CEQA Guidelines Section 15183 Environmental Checklist

QCP Fabrication Facility Plot Plan

APN 763-230-006
Thermal, CA

Case No.: Plot Plan No. 250012

Lead Agency:

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SECTION 1. INTRODUCTION

The QCP Fabrication Facility Plot Plan (proposed Project) proposes the development of a light industrial, concrete furniture fabrication facility on a 19.01-acre site currently occupied by a date palm grove. The proposed Project is within the unincorporated community of Thermal and is subject to the policies and development standards of the Riverside County General Plan (RCGP) and the Eastern Coachella Valley Area Plan (ECVAP).

This Environmental Checklist has been prepared pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15183 to determine whether the proposed Project qualifies for streamlined environmental review. Section 15183 provides a streamlined process for projects that are consistent with the development density and intensity established by a general plan or area plan for which an Environmental Impact Report (EIR) has been certified. Under this provision, additional environmental review is required only to the extent necessary to determine whether there are significant effects that meet one or more of the criteria in CEQA Guidelines Section 15183(b).

1.1 Overview of CEQA Guidelines Section 15183

The CEQA (Public Resources Code Section 21000 et seq.) and the State CEQA Guidelines require lead agencies to evaluate the potential environmental effects of projects subject to their discretionary approval. CEQA Guidelines Section 15183 establishes a streamlined environmental review process for projects that are consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified. When consistency is demonstrated, additional review is limited to project-specific issues not adequately addressed in the prior EIR.

If these consistency requirements are met, the lead agency shall limit its examination of environmental effects (per Section 15183(b)) to those that it determines, based on an initial study or other analysis, meet one or more of the following criteria:

(1) Peculiar to the project or the parcel on which the project would be located;
(2) Not analyzed as significant effects in a prior EIR on the zoning action, general plan, or community plan with which the project is consistent;
(3) Potentially significant off-site impacts and cumulative impacts that were not discussed in the prior EIR prepared for the general plan, community plan, or zoning action; or
(4) Previously identified significant effects which, as a result of substantial new information not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR.

This Environmental Checklist evaluates the proposed Project's consistency with the RCGP and the ECVAP, including applicable land use designations, density, and policies. It further analyzes the potential environmental effects of the Project and determines whether any additional review is required under the criteria set forth in Section 15183(b).

1.1.1 General Plan Program EIR

The RCGP serves as the County's overarching policy document and blueprint for long-term growth and development. It establishes a framework to guide future land use decisions, manage the overall pattern of development, accommodate projected population and economic growth, preserve community character and natural resources, and integrate supporting systems such as circulation, open space, and infrastructure. The RCGP includes a countywide Land Use Map and detailed Area Plans that designate specific land uses, along with General Plan Elements that set forth goals, policies, and implementation programs addressing community needs, environmental protection, resource conservation, and urban growth management.

The proposed Project is located within the Eastern Coachella Valley Area Plan (ECVAP) and is consistent with the "Light Industrial (LI)" land use designation assigned to the site in both the RCGP and ECVAP. This designation allows for a wide variety of industrial and related uses, including assembly and light manufacturing, repair and other service facilities, warehousing, distribution centers, and supporting retail uses.

Pursuant to CEQA, a Program Environmental Impact Report (State Clearinghouse No. 2002051143) was prepared and certified by the Riverside County Board of Supervisors on October 7, 2003, for the adoption and long-term implementation of the RCGP. Because the proposed Project is consistent with the RCGP and applicable ECVAP policies and standards, the certified RCGP Program EIR serves as the primary environmental document for this Section 15183 review.

1.2 Summary of Results

As demonstrated by the following 15183 Environmental Checklist, the proposed Project is found to be in conformance with the analysis and conclusions of the RCGP FEIR. This determination supports the Plot Plan approval of the proposed Project and is based on the following criteria:

1. There are no new significant effects peculiar to the proposed Project or its site;

2. There are no new significant effects that were not previously evaluated in the RCGP FEIR;

3. There are no new significant off-site or cumulative impacts that were not analyzed in the RCGP FEIR, and

4. There are no adverse impacts that are more severe than those previously identified in the RCGP FEIR.

SECTION 2. PROJECT DESCRIPTION

2.1 Location and Setting

The Project site consists of a single rectangular-shaped assessor's parcel totaling approximately 19.01 acres, located on the south side of Avenue 54, east of Harrison Street, in the unincorporated community of Thermal, Riverside County, California (Exhibits 1 and 2). The property's legal description is: 19.01 acres in a portion of Lot 3, Map Book 004/053, Coachella Land & Water Co., Township 6 South, Range 8 East, Section 17, San Bernardino Base and Meridian.

The site is currently used for agriculture and features rows of planted palm trees (Exhibit 3). Access is provided directly from Avenue 54 to the north. No structures or significant improvements exist on the property. There is an existing chain-link fence around the perimeter of the site. Riverside County Building Department records show no permits have ever been issued for the site.

The general area is a mixture of farmlands, commercial and residential development. Surrounding land uses include:

- North: Avenue 54, with a large residential subdivision (single-family homes) beyond within the City of Coachella.
- South: Primarily vacant/undeveloped land with some sparse vegetation. A few scattered rural residences and structures are located farther south,
- East: Vacant land immediately east, transitioning to a mix of light commercial/industrial uses (storage yards, equipment, small businesses) and scattered residences farther east along Shady Lane.
- West: A few residences and vacant land, with farmland beyond.

2.1.1 General Plan and Zoning Designations

The Project is located within the ECVAP of the RCGP and is consistent with the "Light Industrial (LI)" land use designation assigned to the site in both the ECVAP and RCGP (Exhibit 4). This designation allows for a wide variety of industrial and related uses, including assembly and light manufacturing, repair and other service facilities, warehousing, distribution centers, and supporting retail uses. Building intensity ranges from 0.25 to 0.6 FAR. Light Industrial uses will be permitted based on their compatibility with surrounding land uses.

The following summarizes the key land use designations and applicable policies for the Project site:

Land Use Designations: Light Industrial (LI)
Area Plan: Eastern Coachella Valley
General Plan Policy Areas: None
General Plan Policy Overlay: None
Airport Influence Areas: Jacqueline Cochran Regional Airport
Airport Compatibility Zones: Jacqueline Cochran Regional Airport, Zone D

The subject site is zoned M-SC (Manufacturing Service Commercial). This zone promotes industrial and manufacturing activities and permits uses such as the manufacturing of concrete products and warehousing, subject to approval of a Plot Plan (Riverside County Zoning Code § 17.100.020). The M-SC zone is consistent with the RCGP and ECVAP LI land use designation.

2.2 Previous Environmental Review

The RCGP serves as the County's overarching policy document and blueprint for long-term growth and development. It establishes a framework to guide future land use decisions, manage the overall pattern of development, accommodate projected population and economic growth, preserve community character and natural resources, and integrate supporting systems such as circulation, open space, and infrastructure. The RCGP includes a countywide Land Use Map and detailed Area Plans that designate specific land uses, along with General Plan Elements that set forth goals, policies, and implementation programs addressing community needs, environmental protection, resource conservation, and urban growth management.

2.2.1 General Plan Environmental Impact Report

Pursuant to CEQA (Public Resources Code Section 21000 et seq.), a Program EIR was prepared and certified by the Riverside County Board of Supervisors on October 7, 2003, for the RCGP (General Plan Final Program EIR [FEIR] State Clearinghouse No. 2002051143). The Program EIR, referred to as the "RCGP FEIR" throughout this document, analyzed the potential environmental impacts associated with adoption and long-term implementation of the General Plan. Because the proposed Project is consistent with the RCGP, as well as applicable policies and development standards of the ECVAP, the previously certified RCGP FEIR serves as the primary basis for this Section 15183 environmental review. The Project's consistency with RCGP policies and applicable regulations has been evaluated, and relevant information from the RCGP FEIR is incorporated by reference herein.

The RCGP FEIR is available at:

County of Riverside Planning Department
4080 Lemon Street 12th Floor
Riverside, CA 92501
or
Riverside County Planning Department Website:
https://planning.rctlma.org/general-plan-environmental-impact-report-volume-i

2.3 Project Description

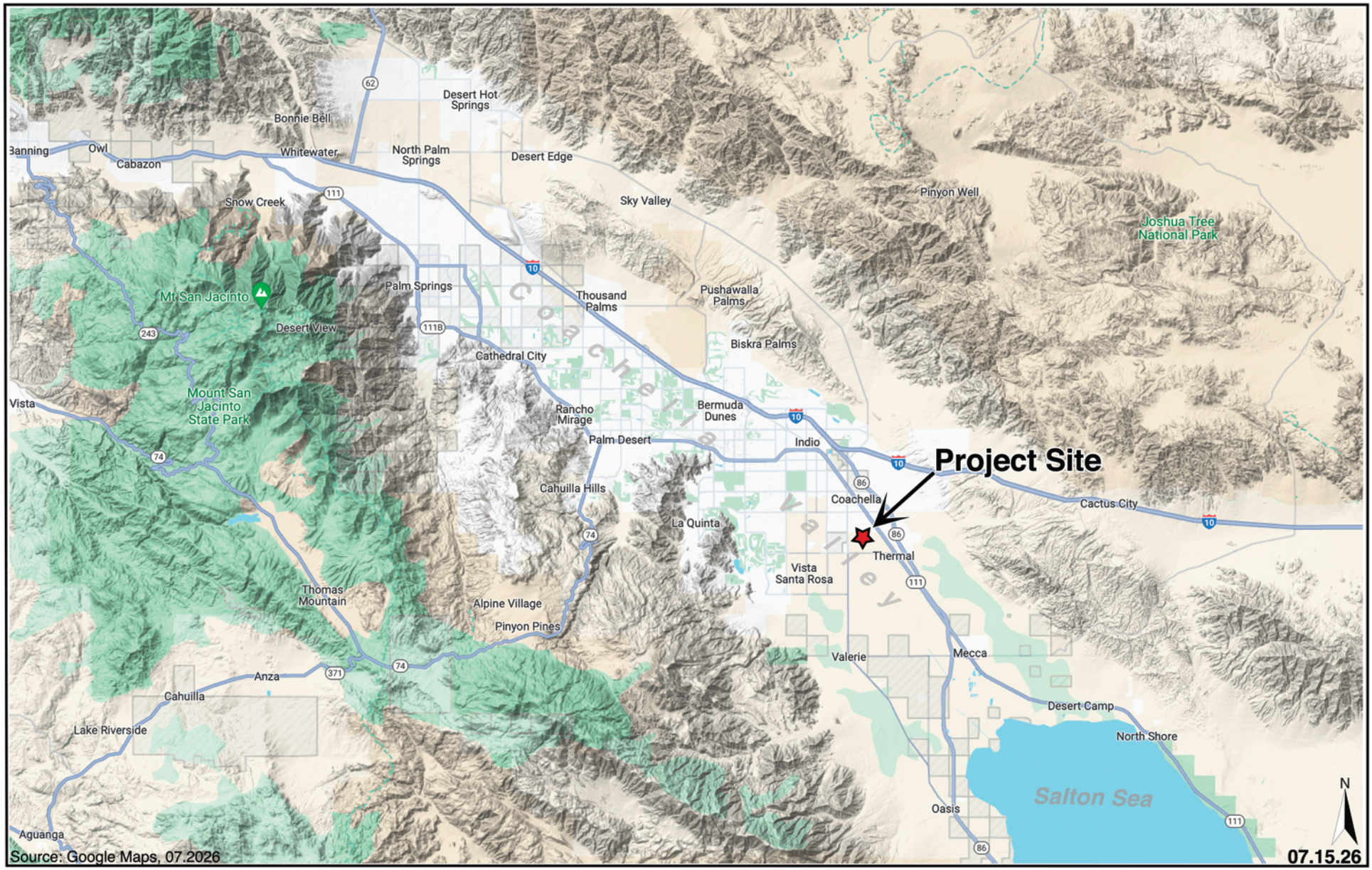
The Project requests Plot Plan approval for a Quick Crete Products (QCP) concrete furniture manufacturing facility. The Project would relocate an existing QCP manufacturing facility from the City of Norco to the subject site and would include approximately 100 employees, of which 50 employees from the existing Norco operations would relocate to the proposed facility. The facility will produce concrete benches, containers, and tables within an 88,400-square-foot (sf) production building, consisting of 83,700 sf of manufacturing and warehouse space, 1,900 sf of administrative offices, and 2,800 sf of employee support and break areas. The maximum building height of the production building is 29 feet 8 inches to top of parapet. The building presents a modern industrial architecture defined by low horizontal massing and corrugated metal exteriors. The site will also include a 106-space parking lot, 108,938 sf of landscaping, a 36,963-square-foot outdoor storage area for finished products, and a 96,100-square-foot mold storage area. Existing date trees will be preserved in two date droves located along the southern boundary and in the northwest portion of the site, totaling approximately 223,872 sf. A 6-foot decorative wall is proposed along the site's frontage (Avenue 54) with the existing chain link fence to remain around the southern, western and eastern property boundaries.

Stormwater runoff will be managed entirely on-site through percolation via two retention basins totaling 32,085 sf. All runoff will be conveyed via a storm drain system or sheet flow to one of the two retention basins located just north of the south property line. In general, the western half of the site will drain to the western basin and the eastern half to the eastern basin, except that all Avenue 54 frontage runoff

will be directed to the eastern basin. Because the basins are situated on the southern portion of the site and the existing topography slopes predominantly from northwest to southeast, historical drainage patterns will be retained without significant interruption. The retention basins have been sized in accordance with County standards to retain the worst-case 100-year storm event plus one foot of freeboard.

The Project includes sidewalk improvements along the Avenue 54 frontage as part of full half-street improvements to enhance pedestrian access. Two gated entrances are proposed off Avenue 54: the west gate will provide right-out exit movements only, while the east gate will allow entry and exit, including westbound left-turn access for both passenger vehicles and trucks.

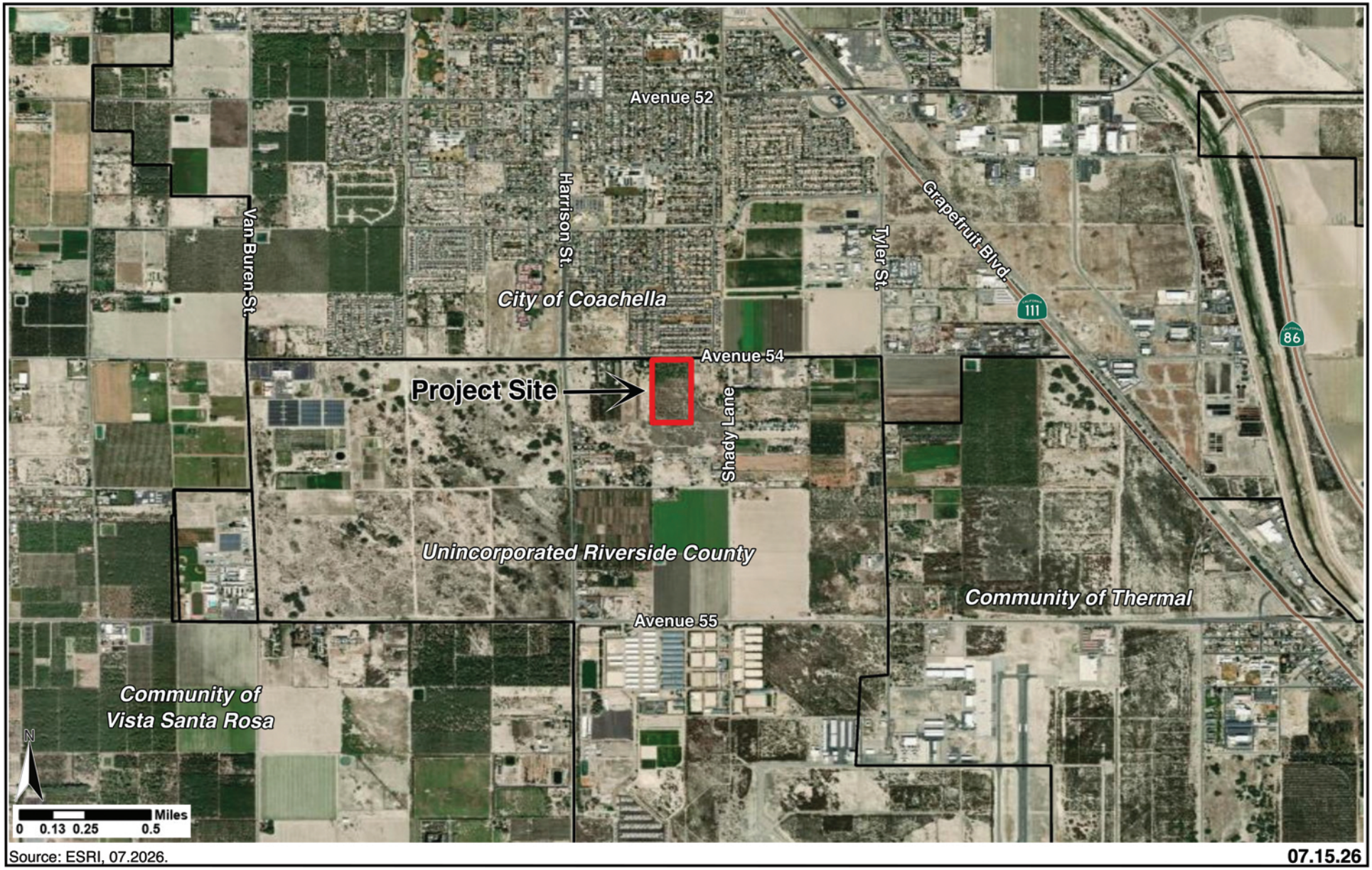
Potable water and sewer services will be provided by the Coachella Water Authority (CWA). Stormwater will be managed through on-site percolation. Electricity will be supplied by Imperial Irrigation District (IID), and natural gas service will be provided by Southern California Gas Company (SoCalGas).



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Regional Location Map
QCP Fabrication Facility
Riverside County, California

Exhibit
1



Source: ESRI, 07.2026.

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Project Vicinity Map
QCP Fabrication Facility
Riverside County, California

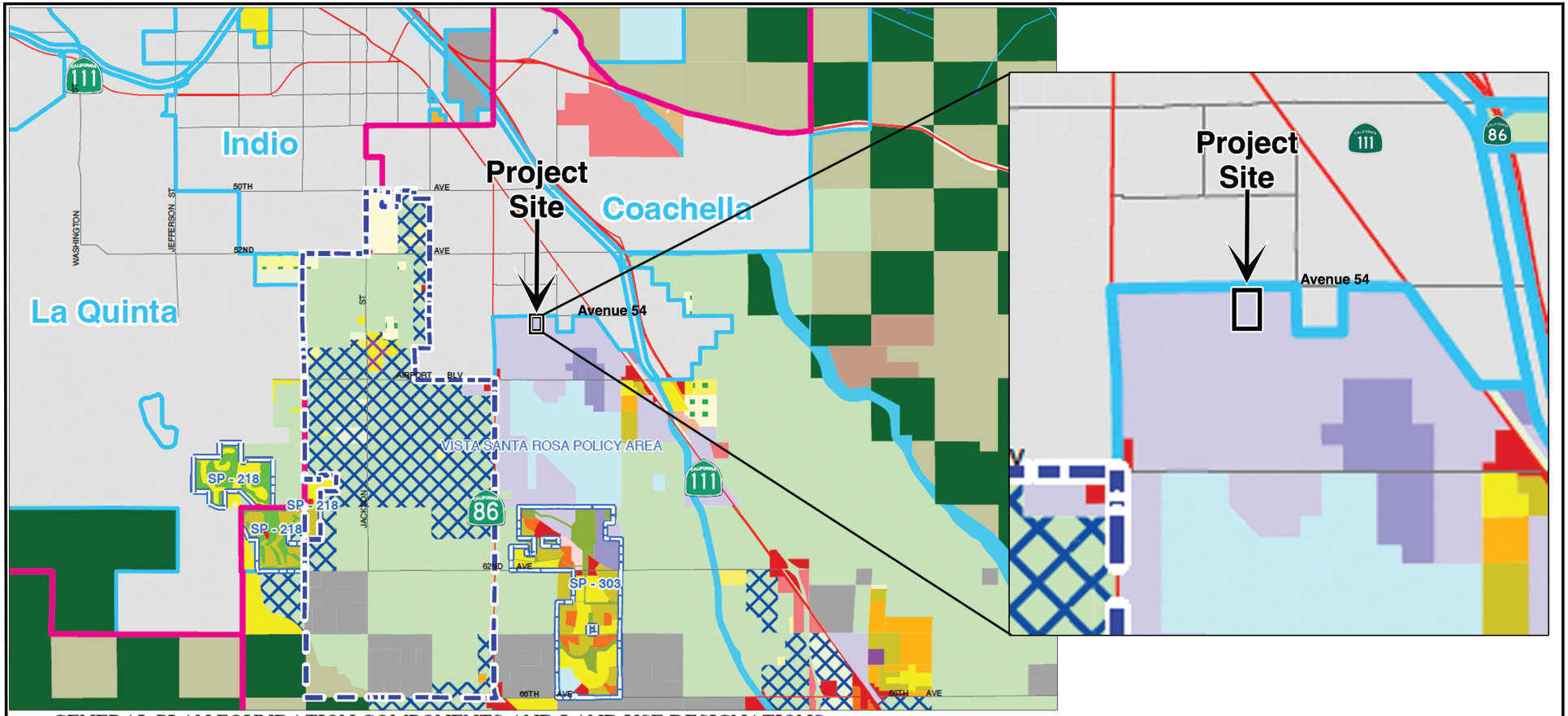
Exhibit
2



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Project Aerial Photo
QCP Fabrication Facility
Riverside County, California

Exhibit
3



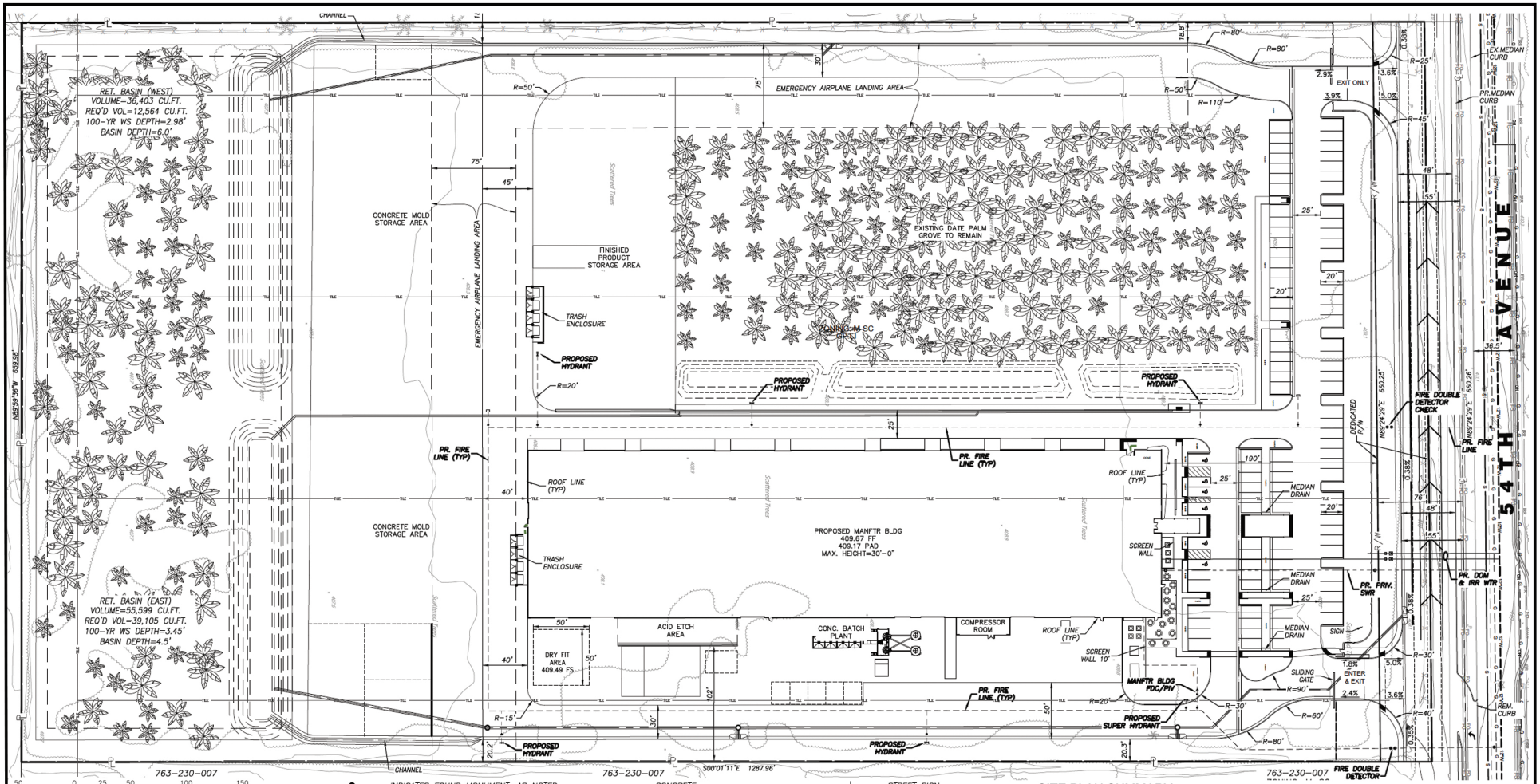
Source: Riverside County Integrated Project, Final Program Environmetal Impact Report, Volume 1, Figure 3.20, 10.07.2003

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General Plan and Eastern Coachella Valley Area Plan
Land Use Designation
QCP Fabrication Facility
Riverside County, California

Exhibit 4



●	INDICATES FOUND MONUMENT, AS NOTED
FD	FOUND
R/W	RIGHT OF WAY
N.A.P.	NOT A PART
O.R.	OFFICIAL RECORDS
B.O.B.	BASIS OF BEARINGS
	BOUNDARY LINE
	SECTION LINE/CENTERLINE
	TRAFFIC LANE PAINT
	PARKING STRIPES
	ROAD/PAVEMENT
	DIRT ROAD/TRAIL
	CURB/GUTTER
	CONCRETE
	FENCE
	RETAINING WALL
850	INDEX CONTOUR
	INTER CONTOUR
	VEGETATION LINE
FO	UNDERGROUND FIBER OPTIC CABLE
S	UNDERGROUND SANITARY SEWER
W	UNDERGROUND WATER MAIN
G	UNDERGROUND GAS LINE
OH	OVERHEAD POWER LINE
	BUILDING
	SIGNS
	STREET SIGN
	HANDICAP
	LIGHT POLE
	UTILITY POLE
	METER/UTILITY
	FIRE HYDRANT
	VALVE
MH	MANHOLE
WM	WATER METER
	POST/BOLLARD
	GATE
2985.5	SPOT ELEVATION
	PALM TREE

SITE PLAN SUMMARY:

IMPERVIOUS AREAS

BUILDING	FOOTPRINT
AMDIN / MANUFACTURING	88,400 SQFT
PAVEMENT AREA (CONC & AC)	220,101 SQFT
TOTAL IMPERVIOUS AREA	308,501 SQFT

PERVIOUS AREA	
DECOMPOSED GRANITE	3,542 SQFT
AGGREGATE SURFACED	94,273 SQFT
RETENTION BASIN	32,085 SQFT
LANDSCAPE	108,938 SQFT
TOTAL PERVIOUS AREA	238,838 SQFT
NET IMPROVEMENT AREA	547,339 SQFT

Source: CVE, 03.23.2026

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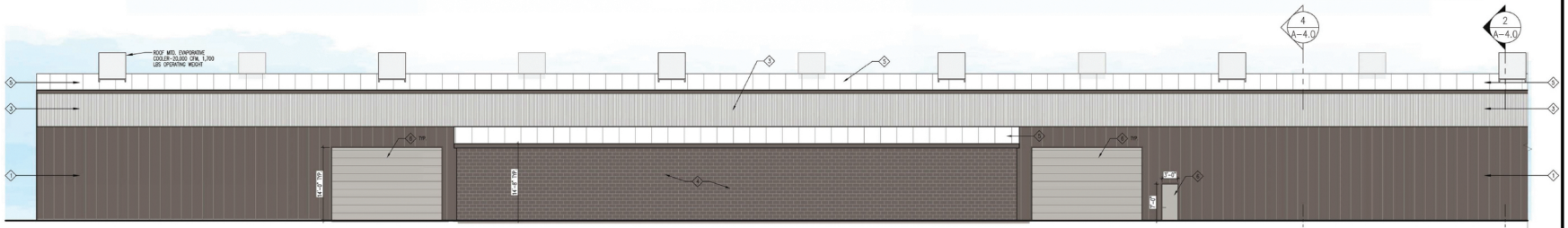
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Final Site Plan
QCP Fabrication Facility
Riverside County, California

