 19, 2022. Available on-line: <u>https://www.fema.gov/emergency-managers/practitioners/environmental-historic/laws/descriptions#11990</u>
FERC, n.d.	Federal Energy Regulatory Commission (FERC), n.d. <i>What is FERC?</i> Accessed December 1, 2022. Available on-line: <u>https://www.ferc.gov/what-ferc</u>
FHWA, 2022	Federal Highway Administration (FHWA), 2022. <i>Highway Traffic Noise</i> . June 15, 2022. Accessed December 13, 2022. Available on-line: <u>https://www.fhwa.dot.gov/environment/noise/</u>
FTA, 2006	Federal Transit Administration (FTA), 2006. Transit Noise and Vibration Impact Assessment. May 2006. Accessed December 13, 2022. Available on-line: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA Noise and Vibration Manual.pdf



<u>Cited As:</u>	<u>Citation:</u>
Google Earth, 2022.	Google Earth, 2022.
HUD, n.d.	U.S. Department of Housing and Urban Development (HUD), n.d. <i>Housing Discrimination Under the Fair Housing Act</i> . Accessed December 1, 2022. Available on-line: https://www.hud.gov/program_offices/fair_housing_equal_opp/fair_housing_act_overview
MLA, n.d.	MLA, n.d. <i>Noise Insulation Standards</i> . Accessed December 13, 2022. Available on-line: <u>https://pdf4pro.com/cdn/california-noise-insulation-standards-5b1acb.pdf</u>
NAHC, n.d.	Native American Heritage Commission (NAHC), n.d. <i>State Laws and Codes</i> . Accessed December 6, 2022. Available on-line: <u>http://nahc.ca.gov/codes/state-laws-and-codes/</u>
NOAA, n.d.	National Oceanic and Atmospheric Administration (NOAA), n.d. <i>American Indian Religious Freedom Act</i> . Accessed December 6, 2022. Available on-line: <u>https://coast.noaa.gov/data/Documents/OceanLawSearch/Summary%20of%20Law%20-%20American%20Indian%20Religious%20Freedom%20Act.pdf</u>
NPS, n.d.	National Park Service (NPS), n.d. <i>CA Administrative Code, Title 14, Section 4308</i> . Accessed December 6, 2022. Available on-line: https://www.parks.ca.gov/pages/627/files/california%20code%20of%20regulations.doc
NPS, n.d.	National Park Service, n.d. <i>National Historic Landmarks Program</i> . Accessed December 6, 2022. Available on-line: <u>https://www.nps.gov/orgs/1582/index.htm</u>
NPS, 2022a	National Park Service, 2022a. <i>National Register of Historic Places FAQ</i> . May 6, 2020. Accessed December 6, 2022. Available on-line: <u>https://www.nps.gov/subjects/nationalregister/faqs.htm</u>
NPS, 2022b	National Park Service, 2022b. <i>Fossils and Paleontology Laws, Regulations, and Policies</i> . Accessed December 6, 2022. Available on-line: <u>https://www.nps.gov/subjects/fossils/fossil-protection.htm</u>
OAG. n.d.	Office of Attorney General, n.d. <i>SB 1000 - Environmental Justice in Local Land Use Planning</i> . Accessed December 8, 2022. Available on-line: <u>https://oag.ca.gov/environment/sb1000</u>
ОЕННА, 2022	California Office of Environmental Health Hazard Assessment, 2022. SB 535 Disadvantage Communities. Accessed December 8, 2022. Available on-line: https://oehha.ca.gov/calenviroscreen/sb535
OHP, n.d.	Office of Historic Preservation (OHP), n.d. <i>California Register of Historical Resources</i> . Accessed December 6, 2022. Available on-line: <u>http://ohp.parks.ca.gov/?page_id=21238</u>
OPR, n.d.	Office of Planning and Research (OPR), n.d. <i>Local Government</i> . Accessed December 1, 2022. Available on-line: <u>http://opr.ca.gov/planning/land-use/local-government/</u>
OPR, 2005	Office of Planning and Research, 2005. <i>Tribal Consultation Guidelines, Supplement to General Plan Guidelines</i> . 2005. Accessed December 6, 2022. Available on-line: https://www.parks.ca.gov/pages/22491/files/tribal consultation guidelines vol-4.pdf