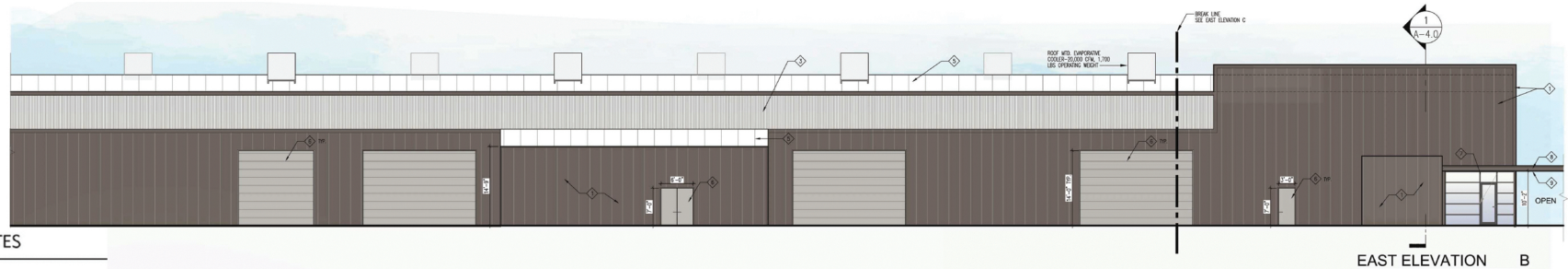
Exhibit 5



NORTH ELEVATION



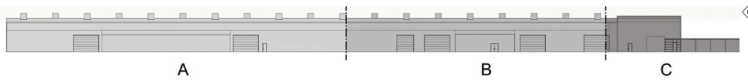
EAST ELEVATION A



EAST ELEVATION B

ELEVATION KEY NOTES

1. EXTERIOR METAL SIDING 1
   METAL SALES T4 CORRUGATED WALL PANEL,
   COLOR: MEDIUM BRONZE (MS #H4)
2. EXTERIOR METAL SIDING 2
   METAL SALES T4 CORRUGATED WALL PANEL,
   COLOR: OLD ZINC GREY (MS #W29)
3. EXTERIOR CORRUGATED TRANSLUCENT PANEL SIDING
4. EXTERIOR CMU WALL – COLOR:
   PAINTED MEDIUM BRONZE (PAINT TO MATCH METAL SALES #H4)
5. ROOF PANEL – METAL SALES 5V-CRIMP CORRUGATED PANEL,
   COLOR: POLAR WHITE (MS #80)
6. ROLL-UP DOORS AND MAN DOORS –
   COLOR: ASH GREY (MS #25)
7. STOREFRONT GLAZING: BLACK ANODIZED FRAMING WITH LOW-E
   TINTED DUAL GLAZING
8. CANOPY FRAMES AND EXTERIOR STEEL COLUMNS –
   COLOR: MEDIUM BRONZE (MS #H4)
9. CANOPY SOFFITS – COMPOSITE FIBER CEMENT,
   COLOR: VINTAGE WOOD "CEDAR"
10. QCP BLDG. SIGN – PTD. ALUM. REVERSE CHANNEL
    LETTERS



EAST ELEVATION KEY



EAST ELEVATION C

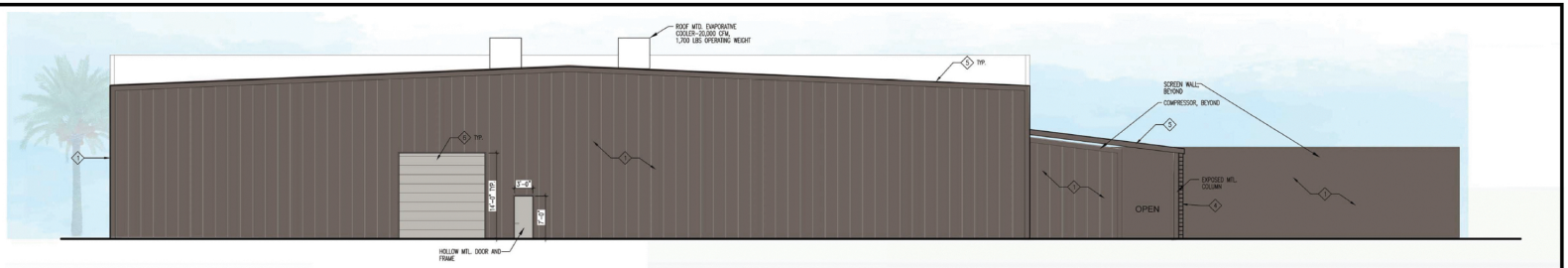
Source: McGee Sharon Architects, 05.15.2025

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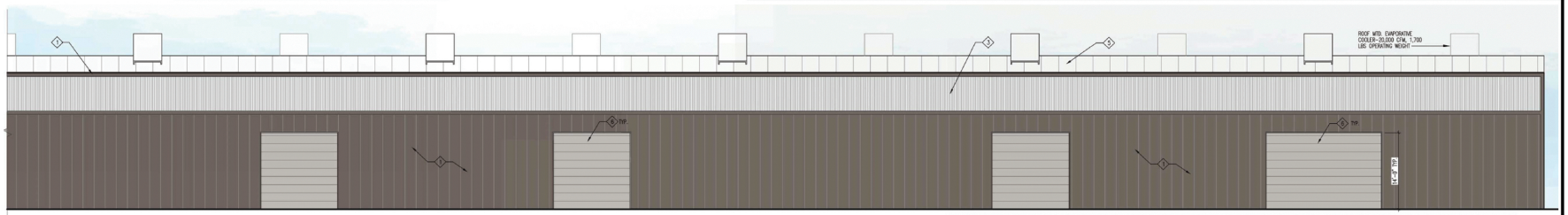
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Production Building Elevations - North and East
QCP Fabrication Facility
Riverside County, California

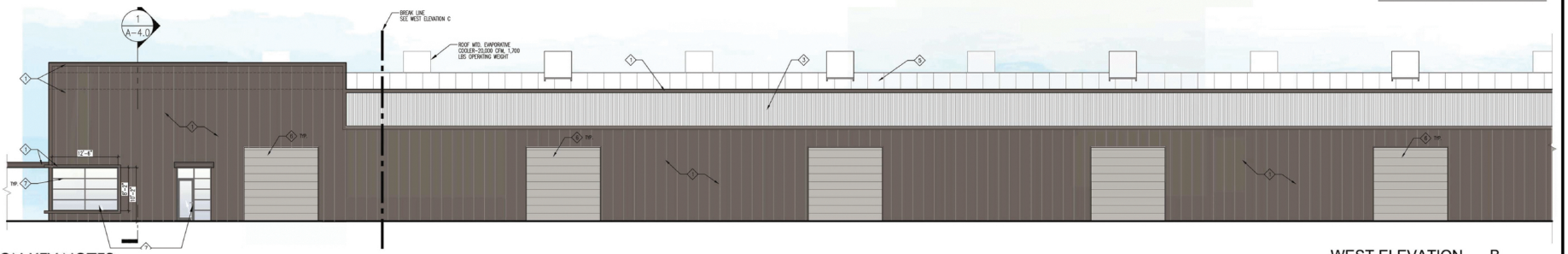
Exhibit 6



SOUTH ELEVATION



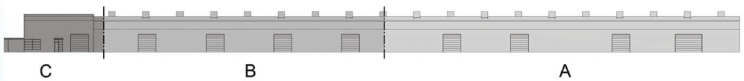
WEST ELEVATION A



WEST ELEVATION B

ELEVATION KEY NOTES

1. EXTERIOR METAL SIDING 1 METAL SALES T4 CORRUGATED WALL PANEL, COLOR: MEDIUM BRONZE (MS #H4)
2. EXTERIOR METAL SIDING 2 METAL SALES T4 CORRUGATED WALL PANEL, COLOR: OLD ZINC GREY (MS #W29)
3. EXTERIOR CORRUGATED TRANSLUCENT PANEL SIDING
4. EXTERIOR CMU WALL – COLOR: PAINTED MEDIUM BRONZE (PAINT TO MATCH METAL SALES #H4)
5. ROOF PANEL – METAL SALES 5V-CRIMP CORRUGATED PANEL, COLOR: POLAR WHITE (MS #80)
6. ROLL-UP DOORS AND MAN DOORS – COLOR: ASH GREY (MS #25)
7. STOREFRONT GLAZING: BLACK ANODIZED FRAMING WITH LOW-E TINTED DUAL GLAZING
8. CANOPY FRAMES AND EXTERIOR STEEL COLUMNS – COLOR: MEDIUM BRONZE (MS #H4)
9. CANOPY SOFFITS – COMPOSITE FIBER CEMENT, COLOR: VINTAGE WOOD "CEDAR"



WEST ELEVATION KEY



WEST ELEVATION C

Source: McGee Sharon Architects, 05.15.2025

07.15.26

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Production Building Elevations - South and West
QCP Fabrication Facility
Riverside County, California

Exhibit 7

SECTION 3. CEQA 15183 PROJECT CONSISTENCY ANALYSIS

CEQA Guidelines Section 15183 establishes that projects that are consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified shall not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects that are peculiar to the proposed project or its site. Section 15183 streamlines the review process and reduces the need to prepare repetitive environmental studies.

CEQA Section 15183 applies to the proposed Project since it meets the requirements of Section 15183(d)(1) and (d)(2) as set forth below:

(d)(1)(A) The project is consistent with a community plan adopted as part of a general plan.

The Project site is located within the ECVAP, which is a community plan adopted as part of the RCGP. The ECVAP designates the site for Light Industrial (LI) land uses which allows for a wide variety of industrial and related uses, including warehousing/distribution, assembly and light manufacturing, repair facilities, and supporting retail uses with a 0.25 – 0.60 FAR.

The 2003 ECVAP shows the site as being with the "Desert Resorts Regional Airport Influence Policy Area," now called Jacqueline Cochran Regional Airport (JCRA) Influence area. Specifically, the site is within "Compatibility Zone D" of the JCRA Influence Area and is therefore subject to the JCRA Land Use Compatibility Plan (ALUCP). Within Compatibility Zone D, there are no restrictions on the intensity (per acre) of non-residential development. While land uses that would attract very high concentrations of people in confined areas are generally discouraged, the proposed Project does not include any such uses and is consistent with the compatibility criteria for Zone D.

The proposed Project has been evaluated for consistency with applicable policies of the ECVAP of the RCGP. The following analysis focuses on the relevant ECVAP policies related to project design, environmental resources, circulation, and safety. Overall, the Project is consistent with the ECVAP because it complies with the site's Light Industrial land use designation and Manufacturing-Service Commercial zoning, incorporates required design and operational measures, and results in less than significant environmental impacts as identified in the Environmental Checklist (Section 4). Detailed consistency findings for each policy are provided below.

<u>Light Pollution Policies</u>

ECVAP 4.1 Require the inclusion of outdoor lighting features that would minimize the effects on the nighttime sky and wildlife habitat areas.

ECVAP 4.2 Adhere to the County's lighting requirements for standards that are intended to limit light leakage and spillage that may interfere with the operations of the Palomar Observatory.

Consistency: The Project is consistent with ECVAP Policies 4.1 and 4.2. Located in Zone B of the Mt. Palomar Nighttime Lighting Policy Area, the Project is required to comply with Riverside County Ordinance No. 655, which mandates the use of shielded, low-intensity outdoor lighting fixtures to minimize light leakage, spillage, skyglow, and trespass. These requirements directly reduce effects on the nighttime sky and wildlife habitat (ECVAP 4.1), while specifically protecting the operations of the Palomar Observatory from artificial light interference (ECVAP 4.2).

Industrial Uses Policies

ECVAP 8.2 Discourage industrial uses that may conflict with agricultural or residential land uses either directly or indirectly within the Eastern Coachella Valley Area Plan.

ECVAP 8.3 Discourage industrial uses which use large quantities of water in manufacturing or cooling processes and result in subsequent effluent discharges.

ECVAP 8.4 Discourage industrial uses which produce significant quantities of toxic emissions into the air.

Consistency: The Project is consistent with ECVAP Policies 8.2, 8.3, and 8.4. The proposed light industrial concrete furniture manufacturing facility is consistent with the site's LI ECVAP land use designation and M-SC zoning, which expressly support light manufacturing and compatible industrial uses. The facility is designed to avoid conflicts with surrounding agricultural operations and nearby residential uses (ECVAP 8.2). Production of concrete benches, containers, and tables would occur inside an 88,400-square-foot building. Outdoor areas would be limited to finished-product and mold storage, not raw-material stockpiles, cement silos, or a concrete batch plant. Existing date groves totaling approximately 223,872 square feet would be preserved along the southern boundary and in the northwest portion of the site, maintaining a vegetated edge next to adjacent agricultural land. A 6-foot decorative wall is proposed along the Avenue 54 frontage, and the existing chain-link fence would remain on the southern, western, and eastern boundaries, providing a physical buffer. Stormwater would be retained on site in two basins sized to County standards, so runoff would not be discharged onto adjoining agricultural fields. These design features, together with enclosed manufacturing and compliance with County and SCAQMD standards, would limit dust, noise, odor, and drainage effects on nearby agricultural operations and residential uses. It does not involve large quantities of water for manufacturing or cooling processes or significant effluent discharges (ECVAP 8.3), nor does it generate significant toxic air emissions (ECVAP 8.4). The Project will comply with all applicable County, CWA, and SCAQMD requirements.

Vehicular Circulation System

ECVAP 11.1 Design and develop the vehicular roadway system per Figure 8, Circulation, and in accordance with the functional classifications and standards in the System Design, Construction and Maintenance section of the General Plan Circulation Element.

ECVAP 11.2 Maintain the County's roadway Level of Service standards as described in the Level of Service section of the General Plan Circulation Element.

ECVAP 11.3 Separate vehicular traffic from pedestrian and equestrian traffic in order to avoid potential hazards and where traffic volumes justify the costs.

Consistency: The Project is consistent with ECVAP Policies 11.1, 11.2, and 11.3. Vehicular access is provided via two gated entrances on Avenue 54, designed in accordance with County requirements, including stop-sign control and sight-distance verification at the improvement plan stage (ECVAP 11.1). The Project will not degrade the County's adopted roadway Level of Service standards (ECVAP 11.2). Pedestrian facilities are incorporated through sidewalk improvements along the Avenue 54 frontage, effectively separating pedestrian and vehicular traffic (ECVAP 11.3).

Habitat Conservation/CVMSHCP Policies

ECVAP 15.1 Protect visual and biological resources in the Eastern Coachella Valley Area Plan through adherence to General Plan policies found in the Fish and Wildlife Habitat section

of the Multipurpose Open Space Element, as well as policies contained in the Coachella Valley Multiple Species Habitat Conservation Plan, upon its adoption.

Consistency: The Project is consistent with ECVAP Policy 15.1. Located within the boundaries of the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP) but outside of any designated conservation area, biological corridor, or linkage, the Project will adhere to all applicable General Plan policies in the Multipurpose Open Space Element and the requirements of the CVMSHCP through payment of the local development mitigation fee.

Seismic Polices

ECVAP 19.1 Protect life and property from seismic-related incidents through adherence to the Seismic Hazards section of the General Plan Safety Elements.

Consistency: The Project is consistent with ECVAP Policy 19.1. It will adhere to the Seismic Hazards section of the Riverside County General Plan Safety Element by complying with all applicable federal, State, and local regulations, including the latest California Building Code earthquake design provisions. The Project incorporates geotechnical recommendations to address strong ground shaking, fault rupture, liquefaction, expansive soils, and other seismic/soil hazards.

Wind Erosion and Blowsand Policies

ECVAP 21.1 Minimize damage from and exposure to wind erosion and blowsand through adherence to the Slope and Soil Instability Hazards section of the General Plan Safety Element.

ECVAP 21.2 Require protection of soil in areas subject to wind erosion or blowsand. Mitigation measures that may be required include, but are not limited to, windbreaks, walls, fences, vegetative groundcover, rock, other stabilizing materials, and installation of an irrigation system or provision of other means of irrigation.

ECVAP 21.3 Control dust through the policies of the Particulate Matter section of the General Plan Air Quality Element.

Consistency: The Project is consistent with ECVAP Policies 21.1, 21.2, and 21.3. Although the site has high susceptibility to wind erosion, the Project will comply with the Slope and Soil Instability Hazards section of the General Plan Safety Element and SCAQMD Rule 403. Construction dust and erosion will be controlled through best available fugitive dust measures, while long-term operations will substantially reduce exposure by covering soils with impervious surfaces and landscaping.

Summary

The proposed Project is consistent with the allowable uses, development intensity, and scale envisioned by the ECVAP for LI-designated lands. The Project will implement permitted industrial activities on a site that is already designated and zoned for such development, with no proposed deviations from the permitted use categories, density, or intensity standards set forth in the ECVAP. Therefore, the Project is consistent with the ECVAP, satisfying the requirements of CEQA Guidelines Section 15183(d)(1)(A).

(d)(1)(B) The project is consistent with a zoning action which zoned or designated the parcel on which the project would be located to accommodate a particular density of development.

The Project site is zoned M-SC under the Riverside County Zoning Ordinance No. 348. This zoning designation accommodates industrial, manufacturing, and service-commercial uses on the parcel. The M-SC zone promotes a range of light industrial and related activities, including the manufacturing of

concrete products, warehousing, distribution, assembly, repair services, and supporting commercial uses.

The proposed Project is consistent with the M-SC zoning standards and the density and intensity of development contemplated by this zoning action. All Project components fall within the permitted use categories of the M-SC zone and will comply with the applicable development standards, including setbacks, height limits, lot coverage, and landscaping requirements. The Project requires approval of a Plot Plan pursuant to Riverside County Zoning Ordinance No. 348 and is designed to comply with all objective M-SC development standards. It does not seek any variances, zone changes, or general plan amendments. Therefore, the Project is consistent with the zoning action that designated the parcel for the M-SC zone to accommodate this type and intensity of development, satisfying the requirements of CEQA Guidelines Section 15183(d)(1)(B).

(d)(1)(C) The project is consistent with the General Plan of a local agency.

The Project site is designated LI by the RCGP and is located within the ECVAP, which serves as the applicable community plan under the General Plan. The LI land use designation is intended to accommodate a variety of light industrial, manufacturing, warehousing, distribution, and supporting service uses at intensities appropriate for such development in the Eastern Coachella Valley.

The proposed Project has been evaluated for consistency with applicable policies of the RCGP. The following analysis focuses on the relevant RCGP policies related to land use, circulation, open space, safety, noise and air quality. Overall, the Project is consistent with the RCGP because it complies with the site's LI land use designation and M-SC zoning, incorporates required design and operational measures, and results in less than significant environmental impacts as identified in the Environmental Checklist (Section 4). Detailed consistency findings for each policy are provided below.

<u>Land Use Element Policies</u>

Project Design

LU 4.1 Require that new developments be located and designed to visually enhance, not degrade the character of the surrounding area through consideration of the following concepts:

a. Compliance with the design standards of the appropriate area plan land use category.
b. Require that structures be constructed in accordance with the requirements of the County's zoning, building, and other pertinent codes and regulations.
c. Require that an appropriate landscape plan be submitted and implemented for development projects subject to discretionary review.
d. Require that new development utilize drought tolerant landscaping and incorporate adequate drought-conscious irrigation systems.
e. Pursue energy efficiency through street configuration, building orientation, and landscaping to capitalize on shading and facilitate solar energy, as provided for in Title 24 of the California Administrative Code.
f. Incorporate water conservation techniques, such as groundwater recharge basins, use of porous pavement, drought tolerant landscaping, and water recycling, as appropriate.
i. Include consistent and well-designed signage that is integrated with the building's architectural character.
j. Provide safe and convenient vehicular access and reciprocal access between adjacent commercial uses.

k. Locate site entries and storage bays to minimize conflicts with adjacent residential neighborhoods.
l. Mitigate noise, odor, lighting, and other impacts on surrounding properties.
m. Provide and maintain landscaping in open spaces and parking lots.
n. Include extensive landscaping.
o. Preserve natural features, such as unique natural terrain, drainage ways, and native vegetation, wherever possible, particularly where they provide continuity with more extensive regional systems.
p. Require that new development be designed to provide adequate space for pedestrian connectivity and access, recreational trails, vehicular access and parking, supporting functions, open space, and other pertinent elements.
q. Design parking lots and structures to be functionally and visually integrated and connected.
r. Site buildings access points along sidewalks, pedestrian areas, and bicycle routes, and include amenities that encourage pedestrian activity.
s. Establish safe and frequent pedestrian crossings.
t. Create a human-scale ground floor environment that includes public open areas that separate pedestrian space from auto traffic or where mixed, it does so with special regard to pedestrian safety.

LU 4.2 Require property owners to maintain structures and landscaping to a high standard of design, health, and safety through the following:
a. Provide proactive code enforcement activities.
b. Promote programs and work with local service organizations and educational institutions to inform residential, commercial, and industrial property owners and tenants about property maintenance methods.
c. Promote and support community and neighborhood-based efforts for the maintenance, upkeep, and renovation of structures and sites.

Consistency: The Project is consistent with General Plan Policies LU 4.1 and LU 4.2. The proposed manufacturing facility has been designed to visually enhance the character of the surrounding area through compliance with applicable area plan design standards, County zoning and building codes, and discretionary review requirements (LU 4.1). Key project features that support this policy include:

- Preservation of existing date trees and incorporation of extensive landscaping, including a Products and Sculpture Garden.
- Drought-tolerant landscaping and on-site stormwater percolation for water conservation.
- Full half-street improvements with new sidewalks along Avenue 54 to enhance pedestrian connectivity.
- A 106-space parking lot designed to integrate with the site layout.
- Gated entrances and storage areas located to minimize conflicts with surrounding uses.

The Project will also be subject to ongoing property maintenance standards to ensure structures and landscaping are kept to a high standard of design, health, and safety (LU 4.2). Overall, the Project incorporates high-quality design, landscaping, and site planning that enhance the visual character and functionality of the area.

Infrastructure, Public Facilities & Service Provision

LU 5.1 Ensure that development does not exceed the ability to adequately provide supporting infrastructure and services, such as libraries, recreational facilities, transportation systems, and fire/police/medical services.

LU 5.2 Monitor the capacities of infrastructure and services in coordination with service providers, utilities, and outside agencies and jurisdictions to ensure that growth does not exceed acceptable levels of service.

LU 5.3 Review all projects for consistency with individual urban water management plans

LU 5.4 Ensure that development and conservation land uses do not infringe upon existing public utility corridors, including fee owned rights-of-way and permanent easements, whose true land use is that of "public facilities". This policy will ensure that the "public facilities" designation governs over what otherwise may be inferred by the large-scale general plan maps.

Consistency: The Project is consistent with General Plan Policies LU 5.1, LU 5.2, LU 5.3, and LU 5.4 regarding infrastructure and public services. The Project will be served by existing CWA potable water and sewer services, IID electricity, and SoCalGas natural gas. Stormwater will be managed through on-site percolation. A 106-space parking lot and full half-street improvements along Avenue 54 (including sidewalks) will adequately support the proposed use. All required development impact fees will be paid to ensure the Project's fair share contribution toward police, fire, and other public services (LU 5.1 and LU 5.2). The Project has been reviewed for consistency with the Coachella Valley Regional Urban Water Management Plan and will not exceed CWA's ability to provide water service (LU 5.3). Finally, the site does not contain or infringe upon any existing public utility corridors or public facilities easements (LU 5.4). The Project will not exceed the capacity of supporting infrastructure and services.

Land Use Compatibility

LU 6.1 Require land uses to develop in accordance with the General Plan and area plans to ensure compatibility and minimize impacts.

LU 6.3 Consider the positive characteristics and unique features of the project site and surrounding community during the design and development process.

Consistency: The Project is consistent with General Plan Policies LU 6.1 and LU 6.3. The proposed concrete furniture manufacturing facility is located on land designated for industrial use and has been designed in accordance with the RCGP and the ECVAP, ensuring compatibility with surrounding land uses and minimizing potential impacts (LU 6.1). In addition, the Project design thoughtfully responds to the site's positive characteristics and unique features by preserving existing date trees, integrating them into the landscaping, parking areas and a Products and Sculpture Garden, and providing sidewalk improvements along Avenue 54. These elements enhance the project's compatibility with the surrounding community (LU 6.3).

Economic Development

LU 7.1 Accommodate the development of a balance of land uses that maintain and enhance the County's fiscal viability, economic diversity, and environmental integrity.

LU 7.2 Promote and market the development of a variety of stable employment and business uses that provide a diversity of employment opportunities.

LU 7.8 Stimulate industrial/business-type clusters that facilitate competitive advantage in the marketplace, provide attractive and well landscaped work environments, and fit with the character of our varied communities.

LU 7.12 Improve the relationship and ratio between jobs and housing so that residents have an opportunity to live and work within the County.

Consistency: The Project is consistent with General Plan Policies LU 7.1, LU 7.2, LU 7.8, and LU 7.12. As a new concrete furniture manufacturing facility, the Project will create stable local manufacturing and support jobs, contributing to economic diversity and the County's fiscal viability (LU 7.1 and LU 7.2). It establishes a light industrial use that can serve as part of an employment cluster, providing a well-designed, landscaped work environment consistent with the character of the surrounding area (LU 7.8). By generating new employment opportunities in the Eastern Coachella Valley, the Project helps improve the local jobs-to-housing ratio and reduces the need for long-distance commuting (LU 7.12).

Open Space, Habitat & Natural Resource Preservation

LU 8.2 Require that development protect environmental resources by compliance with the Multipurpose Open Space Element of the General Plan and Federal and State regulations such as CEQA, NEPA, the Clean Air Act, and the Clean Water Act.

Consistency: The Project is consistent with General Plan Policy LU 8.2. The Environmental Checklist in Section 4 has evaluated all relevant environmental resource areas, and all potential impacts were determined to be less than significant. The Project also incorporates design features and best management practices that protect on-site environmental resources, including preservation of existing date palms. Therefore, the Project satisfies the policy's requirement to protect environmental resources through regulatory compliance.

Fiscal Impacts

LU 9.1 Require that new development contribute their fair share to fund infrastructure and public facilities such as police and fire facilities.

Consistency: The Project is consistent with General Plan Policy LU 9.1. Prior to issuance of building permits, the Project will be required to pay all applicable Riverside County Development Impact Fee Program (DIF) and Transportation Uniform Mitigation (TUMF) fees at the rates then in effect in accordance with Riverside County Ordinance No. 659. These standard fees are specifically designed to ensure that new development pays its fair share for essential public facilities and services, such as sheriff, fire protection, criminal justice, and other infrastructure needs. Payment of these required fees ensures full compliance with Policy LU 9.1.

Air Quality

LU 10.1 Provide sufficient commercial and industrial development opportunities in order to increase local employment levels and thereby minimize long-distance commuting.

Consistency: The Project is consistent with General Plan Policy LU 10.1. As a proposed industrial manufacturing facility, the Project will create new local employment opportunities in manufacturing, warehousing, and support roles within the community. The Project directly supports the policy's objective of expanding local job opportunities, thereby helping to reduce the need for residents to commute long distances for employment.

Circulation

LU 12.6 Require that adequate and accessible circulation facilities exist to meet the demands of a proposed land use.

Consistency: The Project is consistent with General Plan Policy LU 12.6. Avenue 54 is an existing, paved roadway which is designated Urban Arterial (152' ROW) in the Circulation Element of the RCGP. The roadway is built to its ultimate General Plan half-width on its north side, but not on the south side.

The Project will provide direct access via two gated driveways onto Avenue 54, designed to accommodate both passenger vehicles and trucks. In addition, the Project incorporates full half-street improvements along the Avenue 54 frontage, including new sidewalks, which will enhance circulation, pedestrian access, and overall traffic flow in the area, and assure build out of the roadway to its General Plan 152' foot full width. The site also includes a 106-space parking lot sized to support the proposed manufacturing and warehouse operations. These on-site and frontage improvements ensure that adequate and accessible circulation facilities are in place to meet the demands of the proposed industrial use.

Airports

LU 14.2 Review all proposed projects and require consistency with any applicable airport land use compatibility plan as set forth in Appendix L and as summarized in the Area Plan's Airport Influence Area section for the airport in question.

LU 14.9 All development proposals within an Airport Influence Area will be submitted to the affected airport.

Consistency: The Project is consistent with General Plan Policies LU 14.2 and LU 14.9. The site is located within Compatibility Zone D of the Jacqueline Cochran Regional Airport (JCRA) Influence Area. Within this zone, there are no restrictions on the intensity of non-residential development, and the proposed manufacturing facility does not include any uses that would attract high concentrations of people. The Project complies with all applicable airport land use compatibility criteria and will be submitted to JCRA for review, consistent with County policy. The Project was forwarded to Airport Land Use Commission (ALUC) for review on April 10, 2025. ALUC staff determined that the Project is located outside the Airport Influence Area (AIA) and further review by the Airport Land Use Commission (ALUC) is not required.[1]

Community Development - Industrial/Business Park Area Plan Land Use Designations

LU 24.1 Accommodate the continuation of existing and development of new industrial, manufacturing, research and development, and professional offices in areas appropriately designated by General Plan and area plan land use maps.

LU 24.3 Protect industrial lands from encroachment of incompatible or sensitive uses, such as residential or schools, that could be impacted by industrial activity.

LU 24.6 Control the development of industrial uses that use, store, produce, or transport toxins, generate unacceptable levels of noise or air pollution, or result in other impacts.

LU 24.7 Require that adequate and available circulation facilities, water resources, and sewer facilities exist to meet the demands of the proposed land use.

LU 24.8 Require that industrial development be designed to consider their surroundings and visually enhance, not degrade, the character of the surrounding area.

Consistency: The Project is consistent with General Plan Policies LU 24.1, LU 24.3, LU 24.6, LU 24.7, and LU 24.8, which collectively govern the development of industrial uses. As a concrete furniture manufacturing facility located on land designated for industrial use, the Project directly implements LU 24.1 by providing new industrial/manufacturing development in an appropriately designated area. It complies with LU 24.3 by introducing an industrial use that does not encroach upon or conflict with sensitive land uses.

[1] County of Riverside Planning Department Director's Hearing Report, Agenda Item No. 2.1 (ID #30431), Meeting Date: Monday, May 18, 2026, page 14.

Consistent with LU 24.6, during construction, standard hazardous materials (fuels, oils, paints, solvents, etc.) will be used and stored in typical quantities for construction sites and such activities will comply with all applicable federal, State, and local regulations. During long-term operations, only limited quantities of cleaning, degreasing solvents, paints, and similar materials will be used, none in amounts requiring a hazardous materials permit. The Project will not result in significant risk of explosion or accidental release of hazardous substances because no explosive or hazardous substances will be used in the construction of concrete furniture.
The Project satisfies LU 24.7 through the availability of adequate circulation, water, and sewer facilities: it will be served by CWA for water and sewer services, on-site stormwater percolation, and enhanced circulation improvements along Avenue 54.

Finally, the Project meets LU 24.8 by incorporating site design features that respond to the surrounding context, such as preservation of existing date trees, integrated landscaping, and a Products and Sculpture Garden, which will visually enhance rather than degrade the character of the area.

Overall, the Project is fully consistent with the County's industrial development policies

Circulation Element

Level of Service

C 2.1 Maintain the following countywide target Levels of Service:

LOS "C" along all County maintained roads and conventional state highways. As an exception, LOS "D" may be allowed in Community Development areas, only at intersections of any combination of Secondary Highways, Major Highways, Arterials, Urban Arterials, Expressways, conventional state highways or freeway ramp intersections.

LOS "E" may be allowed in designated community centers to the extent that it would support transit-oriented development and walkable communities.

C 2.2 Apply level of service standards to new development via a program establishing traffic study guidelines to evaluate traffic impacts and identify appropriate mitigation measures for new development.

C 2.3 Traffic studies prepared for development entitlements (tracts, plot plans, public use permits, conditional use permits, etc.) Shall identify project related traffic impacts and determine the "significance" of such impacts in compliance with CEQA.

C 2.4 The direct project related traffic impacts of new development proposals shall be mitigated via conditions of approval requiring the construction of any improvements identified as necessary to meet level of service standards.

C 2.5 The cumulative and indirect traffic impacts of development may be mitigated through the payment of various impact mitigation fees such as County Development Impact Fees, Road and Bridge Benefit District Fees, and Transportation Uniform Mitigation Fees to the extent that these programs provide funding for the improvement of facilities impacted by development.

Consistency: The Project is consistent with General Plan Policies C 2.1 through C 2.5. The Project has been evaluated using the appropriate transportation metrics under current CEQA Guidelines (SB 743),

including VMT analysis. A traffic assessment determined that the Project generates a low volume of peak-hour trips and does not require a full Level of Service (LOS) analysis per County guidelines. The Project will not cause any significant traffic impacts or degrade acceptable levels of service on County-maintained roads (C 2.1, C 2.2, and C 2.3). Any direct traffic impacts will be addressed through required frontage improvements and conditions of approval. Cumulative impacts will be mitigated through payment of applicable development impact fees, including TUMF and DIF (C 2.4 and C 2.5). The Project fully complies with the County's transportation and level of service policies.

System Design and Maintenance

C 3.6 Require private developers to be primarily responsible for the improvement of streets and highways service access to developing commercial, industrial, and residential areas. These may include road construction or widening, installation of turning lanes and traffic signals, and the improvement of any drainage facility or other auxiliary facility necessary for the safe and efficient movement of traffic or the protection of road facilities.

C 3.9 Design off-street loading facilities for all new commercial and industrial developments so that they do not face surrounding roadways or residential neighborhoods. Truck backing and maneuvering to access loading areas shall not be permitted on the public road system, except when specifically permitted by the Transportation Department.

C 3.10 Require private and public land developments to provide all on-site auxiliary facility improvements necessary to mitigate any development-generated circulation impacts. A review of each proposed land development project shall be undertaken to identify project impacts to the circulation system and its auxiliary facilities. The Transportation Department may require developers and/or subdividers to provide traffic impact studies prepared by qualified professionals to identify the impacts of a development.

C 3.11 Generally locate commercial and industrial land uses so that they take driveway access from General Plan roadways with a classification of Secondary Highway or greater, consistent with design criteria limiting the number of such commercial access points and encouraging shared access. Exceptions to the requirement for access to a Secondary Highway or greater would be considered for isolated convenience commercial uses, such as stand-alone convenience stores or gas stations at an isolated off ramp in a remote area. Industrial Park type developments may be provided individual parcel access via an internal network of Industrial Collector streets.

C 3.14 Design curves and grades to permit safe movement of vehicular traffic at the road's design speed. Design speed should be consistent with and complement the character of the adjacent area.

Consistency: The Project is consistent with General Plan Policies C 3.6, C 3.9, C 3.10, C 3.11, and C 3.14. The Project will construct full half-street improvements and new sidewalks along Avenue 54, consistent with the requirement that private developers provide necessary street and highway access improvements (C 3.6). All loading and truck maneuvering activities will occur internally within the site, with no loading facilities facing public roadways or residential neighborhoods and no backing or maneuvering onto the public road system (C 3.9). The Project provides all required on-site auxiliary facilities, including a 106-space parking lot and internal drive aisles to mitigate development-generated circulation impacts. Traffic impacts were analyzed in Section 4 of the Environmental Checklist below, which were found to be less than significant supported by a traffic impact study as part of the Plot Plan review (C 3.10). Access is taken directly from Avenue 54, a roadway appropriate for Light Industrial uses, from two controlled gates designed for efficient truck and passenger vehicle movements, consistent with policies governing commercial and industrial driveway access (C 3.11). On-site

circulation elements and frontage improvements will be designed to meet County standards for safe vehicular movement at the roadway's design speed and to complement the character of the surrounding industrial area (C 3.14).

Pedestrian Facilities and Landscaping

C 4.4 Plan for pedestrian access that is consistent with road design standards while designing street and road projects. Provisions for pedestrian paths or sidewalks and timing of traffic signals to allow safe pedestrian street crossing shall be included.

C 4.6 Consult the County Transportation Department as part of the development review process regarding any development proposals where pedestrian facilities may be warranted. The County may require both the dedication and improvement of the pedestrian facilities as a condition of development approval.

C 4.7 Encourage safe pedestrian walkways that comply with the Americans with Disabilities Act (ADA) requirements within commercial, office, industrial, mixed use, residential, and recreational developments.

C 5.2 Encourage the use of drought-tolerant native plants and the use of recycled water for roadway landscaping.

C 5.3 Require parking areas of all commercial and industrial land uses that abut residential areas to be buffered and shielded by adequate landscaping.

C 6.2 Require all-weather access to all new development.

Consistency: The Project is consistent with General Plan Policies C 4.4, C 4.6, C 4.7, C 5.2, C 5.3, and C 6.2. As part of the Plot Plan's conditions of approval, the Project will construct full half-street improvements, including new sidewalks along the Avenue 54 frontage. These improvements provide pedestrian access consistent with road design standards, enhance safe connectivity, and ensure all-weather access to the site (C 4.4, C 6.2). Consistent with the development review process, the County Transportation Department will be consulted regarding pedestrian facilities, and the Project already incorporates the required dedication and construction of these sidewalk improvements (C 4.6). Site design includes safe, ADA-compliant pedestrian walkways that promote internal circulation (C 4.7).

Landscaping throughout the Project will preserve and integrate existing date palms into the Products and Sculpture Garden, the detention basins, undeveloped portions of the site, and along parking and entry areas. These drought-tolerant regionally appropriate plants fulfill water-efficient landscaping objectives for both roadway and on-site areas (C 5.2). In addition, parking areas are buffered with landscaping along the site's frontage and perimeters, providing adequate shielding consistent with requirements for commercial and industrial developments (C 5.3).

<u>Multipurpose Open Space Element</u>

OS 2.2 Where feasible, decrease stormwater runoff by reducing pavement in development areas, and by design practices such as permeable parking bays and porous parking lots with bermed storage areas for rainwater detention.

OS 2.3 Encourage native, drought-resistant landscape planting.

OS 4.4 Incorporate natural drainage systems into developments where appropriate and feasible.

OS 17.1 Enforce the provisions of applicable MSHCP's, if adopted, when conducting review of development applications

OS 19.2 Review all proposed development for the possibility of archaeological sensitivity.

OS 19.8 Whenever existing information indicates that a site proposed for development may contain biological, paleontological, or other scientific resources, a report shall be filed stating the extent and potential significance of the resources that may exist within the proposed development and appropriate measures through which the impacts of development may be mitigated.

Consistency: The Project is consistent with General Plan Policies OS 2.2, OS 2.3, OS 4.4, OS 17.1, OS 19.2, and OS 19.8. The Project incorporates on-site detention basins and manages stormwater through on-site percolation and storm drains, reducing impervious surfaces where feasible and directing runoff into landscaped detention areas when feasible. These design features decrease stormwater runoff in accordance with recommended low-impact development practices (OS 2.2). Natural drainage systems have been integrated through the detention basin and preserved natural portions of the site where feasible (OS 4.4). Drought-tolerant native and regionally appropriate plantings, including the preservation and integration of existing date palms throughout the site, further support water-efficient landscaping (OS 2.3). The Project will pay the applicable CVMSHCP development impact fee and has been reviewed in accordance with MSHCP requirements (OS 17.1). A biological resources study, cultural resources assessment, and paleontological assessment were prepared for the site. These reports determined that potential impacts to archaeological, biological, paleontological, and other scientific resources would be less than significant with the implementation of recommended General Plan implementation measures, as documented in Section 4 of the Environmental Checklist (OS 19.2, OS 19.8).

Safety Element

S 2.2 Require geological and geotechnical investigations in areas with potential for earthquake-induced liquefaction, landsliding or settlement as part of the environmental and development review process, for any structure proposed for human occupancy, and any structure whose damage would cause harm.

S 2.3 Require that a State-licensed professional investigate the potential for liquefaction in areas designated as underlain by "Susceptible Sediments" and "Shallow Ground Water" for all general construction projects.

S 2.4 Require that a State-licensed professional investigate the potential for liquefaction in areas identified as underlain by "Susceptible Sediments" for all proposed critical facilities projects.

S 2.5 Require that engineered slopes be designed to resist seismically induced failure. For lower-risk projects, slope design could be based on pseudo-static stability analyses using soil engineering parameters that are established on a site-specific basis. For higher-risk projects, the stability analyses should factor in the intensity of expected ground shaking, using a Newmark-type deformation analysis.

S 2.6 Require that cut and fill transition lots be over-excavated to mitigate the potential of seismically induced differential settlement.

S 2.7 Require a 100% maximum variation of fill depths beneath structures to mitigate the potential of seismically induced differential settlement.

S 3.8 Require geotechnical studies within documented subsidence zones, as well as zones that may be susceptible to subsidence, as identified in Figure S-7 and the Technical Background Report, prior to the issuance of development permits. Within the documented subsidence zones of the Coachella, San Jacinto, and Elsinore valleys, the studies must address the potential for reactivation of these zones, consider the potential impact on the project, and provide adequate and acceptable mitigation measures.

S 3.11 Require studies that address the potential of this hazard on proposed development within "High" and "Very High" wind erosion hazard zones as shown on Figure S-8, Wind Erosion Susceptibility Map.

S 5.1 Develop and enforce construction and design standards that ensure that proposed development incorporates fire prevention features through the following:

a. All proposed construction shall meet minimum standards for fire safety as defined in the County Building or Fire Codes, or by County zoning, or as dictated by the Building Official or the Transportation Land Management Agency based on building type, design, occupancy, and use.
b. In addition to the standards and guidelines of the Uniform Building Code and Uniform Fire Code fire safety provisions, continue additional standards for high-risk, high occupancy, dependent, and essential facilities where appropriate under the Riverside County Fire Protection Ordinance. These shall include assurance that structural and nonstructural architectural elements of the building will not:
    - impede emergency egress for fire safety staffing/personnel, equipment, and apparatus; nor
    - hinder evacuation from fire, including potential blockage of stairways or fire doors.
c. Proposed development in Hazardous Fire areas shall provide secondary public access, unless determined otherwise by the County Fire Chief.
d. Proposed development in Hazardous Fire areas shall use single loaded roads to enhance fuel modification areas, unless otherwise determined by the County Fire Chief.

S 6.1 Enforce the policies and siting criteria and implement the programs identified in the County of Riverside Hazardous Waste Management plan, which includes the following:

a. Comply with federal and state laws pertaining to the management of hazardous wastes and materials.
b. Ensure active public participation in hazardous waste and hazardous materials management decisions in Riverside County.
c. Coordinate hazardous waste facility responsibilities on a regional basis through the Southern California Hazardous Waste Management Authority (SCHWMA).
d. Encourage and promote the programs, practices, and recommendations contained in the County Hazardous Waste Management Plan, giving the highest waste management priority to the reduction of hazardous waste at its source.

S 7.3 Require commercial businesses, utilities, and industrial facilities that handle hazardous materials to:

- install automatic fire and hazardous materials detection, reporting and shut-off devices; and
- install an alternative communication system in the event power is out or telephone service is saturated following an earthquake.

Consistency: The Project is consistent with General Plan Policies S 2.2, S 2.3, S 2.4, S 2.5, S 2.6, S 2.7, S 3.8, S 3.11, S 5.1, S 6.1, and S 7.3. A geotechnical investigation has been conducted and will be reviewed as part of the environmental and development review process to address seismic hazards, including liquefaction, landsliding, settlement, subsidence, and wind erosion potential. This study evaluates site-specific conditions and incorporates appropriate design measures to ensure compliance with County requirements for slope stability, cut/fill transitions, fill depth variations, and overall structural safety (S 2.2, S 2.3, S 2.4, S 2.5, S 2.6, S 2.7, S 3.8, S 3.11). The Project will comply with all applicable Riverside County Building Code, Fire Code, and zoning standards for fire prevention and safety. It will incorporate required fire safety features, including those that facilitate emergency access, egress, and evacuation, consistent with standards for manufacturing and industrial uses (S 5.1). The facility will handle materials in full compliance with federal, state, and local hazardous waste and hazardous materials regulations. The Project will adhere to the County of Riverside Hazardous Waste Management Plan, support source reduction practices, and implement required detection, reporting, shut-off systems, and alternative communication measures for emergency conditions (S 6.1, S 7.3).

Noise Element

N 4.3 Ensure any use determined to be a potential generator of significant stationary noise impacts be properly analyzed and ensure that the recommended mitigation measures are implemented.

N 7.1 New land use development within Airport Influence Areas shall comply with airport land use noise compatibility criteria contained in the corresponding airport land use compatibility plan for the area. Each Area Plan affected by a public-use airport includes one or more Airport Influence Areas, one for each airport. The applicable noise compatibility criteria are fully set forth in Appendix L and summarized in the Policy Area section of the affected Area Plan.

N 4.3 Ensure any use determined to be a potential generator of significant stationary noise impacts be properly analyzed and ensure that the recommended mitigation measures are implemented.

N 12.1 Minimize the impacts of construction noise on adjacent uses within acceptable practices.

N 12.2 Ensure that construction activities are regulated to establish hours of operation in order to prevent and/or mitigate the generation of

N 13.1 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.

Consistency: A noise study was prepared for the Project and is discussed in Section 4 of the Environmental Checklist. The study concluded that construction and operational noise and vibration impacts would be less than significant and that no mitigation is required (N 4.3). Construction noise would be limited by Riverside County Code Section 9.52.020, which restricts private construction within one-quarter mile of an inhabited dwelling to 6:00 a.m. to 6:00 p.m. from June through September and 7:00 a.m. to 6:00 p.m. from October through May (N 12.1, N 12.2). Outdoor operational noise would comply with Riverside County Ordinance No. 847. The Project complies with applicable airport land use noise compatibility criteria (N 7.1) and will meet California Building Standards for interior noise levels not to exceed 45 CNEL through appropriate construction techniques (N 13.1).

Air Quality Element

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.

Consistency: The Project is consistent with General Plan Policy AQ 4.9. The Project will comply with SCAQMD Rules 403 and 403.1 during all construction activities. Fugitive dust will be controlled through standard best management practices, including watering, soil stabilization, and other appropriate measures to minimize dust emissions from the construction site.

Summary

The proposed Project is fully consistent with the RCGP and the ECVAP. It proposes permitted industrial uses that align with the allowable uses, intensity, scale, and character envisioned for LI-designated lands. The Project does not require any General Plan amendment and complies with all applicable General Plan policies related to land use, economic development, circulation, and infrastructure in the Eastern Coachella Valley. Because the Project is located on a site already designated Light Industrial in the adopted General Plan and will implement uses and intensities contemplated by that designation, it is consistent with the RCGP, satisfying the requirements of CEQA Guidelines Section 15183(d)(1)(C).

(d)(2) An EIR was certified by the lead agency for the zoning action, the community plan, or the general plan.

Pursuant to CEQA (Public Resources Code Section 21000 et seq.), the Riverside County Board of Supervisors certified a Program EIR for the RCGP on October 7, 2003 (State Clearinghouse No. 2002051143). This Program EIR, referred to herein as the "RCGP FEIR," analyzed the potential environmental impacts associated with adoption and long-term implementation of the General Plan, including the land use designations and policies applicable to the Project site.

The Project site is designated Light Industrial (LI) in the RCGP and lies within the ECVAP, a community plan adopted as part of the General Plan. Because the proposed Project is consistent with the RCGP land use designation, the ECVAP, and the implementing M-SC zoning, the previously certified RCGP FEIR serves as the primary environmental documentation for this Project under CEQA Guidelines Section 15183.

The certification of the RCGP FEIR by the Riverside County Board of Supervisors therefore satisfies the requirements of CEQA Guidelines Section 15183(d)(2).

The Proposed Project Qualifies for No Further Environmental Review under CEQA Guidelines Section 15183 and is eligible for a 15183 exemption.

SECTION 4. ENVIRONMENTAL CHECKLIST

CEQA Guidelines Section 15183(b) states that:

> In approving a project meeting the requirements of this section, a public agency shall limit its examination of environmental effects to those which the agency determines, in an initial study or other analysis:
>
> (1) Are peculiar to the project or the parcel on which the project would be located;
> (2) Were not analyzed as significant effects in a prior FEIR on the zoning action, general plan, or community plan, with which the project is consistent;
> (3) Are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior FEIR prepared for the general plan, community plan or zoning action, or
> (4) Are previously identified significant effects which, as a result of substantial new information which was not known at the time the FEIR was certified, are determined to have a more severe adverse impact than discussed in the prior FEIR.

The following pages of this document contain an Environmental Checklist that examines the proposed Project's potential environmental effects within the parameters outlined in CEQA Guidelines Section 15183(b). The "Prior FEIR" used for comparison is the General Plan FEIR certified by the Riverside County Board of Supervisors on October 7, 2003 (RCGP FEIR), including all impact determinations and significance thresholds utilized therein.

	Prior EIR Determination	Effect Peculiar to Project Site?	New Significant Effect?	New Significant Off-Site Cumulative Impact	New Information/ More Severe Impact?
AESTHETICS Would the project:					
1. Scenic Resources a) Have a substantial effect upon a scenic highway corridor within which it is located?	LTS	No	No	No	No
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings and unique 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?	LTS	No	No	No	No
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?	LTS	No	No	No	No

Source(s): Riverside County General Plan Final EIR, October 2003; Riverside County General Plan; Project Application Materials.

Impacts Identified in the General Plan EIR

The RCGP FEIR identified the following five thresholds of significance for Aesthetics/Visual Resources impacts (RCGP FEIR p. 4.4-5):

- Have a substantial adverse effect on a scenic vista;
- Substantially degrade the existing visual character or aesthetic quality of the site and its surroundings;
- Substantially increase the effect of light and glare upon existing residential uses, as well as the Mount Palomar Observatory;
- Result in substantial terrain modifications; and/or
- Conflict with policies regarding community design.

The RCGP FEIR did not analyze the five thresholds individually. Rather, Impact 4.4.1 through 4.4.3 (RCGP FEIR p. 4.4-5 et seq.) provide a comprehensive evaluation of aesthetic and visual impacts that collectively encompasses all five thresholds, addressing both direct and indirect effects.

Regarding impacts to scenic resources, the FEIR determined that implementation of the RCGP would increase urban development, resulting in a substantial loss of open space and aesthetic resources. This would significantly alter existing and future public views and view corridors, including State and County designated Scenic Highways. The FEIR noted, however, that the RCGP includes numerous policies intended to reduce aesthetic impacts by concentrating growth near existing urban and suburban areas, preserving the rural and open space character of the County, permanently protecting important scenic resources, conserving view corridors and skylines, ensuring development compatibility, and maintaining the visual character of project sites. In addition, Appendix J of the RCGP contains Community Center Guidelines addressing landscape, streetscape, building design, and site layout. Adherence to these policies and guidelines would help reduce or eliminate many aesthetic impacts associated with new development to less than significant levels. (RCGP FEIR p. 4.4-5)

Proposed Project Impacts

a) Scenic Highway Corridor

From the subject property, scenic views of the San Jacinto Mountains to the west, San Bernardino Mountains to the north and east, and views of the Santa Rosa Mountains to the south and west. The site is located on the valley floor and views of the lower elevations of the mountains are still mostly visible in all directions. Also, full views of the middle and upper elevations of the mountains are visible in all directions.

The Project site is not located within or directly adjacent to any State or County designated Scenic Highway. According to the General Plan Figure C-8, "Scenic Highways," the Project site is located approximately 4 miles south of a Scenic Highway Corridor as designated on a "County Eligible Scenic Highway," (1-10) and approximately 2.0 miles west of a Scenic Highway Corridor as designated "Non-Designated" (Hwy 86).

The Project site is zoned M-SC and designated LI on the Riverside County General Plan Land Use Map. The Project site is a currently a planted date grove and is bounded by a roadway on the north with a residential subdivision beyond (City of Coachella), vacant land on the south and east and a residence on the west. The proposed single-story QCP Fabrication Facility, with a maximum height of 29’8” (top of parapet) and setback 150 feet from the roadway, is compatible with the surrounding industrial and

agricultural character and would not obstruct existing views of the San Jacinto, San Bernardino, or Santa Rosa Mountains.

Overall, the Project would not result in adverse effects on the local scenic setting or views from designated scenic highway corridors. Because the Project is not located within any designated scenic highway corridor and is consistent with the General Plan land use designation and zoning, it would not have a substantial effect upon a scenic highway corridor. The Project would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already identified in the RCGP FEIR.

b) Damage Scenic Resources

The Project site is zoned M-SC and designated Light Industrial under the General Plan. While the site contains planted date palms, it does not include unique scenic resources such as rock outcroppings, historic buildings, or other distinctive landmark features. The Project design includes preservation of some existing date palms on site to help reduce visual impacts and maintain consistency with the surrounding agricultural character.

The proposed single-story building (maximum 29’8” to top of parapet) is set back 150 feet from Avenue 54 and positioned toward the east-central portion of the site so as not to obstruct existing public views of the San Jacinto, San Bernardino, or Santa Rosa Mountains. Temporary construction impacts would be short-term (approximately 16 months), limited in visibility, and typical of development in the Coachella Valley. The Project design, including building orientation and landscaping, would be compatible with the surrounding industrial and agricultural character.

In summary, the Project is consistent with the General Plan land use designation and M-SC zoning. It would not substantially damage scenic resources (including trees, rock outcroppings, or unique landmark features), obstruct any prominent scenic vista open to the public, or create an aesthetically offensive site. Therefore, the Project would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

c) Degrade Visual Character (Non-Urbanized Area) or Conflict with Zoning (Urban Area)

According to mapping information provided by the Southern California Association of Governments (SCAG), which is based on U.S. Census data for urbanized areas, the Project site is located within a "nonurbanized area" (SCAG, 2024). Because the site is nonurbanized, the relevant standard is whether the Project would substantially degrade the existing visual character or quality of public views of the site and its surroundings. The Project site is zoned M-SC. The proposed single-story building (maximum 29’8” tall to top of parapet) is set back 150 feet from Avenue 54, oriented with its long axis along the parcel so that it presents a limited frontage to Avenue 54 and is further screened by a landscaped parking lot. Preserved date palms and landscaping would retain a portion of the site’s existing agricultural/grove character and soften views of the building from public vantage points along Avenue 54. All public views of the San Jacinto, San Bernardino Mountains and Santa Rosa Mountains will remain.

Construction would be temporary (approximately 16 months), and construction equipment would be removed at completion. The resulting development would appear as a low, modern industrial building consistent with other built form in the vicinity and would not create an aesthetically offensive site open to public view. Therefore, the Project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings. Compliance with the County’s M-SC zoning development standards further supports this conclusion. Impacts will be less than significant.

The Project is consistent with the General Plan land use designation and M-SC zoning and would not substantially degrade the existing visual character or quality of public views of the site and its surroundings. Therefore, the Project would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

Section 15183 Finding

The proposed Project is consistent with the applicable General Plan policies, the ECVAP, and the County's zoning regulations (M-SC zone). Because the RCGP FEIR was prepared at a program level, site-specific project-level assessment is required to determine Project impacts. As demonstrated by the project-level analysis above, the Project is not located within any designated scenic highway corridor, would not substantially damage scenic resources (including trees, rock outcroppings, or unique landmark features), would not obstruct prominent public views of the San Jacinto, San Bernardino, or Santa Rosa Mountains, and would not substantially degrade the existing visual character or quality of public views in this non-urbanized area. The Project preserves some on-site date palms, exceeds required setbacks, and fully adheres to applicable General Plan policies and County development standards. Therefore, the Project would not result in peculiar effects, new or substantially more severe significant effects, new off-site or cumulative effects, or new information that would result in a more severe impact than already identified in the RCGP FEIR. For these reasons, the Project does not require additional environmental review under CEQA Guidelines section 15183.

	Prior EIR Determination	Effect Peculiar to Project Site?	New Significant Effect?	New Significant Off-Site Cumulative Impact	New Information/ More Severe Impact?
2. Mt. Palomar Observatory a) Interfere with the nighttime use of the Mt. Palomar Observatory, as protected through Riverside County Ordinance No. 655?	LTSM	No	No	No	No

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

Impacts Identified in the General Plan EIR

According the RCGP FEIR, a significant impact would occur if the RCGP were to substantially increase the effect of light and glare upon existing residential uses, as well as the Mount Palomar Observatory.

The RCGP FEIR determined that implementation of the RCGP would increase the effects of light and glare upon the Mount Palomar Observatory. New light and glare would be created by the addition of residences and commercial establishments within the RCGP. Although this impact was found to be significant prior to mitigation, the FEIR concluded that compliance with Riverside County Ordinance No. 655, combined with proposed mitigation measures limiting lighting intensity and promoting dark-sky preservation on a project-level basis (Mitigation Measures 4.4.2A–4.4.2E), would reduce impacts to the nighttime use of the Observatory to a less than significant level. (RCGP FEIR p. 4.4-10 et seq.)

Proposed Project Impacts

a) Mt. Palomar Observatory

The Project site is located within Zone B of the Mount Palomar Nighttime Lighting Policy Area. All development in Zone B is subject to Riverside County Ordinance No. 655, which regulates artificial outdoor lighting to protect astronomical observations at the Mount Palomar Observatory. Ordinance No. 655 requires outdoor lighting to favor low-pressure sodium (LPS) sources and to use full or partial shielding directed downward. For light-industrial uses, parking lots, security lighting, equipment yards,

walkways, and private roads fall under Class II rules: LPS is preferred, non-LPS lamps over 4,050 lumens are prohibited, lower-lumen alternatives are allowed, and these lights may operate all night. Outdoor assembly/repair areas or signs (Class I) allow fully shielded higher-lumen lamps and must generally turn off after 11:00 p.m. except while the area is actually in use.

The Project's Conditions of Approval explicitly require compliance with Ordinance No. 655, and the County will enforce this requirement during building permit review. The County of Riverside shall ensure that all lighting for the Project is fully shielded, cast downward, reduced in intensity to the greatest extent, and does not result in lighting trespass including glare into surrounding areas or upward into the night sky. The County shall also ensure use of LED lighting with a correlated color temperature of 3,000 Kelvins or less.

As a result of required compliance with Ordinance 655, and related Conditions of Approval, the Project would not interfere with the nighttime use of the Mount Palomar Observatory. This impact is consistent with the analysis in the RCGP FEIR and would not create peculiar effects, new or substantially more severe significant effects, new off-site or cumulative impacts, or new information requiring further environmental review.

Section 15183 Finding

The proposed Project is consistent with the applicable General Plan policies, the ECVAP, and the County's zoning regulations (M-SC zone). The RCGP FEIR determined that General Plan buildout would increase light and glare impacts on the Mount Palomar Observatory and found the impact significant prior to mitigation. The FEIR concluded that compliance with Riverside County Ordinance No. 655, together with the County's lighting policies carried forward as FEIR Mitigation Measures 4.4.2A–4.4.2E, would reduce Observatory impacts to less than significant at the program level. Because the RCGP FEIR was prepared at a program level, site-specific project-level assessment is required to determine lighting impacts. The Project site lies within Zone B of the Mount Palomar Nighttime Lighting Policy Area. The Project does not require Project-specific lighting mitigation. Outdoor lighting is controlled through standard Conditions of Approval and Building and Safety plan check requiring compliance with Ordinance No. 655 and Ordinance No. 915, which is how the County implements Mitigation Measures 4.4.2A–4.4.2C for new development generally. Mitigation Measures 4.4.2D and 4.4.2E are County institutional actions and are not applicant conditions. Because the Project implements the applicable land use designation and is subject to the same policies, ordinances, and mitigation framework analyzed in the RCGP FEIR, it would not result in peculiar effects, new or substantially more severe significant effects, new off-site or cumulative effects, or new information that would result in a more severe impact than already identified in the General Plan EIR. For these reasons, the Project does not require additional environmental review under CEQA Guidelines section 15183.

	Prior EIR Determination	Effect Peculiar to Project Site?	New Significant Effect?	New Significant Off-Site Cumulative Impact	New Information/ More Severe Impact?
3. Other Lighting Issues					
a) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	LTSM	No	No	No	No
b) Expose residential property to unacceptable light levels?	LTSM	No	No	No	No

Source(s): Project Application Materials; Riverside County Ordinance No. 655 (Riverside County, 1988); Riverside County Ordinance No. 915 (Riverside County, 2012)

Impacts Identified in the General Plan EIR
According the RCGP FEIR, a significant impact would occur if the RCGP were to substantially increase the effect of light and glare upon existing residential uses, as well as the Mount Palomar Observatory.

The RCGP FEIR determined that implementation of the RCGP would increase the effects of light and glare upon existing residential uses. New light and glare would be created by the addition of residences and commercial establishments within the RCGP. Although this impact was found to be significant prior to mitigation, the FEIR concluded that compliance with Riverside County Ordinance No. 655, combined with proposed mitigation measures limiting lighting intensity and promoting dark-sky preservation on a project-level basis (Mitigation Measures 4.4.2A–4.4.2E), would reduce impacts to less than significant level. (RCGP FEIR p. 4.4-10 et seq.)

Proposed Project Impacts

a) Light and Glare

The Project site is located in a rural area that already experiences light and glare from nearby commercial, agricultural, and residential uses, street lighting on Avenue 54, vehicle headlights, and parking lot lighting. No lighting currently exists on the Project site itself. Nighttime construction is not anticipated, so no security lighting would be required for construction staging areas.

At Project buildout, the proposed single-story QCP Fabrication Facility would introduce new sources of light and glare from building lighting, safety/security lighting, landscape lighting, and vehicle activity. However, all exterior lighting would be shielded and designed in accordance with Riverside County Public Works Engineering Standards, Ordinance No. 915 (Outdoor Lighting) and Zoning Ordinance requirements, which will be incorporated as Conditions of Approval. Lighting levels would remain consistent with the surrounding developed environment, would require downward oriented shielded light fixtures, and would not require high-intensity fixtures.