Cited As:

Citation:

OPR, 2017a	Office of Planning and Research, 2017a. <i>Technical Advisory: AB 52 and Tribal Cultural Resources in CEQA</i> . June 2017. Accessed December 6, 2022. Available on-line: http://nahc.ca.gov/wp-content/uploads/2017/06/Technical-Advisory-AB-52-and-Tribal-Cultural-Resources-in-CEQA.pdf
OPR, 2017b	Office of Planning and Research, 2017b. <i>General Plan Guidelines</i> . 2017. Available on-line: <u>http://www.opr.ca.gov/docs/OPR_COMPLETE_7.31.17.pdf</u>
OPR, 2017c	Office of Planning and Research, 2017c. <i>Proposed Updates to the CEQA Guidelines</i> . November 2017. Accessed December 1, 2022. Available on-line at: https://opr.ca.gov/docs/20171127_Comprehensive_CEQA_Guidelines_Package_Nov_2017.pdf
OPR, 2018a	Office of Planning and Research, 2018a. <i>CEQA Guidelines Update</i> . Available on-line: https://resources.ca.gov/CNRALegacyFiles/ceqa/docs/2018_CEQA_FINAL_TEXT_122818.pdf
OSHA, n.d.	Occupational Safety and Health Administration, n.d. <i>Trucking Industry</i> . Accessed December 1, 2022. Available on-line: <u>https://www.osha.gov/trucking-industry</u>
OSHA, n.d.	Occupational Safety and Health Administration (OSHA), n.d. <i>California State Plan</i> . Accessed December 1, 2022. Available on-line: <u>https://www.osha.gov/dcsp/osp/stateprogs/california.html</u>
RCA, n.d.	Regional Conservation Authority, n.d. <i>RCA MSHCP Mapper</i> . Accessed December 12, 2022. Available on-line: <u>https://www.wrc-rca.org/rcamaps/</u>
RCDWR, 2022a	Riverside County Department of Waste Resources, 2022a. <i>El Sobrante Landfill June 2022 Tonnage</i> . June 2022.
RCDWR, 2022b	Riverside County Department of Waste Resources, 2022b. <i>Monthly Tonnage - Lamb Canyon June 2022 Tonnage</i> . June 2022.
RCDWR, 2022c	Riverside County Department of Waste Resources (RCDWR). Monthly Tonnage – Badlands Landfill May 2022. May 2022.
RCWRMD, 1996	Riverside County Waste Resources Management Division, 1996. <i>Countywide Integrated Waste Management Plan</i> . September 1996. Accessed December 13, 2022. Available on-line: https://www.rcwaste.org/Portals/0/Files/Planning/CIWMP/CIWMP.PDF
RCIT, n.d.	Riverside County Information Technology, n.d. <i>Riverside County Map My County GIS Viewer</i> . Accessed December 8, 2022. Available on-line: <u>https://gis1.countyofriverside.us/Html5Viewer/index.html?viewer=MMC_Public</u>
Riverside County, n.d.	Riverside County, n.d. Ordinance No. 787, An ordinance of the County of Riverside adopting the 2019 California Fire Code as Amended. Accessed December 2022. Available on-line: https://www.rivcocob.org/wp-content/uploads/2019/11/787.9.pdf
Riverside County, n.d.	Riverside County, n.d. Ordinance No. 915, An ordinance of the County of Riverside regulating outdoor lighting. December 20, 2011. Accessed September 12, 2022. Available on-line: https://www.rivcocob.org/ords/900/915.pdf