The RCGP FEIR was prepared at a program level, so site-specific project-level analysis is required to determine Project impacts. The Project is consistent with the General Plan land use designation and M-SC zoning. The project-level analysis demonstrates that the Project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. The Project would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

b) Impact Residential Properties

The nearest sensitive receptors to the Project are the single-family residence immediately to the west and the residential subdivision north of Avenue 54 in the City of Coachella. The Project will be required to comply with Riverside County Ordinance No. 915 (Outdoor Lighting), which limits outdoor lighting to prevent spillover onto adjacent properties. All exterior lighting would be shielded and designed in accordance with County standards, which will be incorporated as Conditions of Approval.

The project-level analysis demonstrates that the Project would not expose residential properties to unacceptable light levels (refer to response 3.a, above). The Project would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

Section 15183 Finding
The proposed Project is consistent with the applicable General Plan policies, the ECVAP, and the County's zoning regulations (M-SC zone). Because the RCGP FEIR was prepared at a program level,

site-specific project-level assessment is required to determine Project impacts. The project-level analysis demonstrates that the Project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area, nor would it expose nearby residential properties to unacceptable light levels. All exterior lighting would be shielded and designed in accordance with Riverside County Public Works Engineering Standards, Zoning Ordinance requirements, and Ordinance No. 915, which will be incorporated as Conditions of Approval. The Project would not result in peculiar effects, new or substantially more severe significant effects, new off-site or cumulative effects, or new information that would result in a more severe impact than already identified in the RCGP FEIR. For these reasons, the Project does not require additional environmental review under CEQA Guidelines section 15183.

AGRICULTURE & FOREST RESOURCES Would the project**:**	Prior EIR Determination	Effect Peculiar to Project Site?	New Significant Effect?	New Significant Off-Site Cumulative Impact	New Information/ More Severe Impact?
4. Agriculture a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	SU	No	No	No	No
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?	SU	No	No	No	No
c) Cause development of non-agricultural uses within 300 feet of agriculturally zoned property (Ordinance No. 625 “Right-to-Farm”)?	SU	No	No	No	No
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?	SU	No	No	No	No

Source(s): Riverside County General Plan Final EIR, October 2003; Riverside County General Plan; Project Application Materials.

Impacts Identified in the General Plan EIR

The RCGP FEIR identified the following four thresholds of significance for Agriculture Resources impacts (RCGP FEIR p. 4.2-14):

- Results in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources agency, to non-agricultural use;

- Conflicts with existing zoning for agricultural use, or a Williamson Act contract;

- Involves other changes in the existing environment which, due to its location or nature, could result in conversion of Prime, Unique, or Statewide Important Farmland to non-agricultural use; or

- Expose future residents to nuisances associated with agricultural operations or expose farms to nuisances associated with urban uses.

Although the RCGP FEIR did not analyze these four thresholds on an individual basis, it comprehensively analyzed agriculture-related impacts under Impact 4.2.2 (p. 4.2-27 et seq.).

The RCGP FEIR concluded that implementation of the RCGP would result in significant and unavoidable impacts due to the conversion of active agricultural land to non-agricultural uses. The RCGP FEIR also discussed how buildout of the General Plan would increase the likelihood of urban uses being located in closer proximity to remaining agricultural operations, thereby raising the potential for land-use conflicts and nuisance impacts. Site-specific conflicts with agricultural zoning or Williamson Act contracts are addressed through project-level review processes, consistency with zoning regulations, and applicable General Plan policies rather than through broad programmatic findings in the FEIR. Indirect impacts identified in the FEIR include dust, odors, noise, pests, potential groundwater contamination, and aerial application of agricultural chemicals. These would be exacerbated by closer proximity between new development and ongoing agricultural operations.

The RCGP contains policies encouraging conservation of productive agricultural land, consideration of State agricultural designations during General Plan amendments, and support for agricultural education. However, these policies do not establish specific requirements sufficient to reduce the conversion of agricultural lands to a less-than-significant level. The FEIR therefore determined that no feasible mitigation exists to reduce the significant conversion impacts to less than significant levels, and they remain significant and unavoidable (RCGP FEIR p. 4.2-27 et seq.).

Proposed Project Impacts

a) Conversion of Farmland

The entire Project site is classified as "Indio Series Fine Sandy Loam, wet" by the United States Department of Agriculture "Soil Survey of the Coachella Valley Area." According to the Farmland Mapping and Monitoring Program (FMMP) and Riverside County's Map My County v. 13.00, the site contains approximately 19.01 acres of Prime Farmland. Surrounding areas include designated Farmland of Local Importance and Urban and Built-Up Land. The site was previously farmed with date palms for about 15 years, but active farming operations have ceased, although a number of date palms remain on the property. No active agricultural operations border the site, but a small date garden occurs at the adjacent residence west of the Project site.

The Project will convert approximately 13.87 acres of the 19.01-acre Prime Farmland site to non-agricultural (manufacturing) use. Existing date groves totaling approximately 223,872 square feet (about 5.14 acres) will be preserved along the southern boundary and in the northwest portion of the site. This type of conversion was analyzed in the RCGP FEIR, which determined that the loss of Prime Farmland, Unique Farmland, and Farmland of Statewide Importance would result in a significant and unavoidable impact. The Board of Supervisors adopted a Statement of Overriding Considerations for this impact on October 7, 2003, after finding no feasible mitigation or alternatives that could reduce it to a less-than-significant level.

The Project proposes land uses and intensities that are consistent with the adopted RCGP and ECVAP, as well as applicable zoning standards (M-SC zone). Because the Project implements the land use

designation and planning standards previously analyzed in the General Plan FEIR, it would not result in peculiar effects, new or substantially more severe significant effects, new off-site or cumulative effects, or new information that would result in a more severe impact than already identified in the RCGP FEIR.

b) Conflict with Zoning or Williamson Contract

The Project site is zoned M-SC (Manufacturing Service Commercial) which allows for agricultural and other industrial uses. The site is not subject to a Williamson Act contract. Although the site is currently planted with date palms, active farming has ceased. As shown on Map My County v. 13.00, the Project site is not located within an agricultural preserve, and no agricultural preserves exist on surrounding lands. Surrounding properties to the south, east, and west are zoned M-SC, with a parcel zoned M-M (Manufacturing – Medium) to the southwest. The nearest agriculturally zoned land is located approximately 1,500 feet west of the Project site (west of Harrison Street). Therefore, the development of the Project site would not conflict with lands zoned for agricultural use, or in active cultivation.

The Project is consistent with the M-SC zoning designation and does not conflict with any Williamson Act contract or agricultural preserve. As a result, it would not result in any peculiar effects, new or substantially more severe significant effects, new off-site or cumulative effects, or new information that would result in a more severe impact than already identified in the RCGP FEIR. Therefore, impacts related to conflicts with existing zoning or Williamson Act contracts are less than significant.

c) Ordinance No. 625 "Right-to-Farm"

The Project site is bounded on the north by Avenue 54. Properties north of Avenue 54 are within the City of Coachella and zoned R-1. Surrounding properties to the south, east, and west are zoned M-SC, with a parcel zoned M-M (Manufacturing – Medium) to the southwest. The nearest agriculturally zoned land is located approximately 1,500 feet west of the Project site (west of Harrison Street). Because the Project site is not located within 300 feet of any agriculturally zoned property, the proposed development would not cause non-agricultural uses to be located within 300 feet of such lands. As a result, the Project has no potential to trigger Ordinance No. 625 ("Right-to-Farm") concerns.

The Project would not result in any peculiar effects, new or substantially more severe significant effects, new off-site or cumulative effects, or new information that would result in a more severe impact than already identified in the RCGP FEIR. Impacts related to Ordinance No. 625 are less than significant.

d) Other Changes Impacting Farmland or Agricultural Uses

The Project site is designated Light Industrial by the RCGP and ECVAP and zoned M-SC. All immediately adjacent properties are also designated and zoned for urban development. As discussed under Threshold (a), surrounding areas include Farmland of Local Importance and Urban and Built-Up Land according to the FMMP and Map My County. The Project proposes no changes to adjacent lands or land use designations.

The proposed Project does not involve any changes in the existing environment that, due to its location or nature, could result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. As a result, the Project would not result in any peculiar effects, new or substantially more severe significant effects, new off-site or cumulative effects, or new information that would result in a more severe impact than already identified in the RCGP FEIR. Impacts under this threshold are less than significant.

<u>Section 15183 Finding</u>

The proposed Project is consistent with the land use designations, development intensities, and zoning standards (M-SC zone) of the adopted RCGP and ECVAP. The Project's conversion of approximately 19.01 acres of Prime Farmland falls within the scope and scale of impacts evaluated in the RCGP FEIR, which determined that the overall loss of Prime, Unique, and Statewide Important Farmland would be significant and unavoidable. The analysis for the remaining agriculture thresholds (zoning/Williamson Act conflicts, Right-to-Farm Ordinance, and indirect conversion potential) concluded that the RCGP would result in less than significant impacts. Because the Project implements the land use designation, zoning standards, and planning requirements previously analyzed in the RCGP FEIR, it would not result in peculiar effects, new or substantially more severe significant effects, new off-site or cumulative effects, or new information that would result in a more severe impact than already identified in the RCGP FEIR. For these reasons, the Project does not require additional environmental review under CEQA Guidelines section 15183.

	Prior EIR Determination	Effect Peculiar to Project Site?	New Significant Effect?	New Significant Off-Site Cumulative Impact	New Information/ More Severe Impact?
5. Forest					
a) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Govt. Code section 51104(g))?	LTSM	No	No	No	No
b) Result in the loss of forest land or conversion of forest land to non-forest use?	LTSM	No	No	No	No
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of forest land to non-forest use?	LTSM	No	No	No	No

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

Impacts Identified in the General Plan EIR

The General Plan FEIR did not evaluate impacts to forestry resources as a standalone issue, as the specific CEQA threshold question regarding loss of forest land or conversion of forest land to non-forest use was not yet included in Appendix G of the CEQA Guidelines at that time (it was added in 2009/2010).

Instead, the FEIR indirectly addressed potential effects on forests and forestry resources in the Biological Resources impacts discussion. The RCGP FEIR concluded that the General Plan would result in the conversion of existing natural and sensitive habitat types, including forested or woodland areas, to various proposed urban land uses. At the program level, the FEIR made no standalone significance determination for forestry resources. Instead, potential impacts would be evaluated on a site-specific basis during subsequent project-level CEQA review, depending on site conditions, the extent of impacts, and habitat value. The FEIR noted that RCGP policies focus primarily on conserving superior examples of native vegetation, complying with applicable MSHCPs, and promoting habitat preservation through conservation plans and landowner incentives. Project-level review would include coordination with resource agencies as necessary for any additional mitigation required, consistent with the General Plan's natural resource conservation policies. (RCGP FEIR p. 4.6-17, et seq.)

Proposed Project Impacts

a) Conflict with Zoning

The Project site is located in the Coachella Valley, an arid desert region that does not support forestry or timber production. The Project site is not zoned as forest land and there are no lands within the Project site's vicinity that are zoned for forest land (as defined in Public Resources Code § 12220(9)), timberland (as defined by Public Resources Code § 4526), or Timberland Production (as defined by Government Code § 51104(g)). Due to the lack of forest land in the Project area, the Project would not conflict with zoning of forest land or result in the loss of forest land or the conversion of forest land to non-forest use. No impact would occur and the Project would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

b) Loss of Forest Land

As previously discussed in Threshold 5.a), the Project site is not zoned for forest land and does not contain any forest land. Additionally, because there are no forest lands in the Project vicinity, the Project would not have the potential to involve other changes to the existing environment which, due to their location or nature, could indirectly result in the conversion of forest land to non-forest use. (Riverside County, 2015a, Figure OS-3a; RCIT, 2020; Google Earth Pro, 2020) No impact to forest land would occur as a result of development of the proposed Project. The Project would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

c) Conversion of Forest Land to Non-Forest Land

See responses to Thresholds a) and b). Implementation of the Project would not develop or disturb any lands that contain forest land and, as such, there would be no potential for the Project to cause the loss of forest land or the conversion of forest land to non-forest use. No impact would occur and the Project would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

Section 15183 Finding

The proposed Project is consistent with the applicable General Plan policies, the ECVAP, and the County's zoning regulations (M-SC zone). The RCGP FEIR (2003) did not evaluate forestry resources as a standalone issue because the CEQA threshold for loss or conversion of forest land was not added until 2009/2010. As demonstrated in the project-specific analysis above, the Project site contains no forest land, is not zoned for forest or timberland uses, and is not located near any such resources. Therefore, the Project would not result in the loss of forest land or the conversion of forest land to non-forest use. Because the Project falls within the scope of the impacts evaluated in the RCGP FEIR and the site-specific analysis confirms no impact, the Project would not cause any new or substantially more severe significant effects, peculiar effects, off-site impacts, or new cumulative impacts beyond those already analyzed in the General Plan EIR. For these reasons, the Project does not require additional environmental review under CEQA Guidelines section 15183.

AIR QUALITY Would the project:	Prior EIR Determination	Effect Peculiar to Project Site?	New Significant Effect?	New Significant Off-Site Cumulative Impact	New Information/ More Severe Impact?
6. Air Quality Impacts a) Conflict with or obstruct implementation of the applicable air quality plan?	LTS	No	No	No	No
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?	SU	No	No	No	No
c) Expose sensitive receptors, which are located within one (1) mile of the project site, to substantial pollutant concentrations?	LTS	No	No	No	No
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	LTS	No	No	No	No

Source(s): Riverside County General Plan, Riverside County Climate Action Plan ("CAP"), SCAQMD CEQA Air Quality Handbook, Trip Generation & Vehicle Miles Traveled Screening Analysis for the proposed QCP Fabrication Facility Plot Plan, Air Quality Impact Analysis, Urban Crossroads, (January 2025).

Impacts Identified in the General Plan EIR

According to the RCGP FEIR, the RCGP would be considered to have a significant effect on air quality if it would violate any Ambient Air Quality Standards (AAQS), contribute substantially to an existing air quality violation, expose sensitive receptors to substantial pollutant concentrations, or conflict with adopted environmental plans and goals of the community in which it is located. (p. 4.5-23)

Air Quality Plan Consistency

The RCGP FEIR concluded the General Plan was consistent with SCAG's Regional Growth Management Plan and SCAQMD's Air Quality Management Plan, and the vehicle miles traveled growth rate under the General Plan is consistent with SCAG's projected population growth. In addition, with the planning and implementation of the RCGP Circulation Element, it was anticipated that the RCGP would be consistent with SCAG's Regional Mobility Plan, locally adopted Congestion Management Plan, as well as the Coachella Valley PM10 Plan. Impacts were found to be less than significant with no mitigation required. (RCGP FEIR p. 4.5-25 et seq.)

Cumulatively Considerable Increase of Non-Attainment Criteria Pollutants

The RCGP FEIR did not address criterion 6.b (cumulative increase in criteria pollutants) as a standalone issue. It did, however, analyze broader regional and cumulative air quality impacts associated with PM_{10} emissions, stationary sources, and vehicle emissions, as described below.

PM10 Emissions (Impact 4.5.1)

The RCGP FEIR determined that implementation of the General Plan would result in short-term construction-related air quality impacts from fugitive dust (primarily PM_{10}) generated by grading, site preparation, vehicle and equipment traffic on exposed surfaces, and blowing dust, particularly in the dry desert areas of the County. Because the General Plan is a program-level

document encompassing thousands of future development projects, specific construction emissions could not be quantified. While RCGP policies and compliance with SCAQMD/MDAQMD Rules 402 and 403 (fugitive dust control) would reduce these impacts through dust suppression measures, significant short-term construction-related air quality impacts would remain. (RCGP FEIR p. 4.5-28 et seq.)

Stationary Emissions (Impact 4.5.2)
The RCGP FEIR determined that long-term stationary source emissions associated with buildout of the General Plan would result in substantial air quality impacts. While the RCGP includes policies intended to reduce stationary source emissions, these policies do not guarantee compliance with applicable air quality standards. As a result, the FEIR concluded that long-term stationary source air quality impacts would remain significant and unavoidable at the program level. Because the RCGP FEIR was prepared at a program level, it requires that site-specific project-level analysis be conducted to determine the significance of impacts for individual projects. (RCGP FEIR p. 4.5-33 et seq.)

Vehicle Emissions (Impact 4.5.3)
The RCGP FEIR determined that implementation of the General Plan would result in significant long-term regional air quality impacts from mobile source emissions associated with increased vehicular traffic and vehicle miles traveled (VMT) at buildout. Emissions of criteria pollutants (CO, ROC, NOx, and PM_{10}) were estimated based on projected VMT, and the analysis concluded that the General Plan would generate significant air quality impacts from mobile sources. Although the General Plan includes policies aimed at reducing vehicle trips and air pollutant emissions, these measures would not reduce impacts to less than significant levels. As a result, the FEIR concluded that long-term mobile source air quality impacts would remain significant and unavoidable. (RCGP FEIR p. 4.5-35 et seq.)

Sensitive Receptors
The RCGP FEIR concluded that implementation of the RCGP would result in increased exposure of sensitive receptors (including children, the elderly, the sick, and facilities such as schools, hospitals, and convalescent homes) to air pollutants. This increase would be due to short-term construction emissions and fugitive dust, ongoing and new agricultural activities, stationary sources from energy production and industry, and higher vehicle miles traveled associated with projected growth. However, with implementation of the policies provided in the RCGP, the FEIR determined that exposure of sensitive receptors to increased air pollutants would be reduced to a less than significant level. No additional mitigation measures were required. (RCGP FEIR 4.5-39 et seq.)

Other Emissions (Odors)
The RCGP FEIR concluded that the RCGP would not in and of itself generate odors or toxic air contaminants. Individual development projects with the potential to generate odors or toxic air contaminants would be evaluated at the project-specific level when detailed information became available. Any such facility would be required to comply with SCAQMD Rule 1401 for permit applications. No additional control measures beyond existing regulations were required at the General Plan level to keep impacts less than significant. (RCGP FEIR p. 4.5-28)

Proposed Project Impacts

a) Conflict with Air Quality Plan

The Project site is located within the Salton Sea Air Basin (SSAB) and is subject to the South Coast Air Quality Management District's (SCAQMD) 2022 Air Quality Management Plan (AQMP) and the 2003 Coachella Valley PM_{10} State Implementation Plan. The SCAQMD has jurisdiction over air pollution control in the region and works with SCAG, local governments, and state/federal agencies to reduce

emissions and attain state and federal air quality standards. The 2022 AQMP provides the current framework for achieving ambient air quality standards through control measures, incentive programs, and coordination with regional growth forecasts (including the 2024–2050 RTP/SCS).

Consistency with the AQMP is evaluated using the following two criteria:

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.

- Construction: 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 evaluated in the Air Quality Impact Analysis prepared for the Project (Appendix A), the Project's localized and regional construction-source emissions would not exceed applicable regional significance thresholds and LST thresholds. As such, the Project would neither increase the severity of existing violations, nor cause a new violation, and a less than significant impact is expected.

- Operation: Project operational emissions would not exceed applicable regional or localized significance thresholds. As evaluated in Appendix A and below, the Project's localized and regional operation-source emissions would not exceed applicable regional significance threshold or LST thresholds. As such, a less than significant impact is expected.

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

Consistency Criterion No. 2
The Project will not exceed the assumptions in the AQMP based on the years of Project buildout 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.

- Construction: 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 no emissions thresholds will be exceeded, as described below and in Appendix A, a less than significant impact would result.

- Operation: The Project site is currently zoned as M-SC, which generally allows for light industrial uses. The Project's proposed uses are consistent with the site's land use designation. As such, the Project is determined to be consistent with the second criterion.

The RCGP FEIR was prepared at a program level, so site-specific project-level analysis is required to determine Project impacts. As demonstrated by the project-level analysis above, and under 6.b, below, the Project would not result in new or substantially more severe air quality impacts, nor would it conflict with the 2022 AQMP or other applicable air quality plans. The Project would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

b) Cumulatively Considerable Impacts

A project is considered to have significant impacts if there is a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or state ambient air quality standard. As previously stated, the SSAB is currently a non-attainment area for PM_{10} and ozone. Therefore, if the Project's construction and/or operational emissions exceed SCAQMD thresholds for PM10 and ozone precursors, which include carbon monoxide (CO), nitrous oxides (NOx), and volatile/reactive organic compounds (VOC or ROG), then impacts would be cumulatively considerable and significant.

The air quality impact analysis (Appendix A) quantifies air quality emissions generated by construction and operation of the Project and addresses whether the Project conflicts with implementation of the SCAQMD's AQMP. The analysis of Project-generated air emissions determines whether the Project would result in a cumulatively considerable net increase of any criteria pollutant for which the SCAB is in nonattainment under an applicable NAAQS and CAAQS. Additionally, the Project has been evaluated to determine whether it would expose sensitive receptors to substantial pollutant concentrations and the impacts of odors.

The SCAQMD has also developed regional and localized significance thresholds for other regulated pollutants. SCAQMD's CEQA Air Quality Significance Thresholds (March 2023) indicate that any projects in the SSAB with daily emissions that exceed any of the indicated thresholds should be considered as having an individually and cumulatively significant air quality impact.

Construction Emissions

Construction activities associated with the Project would result in emissions of VOCs, NOX, SOX, CO, PM10, and PM2.5. Construction-related emissions are expected from the following construction activities:

- Site Preparation
- Grading
- Building Construction
- Paving
- Architectural Coating

On-Road Trips

Construction generates on-road vehicle emissions from vehicle usage for workers, vendors, and haul trucks commuting to and from the site. The number of worker, vendor, and hauling trips are presented below in Table 1. Worker trips are based on CalEEMod defaults.

Table 1
Construction Trip Assumptions

Construction Activity	Worker Trips Per Day	Vendor Trips Per Day	Hauling Trips Per Day
Site Preparation	18	1	0
Grading	25	6	0
Building Construction	40	7	0
Paving	15	3	0
Architectural Coating	8	0	0

Construction Duration

The air quality analysis was prepared in January of 2025 and assumed that construction was expected to begin in August 2025 and conclude in November 2026, lasting approximately fifteen months. Although the construction dates have been delayed, the analysis remains accurate. The construction schedule utilized in the analysis, shown in Table 2 represents a "conservative" analysis scenario should construction occur any time after the respective days since emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent. The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet as required per CEQA Guidelines.

Table 2
Construction Duration

Construction Activity	Start Date	End Date	Days
Site Preparation	8/1/2025	8/21/2025	15
Grading	8/22/2025	3/9/2026	142
Building Construction	3/10/2026	11/30/2026	190
Paving	8/25/2026	11/30/2026	70
Architectural Coating	8/25/2026	11/30/2026	70

Construction Equipment

Consistent with industry standards and typical construction practices, each piece of equipment listed in Table 3 is assumed to operate up to a total of eight (8) hours per day (except as noted below), or more than two-thirds of the period during which construction activities are allowed pursuant to the County code. It should be noted that the Project Applicant has confirmed that the equipment list is reasonable for the Project's construction.

Table 3
Construction Equipment Assumptions

Activity	Equipment	Number	Hours per Day
Site Preparation	Crawler Tractor	3	8
	Tractors/Loaders/Backhoes	4	8
Grading	Crawler Tractors	2	8
	Excavators	3	8
	Graders	2	2
	Rubber Tired Dozers	1	8
	Scrapers	2	8
Building Construction	Cranes	1	8
	Forklifts	4	8
	Generator Sets	3	8
	Tractors/Loaders/Backhoes	3	8
	Welders	1	8
	Pavers	2	8
Paving	Paving Equipment	2	8
	Rollers	2	8
Architectural Coating	Air Compressors	1	8

Construction Emissions Summary

The estimated maximum daily construction emissions without mitigation are summarized in Table 4. Detailed construction model outputs are presented in the Air Quality Impact Analysis Appendix 4.1 (Appendix A of this document). Under the assumed scenarios, emissions resulting from the Project

construction would not exceed thresholds established by the SCAQMD for emissions of any criteria pollutant. As such, construction impacts would be considered less than significant

Table 4
Overall Construction Emissions Summary – Without Mitigation

Pollutant Emissions (Pounds per Day) Activity	**VOC**	**NOx**	**CO**	**SOx**	**PM10**	**PM2.5**
Summer						
2025	4.14	37.59	34.11	0.06	7.83	4.52
2026	10.24	21.81	33.30	0.05	1.77	1.01
Winter						
2025	3.59	32.25	30.07	0.06	4.44	2.41
2026	10.19	29.76	30.89	0.06	4.31	2.29
Maximum Daily Emissions	**10.24**	**37.59**	**34.11**	**0.06**	**7.83**	**4.52**
SCQMD Thresholds	75	100	550	150	150	55
Exceeds Thresholds?	**No**	**No**	**No**	**No**	**No**	**No**

Operational Emissions

Operational activities associated with the Project would result in emissions of VOCs, NOX, SOX, CO, PM10, and PM2.5. Operational emissions are expected from the following primary sources:

- Mobile Source Emissions
- Area Source Emissions
- Energy Source Emissions
- Operational Equipment Source Emissions

The Project would relocate an existing manufacturing facility from the City of Norco to the subject site. Operational characteristics at the new facility are not anticipated to differ substantially from those of the existing facility. Both the existing facility and the proposed Project site are located within the jurisdiction of the SCAQMD. A net-emissions analysis is therefore appropriate for evaluating the Project's contribution to regional air quality. Estimated operational emissions from the existing facility are quantified below and compared with the proposed Project's operational emissions. The resulting net change in emissions (proposed minus existing) is then evaluated against the applicable SCAQMD regional significance thresholds to determine whether the Project would result in a significant air quality impact.

Operational Emissions Summary

CalEEMod utilizes summer and winter EMFAC2021 emission factors in order to derive vehicle emissions associated with Project operational activities, which vary by season. As such, operational activities for summer and winter scenarios are presented in Table 5. Detailed operational model outputs are presented in the Air Quality Impact Analysis Appendix 4.1 (Appendix A of this document). Project operational emissions, evaluated both on a standalone basis and on a net basis (proposed Project emissions minus existing facility emissions), would not exceed the numerical thresholds of significance established by the SCAQMD for any criteria pollutant. As such, operational impacts would be considered less than significant.

Table 5
Summary of Peak Operational Emissions

Pollutant Emissions (Pounds per Day) Activity	VOC	NO_x	CO	SO_x	PM10	PM2.5
Summer						
Mobile Source Emissions	2.07	3.01	25.09	20.07	5.35	1.40
Area Source Emissions	3.00	0.03	4.12	0.00	0.01	0.01
Energy Source Emissions	0.00	0.00	0.00	0.00	0.00	0.00
Operational Equipment Source Emissions	0.95	14.31	55.03	0.01	0.50	0.46
Total Maximum Daily Emissions	6.03	17.36	84.25	0.08	5.86	1.87
Existing Facility	*-6.16*	*-19.25*	*-84.50*	*-0.09*	*-6.50*	*-2.10*
Net New Total (Proposed - Existing)	**-0.14**	**-1.89**	**-0.26**	**-0.01**	**-0.64**	**-0.24**
SCQMD Thresholds	55	55	550	150	150	55
Exceeds Thresholds?	**No**	**No**	**No**	**No**	**No**	**No**
Winter						
Mobile Source Emissions	1.73	3.27	16.77	0.06	5.35	1.40
Area Source Emissions	2.32	0.00	0.00	0.00	0.00	0.00
Energy Source Emissions	0.00	0.00	0.00	0.00	0.00	0.00
Operational Equipment Source Emissions	0.95	14.31	55.03	0.01	0.50	0.46
Total Maximum Daily Emissions	5.01	17.58	71.80	0.08	5.85	1.86
Existing Facility	*-5.39*	*-19.46*	*-76.33*	*-0.09*	*-6.49*	*-2.10*
Net New Total (Proposed -Existing)	**-0.38**	**-1.88**	**-4.53**	**-0.01**	**-0.64**	**-0.24**
SCQMD Thresholds	55	55	550	150	150	55
Exceeds Thresholds?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Table 4-8 of Project Air Quality Report, Appendix A.

Cumulative Impacts

There are a number of cumulative projects in the project area that have not yet been built or are currently under construction. Since the timing or sequencing of the cumulative projects is unknown, any quantitative analysis to ascertain daily construction emissions that assumes multiple, concurrent construction projects would be speculative. Further, cumulative projects include local development as well as general growth within the project area. However, as with most development, the greatest source of emissions is from mobile sources, which travel well out of the local area. Therefore, from an air quality standpoint, the cumulative analysis would extend beyond any local projects and when wind patterns are considered would cover an even larger area. The SCAQMD recommends using two different methodologies: (1) that project-specific air quality impacts be used to determine the potential cumulative impacts to regional air quality; and (2) that a project's consistency with the current AQMP be used to determine its potential cumulative impacts.

Project Specific Impacts

The region, including the Project site, is in non-attainment for ozone and PM10. Construction and operation of cumulative projects will further degrade the local air quality, as well as the air quality of the Salton Sea Air Basin. The greatest cumulative impact on the quality of regional air will be the incremental addition of pollutants mainly from increased traffic volumes from residential, commercial, and industrial development and the use of heavy equipment and trucks associated with the construction

of these projects. Air quality will be temporarily degraded during construction activities that occur separately or simultaneously. However, in accordance with the SCAQMD methodology, projects that do not exceed the SCAQMD threshold criteria or can be mitigated to less than criteria levels are not significant and do not add to the overall cumulative impact. A significant impact may occur if a project would add a cumulatively considerable contribution of a federal or state non-attainment pollutant.

Project operations would generate emissions of VOC, NOx, ROG, CO, PM10, and PM2.5, which would not exceed the SCAQMD regional or local thresholds and would not be expected to result in ground level concentrations that exceed the NAAQS or CAAQS. Since the project would not introduce any substantial stationary sources of emissions, CO (Carbon Monoxide) is the benchmark pollutant for assessing local area air quality impacts from post-construction motor vehicle operations. As indicated in the Air Quality Impact Analysis (Appendix A), no violations of the state and federal CO standards are projected to occur for the project, based on the magnitude of traffic the project is anticipated to create. Therefore, operation of the Project would not result in a cumulatively considerable net increase for nonattainment of criteria pollutants or ozone precursors. As a result, the Project would result in a less than significant cumulative impact for operational emissions.

Air Quality Compliance
The California Environmental Quality Act (CEQA) requires a discussion of any inconsistencies between a proposed project and applicable General Plans and Regional Plans (CEQA Guidelines Section 15125). The regional plan that applies to the proposed project includes the SCAQMD AQMP. As described above, under question 6.a., the Project is consistent with the AQMP under both applicable criteria. Based on emission results presented in Tables 4 and 5, above, the proposed Project will not result in a cumulative considerable net increase of any criteria pollutant. Therefore, a less than significant impact will occur.

The project-level air quality analysis above demonstrates that the proposed Project would not result in any new or substantially more severe significant air quality impacts beyond those analyzed in the RCGP FEIR. The RCGP FEIR was prepared at a program level, so site-specific project-level analysis is required to determine Project impacts. As shown above, the Project would not result in a cumulatively considerable net increase of any criteria pollutant. The Project would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

c) Impacts to Sensitive Receptors

Sensitive receptors are populations that are more susceptible to the effects of air pollution than the general population, including children, the elderly, and people with pre-existing respiratory or cardiovascular conditions. Land uses that typically accommodate sensitive receptors include residences, schools, hospitals, daycare centers, parks, and convalescent facilities. CEQA requires an evaluation of whether a project would expose sensitive receptors to substantial pollutant concentrations, including criteria air pollutants and toxic air contaminants (TACs). This analysis considers both the proximity of existing sensitive receptors to the Project site and the potential for Project-generated emissions to result in localized health impacts.

The nearest sensitive receptors to the Project site include the existing residential dwelling located approximately 40 feet west and the existing residential subdivision located approximately 191 feet north of the Project site (within the City of Coachella). In order to accurately model impacts to nearby sensitive receptors, the air quality analysis (Appendix A), identified specific locations surrounding the Project site:

R1: Location R1 represents the existing residence at 85186 Corte del Roble, approximately 191 feet north of the Project site. Receptor R1 is placed in the private outdoor living area (backyard) facing the Project site.

R2: Location R2 represents the existing residence at 85467 54th Avenue, approximately 391 feet east of the Project site. Receptor R2 is placed at the building façade facing the Project site.

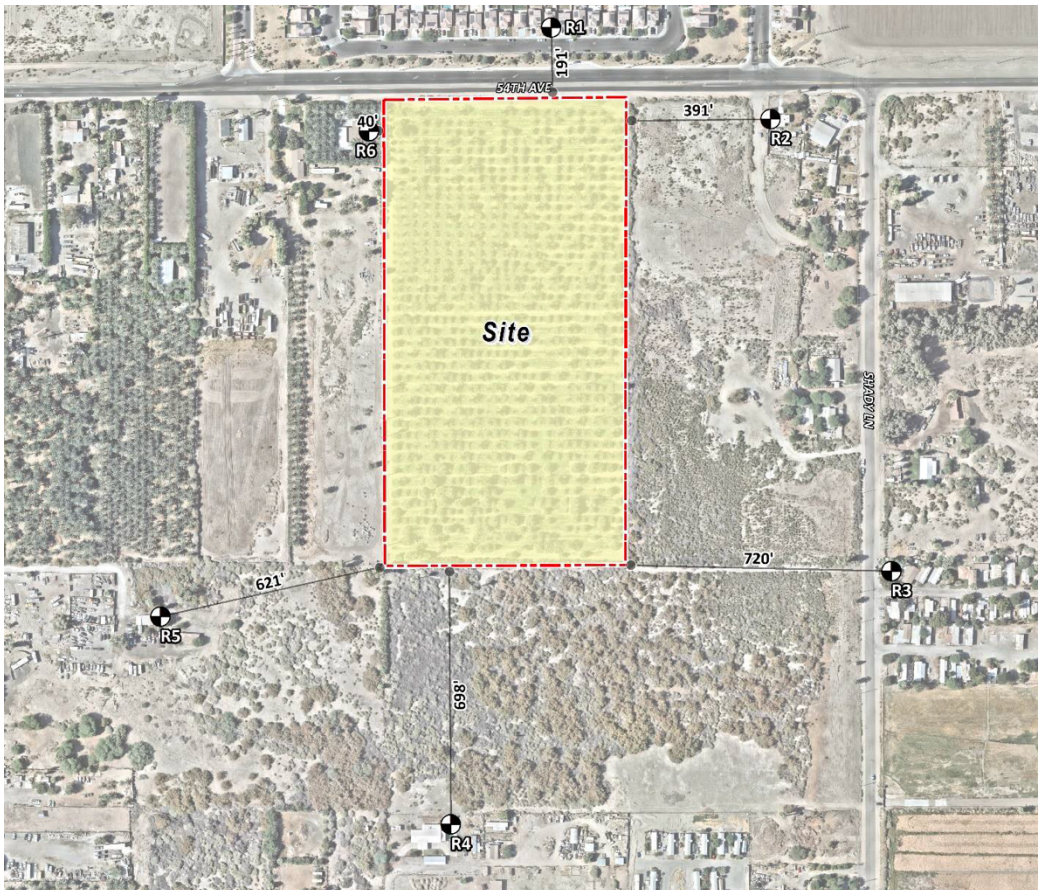
R3: Location R3 represents the existing residence at 54540 Shady Lane, approximately 720 feet east of the Project site. Receptor R3 is placed at the building façade facing the Project site.

R4: Location R4 represents the existing residence at 85300 55th Avenue, approximately 698 feet south of the Project site. Receptor R4 is placed at the building façade facing the Project site.

R5: Location R5 represents the existing at 54684 Harrison Street, approximately 621 feet southwest of the Project site. Receptor R5 is placed in the private outdoor living area (backyard) facing the Project site.

R6: Location R6 represents the existing residence at 85265 54th Avenue, approximately 40 feet west of the Project site. Receptor R6 is placed in the private outdoor living area (backyard) facing the Project site.

Figure 1: Receptor Locations



The proposed 19.01-acre Project exceeds the five (5) acre limit that enable uses of the mass rate Localized Significance Threshold (LST) Look-Up Table. Therefore, dispersion modeling was performed (see Appendix A) to evaluate the potential for significant localized air quality impacts from both construction and operational activities.

For construction, the highest daily peak on-site emissions from overlapping construction phases were modeled to represent worst-case conditions. For operations, the model included all on-site stationary (area) sources and on-site mobile emissions. A trip length of 0.25 miles was applied to both trucks and passenger vehicles to account for on-site vehicle travel.

As shown below in Table 6, modeled concentrations at the maximally exposed sensitive receptors would not exceed SCAQMD's localized significance thresholds for any criteria pollutant during construction or operations. Therefore, localized air quality impacts would be less than significant.

Table 6
Localized Significance Summary Peak Construction and Operations

	CO		NO2	PM10	PM2.5
	Averaging Time				
	1-Hour	8-Hours	1-Hour	24-Hours	24-Hours
Peak Construction					
Peak Day Localized Emissions	0.04	0.02	3.10E-02	2.56	1.34
Background Concentration A	1.1	0.08	0.38	n/a	n/a
Total Concentration	**1.14**	**0.82**	**0.07**	**2.56**	**1.34**
SCAQMD Localized Significance Threshold	20	9	0.18	10.4	10.4
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**
Peak Operation					
Peak Day Localized Emissions	3.28E-02	2.26E-02	4.72E-03	0.17	0.14
Background Concentration A	1.1	0.08	0.38	n/a	n/a
Total Concentration	**1.13**	**0.82**	**0.04**	**0.17**	**0.14**
SCAQMD Localized Significance Threshold	20	9	0.18	2.5	2.5
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**

Source: Tables 4-9 and 4-10 of Project Air Quality Report, Appendix A.
A Highest concentration from the last three years of available data.
Notes: PM10 and PM2.5 concentrations are expressed in µg/m3. All others are expressed in ppm.
Based on SCAQMD's LST Methodology, background concentrations are considered only for CO and NO2.

Health Impacts

As shown in Tables 3 through 6, construction and operation of the proposed Project will result in criteria emissions that are below the SCAQMD significance thresholds, and neither would violate any air quality standard or contribute substantially to an existing or projected air quality violation.

With today's technology, it is not scientifically possible to calculate the degree to which exposure to various levels of criteria pollutant emissions will impact an individual's health. There are several factors that make predicting a Project-specific numerical impact difficult:

- Not all individuals will be affected equally due to medical history. Some may have medical pre-dispositions and diet and exercise levels tend to vary across a population.
- Due to the dispersing nature of pollutants, it is difficult to locate and identify which group of Individuals will be impacted, either directly or indirectly.
- There are currently no approved methodologies or studies to base assumptions on, such as baseline health levels or emission level-to-health risk ratios.

As shown in the LST analysis above, Project emissions would not exceed SCAQMD localized significance thresholds during either construction or operation. Therefore, the Project would not expose sensitive receptors to substantial pollutant concentrations.

In addition, the Project would not contribute to the formation of a carbon monoxide (CO) hotspot. A CO hotspot is a localized concentration of CO that exceeds the state 1-hour standard of 20 ppm or the 8-

hour standard of 9 ppm. As shown in Table 6, existing background 1-hour and 8-hour CO concentrations in the Project area are well below the applicable ambient air quality standards. Given these low background levels, Project-related traffic volumes at nearby intersections would not cause or contribute to a CO hotspot.

The Project is a concrete furniture fabrication facility (forming, casting, finishing, and assembly), not a concrete batch plant. It would not include cement silos, large aggregate stockpiles, ready-mix truck loading, or continuous high-volume batching, and therefore would not generate the localized particulate or process emissions typically associated with batch plants. Concrete would be used in limited quantities to manufacture finished products on site, rather than produced as a bulk commodity for off-site delivery. As a result, the Project would not generate the unique process-related particulate emissions associated with batch plants, and operational emissions would be limited to those typical of a light industrial/manufacturing use (vehicle trips, area sources, and indoor fabrication/finishing).

The RCGP FEIR was prepared at a program level, therefore a site-specific project-level analysis was prepared to determine Project impacts. As shown above, the Project would not result in new or substantially more severe impacts to sensitive receptors. Project emissions would not exceed SCAQMD localized significance thresholds during construction or operation, and the Project would not cause or contribute to a CO hotspot. The Project would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

d) Other Emissions (Odors etc.)

Land uses 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 Project does not include land uses typically associated with emitting objectionable odors. Potential odor sources associated with the proposed Project are limited to construction equipment exhaust, the application of asphalt and architectural coatings during construction, and the temporary storage of typical solid waste (refuse) during long-term operations. Standard construction requirements would minimize odor impacts from construction activities. These construction-related odor emissions would be temporary, short-term, and intermittent, and would cease upon completion of each phase of construction; therefore, they are considered less than significant. Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with current solid waste regulations. The proposed Project would also be required to comply with SCAQMD Rule 402, which prohibits the discharge of emissions that would cause a public nuisance.

As demonstrated by the project-level analysis above, the Project would not result in other emissions (such as those leading to odors) that would adversely affect a substantial number of people. The RCGP FEIR was prepared at a program level, so site-specific project-level analysis has been completed to determine Project impacts. As shown above, the Project would not result in new or substantially more severe odor impacts. The Project would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

<u>Section 15183 Finding</u>
The RCGP FEIR was prepared at a program level, therefore a site-specific project-level assessment is required to determine Project impacts. The project-level analysis demonstrates that the Project would not conflict with or obstruct implementation of the applicable air quality plan; would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is in non-attainment; would not expose sensitive receptors located within one mile of the site to substantial pollutant concentrations; and would not result in other emissions, such as those leading to odors, that would adversely affect a substantial number of people.

The proposed Project is consistent with the applicable General Plan policies, the ECVAP, and the County's zoning regulations (M-SC zone). The Project would not result in peculiar effects, new or substantially more severe significant effects, new off-site or cumulative effects, or new information that would result in a more severe impact than already identified in the RCGP FEIR. For these reasons, the Project does not require additional environmental review under CEQA Guidelines section 15183.

BIOLOGICAL RESOURCES Would the project:	Prior EIR Determination	Effect Peculiar to Project Site?	New Significant Effect?	New Significant Off-Site Cumulative Impact	New Information/ More Severe Impact?
7. Wildlife & Vegetation a) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state conservation plan?	SU	No	No	No	No
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)?	SU	No	No	No	No
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?	SU	No	No	No	No
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?	SU	No	No	No	No
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 Wildlife or U. S. Fish and Wildlife Service?	SU	No	No	No	No
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?	SU	No	No	No	No
g) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	LTS	No	No	No	No

Source(s): GIS database, WRCMSHCP and/or CVMSHCP, On-site Inspection, Biological Resources Assessment Memorandum and Coachella Valley Multiple Species Habitat Conservation Plan Analysis for the QCP Fabrication Facility Plot Plan Thermal, Riverside County, California, Biological Resources Technical Report, CADRE Environmental, October 2024.

Impacts Identified in the General Plan EIR

The RCGP FEIR identified the following six thresholds of significance for Biological Resources impacts:

- 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 CDFG or USFWS.
- 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 CDFG or USFWS.
- Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.
- 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.
- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation (RCGP FEIR p. 4.6-17):

The RCGP FEIR compressively analyzed these six thresholds under Impacts 4.6.1 through 4.6.7 (p. 4.6-18 et seq.) and under section 4.2.3 Land Use/Agricultural Resources (Habitat Conservation Plan/Natural Community Plan Consistency) (p. 4.2-15).

The RCGP FEIR determined that buildout of the General Plan would result in significant and unavoidable impacts to biological resources through direct mortality of individuals of listed, proposed, or candidate species, loss or degradation of habitat occupied by such species, adverse effects on riparian habitats and sensitive natural communities, impacts to federally protected wetlands, interference with wildlife movement and corridors, and habitat fragmentation. Impacts related to conflicts with applicable habitat conservation plans or natural community conservation plans, however, would be less than significant without mitigation. This is because the proposed General Plan includes policies that acknowledge existing habitat conservation plans within the County and ensure that land use plans are consistent with the provisions of applicable conservation plans.

Implementation of the RCGP policies would partially reduce these effects by promoting avoidance and minimization of impacts to floodplain, riparian, and wetland habitats, conserving superior examples of native vegetation, and requiring compliance with applicable MSHCPs. In addition to these policies, compliance with applicable federal, state, and local laws and regulations, combined with project-level review and mitigation measures (including adherence to the Riverside County Planning Department Biological Report Guidelines (RCGP FEIR MM 4.6.1A), preservation of habitat at a 1:1 ratio when necessary (RCGP FEIR MM 4.6.1B), and compliance with applicable Habitat Conservation Plans (HCPs) (RCGP FEIR MM 4.6.1C)), would further reduce impacts.

During subsequent project-level environmental analysis and review of individual development projects (RCGP FEIR Mitigation Measure 4.6.1A), compliance with applicable regulations could require coordination with resource agencies (e.g., USFWS, CDFG, or the U.S. Army Corps of Engineers) to determine specific mitigation for impacts to waters of the U.S. (including wetlands), riparian habitats,

and State and federally listed species. Resource agency permits for project-level approvals may require mitigation measures in addition to those outlined in the RCGP.

Even with implementation of the RCGP policies and mitigation measures 4.6.1A-C, impacts related to direct mortality of listed species, loss of sensitive habitats (particularly coastal sage scrub, meadow, and marsh), habitat fragmentation, and wildlife movement would remain significant and unavoidable. In the absence of a comprehensive, approved MSHCP covering the Coachella Valley and western Riverside County, these effects would also contribute to cumulative significant and unavoidable adverse impacts on biological resources. (RCGP FEIR pp. 4.6-18 et seq.)

(Note that the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP) was not yet adopted when the FEIR was prepared. It was approved in 2008 and remains in effect today.)

Proposed Project Impacts

a) Conflict with Habitat Conservation Plan

As required by Mitigation Measures 4.6.1A of the RCGP FEIR, a Project-specific biological resources study was prepared. The biological resources technical report prepared by CADRE Environmental, October 2024 (Appendix B) provides a detailed assessment of potential sensitive natural resources located within and/or immediately adjacent to the Project site. As discussed below, the assessment included a thorough literature review, site reconnaissance characterizing existing conditions (including floral, faunal and dominant vegetation communities), impact analysis, and development of proposed measures to reduce impacts to a level of less than significant, as warranted.

The CVMSHCP was established after completion of the RCGP and FEIR, to address impacts to 27 special status species and natural communities and assure their long-term preservation. The Project site is within the planning boundary/fee area and outside of a designated conservation area, biological corridor or linkage area. Impacts to specific covered species are addressed through payment of the Local Development Mitigation Fee (LDMF) established under the CVMSHCP (RCGP FEIR MM 4.6.1C) and County Ordinance No. 875. The LDMF is collected by the County of Riverside Transportation and Land Management Agency (TLMA) and administered by the Coachella Conservation Commission (CVCC). The Project will have less than significant impacts and would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

b, c) Endangered, Threatened, Sensitive, and Special-Status Species

As required by Mitigation Measures 4.6.1A of the RCGP FEIR, a Project-specific biological resources technical report was prepared to assess the potential impact of endangered, threatened, and special-status species (Appendix B). The 19.01-are Project site consists of fully disturbed agricultural land that has been planted with date palms since the late 2000s. The technical report documented no native undisturbed habitat and no observations of sensitive plant or wildlife species on the site.

The technical report concluded that the proposed Project would not have a substantial adverse effect, either directly or through habitat modifications, on any plant or wildlife 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 (CDFW) or United States Fish and Wildlife Service (USFWS).

Although no potential burrowing owl burrows were observed within or immediately adjacent to the site, the species is provided specific requirements under the CVMSHCP and could recolonize the area. Therefore, pre-construction surveys will be required. The date palms also provide potential roosting habitat for the southern and western yellow bat. While the site is not located within or adjacent to a desert

fan palm oasis woodland Conservation Area or modeled habitat for these species, pre-construction surveys will likewise be required. The requirement for pre-construction surveys for burrowing owl and yellow bat implements RCGP FEIR Mitigation Measure 4.6.1A, which requires preparation of a biological resources report that includes recommendations for any additional focused surveys necessary to avoid or minimize impacts to sensitive species.

With implementation of RCGP FEIR Mitigation Measure 4.6.1A (adherence to the recommendations of the project-level biological assessment) and payment of the Local Development Mitigation Fee, impacts to sensitive species would be less than significant and no additional mitigation is required. The Project would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

d) Migratory Fish and Wildlife

The Project Site is not located within or adjacent to a CVMSHCP designated conservation area, biological corridor or linkage area. The Project Site does not represent a wildlife movement corridor or route between extensive open space habitats. The Project Site contains vegetation that could provide nesting habitat for migratory birds protected under the California Department of Fish and Game (CDFG) Code. Potential direct or indirect impacts to nesting birds or raptors would be avoided through mandatory compliance with CDFG Code Section 3503, as detailed in the Project-level biological resources technical report (Appendix B) and consistent with RCGP FEIR Mitigation Measure 4.6.1A.

The Project would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

e) Riparian Habitats and Other Sensitive Natural Communities

No riparian, sensitive, or undisturbed native habitats were documented within the Project site according to the biological resources technical report (Appendix B). The Project site consists of 19.01 acres of fully disturbed agricultural land that has been planted with dates since the late 2000s. Therefore, the proposed Project would not impact any riparian habitat or other sensitive natural community. No impacts would occur, and the Project would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

f) Protected Wetlands

No wetlands or jurisdictional resources regulated by the USACE, CDFW and RWQCB were documented within or adjacent to the Project site according to the biological resources technical report (Appendix B). Therefore, the proposed Project would have no impact on protected wetlands, and would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

g) Local Policies or Ordinances Protecting Biological Resources

Local policies and ordinances protecting biological resources in the Project area (beyond the CVMSHCP, which is addressed above) are limited to Riverside County Ordinance No. 559 (Regulating the Removal of Trees) and the County's Oak Tree Management Guidelines. The Project site contains no trees other than agricultural date palms, which are not subject to these regulations. Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. No impact would occur, and the Project would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

RCGP FEIR Implementation Measures

RCGP FEIR Mitigation Measures 4.6.1A and 4.6.1C require preparation of a site-specific biological report to assess potential impacts to biological resources and compliance with applicable habitat conservation plans prior to project approval.

4.6.1A Comply with Riverside County Planning Department Biological Report Guidelines to include an analysis of the potential for a proposed project to result in direct mortality of individuals of listed, proposed, or candidate species or loss of habitat occupied by such species and sensitive habitats.

Under the Planning Department Guidelines, biological reports must be conducted as follows:

a. Reports must be prepared by a biologist on the County's list of qualified consultants.
b. The County Planning Department must be notified in advance that a report will be prepared for a specific project.
c. The report must include a signed certification attesting to the report contents.
d. The report must include specific information as to the type of survey (e.g., General Biological Resources Assessment, Habitat Assessment, etc.), site location, property owner, principal investigator, and contact information for participants in the field surveys.
e. The report must include specified attachments (summary sheet, level of significance checklist, biological resources/project footprint map, and site photos).
f. The report must include information on literature sources (e.g., California Natural Diversity Data Base, California Department of Fish and Game, U.S. Fish and Wildlife Service, and environmental documents for nearby projects).
g. The report must include a description of surveys, including timing, personnel, and weather conditions.
h. The report must include a description of site conditions including plant and wildlife habitat, disturbances, and sensitive elements.
i. The report must include an assessment of anticipated project impacts and a discussion of mitigation.
j. The report must include a list of all species observed or detected and a recommendation for any additional focused surveys that may be necessary.

The above list is a summary of the County's guidelines, the actual guidelines available from the Planning Department shall be used in determining requirements for, and adequacy of, biological reports.

4.6.1C Comply with applicable HCPs.

As required by Mitigation Measures 4.6.1A of the RCGP FEIR, a Project-specific biological resources technical report was prepared to assess the potential impact of endangered, threatened, and special-status species, as well as other biological resources (Appendix B). The following pre-construction surveys are required for the Project per the biological resources technical report, thereby implementing RCGP FEIR Mitigation Measure 4.6.1A

Pre-Construction Burrowing Owl Surveys

Pre-construction surveys for burrowing owl shall be conducted prior to the start of ground disturbing activities (grading, grubbing, and construction) at the Project Site. The surveys shall follow the methods described in the CDFW's Staff Report on Burrowing Owl Mitigation (CDFW 2012). Two surveys shall be conducted, with the first survey being conducted between 30 and 14 days before initial ground disturbance, and the second survey being conducted no more than 24 hours prior to initial ground

disturbance. If burrowing owls and/or suitable burrowing owl burrows with sign (e.g., whitewash, pellets, feathers, prey remains) are identified on the Project Site during the survey and impacts to those features are unavoidable, consultation with the CDFW shall be conducted and the methods described in the CDFW's Staff Report on Burrowing Owl Mitigation (CDFW 2012) for avoidance and/or passive relocation shall be followed.

Pre-Construction Bat Surveys
Prior to the initiation of Project activities, suitable bat roosting habitat within the Project Site (date palms), a focused bat habitat assessment will be conducted by a qualified bat biologist. The bat habitat assessment will examine existing palms within the Project Site that have features suitable for day roosting and/or night roosting. Suitable bat roosting features will be documented and the area around these features will be searched for bats and bat sign (guano, staining, culled insect parts) prior to project initiation.

If suitable bat-roosting habitat with potential roost sites is found during the bat habitat assessment, pre-construction surveys shall occur no less than 30 days prior to the initiation of Project activities, regardless of the time of year. During the pre-construction surveys, the qualified bat biologist will inspect all palms proposed for removal for evidence of bat occupation. Visual inspections shall focus on the identification of bat sign (i.e., individuals, guano, urine staining, corpses, feeding remains, scratch marks and bats squeaking and chattering). If evidence of bat occupation is observed during the pre-construction survey, the pre-construction survey will also include a nighttime emergence survey component. Bat detectors, bat call analysis, and visual observation shall be used during all nighttime surveys. Nighttime emergence surveys shall be conducted by a qualified bat biologist under appropriate weather conditions and moon phase. These surveys will inform the current size and composition of the roosting colony onsite.

If no evidence of bat occupation of the palms is identified during the surveys, then Project activities may proceed as planned without a biological monitor.

If evidence of bat occupation is identified during surveys and/or the emergence survey determines that bats are occupying the palms proposed for removal, the qualified bat biologist will identify the bats to the species level and evaluate the colony to determine its size and significance. Maternity roosts and hibernacula shall not be evicted, excluded, removed, or disturbed. The qualified bat biologist will then provide additional measures to avoid impacts to roosting bats.

CDFG Nesting Bird Code Compliance
Mitigation for potential direct/indirect impacts on common and CVMSHCP covered sensitive bird and raptor species will require compliance with CDFG Code Sections 3503, 3503.5, and 3513. Construction outside the nesting season (between September 1st and January 31st) do not require pre-removal nesting bird surveys. If construction is proposed between February 1st and August 31st, a qualified biologist must conduct a nesting bird survey(s) no more than three (3) days prior to initiation of grading to document the presence or absence of nesting birds within or directly adjacent (100 feet) to the Project Site.

The survey(s) would focus on identifying any bird or raptor nests that would be directly or indirectly affected by construction activities. If active nests are documented, species-specific measures shall be prepared by a qualified biologist and implemented to prevent abandonment of the active nest. At a minimum, grading in the vicinity of a nest shall be deterred until the young birds have fledged. A minimum exclusion buffer of 100 feet shall be maintained during construction, depending on the species and location. The perimeter of the nest setback zone shall be fenced or adequately demarcated with stakes and flagging at 20-foot intervals, and construction personnel and activities restricted from the area. A survey report by a qualified biologist verifying that no active nests are present, or that the young have fledged, shall be submitted to the County of Riverside Environmental Programs Division for review

and approval prior to initiation of grading in the nest-setback zone. The qualified biologist shall serve as a construction monitor during those periods when construction activities occur near active nest areas to ensure that no inadvertent impacts on these nests occur. Any nest permanently vacated for the season would not warrant protection pursuant to the CDFG Codes.

Section 15183 Finding

The RCGP FEIR was prepared at a program level, therefore a site-specific project-level assessment is required to determine Project impacts. Consistent with RCGP FEIR Mitigation Measure 4.6.1A, a biological resources technical report was prepared for the Project. The pre-construction surveys identified in that report are not project-specific mitigation measures for a peculiar impact. They are existing, uniformly applied requirements that apply to development projects where suitable habitat is present:

- Pre-construction burrowing owl surveys follow the CDFW Staff Report on Burrowing Owl Mitigation (2012), which is the standard protocol used throughout the CVMSHCP area to avoid take of individuals, nests, or eggs.
- The bat habitat assessment and, if warranted, pre-construction surveys of on-site date palms follow standard CDFW/CVMSHCP practice for potential roost habitat and would apply to any project proposing removal of similar palm features.
- Nesting bird surveys are required only if construction occurs during the nesting season and implement California Fish and Game Code Sections 3503, 3503.5, and 3513, which apply to projects countywide.

These measures implement adopted RCGP policies, RCGP FEIR Mitigation Measure 4.6.1A, CVMSHCP requirements, and existing state law. They do not indicate a new or unique biological impact associated with the Project. The project-level analysis demonstrates that all potential impacts to biological resources would be less than significant with implementation of these existing standard conditions.

The Project would not conflict with the provisions of any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state conservation plan (including the CVMSHCP). The Project would not have a substantial adverse effect, either directly or through habitat modifications, on any endangered or threatened species, candidate, sensitive, or special-status species, nor would it interfere substantially with the movement of any native resident or migratory fish or wildlife species, established wildlife corridors, or native wildlife nursery sites. The Project would not have a substantial adverse effect on riparian habitat, sensitive natural communities, or State or federally protected wetlands, and it would not conflict with any local policies or ordinances protecting biological resources.

The proposed Project is consistent with the applicable General Plan policies, the ECVAP, and the County's zoning regulations (M-SC zone). Because the Project implements the land use designation, zoning standards, and biological resource requirements previously analyzed in the RCGP FEIR, it would not result in new or significant environmental impacts. As such, the Project would not result in peculiar effects, new or substantially more severe significant effects, or new off-site or cumulative effects, and no new information of substantial importance has been identified that that would result in a more severe impact than identified within the RCGP FEIR. For these reasons, the Project does not require additional environmental review under CEQA Guidelines section 15183.

CULTURAL RESOURCES Would the project:	Prior EIR Determination	Effect Peculiar to Project Site?	New Significant Effect?	New Significant Off-Site Cumulative Impact	New Information/ More Severe Impact?
8. Historic Resources a) Alter or destroy a historic site?	LTSM	No	No	No	No
b) Cause a substantial adverse change in the significance of a historical resource, pursuant to California Code of Regulations, Section 15064.5?	LTSM	No	No	No	No

Source(s): On-Site Inspection; Project Application Materials; Phase I Cultural Resource Study, Brian F. Smith & Associates, revised March 2025.

Impacts Identified in the General Plan EIR

The RCGP FEIR determined that buildout of the General Plan would result in less than significant impacts to historic resources as defined in CEQA Guidelines Section 15064.5 with mitigation incorporated. Implementation of the RCGP policies would reduce these effects by requiring development proposals to be evaluated for the presence of historic resources, protecting historic buildings from demolition, and providing capital for preservation. In addition, Mitigation Measures 4.7.1B and 4.7.1C require avoidance of cultural resources where feasible (including capping and conservation easements) and, where avoidance is not possible, a testing program, evaluation of California/National Register eligibility, and a treatment/data recovery program (with Native American participation) prior to grading. Compliance with these measures, applicable federal, state, and local laws and regulations, and project-level review would ensure that future development would not have any significant adverse impacts on historic resources. Therefore, impacts to historic resources would be reduced to less than significant levels. (RCGP FEIR p. 4.7-25 et seq.)

Proposed Project Impacts

a) Historic Sites

Based on the RCGP, the Project site is not located within a designated Historic Preservation District. A records search, review of historic aerial photographs and maps, and a pedestrian field survey conducted on November 11, 2024, as part of the Phase I Cultural Resource Study (Appendix C), did not identify any historic-period structures, buildings, objects, or other historical resources on the property.