<u>Cited As:</u>	<u>Citation:</u>
Riverside County, 1988	Riverside County, 1988. Ordinance No. 655, An ordinance of the County of Riverside regulating light pollution. June 7, 1988. Accessed September 12, 2022. Available on-line: http://www.rivcocob.org/ords/600/655.htm
Riverside County, 1994	Riverside County, 1994. Ordinance 625. Accessed September 12, 2022. Available on-line: <u>https://www.rivcocob.org/ords/600/625.1.pdf</u>
Riverside County, 2003	Riverside County, 2003. Western Riverside County Multiple Species Habitat Conservation Plan. 2003. Accessed December 12, 2022. Available on-line: https://rctlma.org/Portals/0/mshcp/volume1/sec3.html#table3.10
Riverside County, 2019	Riverside County, 2019. <i>County of Riverside Climate Action Plan Update</i> . November 2019. Available on-line: <u>https://planning.rctlma.org/Portals/14/CAP/2019/2019_CAP_Update_Full.pdf</u>
Riverside County, 2021b	Riverside County, 2021b. <i>County of Riverside General Plan - Mead Valley Area Plan</i> . September 28, 2021. Accessed September 12, 2022. Available on-line: <u>https://planning.rctlma.org/Portals/14/genplan/GPA%202022/Compiled%20MVAP_4-2022%20rev.pdf?ver=2022-06-27-145214-087</u>
Riverside County, 2021c RWQCB, 2019	Riverside County, 2021c. <i>Ordinance No. 348</i> . April 1, 2021. Accessed September 12, 2022. Available on-line: <u>https://planning.rctlma.org/Portals/14/Ord_348_clean_version.pdf</u> Regional Water Quality Control Board (RWQCB), 2019. <i>Santa Ana River Basin Plan</i> . June 2019. Accessed September 12, 2022. Available on-line: <u>https://www.waterboards.ca.gov/santaana/water_issues/programs/basin_plan/</u>
SAWPA, 2019	Santa Ana River Watershed, 2019. <i>One Water One Watershed Plan 2.0.</i> January 2019. Available on-line: June 11, 2015, from <u>https://www.sawpa.org/wp-content/uploads/2019/02/OWOW-Plan-Update-2018-1.pdf</u>
SCAG, n.d.	Southern California Association of Governments, n.d. (SCAG) <i>About Us</i> . Accessed September 12, 2022. Available on-line: SCAG: <u>https://scag.ca.gov/about-us</u>
SCAG, n.d.	Southern California Association of Governments, n.d. <i>Housing - What is RHNA</i> . Accessed September 12, 2022. Available on-line: <u>https://scag.ca.gov/housing</u>
SCAG, 2018	Southern California Association of Governments (SCAG), 2018. <i>Industrial Warehousing in the SCAG Region</i> . April 2018. Accessed September 12, 2022. Available on-line: https://scag.ca.gov/sites/main/files/file-attachments/final_report_03_30_18.pdf?1604268012
SCAG, 2019	Southern California Association of Governments, 2019. <i>Profile of Unincorporated Riverside County</i> . May 2019. Accessed September 12, 2022. Available on-line: <u>https://scag.ca.gov/sites/main/files/file-attachments/unincareariversidecounty_0.pdf?1606013120</u>
SCAG, 2020	Southern California Association of Governments, 2020. <i>The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy RTP/SCS</i> . September 3, 2020. Accessed September 12, 2022. Available on-line: <u>https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176</u>