An archaeological records search for the project and the surrounding area within a one-mile radius was requested from the SCIC at SDSU on October 22, 2024. The SCIC identified 38 cultural resources (19 prehistoric, four multicomponent, and 15 historic) within a one-mile radius of the Project, none of which are located on the subject property. Of the 37 previous studies identified within one mile, one (Van Horn et al. 1990) included the property but consisted only of a cultural resources overview and did not include a survey.

Historic aerial photographs indicate the property was vacant and repeatedly cleared throughout the 20th century. Although no structures are visible on the project site, the northwest corner contained trees and what appears to be a yard associated with a residence and ranch complex on the adjacent property to the west (first visible on the 1943 Coachella USGS Quadrangle). The Project site was later used for agriculture, with a date palm nursery established between 2006 and 2009. Agricultural rows and growing palm trees are visible in subsequent imagery. The analysis concluded that no historic resource occurs on the Project site. As a result, the Project would not alter or destroy any historic site, nor would

it cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5. Because no historical resources were identified within the project area, impacts to historic resources are less than significant. The Project would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

b) Impacts to Historical Resources

As discussed above in (Threshold 8.a), no historic resources are located on the Project site or have the potential to be impacted by the Project. Less than significant impacts related to Historic Resources are anticipated.

Section 15183 Finding

The RCGP FEIR was prepared at a program level, therefore a site-specific project-level assessment is required to determine Project impacts. A Phase I cultural resources study was prepared for the Project, and the project-level analysis demonstrates that all potential impacts to cultural and historical resources are less than significant. The Project would not alter or destroy a historic site and would not cause a substantial adverse change in the significance of a historical resource pursuant to California Code of Regulations, Section 15064.5.

The proposed Project is consistent with the applicable General Plan policies, the ECVP, and the County's zoning regulations (M-SC zone). Because the Project implements the land use designation, zoning standards, and cultural resource requirements of these plans previously analyzed in the RCGP FEIR, it would not result in significant environmental impacts. As such, the proposed Project does not have peculiar effects, new or substantially more severe significant effects, new off-site or cumulative effects, and no new information of substantial importance has been identified that would result in a more severe impact than analyzed in the RCGP FEIR. For these reasons, the Project does not require additional environmental review under CEQA Guidelines section 15183.

	Prior EIR Determination	Effect Peculiar to Project Site?	New Significant Effect?	New Significant Off-Site Cumulative Impact	New Information/ More Severe Impact?
9. Archaeological Resources					
a) Alter or destroy an archaeological site?	LTSM	No	No	No	No
b) Cause a substantial adverse change in the significance of an archaeological resource, pursuant to California Code of Regulations, Section 15064.5?	LTSM	No	No	No	No
c) Disturb any human remains, including those interred outside of formal cemeteries?	LTSM	No	No	No	No

Source(s): On-Site Inspection; Project Application Materials; Phase I Cultural Resource Study, Brian F. Smith & Associates, revised March 2025.

Impacts Identified in the General Plan EIR

The RCGP FEIR determined that buildout of the General Plan could result in potentially significant impacts to archaeological resources and human remains through disturbance or destruction of known and unknown resources during development of vacant lands. The RCGP policies require site-specific

cultural resources surveys and technical reports. In addition to implementation of these policies, Mitigation Measures 4.7.1A (notification and handling of human remains in accordance with State Health and Safety Code §7050.5 and Public Resources Code §5097.98), 4.7.1B (avoidance where feasible, including capping and conservation easements), and 4.7.1C (data recovery where avoidance is not possible), along with project-level review and compliance with applicable laws and regulations, were found to reduce potential impacts to archaeological resources and human remains to less than significant levels. (RCGP FEIR p. 4.7-22 et seq.)

Proposed Project Impacts

a, b) Archeological Sites and Resources

The project site has been disturbed by grading and farming beginning in the 1950's. Historical Topographic Maps and Aerial Photographs indicated that there was a rural residential structure on the Project site from the 1930's to the early 1980's. A Phase I Cultural Resource Study was prepared for the Project by Brian F. Smith & Associates in March 2025 (Appendix C). The survey did not identify any prehistoric cultural resources or isolates within the Project area. The Project site has been highly disturbed by agricultural activities that have left virtually none of the ground surface undisturbed. Overall, the current study and previous research suggest the Project area is highly disturbed with little likelihood for intact buried cultural resources.

Although it is unclear whether cultural resources have ever existed on the Project site, the proximity of numerous recorded cultural resources nearby indicates that previously undiscovered archaeological resources could be present and potentially exposed during ground-disturbing construction activities. Consistent with RCGP FEIR Mitigation Measure 4.7.1C, all earthwork shall be monitored by a qualified archaeologist and a Native American representative. A detailed monitoring program will also be implemented, including onsite monitors, staff training, and protocols for handling any inadvertent discoveries at the Project site. These measures, in conformance with RCGP FEIR Mitigation Measure 4.7.1C, will reduce impacts to less than significant levels. The Project would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

c) Human Remains

The Project site does not contain any known human remains. Although mass grading and excavation activities would disturb the entire site, the potential to uncover human remains during ground-disturbing activities is remote and is typical of nearly any construction project that disturbs undeveloped ground. If human remains are encountered, the developer/permit holder or any successor in interest is required by law to comply with State Health and Safety Code Section 7050.5 (RCGP FEIR Mitigation Measure 4.7.1A). Compliance with this requirement, as mandated by law and County policy, would reduce impacts to human remains to less than significant levels. The Project would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

RCGP FEIR Implementation Measures

RCGP FEIR Mitigation Measures 4.7.1A through 4.7.1C require notification and handling of human remains in accordance with State Health and Safety Code 7050.5 and Public Resources Code 5097.98, avoidance of cultural resources where feasible, and data recovery where avoidance is not possible.

4.7.1A If human remains are encountered during a public or private construction activity, State Health and Safety Code 7050.5 states that no further disturbance shall occur until the Riverside County Coroner has made a determination of origin and disposition pursuant

to Public Resources Code Section 5097.98. The Riverside County Coroner must be notified within 24 hours.

a. If the coroner determines that the burial is not historic, but prehistoric, the Native American Heritage Commission (NAHC) must be contacted to determine the most likely descendent (MLD) for this area. The MLD may become involved with the disposition of the burial following scientific analysis.

4.7.1B Avoidance is the preferred treatment for cultural resources. Where feasible, project plans shall be developed to allow avoidance of cultural resources. Where avoidance of construction impacts is possible, capping of the cultural resource site and avoidance planting (e.g., planting of prickly pear cactus) shall be employed to ensure that indirect impacts from increased public availability to the site are avoided. Where avoidance is selected, cultural resource sites shall be placed within permanent conservation easements or dedicated open space.

4.7.1C If avoidance and/or preservation in place of cultural resources is not possible, the following mitigation measures shall be initiated for each impacted site:

a. A participant-observer from the appropriate Indian Band or Tribe shall be used during archaeological testing or excavation in the project site.

b. Prior to the issuance of a grading permit for the project, the project proponent shall develop a test level research design detailing how the cultural resource investigation shall be executed and providing specific research questions that shall be addressed through the excavation program. In particular, the testing program shall characterize the site constituents, horizontal and vertical extent, and, if possible, period of use. The testing program shall also address the California Register and National Register eligibility of the cultural resource and make recommendations as to the suitability of the resource for listing on either Register. The research design shall be submitted to the County of Riverside Regional Park and Open-Space District for review and comment. For sites determined, through the Testing Program, to be ineligible for listing on either the California or National Register, execution of the Testing Program will suffice as mitigation of project impacts to this resource.

c. After approval of the research design and prior to the issuance of a grading permit, the project proponent shall complete the excavation program as specified in the research design. The results of this excavation program shall be presented in a technical report that follows the County of Riverside outline for Archaeological Testing. The Test Level Report shall be submitted to the County of Riverside Regional Park and Open-Space District for review and comment. If cultural resources that would be affected by the project are found ineligible for listing on the California or National Register, test level investigations will have depleted the scientific value of the sites and the project can proceed.

d. If the resource is identified as being potentially eligible for either the California or National Register, and project designs cannot be altered to avoid impacting the site, a Treatment Program to mitigate project effects shall be initiated. A Treatment Plan detailing the objectives of the Treatment Program shall be developed. The Treatment Plan shall contain specific, testable hypotheses relative to the sites under study and shall attempt to address the potential of the sites to address these research questions. The Treatment Plan shall be submitted to the County of Riverside Regional Park and Open-Space District for review and comment.

e. After approval of the Treatment Plan, the Treatment Program for affected, eligible sites shall be initiated. Typically, a Treatment Program involves excavation of a statistically representative sample of the site to preserve those resource values that qualify the site as being eligible for the California or National Register. At the conclusion of the excavation or research program, a Treatment Report, following the outline of the County of Riverside for Archaeological Mitigation or Data Recovery, shall be developed. This data recovery report shall be submitted to the County of Riverside Regional Park and Open-Space District for review and comment.

Consistent with Mitigation Measures 4.7.1C of the RCGP FEIR, all earthwork shall be monitored by a qualified archaeologist and a Native American representative, and a detailed monitoring program will also be implemented as described below:

Prior to issuance of grading permits, the applicant/developer 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 Cultural Resource Monitoring Plan 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 this 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 with this condition of approval. 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.

See Section 39 Tribal Cultural Resources for discussion of Native American Monitoring requirements.

Section 15183 Finding

The RCGP FEIR was prepared at a program level, therefore a site-specific project-level assessment is required to determine Project impacts. Consistent with RCGP FEIR Mitigation Measure 4.7.1A, and as recommended by the Project-level Cultural Resources Study (Appendix C), all earthwork shall be monitored by a qualified archaeologist and a Native American representative, and a detailed monitoring program will also be implemented. Archaeological and tribal monitoring, and the associated Cultural Resource Monitoring Program, are standard County conditions of approval for projects involving ground disturbance. They implement existing RCGP policies, RCGP FEIR mitigation measures, and statewide procedures that apply to grading projects generally. They do not introduce new requirements or address a peculiar cultural resources impact unique to this Project. The project-level analysis demonstrates that all potential impacts to archeological resources would be less than significant with implementation of these existing and standard conditions. In addition, any discovery of human remains would be subject to mandatory compliance with State Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98, further ensuring protection of such resources.

The proposed Project is consistent with the applicable General Plan policies, the ECVAP, and the County's zoning regulations (M-SC zone). Because the Project implements the land use designation, zoning standards, and archeological resource requirements previously analyzed in the RCGP FEIR, it would not result in new or significant environmental impacts. As such, the Project would not result in peculiar effects, new or substantially more severe significant effects, new off-site or cumulative effects, or new information that would result in a more severe impact than already identified in the RCGP FEIR.

For these reasons, the Project does not require additional environmental review under CEQA Guidelines section 15183.

ENERGY Would the project:	Prior EIR Determination	Effect Peculiar to Project Site?	New Significant Effect?	New Significant Off-Site Cumulative Impact	New Information/ More Severe Impact?
10. Energy Impacts a) Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	LTSM	No	No	No	No
b) Conflict with or obstruct a State or Local plan for renewable energy or energy efficiency?	LTS	No	No	No	No

Source(s): Riverside County General Plan, Riverside County Climate Action Plan ("CAP"), Project Application Materials, Vehicle Miles Traveled Analysis (VMT) & Energy Analyses prepared by Urban Crossroads (August 2026).

Impacts Identified in the General Plan EIR

According to the RCGP FEIR, a project is considered to have a significant impact on natural gas or electrical service if existing or planned facilities and supplies are not adequate to serve the proposed land uses or if existing natural gas or electrical service is significantly disrupted.

The RCGP FEIR determined that buildout of the General Plan would result in less than significant impacts to energy resources (natural gas and electricity) with mitigation incorporated. Implementation of the RCGP policies would reduce these effects by promoting energy conservation, minimizing consumption, and encouraging more efficient use of energy resources associated with future growth. In addition to these policies, RCGP FEIR Mitigation Measures 4.8.1A and 4.8.1B require the County to conduct project-level review of future development projects to ensure that adequate energy resources and facilities are available to serve the proposed project and its associated uses, and that Title 24 energy conservation and efficiency standards are met and incorporated into project design. Where necessary, appropriate mitigation measures will be required to reduce potential impacts to less-than-significant levels. Therefore, impacts to energy resources would be less than significant (RCGP FEIR p. 4.8-3 et seq.).

The Energy section of the RCGP FEIR did not include discussion of vehicle fuels. However, the FEIR determined that implementation of the RCGP would result in an irretrievable commitment of non-renewable resources such as energy supplies, including fuel/gasoline used by vehicles and equipment (RCGP FEIR p. 5-5)

Proposed Project Impacts

a) Consumption of Energy

The proposed Project will utilize energy resources during both construction and operational activities. Construction related energy demand comes from the operation of construction equipment and the manufacturing of construction materials. Operational energy demand primarily comes from building/site lighting, HVAC systems, and use of electricity and natural gas for commercial activities.

All development will be constructed in accordance with the Building Code, California Green Building Code, and Energy Code in effect at the time that development occurs, to ensure the most efficient construction/building technologies are used, which will benefit overall building operations, ensure energy efficiency and reduce wasteful and unnecessary consumption of energy resources. These requirements of law assure that future buildings on the site will not waste energy.

Urban Crossroads prepared energy calculations for the Project (Appendix D) that quantify construction electricity and fuel usage, Project-generated fuel consumption, and operational equipment energy demands. Because the Project would relocate an existing manufacturing facility from the City of Norco to the subject site, operational energy demands are calculated as the net difference between the Project's energy demand and the energy demand of the previous location.

Construction: Electricity demand will be temporary, nominal, and will cease upon the completion of construction. Electricity will be supplied through existing power lines near the project site. Construction activities will require limited energy consumption and are not expected to have an adverse impact on available energy supplies and infrastructure. Natural gas typically is not consumed during construction.

Construction Equipment Electricity Usage Estimates
Electricity would be provided to the Project by Imperial Irrigation District (IID). Urban Crossroads estimated the Project's construction electricity usage to be approximately 31,504 kWh (Table 2, Appendix D).

Construction Equipment Fuel Estimates
The aggregate fuel consumption rate for all equipment used during construction is estimated at 18.5 hp-hr-gal., obtained from California Air Resources Board (CARB) 2018 Emissions Factors Tables and cited fuel consumption rate factors presented in Table D-24 of the Moyer guidelines. For analysis purposes, the calculations were based on all construction equipment being diesel-powered which is standard practice consistent with industry standards. Diesel fuel would be supplied by existing commercial fuel providers serving the region. Urban Crossroads estimated Project construction activities would consume 75,917 gallons of diesel fuel (Table 3, Appendix D).

Construction Worker Fuel Estimates
Urban Crossroads assumed that 50% of all construction worker trips are from light-duty-auto vehicles (LOA), 25% are from light-duty-trucks (LDT11), and 25% are from light-duty-trucks (LDT22). Data regarding Project related construction worker trips were based on CalEEMod 2022 model defaults utilized in the air quality report (Appendix A). Vehicle fuel efficiencies for LDAs were estimated using information generated within the 2021 version of the EMFAC developed by the CARB. Urban Crossroads estimated that 8,773 gallons of fuel (gasoline) will be consumed related to construction worker trips over the course of the Project construction period (Table 4, Appendix D).

Construction Vendor/Hauling Fuel Estimates
Urban Crossroads assumed that 50% of all vendor trips are from Medium-Heavy-Duty-Trucks (MHDT), 50% are from Heavy-Heavy-Duty Trucks (HHDT), and 100% of hauling trips are HHDT. These assumptions are consistent with the CalEEMod 2022 defaults utilized in the air quality report (Appendix A). Vehicle fuel efficiencies for MHDTs and HHDTs were estimated using information generated within EMFAC2021. The energy analysis estimated fuel economy of MHDTs and HHDTs accessing the Project site. Based on fuel consumption, construction trips will total approximately 3,893 gallons of fuel (diesel) over the course of the Project construction period (Table 5, Appendix D).

Construction Summary
Construction of the proposed Project would result in temporary energy consumption associated with electricity and transportation fuels. These demands would be short term in nature, would not involve unusual or excessive energy use, and would be met by existing energy supplies and infrastructure

without exceeding capacity. As such, the Project would have a less than significant impact, directly, indirectly, or cumulatively, on electricity and transportation energy resources and infrastructure during construction. No mitigation is required.

Operation

Operational Equipment Energy Demands
Based on data provided by the Project applicant, operational activities at the facility are estimated to require seven diesel forklifts and three propane forklifts. The same type and number of equipment currently in use at the existing Norco facility would be utilized at the proposed Project site, while operations at the Norco location would cease. As a result, the Project would not result in a net increase in fuel consumption from operational equipment.

Facility Energy Demands
Project building operations and Project site maintenance activities would result in the consumption of electricity. Based on information provided by the Project applicant, the proposed Project will utilize on-site renewable energy to satisfy 100% of the Project's electrical demand. Additionally, the proposed Project would not utilize natural gas for the building envelope. Table 7 presents the electricity demand associated with the proposed Project as well as the existing facility, which was estimated based on CalEEMod defaults. As shown in Table 7, implementation of the proposed Project would be expected to result in a net reduction of approximately 909,669 kWh per year.

Table 7
Annual Operational Energy Demand Summary

Land Use	Natural Gas Demand (kBTU/year)	Electricity Demand (kWh/year)
Total Project Energy Demand	0	0
Existing Norco Operations	*0*	*906,669*
Net Project Energy Demand	**0**	***-909,669***

Source: QCP Manufacturing Facility Energy Tables, prepared by Urban Crossroads, August 4, 2026. See Appendix D.

Transportation Energy Demands
Energy consumed by Project-generated traffic is a function of total vehicle miles traveled (VMT) and the estimated fuel economies of vehicles accessing the Project site. Table 8 presents the estimated annual fuel consumption from Project-generated traffic, along with the net energy consumption after accounting for the closure of the Norco operations.

Table 8
Project-Generated Traffic Annual Fuel Consumption

	Annual VMT	Estimated Annual Fuel Consumption (gallons)
Total Project Operations	**1,423,186**	**66,950**
Existing Norco Operations	*1,830,675*	*84,274*
Net Total (All Vehicles)	**-407,489**	**-17,324**

Source: QCP Manufacturing Facility Energy Tables, Table 6, prepared by Urban Crossroads, August 4, 2026. See Appendix D.

Operation Summary
The proposed Project must comply with all applicable federal, state, and County requirements related to electricity consumption, including the energy efficiency standards in California Code of Regulations Title 24, Parts 6 and 11 for commercial and industrial buildings. These standards require energy efficiency measures to be incorporated into the proposed buildings, including photovoltaic solar panels on the roofs. The Project is anticipated to be designed and constructed to minimize electricity use, and to produce sufficient energy through photovoltaic installation to meet the projected demand. As a result, the proposed Project would have a less than significant impact, directly, indirectly, or cumulatively, on electricity or transportation energy supply and infrastructure capacity during operation. No mitigation is required.

As established by the County of Riverside, the proposed Project qualifies as a "small project" that may be presumed to result in a less than significant VMT impact. According to the Vehicle Miles Traveled Analysis prepared by Urban Crossroads (August 2026) (Appendix E), the Project is forecast to generate approximately 210 daily trips, including 15 trips during the AM peak hour and 9 trips during the PM peak hour. Because the Project would generate fewer than 50 peak hour trips, further Level of Service analysis is not warranted under the County's Traffic Analysis Guidelines. The Project also satisfies the County's small project screening criteria. Therefore, the proposed Project is presumed to result in a less than significant VMT impact based on the State-recommended screening criteria adopted by the County of Riverside.

IID has indicated that existing electrical distribution facilities are already located at the site and that the Project can take service from those facilities. All work would occur within previously disturbed areas on site and would not impact energy facilities in the area. Therefore, the proposed Project would have a less than significant impact and would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

b) Conflict with State or Local Plan

The applicable renewable energy and energy efficiency plan for the Project site is the Riverside County Climate Action Plan (CAP). The proposed Project would comply with the CAP through the installation of photovoltaic solar panels, which is also required under the Title 24, Part 6 energy efficiency standards for office, commercial, and warehouse buildings. Based on the information above, the Project would not conflict with any state or local plan for renewable energy or energy efficiency. Adherence to the applicable state standards enforced by IID will ensure the Project is consistent with current energy standards and conservation goals. The proposed Project would have no impact, directly, indirectly, or cumulatively, related to any state or local plan for renewable energy or energy efficiency. No mitigation is required, and the Project would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

<u>Section 15183 Finding</u>
The proposed Project is consistent with the applicable General Plan policies, the ECVAP, and the County's zoning regulations (M-SC zone). The Project would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during construction or operation, nor would it conflict with or obstruct any state or local plan for renewable energy or energy efficiency. Because the Project implements the land use designation, zoning standards, and energy-related requirements previously analyzed and disclosed in the RCGP FEIR, it would not result in significant environmental impacts. Further, the Project implements RCGP policies related to energy efficiency and use of alternate energy sources to reduce demand on the grid. As such, the proposed Project would not result in peculiar effects, new or substantially more severe significant effects, new off-site or cumulative effects, and is not subject to new information that would result in a more severe impact than identified in the RCGP FEIR. For these reasons, the Project does not require additional environmental review under CEQA Guidelines section 15183.

GEOLOGY AND SOILS Would the project directly or indirectly:	Prior EIR Determination	Effect Peculiar to Project Site?	New Significant Effect?	New Significant Off-Site Cumulative Impact	New Information/ More Severe Impact?
11. Alquist-Priolo Earthquake Fault Zone or County Fault Hazard Zones a) Be subject to rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	LTSM	No	No	No	No

Source(s): Riverside County General Plan Figure S-2 "Earthquake Fault Study Zones"; GIS database; Geologist Comments, Geotechnical Investigation, Proposed QCP Facility, Sladden Engineering (January 2025).

Impacts Identified in the General Plan EIR

According to the RCGP FEIR, the effects of the implementation of the RCGP on geology and slope stability are considered to be significant if they:

- Expose people or structures to major geologic hazards beyond an acceptable level;
- Permit development in areas of unsuitable and unmitigable geologic conditions; or
- Create substantial erosion or otherwise diminish soil as a natural resource (p. 4.10-29)

The RCGP FEIR determined that buildout of the General Plan would result in less than significant impacts related to fault rupture with mitigation incorporated. Some lands designated for "Community Development" or "Rural" uses under the RCGP lie within existing Alquist-Priolo Earthquake Fault Zones (along the Elsinore, San Jacinto, and San Andreas Faults) or County-designated fault zones. Future development on these lands would increase the number of people and structures exposed to potential fault rupture. Implementation of the RCGP policies and existing County requirements (including Riverside County Ordinance 547, which requires compliance with the Alquist-Priolo Act) would reduce these effects. In addition to these policies, project-level geotechnical investigations and site-specific mitigation measures would be required for development proposed within identified or potentially unidentified fault zones or within other potential earthquake hazard area (RCGP FEIR Mitigation Measure 4.10.1A). Therefore, impacts associated with fault rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zone Map or based on other substantial evidence of a known fault, would be reduced to a less than significant level. (RCGP FEIR p. 4.10-29 et seq.)

Proposed Project Impacts

a) Alquist-Priolo Fault Zone

The subject site is located in an active seismic zone and will likely experience strong seismic shaking during the design life of the proposed Project. In general, the intensity of ground shaking depends on several factors, including the distance to the earthquake focus, the earthquake magnitude, the response characteristics of the underlying materials, and the quality and type of construction. According to the Geotechnical Investigation (Appendix F) and the RCGP, there are no known active or potentially active faults on or trending toward the Project site, and the site is not located within a mapped Alquist-Priolo Earthquake Fault Zone. The nearest major fault (the San Andreas Fault) is approximately 3.7 miles

northeast of the site. No evidence of active surface fault rupture or secondary seismic effects (such as lateral spreading or lurching) was identified during the investigation. Therefore, the investigation concluded that the risk of primary surface ground rupture is low.

As required by Mitigation Measures 4.10.1A of the RCGP FEIR, a Project-specific geotechnical study was prepared to assess potential seismic and faulting hazards prior to project approval. Implementation of these recommendations would further reduce potential impacts. Because the Project site is not located on a known fault and no known faults trend toward it, the Project would have a less than significant impact related to directly or indirectly exposing people or structures to substantial adverse effects from ground rupture of a known earthquake fault. The Project would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

The proposed Project is required by law to comply with the California Building Standards Code which addresses construction standards including those related to geologic and soil conditions. As a standard condition of Project approval, the Project shall be required to comply with the site-specific recommendations contained in the geotechnical investigation prepared for the Project site. The recommendations cover grading, soil removal, and recompaction activities; building foundation, floor slab, retaining wall, and paving design; shoring of excavations and trenches, and related topics. See Appendix F for complete list of all geotechnical design parameters.

Section 15183 Finding

The RCGP FEIR was prepared at the program level, and a site-specific assessment was required to evaluate Project impacts. The Project would not 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. Implementation of the design parameters and recommendations set forth in the Geotechnical Investigation (Appendix F), in accordance with County policy and the California Building Code, is a standard regulatory requirement that ensures potential impacts related to seismic hazards, including fault rupture, remain less than significant.

The proposed Project is consistent with the applicable General Plan policies, the ECVAP, County's zoning regulations (M-SC zone), and implements the site-specific geotechnical recommendations as a standard regulatory requirement under the California Building Code and County policy. As a result, the proposed Project would not result in peculiar effects, new or substantially more severe significant effects, or new off-site or cumulative effects, and there is no new information that would result in a more severe impact than identified in the RCGP FEIR. For these reasons, the Project does not require additional environmental review under CEQA Guidelines section 15183.

	Prior EIR Determination	Effect Peculiar to Project Site?	New Significant Effect?	New Significant Off-Site Cumulative Impact	New Information/ More Severe Impact?
12. Liquefaction Potential Zone					
a) Be subject to seismic-related ground failure, including liquefaction?	LTSM	No	No	No	No

Source(s): Riverside County General Plan Figure S-3 "Generalized Liquefaction," Geotechnical Investigation, Proposed QCP Facility, Sladden Engineering (January 2025).

Impacts Identified in the General Plan EIR

The RCGP FEIR determined that buildout of the General Plan would result in less than significant impacts related to seismic-related ground failure, including liquefaction, with mitigation incorporated.

The RCGP would allow the construction and occupation of structures within areas susceptible to liquefaction. This would increase the exposure of persons and property to potential property loss, injury, or death resulting from liquefaction during earthquake events. Implementation of the RCGP policies would help reduce these effects. In addition to these policies, project-level review would require site-specific liquefaction assessments for future development in areas subject to liquefaction (RCGP FEIR Mitigation Measures 4.10.3A-3B). Therefore, impacts associated with seismic-related ground failure, including liquefaction, would be reduced to less than significant levels. (RCGP FEIR p. 4.10-37 et seq.)

Proposed Project Impacts

a) Liquefaction

Liquefaction is the process by which loose, saturated granular soil loses strength due to cyclic loading, typically resulting from a decrease in soil volume and an increase in pore water pressure. It generally requires three concurrent conditions: liquefaction-susceptible soils, groundwater within approximately 50 feet of the ground surface, and strong seismic shaking. Riverside County has mapped areas of known and suspected liquefaction hazard. In general, the valley floor and alluvial fans along the eastern margin of the valley are susceptible to this hazard. Both the County's General Plan Figure S-3 ("Generalized Liquefaction") and the Riverside County Land Information System identify the Project site as lying within an area of high liquefaction potential.

As required by Mitigation Measures 4.10.3A and 3.B of the RCGP FEIR, a Project-specific geotechnical study was prepared. The Project Geotechnical Investigation (Appendix F) evaluated liquefaction potential at the site using site-specific data, including an estimated high groundwater depth of approximately 10 feet below ground surface and seismic parameters consistent with regional conditions. The investigation identified potential liquefaction-related seismic settlements. Although the site lies in a region of high seismicity, the investigation's design recommendations, combined with adherence to the most recent California Building Code provisions for earthquake resistance, will reduce these impacts to acceptable levels and provide adequate protection against typical southern California ground-shaking and liquefaction hazards. Implementation of these recommendations is consistent with County policy and RCGP FEIR Mitigation Measures 4.10.3A and 4.10.3B, which require a site-specific liquefaction assessment and appropriate measures to reduce potential hazards. With implementation of these measures, impacts related to seismic ground failure, including liquefaction, would be less than significant. The Project would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

RCGP FEIR Implementation Measures

RCGP FEIR Mitigation Measures 4.10.3A and 4.10.3B require preparation of a site-specific liquefaction assessment and implementation of appropriate measures to reduce potential liquefaction hazards.

4.10.3A As determined by the County Geologist, a site-specific assessment shall be prepared to ascertain potential liquefaction impacts resulting from development. The site-specific liquefaction assessment shall incorporate up-to-date data from government and non-government sources and may be included as part of any site-specific geotechnical investigation required in Mitigation Measure 4.10.1A. This site-specific ground shaking assessment shall be prepared by a licensed geologist and shall be submitted to the County Geologist for review and approval prior to the issuance of building permits. (RCGP FEIR p.4.10-38)

4.10.3B Where development is proposed within an identified or potential liquefaction hazard area (as determined by the County Geologist), adequate and appropriate measures such as (but not limited to) design foundations in a manner that limits the effects of liquefaction, the placement of an engineered fill with low liquefaction potential, and the alternative

siting of structures in areas with a lower liquefaction risk, shall be implemented to reduce potential liquefaction hazards. Any such measures shall be submitted to the Riverside County Geologist and the County Department of Building and Safety for review prior to the approval of the building permits. (RCGP FEIR p.4.10-38)

The proposed Project is required by law to comply with the California Building Standards Code which addresses construction standards including those related to geologic and soil conditions. As a standard condition of Project approval, the Project shall be required to comply with the site-specific recommendations contained in the geotechnical investigation prepared for the Project site. The recommendations cover grading, soil removal, and recompaction activities; building foundation, floor slab, retaining wall, and paving design; shoring of excavations and trenches, and related topics. See Appendix F for complete list of all geotechnical design parameters.

Section 15183 Finding

The RCGP FEIR was prepared at the program level, therefore a site-specific project-level assessment is required to determine Project requirements. Implementation of the design parameters and recommendations in the Geotechnical Investigation (Appendix F), in accordance with County policy, the California Building Code, and RCGP FEIR Mitigation Measures 4.10.3A and 4.10.3B, is a standard regulatory requirement that ensures potential impacts related to seismic-related ground failure, including liquefaction, remain less than significant.

The proposed Project is consistent with the applicable General Plan policies, the ECVAP, County's zoning regulations (M-SC zone), and implements the site-specific geotechnical recommendations as a standard regulatory requirement under the California Building Code, County policy, and the FEIR's mitigation measures. As a result, the proposed Project would not result in peculiar effects, new or substantially more severe significant effects, or new off-site or cumulative effects, and there is no new information that would result in a more severe impact than identified in the RCGP FEIR. For these reasons, the Project does not require additional environmental review under CEQA Guidelines section 15183.

	Prior EIR Determination	Effect Peculiar to Project Site?	New Significant Effect?	New Significant Off-Site Cumulative Impact	New Information/ More Severe Impact?
13. Ground-shaking Zone					
a) Be subject to strong seismic ground shaking?	LTSM	No	No	No	No

Source(s): Riverside County General Plan Figure S-4 "Earthquake-Induced Slope Instability Map," and Figures S-13 through S-21 (showing General Ground Shaking Risk), Geotechnical Investigation, Proposed QCP Fabrication Facility, Sladden Engineering (January 2025).

Impacts Identified in the General Plan EIR

The RCGP FEIR determined that buildout of the General Plan would result in less than significant impacts related to strong seismic ground shaking with mitigation incorporated. Increases in population and the development of residential and non-residential uses would increase the exposure of persons and property to ground shaking hazards. Implementation of the RCGP policies would help reduce these effects. In addition to these policies, project-level review would require site-specific ground shaking assessments and adherence to design standards for future development in areas subject to potential strong seismic ground shaking (RCGP FEIR Mitigation Measures 4.10.2A-2C). Therefore, impacts associated with strong seismic ground shaking would be reduced to less than significant levels. (RCGP FEIR p 4.10-29 et seq.)

Proposed Project Impacts

a) Ground-Shaking

The site is located in an area of high regional seismicity, with the nearest major fault (the San Andreas Fault) approximately 3.7 miles to the northeast. The site has experienced past ground shaking from regional faults and is expected to undergo strong seismic shaking from nearby active faults during the life of the Project. As discussed under Threshold 11(a), no known or potentially active faults trend toward or through the site, so the potential for damage from direct fault rupture is low.

As required by RCGP FEIR Mitigation Measures 4.10.2A–2B, a Project-specific geotechnical investigation was prepared to assess potential impacts from strong seismic ground shaking. Adherence to the site-specific recommendations in the Geotechnical Investigation (Appendix F) is a standard regulatory requirement under County policy, the California Building Code, and the RCGP FEIR mitigation measures. The Project's design and construction will conform to the latest California Building Code provisions for earthquake resistance and the recommendations in Appendix F, subject to County review. With these measures, impacts related to seismic ground shaking would be less than significant. The Project would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

RCGP FEIR Implementation Measures
RCGP FEIR Mitigation Measures 4.10.2A-2C require preparation of a site-specific geotechnical study to assess potential impacts associated with strong seismic ground shaking for new projects.

4.10.2A The design and construction of structures and facilities shall adhere to the standards and requirement detailed in the California Building Code (California Code of Regulations, Title 24), County Building Code, and/or professional engineering standards appropriate for the seismic zone in which such construction may occur. Conformance with these design standards shall be enforced through building plan review and approval by the Riverside County Department of Building and Safety prior to the issuance of building permits for any structure or facility. (RCGP FEIR p. 4.10-36)

4.10.2B As determined by the County Geologist, a site-specific assessment shall be prepared to ascertain potential ground shaking impacts resulting from development. The site-specific ground shaking assessment shall incorporate up-to-date data from government and non-government sources and may be included as part of any site-specific geotechnical investigation required in Mitigation Measure 4.10.1A. The site-specific ground shaking assessment shall include specific measures to reduce the significance of potential ground shaking hazards. This site-specific ground shaking assessment shall be prepared by a licensed geologist and shall be submitted to the County Geologist for review and approval prior to the issuance of building permits. (RCGP FEIR p. 4.10-36)

The proposed Project is required by law to comply with the California Building Standards Code which addresses construction standards including those related to geologic and soil conditions. As a standard condition of Project approval, the Project shall be required to comply with the site-specific recommendations contained in the geotechnical investigation prepared for the Project site. The recommendations cover grading, soil removal, and recompaction activities; building foundation, floor slab, retaining wall, and paving design; shoring of excavations and trenches, and related topics. See Appendix F for complete list of all geotechnical design parameters.

Section 15183 Finding
The RCGP FEIR was prepared at the program level, therefore a site-specific project-level assessment is required to determine Project impacts. Implementation of the design parameters and

recommendations in the Geotechnical Investigation (Appendix F), in accordance with County policy, the California Building Code, and RCGP FEIR Mitigation Measures 4.10.2A and 4.10.2B, is a standard regulatory requirement that ensures potential impacts related to strong seismic ground shaking remain less than significant.

The proposed Project is consistent with the applicable General Plan policies, the ECVAP, County's zoning regulations (M-SC zone), and implements the site-specific geotechnical recommendations as a standard regulatory requirement under the California Building Code, County policy, and the FEIR's mitigation measures. As a result, the proposed Project would not result in peculiar effects, new or substantially more severe significant effects, or new off-site or cumulative effects, and there is no new information that would result in a more severe impact than identified in the RCGP FEIR. For these reasons, the Project does not require additional environmental review under CEQA Guidelines section 15183.

	Prior EIR Determination	Effect Peculiar to Project Site?	New Significant Effect?	New Significant Off-Site Cumulative Impact	New Information/ More Severe Impact?
14. Landslide Risk					
a) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, collapse, or rockfall hazards?	LTS	No	No	No	No

Source(s): On-site Inspection, Riverside County General Plan Figure S-5 "Regions Underlain by Steep Slope," Geotechnical Investigation, Proposed QCP Fabrication Facility, Sladden Engineering (January 2025).

Impacts Identified in the General Plan EIR

The RCGP FEIR determined that buildout of the General Plan could result in less than significant impacts related to unstable geologic units or soils that could lead to on- or off-site landslide, lateral spreading, collapse, or rockfall hazards. Areas highly susceptible to landslides and rockfalls are located within and adjacent to mountainous areas throughout the County. "Community Development" and "Rural" land uses envisioned in the RCGP would occur in some of these highly susceptible areas, increasing the potential for injury, death, or property loss. The RCGP includes specific policies that require identification, evaluation, and mitigation of potential impacts associated with development on steep slopes and areas subject to seismically induced landsliding and rockfalls. Implementation of these policies would reduce significant adverse impacts resulting from landslides/rockfalls to a less than significant level, with no mitigation required. (RCGP FEIR p. 4.10-39)

Proposed Project Impacts

a) Landslide Risk

The Project site is located on the Coachella Valley floor amid relatively flat terrain. The nearest hillsides are the Little San Bernardino Mountains approximately 4.5 miles to the east and the Santa Rosa Mountain foothills approximately 5.8 miles to the west. Slope instability in the form of landslides and rock falls was not observed at or near the site during the geotechnical investigation (Appendix F). Because the site sits on relatively flat ground and is not immediately adjacent to any slopes, risks associated with slope instability (landslides, mass wasting, and rock falls) are considered negligible. Due to the distance from the nearest hillsides, no impacts associated with landslides would occur. The

Project would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

Section 15183 Finding

The RCGP FEIR was prepared at the program level, therefore a site-specific project-level assessment is required to determine Project impacts. Implementation of the design parameters and recommendations in the Geotechnical Investigation (Appendix F), in accordance with County policy and the California Building Code is a standard regulatory requirement that ensures potential impacts related to on- or off-site landslide, lateral spreading, collapse, or rockfall hazards remain less than significant.

The proposed Project is consistent with the applicable General Plan policies, the ECVAP, County's zoning regulations (M-SC zone), and implements the site-specific geotechnical recommendations as a standard regulatory requirement under the California Building Code and County policy. As a result, the proposed Project would not result in peculiar effects, new or substantially more severe significant effects, or new off-site or cumulative effects, and there is no new information that would result in a more severe impact than identified in the RCGP FEIR. For these reasons, the Project does not require additional environmental review under CEQA Guidelines section 15183.

	Prior EIR Determination	Effect Peculiar to Project Site?	New Significant Effect?	New Significant Off-Site Cumulative Impact	New Information/ More Severe Impact?
15. Ground Subsidence					
a) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in ground subsidence?	LTS	No	No	No	No

Source(s): Riverside County General Plan Figure S-7 "Documented Subsidence Areas Map," Geotechnical Investigation, Proposed QCP Fabrication Facility, Sladden Engineering (January 2025).

Impacts Identified in the General Plan EIR

The RCGP FEIR determined that buildout of the General Plan could result in impacts related to ground subsidence. Documented subsidence has occurred in the San Jacinto Valley, the Elsinore Trough, and the southern Coachella Valley. Areas designated for "Community Development" under the RCGP are located within areas of documented or potential subsidence. Buildout would increase the number of persons, residential units, and non-residential development on soils susceptible to subsidence or soil collapse. The RCGP includes specific policies that require identification, evaluation, and mitigation of potential impacts associated with subsidence and collapsible soils. Implementation of these policies would reduce significant adverse impacts resulting from subsidence to a less than significant level. (RCGP FEIR p. 4.10-42 et seq.)

Proposed Project Impacts

a) Ground Subsidence

Land subsidence can occur in valleys where aquifer systems have been subjected to extensive groundwater pumping, such that groundwater pumping exceeds groundwater recharge. Generally, pore water reduction can result in a rearrangement of skeletal grains and could result in elastic (recoverable) or inelastic (unrecoverable) deformation of an aquifer system. The General Plan shows that the site is located in an area of active subsidence.

As required by RCGP Safety Policy 3.8, a Project-specific geotechnical investigation was prepared to assess potential impacts from ground subsidence. Adherence to the site-specific recommendations in the Geotechnical Investigation (Appendix F) is a standard regulatory requirement under County policy

and the California Building Code. The Project's design and construction will conform to the latest California Building Code provisions and the recommendations in Appendix F to prevent impacts from ground subsidence, subject to County review. With these required measures, impacts related to seismic ground subsidence would be less than significant. The Project would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

RCGP FEIR Implementation Measures

RCGP Safety Policy 3.8 requires preparation of a site-specific geotechnical study to assess potential impacts associated with ground subsidence:

Safety Policy 3.8 Require geotechnical studies within documented subsidence zones, as well as areas that may be susceptible to subsidence, as identified in the Safety Element Technical Background Report, prior to the issuance of development permits. Within the documented subsidence zones of the Coachella, San Jacinto, and Elsinore Valleys, the studies must address the potential for reactivation of these zones, consider the potential impact of the proposed development, and provide adequate and acceptable mitigation measures. (RCGP FEIR p. 4.10-42)

The proposed Project is required by law to comply with the California Building Standards Code which addresses construction standards including those related to geologic and soil conditions. As a standard condition of Project approval, the Project shall be required to comply with the site-specific recommendations contained in the geotechnical investigation prepared for the Project site. The recommendations cover grading, soil removal, and recompaction activities; building foundation, floor slab, retaining wall, and paving design; shoring of excavations and trenches, and related topics. See Appendix F for complete list of all geotechnical design parameters.

Section 15183 Finding

The RCGP FEIR was prepared at the program level, therefore a site-specific project-level assessment is required to determine Project impacts. Implementation of the design parameters and recommendations in the Geotechnical Investigation (Appendix F), in accordance with County policy and the California Building Code is a standard regulatory requirement that ensures potential impacts related to ground subsidence remain less than significant.

The proposed Project is consistent with the applicable General Plan policies, the ECVAP, County's zoning regulations (M-SC zone), and implements the site-specific geotechnical recommendations as a standard regulatory requirement under the California Building Code and County policy. As a result, the proposed Project would not result in peculiar effects, new or substantially more severe significant effects, or new off-site or cumulative effects, and there is no new information that would result in a more severe impact than identified in the RCGP FEIR. For these reasons, the Project does not require additional environmental review under CEQA Guidelines section 15183.

	Prior EIR Determination	Effect Peculiar to Project Site?	New Significant Effect?	New Significant Off-Site Cumulative Impact	New Information/ More Severe Impact?
16. Other Geologic Hazards					
a) Be subject to geologic hazards, such as seiche, mudflow, or volcanic hazard?	LTS	No	No	No	No

Source(s): Riverside County General Plan Figure S-7 "Documented Subsidence Areas Map," Geotechnical Investigation, Proposed QCP Fabrication Facility, Sladden Engineering (January 2025).

Impacts Identified in the General Plan EIR

The RCGP FEIR does not directly evaluate hazards such as seiche, mudflow or volcanic hazards as a distinct impact category. Geological issues are fully addressed within the Geology and Soils analysis, which includes landslide, soils, rockfall, seismic ground failure, and other hazards (RCGP FEIR p. 4.10-29 et seq.). Development projects are required to prepare site-specific geotechnical reports to evaluate and identify potential hazards and recommend appropriate engineering mitigation measures as necessary. Refer to the RCGP FEIR impact summaries in Sections 11 through 19 of this document for detailed discussions.

Proposed Project Impacts

a) Other Geologic Hazards

Because the site is situated at an inland location and is not immediately adjacent to any impounded bodies of water, risks associated with tsunamis and seiches are considered negligible. With respect to seiches, the nearest body of water to the Project site is the Salton Sea, located approximately 12.8 miles southeast of the Project site. No steep hillsides subject to mudflow and no volcanoes are located on or near the Project site. Therefore, there is no potential for the Project to be subject to hazards associated with seiches, mudflows, and/or volcanic hazards. No impacts would occur and the Project would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

The proposed Project is required by law to comply with the California Building Standards Code which addresses construction standards including those related to geologic and soil conditions. As a standard condition of Project approval, the Project shall be required to comply with the site-specific recommendations contained in the geotechnical investigation prepared for the Project site. The recommendations cover grading, soil removal, and recompaction activities; building foundation, floor slab, retaining wall, and paving design; shoring of excavations and trenches, and related topics. See Appendix F for complete list of all geotechnical design parameters.

Section 15183 Finding

The RCGP FEIR was prepared at the program level, therefore a site-specific project-level assessment is required to determine Project impacts. Implementation of the design parameters and recommendations in the Geotechnical Investigation (Appendix F), in accordance with County policy and the California Building Code is a standard regulatory requirement that ensures potential impacts related to geological hazards remain less than significant.

The proposed Project is consistent with the applicable General Plan policies, the ECVAP, County's zoning regulations (M-SC zone), and implements the site-specific geotechnical recommendations as a standard regulatory requirement under the California Building Code and County policy. As a result, the proposed Project would not result in peculiar effects, new or substantially more severe significant effects, or new off-site or cumulative effects, and there is no new information that would result in a more severe impact than identified in the RCGP FEIR. For these reasons, the Project does not require additional environmental review under CEQA Guidelines section 15183.

	Prior EIR Determination	Effect Peculiar to Project Site?	New Significant Effect?	New Significant Off-Site Cumulative Impact	New Information/ More Severe Impact?
17. Slopes					
a) Change topography or ground surface relief features?	LTS	No	No	No	No
b) Create cut or fill slopes greater than 2:1 or higher than 10 feet?	LTS	No	No	No	No
c) Result in grading that affects or negates subsurface sewage disposal systems?	LTS	No	No	No	No

Source(s): Riv. Co. 800-Scale Slope Maps, Project Application Materials, Slope Stability Report, Geotechnical Investigation, Proposed QCP Facility, Sladden Engineering (January 2025).

Impacts Identified in the General Plan EIR

The RCGP FEIR does not evaluate "slopes," as defined in this Section, as a distinct impact category. Slope stability issues are fully addressed within the broader Geology and Soils analysis, which includes landslide, soils, rockfall, and seismic ground failure hazards (RCGP FEIR p. 4.10-29 et seq.). Development projects are required to prepare site-specific geotechnical reports to evaluate slope stability, identify potential hazards, and recommend appropriate engineering mitigation measures as necessary. Refer to the RCGP FEIR impact summaries in Sections 11 through 19 of this document for detailed discussions.

Proposed Project Impacts

a) Change Topography

The Project site is relatively level, with topography descending gradually from northwest to southeast at an average elevation of approximately 86–95 feet below mean sea level (MSL). Grading would occur across the entire site, including construction of two retention basins (west basin to a depth of 5.0 feet and east basin to a depth of 4.5 feet), both utilizing 4:1 side slopes.

The Project is required to comply with the California Building Standards Code, which establishes construction standards for geologic and soil conditions. As a standard condition of approval, the Project shall also implement the site-specific recommendations of the geotechnical investigation (Appendix F). These recommendations address grading, soil removal and recompaction, foundation and floor-slab design, retaining walls, paving, excavation shoring, and related topics to ensure long-term slope stability. Implementation of these requirements would ensure that topographic changes associated with grading do not create geologic or soil hazards. Impacts to geology and soils would therefore be less than significant. The Project would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

b) Slopes

Two retention basins would be constructed as part of the Project totaling 28,050 sf: the west basin to a depth of 5.0 feet and the east basin to a depth of 4.5 feet, both utilizing 4:1 side slopes. These slopes are less steep than 2:1 and substantially lower than 10 feet in height; therefore, the Project would not create cut or fill slopes greater than 2:1 or higher than 10 feet. The Project must comply with the California Building Standards Code, which establishes construction standards for geologic and soil conditions. As a standard condition of approval, the Project will also implement the site-specific recommendations of the geotechnical investigation (Appendix F). These recommendations address grading, soil removal and recompaction, foundation and floor-slab design, retaining walls, paving,

excavation shoring, and related topics, including measures to ensure long-term stability of the manufactured slopes.

Because the slopes will be engineered and constructed in accordance with these recommendations, the proposed grading and topographic changes will not create geologic hazards. Impacts regarding slopes would therefore be less than significant. The Project would not produce peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

c) Subsurface Sewage Disposal Systems

The Project site does not contain any operational subsurface sewage disposal systems under existing conditions. The Project site does not serve as a leach field for any off-site properties and has no potential to affect or negate operating subsurface sewage disposal systems. No impact would occur and the Project would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

Section 15183 Finding
The RCGP FEIR was prepared at the program level, therefore a site-specific project-level assessment is required to determine Project impacts. Implementation of the design parameters and recommendations in the Geotechnical Investigation (Appendix F), in accordance with County policy and the California Building Code is a standard regulatory requirement that ensures potential impacts related to on- or off-site landslide, lateral spreading, collapse, or rockfall hazards remain less than significant.

The proposed Project is consistent with the applicable General Plan policies, the ECVAP, County's zoning regulations (M-SC zone), and implements the site-specific geotechnical recommendations as a standard regulatory requirement under the California Building Code and County policy. As a result, the proposed Project would not result in peculiar effects, new or substantially more severe significant effects, or new off-site or cumulative effects, and there is no new information that would result in a more severe impact than identified in the RCGP FEIR. For these reasons, the Project does not require additional environmental review under CEQA Guidelines section 15183.

	Prior EIR Determination	Effect Peculiar to Project Site?	New Significant Effect?	New Significant Off-Site Cumulative Impact	New Information/ More Severe Impact?
18. Soils					
a) Result in substantial soil erosion or the loss of topsoil?	LTSM	No	No	No	No
b) Be located on expansive soil, as defined in Section 1803.5.3 of the California Building Code (2022), creating substantial direct or indirect risks to life or property?	LTSM	No	No	No	No
c) Have soils incapable of adequately supporting use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	LTSM	No	No	No	No

Source(s): U.S.D.A. Soil Conservation Service Soil Surveys, Project Application Materials, On-site Inspection, Geotechnical Investigation, Proposed QCP Facility, Sladden Engineering (January 2025).

Impacts Identified in the General Plan EIR

The RCGP FEIR determined that buildout of the General Plan would result in less than significant impacts related to soil erosion, loss of topsoil, and expansive soils with mitigation incorporated. Development associated with anticipated population growth and land uses would involve alteration of existing topography, removal of vegetation and topsoil, and construction on soils susceptible to erosion (by wind or water) and expansive soils, which are widely dispersed throughout the County in hillside areas and low-lying alluvial basins. These activities would increase the potential for substantial soil erosion, loss of topsoil, structural damage, and disruption of utility services. The RCGP does not include specific policies that would reduce the significance of potential impacts from soil erosion, loss of topsoil, or expansive soils. Therefore, project-level mitigation measures, including adherence to the most recent version of the California Building Code standards for construction on expansive soils and other identified erosion control measures, have been required (RCGP FEIR Mitigation Measures 4.10.7A, 4.10.9A through 4.10.9C). Implementation of these measures will reduce potential impacts related to soil erosion, loss of topsoil, and expansive soils to a less than significant levels. (RCGP FEIR p. 4.10-43 et seq.)

Proposed Project Impacts

a) Topsoil Erosion

No signs of flooding or erosion were observed during the Geotechnical Investigation (Appendix F). Development of the Project site has the potential to result in soil erosion during site preparation, grading, and building construction. However, the applicant will be required to adhere to County of Riverside erosion control measures imposed through grading and building permit regulations, including SCAQMD Rule 403.1 (fugitive dust control plan), NPDES permit requirements, and RCGP FEIR Mitigation Measures 4.10.9A through 4.10.9C. These measures require implementation of Best Management Practices (BMPs), submittal of grading plans with erosion and sediment controls, and incorporation of drainage design features to minimize terrain modification, control runoff, and reduce erosion potential.

All grading activities would require permits from the TLMA Building Division and compliance with applicable County standards and the site-specific recommendations of the Geotechnical Investigation. At buildout, the construction of buildings, impervious parking areas, and stabilized landscaping would result in a low potential for soil erosion or loss of topsoil. Impacts would be less than significant, and the Project would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

b) Expansive Soil

Expansive soils typically contain large amounts of clay that expand when water is absorbed and shrink when they dry. Generally, the near-surface soil on-site consists of silty sand (SM). Based on laboratory testing performed as part of the Geotechnical Investigation (Appendix F; Expansion Index = 0), the materials underlying the site are considered to have a negligible expansion potential. Recommended remedial grading will result in substantial mixing and blending of the surface soil, and the expansion potential of the subsurface soil will be reevaluated after grading.

The Project is required to comply with the California Building Code standards for construction on expansive soils (RCGP FEIR Mitigation Measure 4.10.7A) and with the site-specific recommendations of the geotechnical investigation. Therefore, impacts associated with expansive soils would be less than significant. The Project would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

c) Septic Tanks

The Project site is currently farmed and is located in an area served by existing sewage infrastructure (a 12-inch line in Avenue 54). The Project's wastewater demand would be fully accommodated by connections to this existing infrastructure, which is serviced by the Coachella Water Authority (CWA). The Project does not propose the use of septic tanks or alternative wastewater disposal systems. Therefore, the Project would have no impact related to the ability of on-site soils to support septic tanks or alternative wastewater disposal systems. The Project would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

RCGP FEIR Implementation Measures

RCGP FEIR Mitigation Measure 4.10.7A requires adherence to Uniform Building Code standards for construction on expansive soils, while Measures 4.10.9A through 4.10.9C require implementation of Best Management Practices, grading plans with erosion and sediment controls, and drainage design measures to minimize soil erosion, control runoff, and reduce related hazards.

4.10.7A Proponents of new development within Riverside County shall adhere to applicable policies and standards contained in the most recent version of the Uniform Building Code related to the construction of structures and facilities on expansive soils. (RCGP FEIR p. 4.10-44)

4.10.9A Riverside County, where required, and in accordance with issuance of a National Pollutant Discharge Elimination System (NPDES) permit, shall require the construction and/or grading contractor for individual developments to establish and implement specific Best Management Practices (BMPs) at time of project implementation. (RCGP FEIR p. 4.10-46)

4.10.9B Prior to any development within the County, a Grading Plan shall be submitted to the Riverside County Building and Safety Department and/or Riverside County Geologist for review and approval. As required by the County, the grading plan shall include erosion and sediment control plans. Measures included in individual erosion control plans may include, but shall not be limited to, the following:

a. Grading and development plans shall be designed in a manner which minimizes the amount of terrain modification.
b. Surface water shall be controlled and diverted around potential landslide areas to prevent erosion and saturation of slopes.
c. Structures shall not be sited on or below identified landslides unless slides are stabilized.
d. The extent and duration of ground disturbing activities during and immediately following periods of rain shall be limited, to avoid the potential for erosion which may be accelerated by rainfall on exposed soils.
e. To the extent possible, the amount of cut and fill shall be balanced.
f. The amount of water entering and exiting a graded site shall be limited though the placement of interceptor trenches or other erosion control devices.
g. Erosion and sediment control plans shall be submitted to the County for review and approval prior to the issuance of grading permits. (RCGP FEIR p. 4.10-46)

4.10.9C Where required, drainage design measures shall be incorporated into the final design of individual projects on-site. These measures shall include, but will not be limited to:

a. Runoff entering developing areas shall be collected into surface and subsurface drains for removal to nearby drainages.
b. Runoff generated above steep slopes or poorly vegetated areas shall be captured and conveyed to nearby drainages.

c. Runoff generated on paved or covered areas shall be conveyed via swales and drains to natural drainage courses.
d. Disturbed areas that have been identified as highly erosive shall be (re)vegetated.
e. Irrigation systems shall be designed, installed, and maintained in a manner which minimizes runoff.
f. The landscape scheme for projects within the project site shall utilize drought-tolerant plants.
g. Erosion control devices such as rip-rap, gabions, small check dams, etc., may be utilized in gullies and active stream channels to reduce erosion. (RCGP FEIR p. 4.10-47)

The proposed Project is required by law to comply with the California Building Standards Code (including standards related to expansive soils under RCGP FEIR Mitigation Measure 4.10.7A) and with NPDES permit requirements. As a standard condition of Project approval, the Project shall implement the site-specific recommendations of the Geotechnical Investigation and the applicable BMPs, grading, erosion and sediment control, and drainage design measures identified in RCGP FEIR Mitigation Measures 4.10.9A through 4.10.9C. See Appendix F for full list of geotechnical recommendations.

Section 15183 Finding

The RCGP FEIR was prepared at a program level, therefore a site-specific project-level assessment was required to assess potential impacts from geological hazards. The geotechnical investigation prepared for the Project (Appendix F), together with mandatory compliance with the California Building Standards Code, NPDES permit requirements, Best Management Practices, and adherence to RCGP FEIR Mitigation Measures 4.10.7A and 4.10.9A–C, ensure all potential geology and soils impacts are avoided. The Project would not result in substantial soil erosion or the loss of topsoil, would not be located on expansive soil creating substantial risks to life or property, and does not propose the use of septic tanks or alternative wastewater disposal systems.

The proposed Project is consistent with the applicable General Plan policies, the ECVAP, and the County's zoning regulations (M-SC zone). Because the Project implements the land use designation, zoning standards, and geotechnical requirements previously analyzed in the RCGP FEIR, it would not result in peculiar effects, new or substantially more severe significant effects, or new off-site or cumulative impacts beyond those identified in the RCGP FEIR. For these reasons, the Project does not require additional environmental review under CEQA Guidelines section 15183.

	Prior EIR Determination	Effect Peculiar to Project Site?	New Significant Effect?	New Significant Off-Site Cumulative Impact	New Information/ More Severe Impact?
19. Wind Erosion and Blowsand from project either on or off site. a) Be impacted by or result in an increase in wind erosion and blowsand, either on or off site?	LTSM	No	No	No	No

Source(s): Riverside County 2019 General Plan Safety Element Figure S-8 "Wind Erosion Susceptibility Areas," Ord. No. 460, Article XV & Ord. No. 484

Impacts Identified in the General Plan EIR

The RCGP FEIR determined that buildout of the General Plan could result in less than significant impacts related to wind erosion hazards with mitigation implemented. Future development envisioned under the General Plan would result in the construction and occupation of structures and facilities in areas highly susceptible to wind erosion. The RCGP includes a policy requiring preparation of a study

addressing potential wind hazards and design requirements for structures in “High” and “Very High” wind erosion hazard zones. In addition, Riverside County Ordinance 484.2 establishes requirements for the control of blowing sand (RCGP FEIR Mitigation Measure 4.10.8). While these policies and existing regulations provide a foundation for reducing impacts, they do not fully address site-specific measures. Therefore, project-level mitigation requiring site-specific design features for structures and facilities in wind hazard zones has been identified. Implementation of the proposed policies, applicable County ordinances, and project-level mitigation measures would reduce potential wind erosion impacts to a less than significant level. (RCGP FEIR p. 4.10-44 et seq.)

Proposed Project Impacts

a) Wind Erosion and Blowsand

According to the Riverside County General Plan, the Project site is located in an area with “High” susceptibility to wind erosion (RCGP Figure S-8). During construction, existing vegetative cover would be removed, exposing soils and increasing the potential for wind-induced erosion and blowsand relative to existing conditions. The Project would be required to comply with SCAQMD Rule 403, which mandates implementation of best available dust control measures during earthmoving, grading, and construction equipment travel on unpaved roads.

Following development, soils on the Project site would be covered by impervious surfaces and landscaping, substantially reducing long-term exposure to wind compared with existing conditions. County Ordinance 484.2 does not apply because the Project site is not located within any of the three designated Agricultural Dust Control Areas (Mira Loma, Beaumont-Cherry Valley, or San Jacinto) where the ordinance’s special permit requirements are triggered.

With mandatory compliance with Rule 403, the potential for the Project to result in an increase in wind erosion and blowsand, either on- or off-site, would be less than significant. As a standard condition of Project approval, the Project will be required to comply with the site-specific recommendations contained in the geotechnical investigation prepared for the Project. The recommendations cover grading, soil removal, and recompaction activities; building foundation, floor slab, retaining wall, and paving design; shoring of excavations and trenches, and related topics. The Project would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

Applicable Regulatory Requirements

The Project is required to comply with the provisions of the SCAQMD Rule 403 "Fugitive Dust” and 403.1 “Supplemental Fugitive Dust Control Requirements for Coachella Valley Sources."[2] Rules 403 and 403.1 require implementation of best available dust control measures during construction activities that generate fugitive dust, such as earth moving, grading, and construction equipment travel on unpaved roads. To comply with Rule 403, and prior to grading permit issuance, the County of Riverside shall verify that notes are specified on the Project's grading plans requiring Rule 403 compliance. Project construction contractors would be required to ensure compliance with the notes and permit periodic inspection of the construction site by County of Riverside staff or its designee to confirm compliance. To comply with Rule 403:

- In order to limit fugitive dust emissions, all clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 miles per hour (mph) per SCAQMD guidelines.