<u>Cited As:</u>	<u>Citation:</u>
SCAQMD, n.d.	South Coast Air Quality Management District, n.d. <i>Authority</i> . Accessed December 8, 2022. Available on-line: <u>https://www.aqmd.gov/nav/about/authority</u>
SCAQMD, 2003	South Coast Air Quality Management District (SCAQMD), 2003. <i>White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution</i> . August 2003. Accessed November 22, 2022. Available on-line: http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-working-group/cumulative-impacts-working-group/cumulative-impacts-white-paper.pdf?sfvrsn=2
SWRCB, n.d.	State Water Resources Control Board (SWRCB), n.d. <i>California Statutes Making Conservation a California Way of Life</i> . Accessed December 1, 2022. Available on-line: https://www.waterboards.ca.gov/water_issues/programs/conservation_portal/california_statutes.
SWRCB, 2014	State Water Resources Control Board, 2014. 0A - Federal, State and Local Laws, Policy and Regulations. June 23, 2014. Accessed December 19, 2022. Available on-line: https://www.waterboards.ca.gov/water_issues/programs/nps/encyclopedia/0a_laws_policy.html
SWRCB, 2016	State Water Resources Control Board, 2016. <i>A Compilation of Water Quality Goals</i> . January 2016. Accessed September 12, 2022. Available on-line: <u>http://www.waterboards.ca.gov/water_issues/programs/water_quality_goals/docs/wq_goals_text</u> .pdf
SWRCB, 2020	State Water Resources Control Board, 2020. <i>Drought Information - Governor's Drought Declaration</i> . July 27, 2020. Accessed December 1, 2022. Available on-line: <u>https://www.waterboards.ca.gov/water_issues/programs/conservation_portal/executive_orders.html</u>
SCAQMD, 2017	South Coast Air Quality Management District, 2017. <i>Final 2016 Air Quality Management Plan</i> . March 2017. Accessed September 12, 2022. Available on-line: <u>http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf?sfvrsn=15</u>
SCAQMD, 2019	South Coast Air Quality Management District, 2019. <i>South Coast AQMD Air Quality Significance Thresholds</i> . April 2019. Accessed November 22, 2022. Available on-line: <u>http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2</u>
SWRCB, 2014	State Water Resources Control Board, 2014. <i>Federal, State, and Local Laws; Policy and Regulations</i> . June 23, 2014. Accessed September 12, 2022. Available on-line: https://www.waterboards.ca.gov/water_issues/programs/nps/encyclopedia/0a_laws_policy.html
SWRCB, 2017	State Water Resources Control Board, 2017. <i>Watershed Management</i> . August 3, 2017. Accessed September 12, 2022. Available on-line: http://www.waterboards.ca.gov/water_issues/programs/watershed/
USCB, n.d.	United States Census Bureau (USCB), n.d. <i>American Community Survey</i> . Accessed September 12, 2022. Available on-line: https://www.census.gov/programs-surveys/acs



Cited As:Citation:USCB, 2010United States Census Bureau, 2010. 210 Cenus - Urbanized Area Reference Map: Riverside-San
Bernardino, CA. January 1, 2010. Accessed September 12, 2022. Available on-line:
https://www2.census.gov/geo/maps/dc10map/UAUC_RefMap/ua/ua75340_riverside---
san_bernardino_ca/DC10UA75340.pdfUSDA, n.d.United States Department of Agriculture, n.d. Web Soil Survey. Accessed September 12, 2022.
Available on-line: https://websoilsurvey.nrcs.usda.gov/app/USDA, 1971United States Department of Agriculture, 1971. Western Riverside Area California. November
1971.

- UNFCCC, n.d. United Nations Framework Convention on Climate Change (UNFCCC), n.d. *The Paris Agreement*. Accessed December 8, 2022. Available on-line: <u>https://unfccc.int/process-and-meetings/the-paris-agreement/the-paris-agreement</u>
- UNFCCC, n.d. United Nations Framework Convention on Climate Change (UNFCCC), n.d. *What is the Kyoto Protocol?* Accessed December 8, 2022. Available on-line: <u>https://unfccc.int/kyoto_protocol</u>
- USFWS, n.d. United States Fish and Wildlife Service, n.d. *Migratory Bird Treaty Act of 1918*. Accessed December 19, 2022. Available on-line: <u>https://www.fws.gov/law/migratory-bird-treaty-act-1918</u>
- USFWS, 2017 United States Fish and Wildlife Service, 2017. *ESA Basics*. February 2017. Accessed December 19, 2022. Available on-line: <u>https://www.fws.gov/sites/default/files/documents/endangered-species-act-basics.pdf</u>
- VVUSD, 2018
 Val Verde Unified School District (VVUSD), 2018. School Facilities Needs Analysis. January 31, 2018. Accessed September 12, 2022. Available on-line: https://drive.google.com/file/d/13w_GGpg6QQQJ-BDGqt9Ju5HeOgnG-5A5/view