[2] *Rule 403 Dust Control Information*. (2026). Aqmd.Gov. https://www.aqmd.gov/home/rules-compliance/compliance/rule-403-dust-control-information

- The construction contractor(s) shall ensure that all disturbed unpaved roads and disturbed areas within the Project site are watered at least three (3) times daily during dry weather. Watering, with complete coverage of disturbed areas, shall occur at least three (3) times a day, preferably in the mid-morning, afternoon, and after work is done for the day.
- The construction contractor(s) shall ensure that traffic speeds on unpaved roads and the Project site area are reduced to 15 miles per hour or less.

Section 15183 Finding

The RCGP FEIR was prepared at a program level, therefore a site-specific project-level assessment is required to determine Project impacts. A geotechnical investigation prepared for the Project (Appendix F), together with mandatory compliance with SCAQMD Rule 403 (and Rule 403.1) dust control requirements and standard County erosion control measures, demonstrates that potential wind erosion and blowsand impacts are less than significant.

The proposed Project is consistent with the applicable General Plan policies, the ECVAP, and the County's zoning regulations (M-SC zone). Because the Project implements the land use designation, zoning standards, and regulatory requirements previously analyzed in the RCGP FEIR, it would not result in peculiar effects, new or substantially more severe significant effects, or new off-site or cumulative impacts beyond those identified in the RCGP FEIR. For these reasons, the Project does not require additional environmental review under CEQA Guidelines section 15183.

GREENHOUSE GAS EMISSIONS Would the project:	Prior EIR Determination	Effect Peculiar to Project Site?	New Significant Effect?	New Significant Off-Site Cumulative Impact	New Information/ More Severe Impact?
20. Greenhouse Gas Emissions					
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	N/A	No	No	No	No
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	N/A	No	No	No	No

Source(s): Riverside County General Plan, Riverside County Climate Action Plan ("CAP"), Project California Emissions Estimator Model (CalEEMod), Greenhouse Gas Analysis, Urban Crossroads, (January 2025).

Impacts Identified in the General Plan EIR

The General Plan FEIR did not evaluate impacts related to greenhouse gas emissions as a standalone issue because the specific CEQA Appendix G questions concerning GHG emissions and climate change had not yet been added to the CEQA Guidelines at the time of the 2003 FEIR's preparation (they were incorporated in 2010). That does not, by itself, require additional CEQA review. Under CEQA Guidelines section 15183, a project consistent with the General Plan and zoning may rely on the certified RCGP FEIR unless the Project would have peculiar GHG impacts or other effects that meet the limited exceptions in section 15183(b). A project-level GHG evaluation was prepared to make that determination and to document consistency with the County of Riverside Climate Action Plan and applicable GHG thresholds. As discussed below, the Project would not result in peculiar GHG effects, new or substantially more severe significant GHG effects, or new off-site or cumulative GHG effects requiring additional environmental review under section 15183.

Proposed Project Impacts

a) Greenhouse Gas Emissions

Project Requirements
The proposed Project would be required to comply with regulations imposed by the State of California, the South Coast Air Quality Management District (SCAQMD), and the County of Riverside aimed at the reduction of air pollutant emissions. Those that are directly and indirectly applicable to the Project and that would assist in the reduction of GHG emissions include:

- Global Warming Solutions Act of 2006 (Assembly Bill [AB] 32).
- Regional GHG Emissions Reduction Targets/Sustainable Communities Strategies (Senate Bill [SB] 375).
- Pavley Fuel Efficiency Standards (AB 1493). Establishes fuel efficiency ratings for new vehicles.
- California Building Code (Title 24 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 percent(%) less by 2020.
- Statewide Retail Provider Emissions Performance Standards (SB 1368). Requires energy generators to achieve performance standards for GHG emissions.
- Renewable Portfolio Standards (RPS). Requires electric corporations to increase the amount of energy obtained from eligible renewable energy resources to 20% by 2010 and 33% by 2020. SB 350 mandated a 50% RPS by 2030. SB 100 increased the RPS requirements to
- 60% by 2030 with new interim targets of 44% by 2024 and 52% by 2027.
- 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 8-30-15.

Promulgated regulations that would affect the Project's emissions are accounted for in the proposed Project's GHG calculations provided in Greenhouse Gas Analysis prepared Urban Crossroads (Appendix G). In particular, AB 1493, LCFS, and RPS are accounted for in the Project's emission calculations.

GHG Thresholds
On December 5, 2008, the SCAQMD formally adopted a greenhouse gas significance threshold of 10,000 MTCO2e/yr that only applies to industrial uses' stationary sources where SCAQMD is the lead agency (SCAQMD Resolution No. 08-35). This threshold was adopted based upon an October 2008 staff report and draft interim guidance document that also recommended a threshold for all projects using a tiered approach.

It was recommended by SCAQMD staff that a project's greenhouse gas emissions would be considered significant if it could not comply with at least one of the following "tiered" tests:

- Tier 1: Is there an applicable exemption?
- Tier 2: Is the project compliant with a greenhouse gas reduction plan that is, at a minimum, consistent with the goals of AB 32?
- Tier 3: Is the project below an absolute threshold (10,000 MTCO2e/year for industrial projects; 3,000 MTCO2e/year for residential and commercial projects)?
- Tier 4: Is the project below a (yet to be set) performance threshold?
- Tier 5: Would the project achieve a screening level with off-site mitigation?

The County of Riverside is the lead agency for this Project. The County's Climate Action Plan uses a screening threshold of 3,000 MTCO2e per year for land use development. Projects below that level are considered less than significant for GHG and do not need to use the CAP Screening Tables or provide additional GHG mitigation. That 3,000 MTCO2e/year screening level is the same numeric value SCAQMD staff recommended under Tier 3 for residential and commercial projects. It is more conservative than SCAQMD's adopted 10,000 MTCO2e/year industrial stationary-source threshold, which applies only when SCAQMD is the lead agency. This analysis therefore applies the County CAP screening threshold of 3,000 MTCO2e/year, which is consistent with, and more stringent than, the applicable SCAQMD guidance.

Project Impacts

CalEEMod was used to quantify GHG emissions associated with the project. The California Air Pollution Control Officers Association (CAPCOA) in conjunction with other California air districts, including SCAQMD, released CalEEMod 2022 in May 2022. CalEEMod periodically releases updates, as such the latest version available at the time of preparation of the report was utilized in this analysis. 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 Appendix 4.1 of the Greenhouse Gas Analysis prepared by Urban Crossroads (Appendix G). CalEEMod includes GHG emissions from the following source categories: construction, area, energy, mobile, waste, water, and refrigerants.

Construction Emissions

Project construction activities would generate CO2 and CH4 emissions. The QCP Manufacturing Facility Air Quality Impact Analysis (Appendix A) report contains detailed information regarding Project construction activities. As discussed in the air quality report, construction-related emissions are expected from the following activities:

- Site Preparation
- Grading
- Building Construction
- Paving
- Architectural Coating

Construction Duration

Construction is expected to begin in August 2025 and conclude in November 2026, lasting approximately fifteen months. The construction schedule utilized in the analysis, shown in Table 9 represents a "conservative" analysis scenario should construction occur any time after the respective days since emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent. The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet as required per CEQA Guidelines.

Table 9
Construction Duration

Construction Activity	Start Date	End Date	Days
Site Preparation	8/1/2025	8/21/2025	15
Grading	8/22/2025	3/9/2026	142
Building Construction	3/10/2026	11/30/2026	190
Paving	8/25/2026	11/30/2026	70

Architectural Coating	8/25/2026	11/30/2026	70

Construction Equipment
Consistent with industry standards and typical construction practices, each piece of equipment listed in Table 10 is assumed to operate up to a total of eight (8) hours per day (except as noted below). It should be noted that the Project applicant has confirmed that the equipment list is reasonable for the Project's construction.

Table 10
Construction Equipment
Assumptions

Activity	Equipment	Number	Hours per Day
Site Preparation	Crawler Tractor	3	8
	Tractors/Loaders/Backhoes	4	8
Grading	Crawler Tractors	2	8
	Excavators	3	8
	Graders	2	2
	Rubber Tired Dozers	1	8
	Scrapers	2	8
Building Construction	Cranes	1	8
	Forklifts	4	8
	Generator Sets	3	8
	Tractors/Loaders/Backhoes	3	8
	Welders	1	8
	Pavers	2	8
Paving	Paving Equipment	2	8
	Rollers	2	8
Architectural Coating	Air Compressors	1	8

Construction Emissions Summary
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 11.

Construction activities will result in short-term GHG emissions associated with operation of construction equipment, employee commute, material hauling, and other ground disturbing activities. As shown in Table 11, the Project will generate 892.43 metric tons of CO2e during the 15-month construction period. There are currently no construction related GHG emission thresholds for projects of this nature. To determine if construction emissions will result in a cumulative considerable impact, GHG emissions were amortized over a 30-year period and added to annual operational emissions to be compared to applicable GHG thresholds (see Table 11, below).

Table 11
Amortized Annual Construction Emissions

Emissions (Metric Tons Per Year)	CO2	CH4	N20	Refrigerants	Total C02e
Year					
2025	343.10	0.01	0.00	0.04	344.75
2026	544.24	0.02	0.01	0.12	547.67
Total GHG Emissions	887.34	0.03	0.01	0.16	892.43
Amortized Construction Emissions	**29.58**	**0.00**	**0.00**	**0 0.01**	**29.75**

Operational Emissions

Operational activities associated with the Project would result in emissions of CO2, CH4, N2O, and refrigerant emissions from the following primary sources:

Mobile Sources: GHG emissions will result from mobile sources associated with the Project, which include the typical daily operation of motor vehicles by employees and visitors. Project mobile source air quality impacts are dependent on both overall daily vehicle trip generation and the effect of the project on peak hour traffic volumes and traffic operations in the local vicinity.

Area Sources: 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 developed site.

Energy Sources: GHGs are emitted from buildings as a result of activities for which electricity and natural gas are typically used as energy sources. Combustion of any type of fuel emits CO2 and other GHGs directly into the atmosphere; these emissions are considered direct emissions associated with a building. GHGs are also emitted during the generation of electricity from fossil fuels; these emissions are considered to be indirect emissions.

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.

Solid Wastes: The proposed land uses will result in the generation and disposal of solid waste. A large percentage of this waste will 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 will 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 the CalEEMod model using default parameters

Emissions Summary

As noted previously, the Project proposes to relocate the existing manufacturing facility from the City of Norco to the unincorporated community of Thermal, and it is anticipated that operations would not differ significantly at the new facility. The estimated Project-related GHG emissions are summarized in Table 12. As shown in the table, construction and operation of the proposed Project would generate a total of 1,018.61 $MTCO_2e$ annually. After subtracting emissions from the existing Norco location, net emissions would be approximately −492.43 $MTCO_2e$ per year.

Table 12
Project GHG Emissions

Emissions (Metric Tons Per Year)	CO2	CH4	N2O	Refrigerants	Total CO2e
Annual construction-related emissions amortized over 30 years	29.58	0.00	0.00	0 0.01	29.75
Mobile Source	599.03	0.01	0.04	0.93	611.51
Area Source	1.38	0.00	0.00	0	1.39
Energy Source	0	0.00	0.00	0	0.00
Water Usage	21.73	0.71	0.02	0	44.71
Waste	10.48	1.05	0	0	36.68
Refrigeration	0	0	0	1.47	1.47
On-Site Equipment	292	0	0	0.00	293.11
Total CO2e (All Sources)	**1,018.61**				
Existing	-1,511.04				
Net Emissions (Proposed − Existing)	**-492.43**				

Source: Table 4-6, Project Greenhouse Gas Analysis. Appendix G.

Small Projects Screening
The County Guidelines identify two screening criteria that may apply to "small projects." The first is a vehicle trip threshold of 110 trips per day. Based on the QCP Trip Generation Assessment (Appendix M), the Project is estimated to generate 210 vehicle trip-ends per day, which exceeds this threshold.

The second criterion provides that land use projects generating GHG emissions below 3,000 metric $MTCO_2e$ per year are anticipated to result in a less than significant VMT impact. Consistent with the QCP Manufacturing Facility Greenhouse Gas Analysis (Appendix G), the Project is forecast to generate 1,018.61 $MTCO_2$, and a net reduction of 492.43 $MTCO_2e$ per year, which is well below the 3,000 $MTCO_2e$ threshold.

Accordingly, the small projects screening criteria are met, and the Project's impact with respect to GHG emissions is less than significant. No mitigation is required. The Project would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

b) Conflict with GHG Reduction Plan, Policy or Regulation

As previously stated, 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 the 2022 Scoping Plan is discussed below. It should be noted that the Project's consistency 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 and 2017 Scoping Plan is not necessary since both of these plans have been superseded by the 2022 Scoping Plan. For reasons outlined herein, the proposed Project would result in a less than significant impact with respect to GHG emissions conflicting with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs.

2022 Scoping Plan Consistency
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 will comply with (through vehicle manufacturer compliance) include: Advanced Clean Cars II, Advanced Clean Trucks, Advanced Clean Fleets, Zero Emission Forklifts, Off-Road Zero-Emission Targeted Manufacturer Rule, Clean Off-Road Fleet Recognition Program, Amendments to the In-use Off-Road Diesel-Fueled Fleets Regulation, carbon pricing through the Cap-and-Trade Program, and the Low Carbon Fuel Standard. As such, the Project would be consistent with the 2022 Scoping Plan.

Riverside County Climate Action Plan
The County of Riverside adopted the 2019 Climate Action Plan (CAP) Update as a roadmap for achieving community-wide greenhouse gas (GHG) emissions reductions consistent with State targets. The CAP establishes an emissions inventory, reduction targets, and a suite of strategies focused on land use and transportation, energy efficiency, renewable energy, and waste reduction. It also provides a CEQA streamlining mechanism for evaluating and mitigating GHG emissions from new development.

Under the 2019 CAP, projects generating less than 3,000 $MTCO_2e$ per year are considered "small projects" and are presumed to result in a less than significant GHG impact without the need for Screening Tables or a project-specific technical analysis (provided basic efficiency measures are incorporated). As documented in the Project's Greenhouse Gas Analysis (Appendix G), the Project would generate 1,018.61 $MTCO_2$, and a net reduction of approximately 492.43 $MTCO_2e$ per year after accounting for the elimination of emissions from the existing Norco location. This net reduction is well below the CAP's 3,000 $MTCO_2e$ screening threshold.

Accordingly, the Project is consistent with the County's CAP. With implementation of Project design features and adherence to applicable regulations, the Project would not conflict with the CAP, and GHG emissions impacts would be less than significant. The Project would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

Section 15183 Finding
A greenhouse gas analysis prepared for the Project demonstrates that all potential impacts related to GHG emissions would be less than significant. The Project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment, nor would it conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing greenhouse gas emissions.

The proposed Project is consistent with the applicable General Plan policies, the ECVAP, and the County's zoning regulations (M-SC zone). Although the RCGP FEIR was certified in 2003 and therefore did not analyze greenhouse gas emissions (which were not a required CEQA topic at that time), the current project-level analysis confirms that GHG impacts would be less than significant and that the Project is consistent with the County's adopted greenhouse gas reduction goals and strategies. Consequently, the Project would not result in peculiar effects, new significant effects, or substantially more severe effects related to greenhouse gas emissions, and no new information of substantial importance has been identified that would require additional environmental review. Therefore, the Project does not require further environmental review pursuant to CEQA Guidelines Section 15183.

HAZARDS AND HAZARDOUS MATERIALS Would the project:	Prior EIR Determination	Effect Peculiar to Project Site?	New Significant Effect?	New Significant Off-Site Cumulative Impact	New Information/ More Severe Impact?
21. Hazards and Hazardous Materials a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	LTS	No	No	No	No
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?	LTS	No	No	No	No
c) Impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan?	LTS	No	No	No	No
d) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter (1/4) mile of an existing or proposed school?	LTS	No	No	No	No
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?	LTS	No	No	No	No

Source(s): Project Application Materials; Phase II ESI, QCP Facility Plot Plan, Coachella Valley Engineers, (January 2025) with reference to Phase I ESA, Nova Group, (May 2024) within.

Impacts Identified in the General Plan EIR

According to the RCGP FEIR, an impact related to hazardous materials compliance is considered significant if the exposure of people or the environment to hazardous materials is in excess of federal, State, or local regulatory standards. (p. 4.11-5)

The RCGP FEIR determined that buildout of the General Plan would result in less than significant impacts related to hazardous materials and hazardous waste. While there is a potential for encountering previously unknown contamination during future development, existing federal, state, and local regulations and procedures would require appropriate remediation. The RCGP would also introduce new land uses that may use or generate hazardous materials and waste. However, compliance with applicable EPA, State, County, and local regulations and standards governing the storage, use, transport, and disposal of hazardous materials would reduce potential risks to a less than significant level. The General Plan includes policies that enforce the County's Hazardous Waste Management Plan (Safety Policy 6.1). Therefore, potential impacts related to the use, generation, handling, and disposal of hazardous materials would be less than significant, and no additional mitigation is required. (RCGP FEIR pp. 4.11-5 et seq.)

Proposed Project Impacts

a) Transport, Use, or Disposal of Hazardous Materials

During Project construction, heavy equipment (e.g., dozers, excavators, and tractors) would operate on the subject property. This equipment would be fueled and maintained with 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 present on the Project site. Improper use, storage, or transportation of hazardous materials can result in accidental releases or spills that could pose health risks to workers, the public, and the environment. This is a standard risk on all construction sites, and the proposed Project would not present a greater risk of improper handling, transportation, or spills than any other similar construction site, because standard construction is proposed. 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 requirements imposed by the U.S. Environmental Protection Agency (EPA), California Department of Toxic Substances Control (DTSC), South Coast Air Quality Management District (SCAQMD), and Regional Water Quality Control Board (RWQCB). With mandatory compliance with these regulations, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials during construction, and impacts would be less than significant.

During long-term operations, the proposed Project would include a concrete fabrication facility, warehouse, office, and open storage area. Operations would involve the use of limited quantities of chemicals such as cleaning and degreasing solvents, paints, varnishes, and similar materials. These materials would be transported to and stored on the Project site in limited quantities that would not require a hazardous materials handling or storage permit. The proposed Project would not result in a significant risk of explosion or accidental release of hazardous substances because the materials used are not explosive and would not be stored in large quantities. Use and handling of hazardous materials during both construction and long-term operation would occur in accordance with applicable federal, State, and local laws, including California Occupational Safety and Health Administration (Cal/OSHA) requirements.

Adherence to these federal, State, and local requirements for the management of hazardous materials and wastes would ensure consistency with RCGP Safety Policy 6.1, which requires compliance with federal and State laws pertaining to the management of hazardous wastes and materials. Impacts would be less than significant. The Project would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

b) Accidental Release of Hazardous Materials

A Phase II Environmental Site Investigation (ESI) (Appendix H) was prepared for the Project site in January 2025. The Phase II ESI summarizes the findings of the Phase I Environmental Site Assessment (ESA) completed by Nova Group in May 2024.

According to the historical research presented in the Phase I (and summarized in the Phase II), the subject property consisted of undeveloped land with an apparent rural-residential building in the northwest corner from at least 1938 until the early 1950s, when agricultural activities began. By the late 1970s to early 1980s, the rural-residential building was removed and the property transitioned to vacant land. The site remained vacant until the late 2000s, when rowed palm trees were planted. Based on the review of historical information, no prior uses of the subject property were identified that would be expected to result in a recognized environmental condition (REC).

Although residual agricultural chemicals may be associated with the former agricultural use of the subject property, typical site development practices (including topsoil stripping) are expected to remove any such residuals if present. The Phase I recommended preparation of a Phase II ESI to sample and evaluate the Project site for pesticides (EPA Method 8081A), arsenic (EPA Method 6010B), and metals (Acid Digestion, EPA Method 3050B).

The Phase II was conducted in accordance with "Interim Guidance for Sampling Agricultural Properties," California Department of Toxic Substances Control (DTSC). The Phase II Investigation sampled and evaluated the Project site for Pesticides via EPA 8081A, Arsenic via EPA 601OB and Metals Acid Digestion EPA 3050B.

Current and Prior Agricultural Activity
All fourteen soil samples contained detectable concentrations of DDE, a persistent breakdown product of DDT, at low levels. These concentrations are not considered immediately dangerous to life or health. Residual DDE and related compounds are common in the southern Coachella Valley due to historical agricultural use of DDT prior to its 1972 ban. The subject property's history of row crop farming from the early 1950s through the late 1970s or early 1980s, followed by a long period of abandonment, is consistent with the low residual levels detected. Standard construction practices such as watering, grading, solar exposure, over excavation, and finish grading are expected to further reduce any remaining concentrations. As a precautionary measure, confirmatory soil samples could be collected from building pad centers after finish grading. However, given the low levels encountered, this step does not appear necessary for the proposed industrial Project, and no further investigation is necessary. Detailed sampling results and analysis are provided in the Phase II ESI (Appendix H).

Arsenic
All samples tested showed arsenic at levels less than 1.0 mg/kg. This is below the range of naturally occurring arsenic concentrations typically found in Coachella Valley farming areas (0.1 to 40 mg/kg). No further investigation is necessary.

Metals Acid Digestion
No samples tested above reported limits. No further investigation necessary.

Conclusion
Based on the Phase I and Phase II findings, residual concentrations of agricultural chemicals and arsenic on the Project site are low and do not pose a significant hazard to human health or the environment. Standard construction practices are expected to further reduce any remaining residuals. No further investigation or remediation is required. Compliance with applicable federal and State requirements for the investigation and management of potential residual hazardous materials (including DTSC guidance) ensures consistency with RCGP Safety Policy 6.1, which requires the County to comply with federal and State laws pertaining to the management of hazardous wastes and materials. Impacts related to hazardous materials would be less than significant. The Project would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

c) Emergency Response Plan

The Project site does not contain any emergency facilities and does not serve as an emergency evacuation route. Under long-term operational conditions, the Project would be required to maintain adequate on-site emergency access for emergency vehicles in accordance with County requirements.

The Project would not alter the existing public street system in its vicinity. The Project would construct frontage improvements along Avenue 54, including AC pavement, driveway, sidewalk, curb, and gutter. These improvements would occur within existing and planned public rights-of-way, would be designed

and constructed in accordance with Riverside County roadway standards, and would be subject to County review and approval. All Project driveways would be stop-sign controlled, and sight distances would be reviewed by the County at the building permit stage to ensure compliance with minimum safety standards. These roadway improvements are beneficial and consistent with County policy, and they would enhance rather than impair access and would not substantially alter the design or capacity of any public road in a manner that would interfere with emergency response or evacuation procedures.

The Project would provide adequate emergency access both during temporary construction activities within the public right-of-way and at buildout. The types of traffic generated by the Project would be compatible with existing traffic on area roadways, and no hazardous transportation design features would be introduced. Because the Project would maintain adequate emergency access, implement beneficial frontage improvements consistent with County standards, and would not interfere with an adopted emergency response or evacuation plan, no impact would occur. The Project would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

d) Hazardous Material Within Proximity of a School

The nearest school facility to the Project site is Coachella Valley High School, located approximately 1.4 miles southwest of the Project site. As discussed under Thresholds 21(a) and (b), the transport of hazardous substances or materials to and from the Project site during construction and long-term operational activities would be required to comply with applicable federal, State, and local regulations. These requirements preclude substantial public safety hazards. Accordingly, there would be no potential for existing or proposed schools to be exposed to substantial safety hazards associated with the routine transport of hazardous substances or materials to and from the Project site.

The proposed Project would result in the development of light industrial space, which is not expected to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste in quantities or in a manner that would jeopardize nearby schools. Compliance with applicable federal, State, and local regulations governing the management of hazardous materials ensures consistency with Riverside County General Plan Safety Policy 6.1, which requires compliance with federal and State laws pertaining to the management of hazardous wastes and materials. No impact would occur. The Project would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

e) Hazardous Sites

The Project site is currently vacant and is not listed on the DTSC Hazardous Waste and Substances Sites List (EnviroStor). As part of the Phase I ESA, Nova Group reviewed regulatory databases and available agency files and records for the site. An American Society for Testing and Materials (ASTM) radius search was performed by Environmental Data Resources (EDR) to determine whether the Project site is identified as a hazardous materials site pursuant to Government Code Section 65962.5. The EDR regulatory database search, which obtains updated environmental information from standard federal, State, and tribal sources, determined that no hazardous materials or waste sites are located on or near the Project site, and the site is not included on a list compiled pursuant to Government Code Section 65962.5. The proposed Project would not create a significant hazard to the public or the environment. No impact would occur. The Project would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

<u>Section 15183 Finding</u>
The RCGP FEIR was prepared at a program level, therefore a site-specific project-level assessment is required to determine Project impacts. A Phase I ESA and Phase II ESI were prepared for the Project,

and the project-level analysis demonstrates that all potential impacts related to hazards and hazardous materials would be less than significant. Specifically, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials; would not create a significant hazard through reasonably foreseeable upset and accident conditions involving the release of hazardous materials; would not impair implementation of or physically interfere with an adopted emergency response or evacuation plan; would not emit hazardous emissions or handle hazardous materials within one-quarter mile of an existing or proposed school; and would not be located on a site included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 that would create a significant hazard to the public or the environment.

The proposed Project is consistent with the applicable RCGP policies (including Safety Policy 6.1), the ECVAP, and the County's zoning regulations (M-SC zone). Safety Policy 6.1 requires compliance with federal and State laws pertaining to the management of hazardous wastes and materials. The Project's adherence to all applicable federal, State, and local hazardous materials regulations ensures consistency with this policy. Because the Project implements the land use designation, zoning standards, and hazards/hazardous materials requirements of these plans, and because project-level analysis confirms less than significant impacts, the Project would not result in significant environmental effects. As such, the Project would not result in peculiar effects, new or substantially more severe significant effects, or new off-site or cumulative effects, and no new information of substantial importance has been identified that would result in a more severe impact than analyzed in the RCGP FEIR. Therefore, the Project does not require additional environmental review pursuant to CEQA Guidelines Section 15183.

	Prior EIR Determination	Effect Peculiar to Project Site?	New Significant Effect?	New Significant Off-Site Cumulative Impact	New Information/ More Severe Impact?
22. Airports					
a) Result in an inconsistency with an Airport Master Plan?	LTS	No	No	No	No
b) Require review by the Airport Land Use Commission?	LTS	No	No	No	No
c) For a project located within an airport land use plan or, where such a plan has not been adopted, within two (2) miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	LTS	No	No	No	No
d) For a project within the vicinity of a private airstrip, or heliport, would the project result in a safety hazard for people residing or working in the project area?	LTS	No	No	No	No

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

Impacts Identified in the General Plan EIR

The RCGP FEIR did not evaluate "Airports" as a standalone environmental issue. Instead, the FEIR addressed the underlying intent of the Airports questions (inconsistency with Airport Master Plans, Airport Land Use Commission review, and safety hazards) within the Land Use and Agricultural Resources section.

The General Plan FEIR concluded that impacts related to airports would be less than significant. With respect to airport land use plans, the FEIR acknowledged that future growth and development could create pressure for urban encroachment near airports. However, the General Plan and the associated Area Plans identify airport-influenced areas and include specific policies to protect flight paths, minimize land-use conflicts, and safeguard residents and employees. As a program-level document, the RCGP FEIR did not analyze site-specific factors such as exact distances to airports, public use airports or private airstrips. Therefore, individual projects will require project-level review, including any necessary consistency determinations with Airport Master Plans and review by the Airport Land Use Commission where applicable, to ensure no safety hazards for people residing or working in the project area. No additional mitigation measures were required at the General Plan level. (RCGP FEIR p. 4.2-14 et seq.)

Proposed Project Impacts

a) Airport Master Plan

The Project site is located within "Compatibility Zone D" of the Jacqueline Cochran Regional Airport Master Plan (JCRA) Influence Area and is therefore subject to the JCRA Land Use Compatibility Plan (ALUCP). Within Compatibility Zone D, there is no limitation of intensity per acre of non-residential development. Although no explicit upper limit on usage intensity is defined for Zone D, land uses that attract very high concentrations of people in confined areas are discouraged in locations below or near the principal arrival and departure flight tracks. The proposed Project is consistent with this limitation, insofar as no concentration of people would occur, and therefore impacts are less than significant. The Project would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

b, c) ALUC Review, Proximity to Airport

The Project is subject to review by the Airport Land Use Commission (ALUC) to determine consistency with the JCRA ALUCP. As described in Threshold 22.a. above, the proposed Project does not entail any uses prohibited or discouraged in Compatibility Zone D and would not create a hazard. The Project was forwarded to Airport Land Use Commission (ALUC) for review on April 10, 2025. ALUC staff determined that the Project is located outside the Airport Influence Area (AIA) and further review by the Airport Land Use Commission (ALUC) is not required.[3] Therefore, impacts are less than significant, and the Project would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

d) Vicinity of Airstrip

There are no private airport facilities or heliports within the vicinity of the Project site. 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. The Project would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

Section 15183 Finding

The RCGP FEIR was prepared at a program level, therefore a site-specific project-level assessment is required to determine Project impacts. The project-level analysis demonstrates that all potential impacts related to airport land use compatibility are less than significant. The Project site is located within Compatibility Zone D of the JCRA Influence Area and is subject to the JCRA Land Use Compatibility Plan. The Project would not result in an inconsistency with the Airport Master Plan, would not require

[3] County of Riverside Planning Department Director's Hearing Report, Agenda Item No. 2.1 (ID #30431), Meeting Date: Monday, May 18, 2026, page 14.

additional review by the Airport Land Use Commission beyond standard compliance, would not result in a safety hazard for people residing or working in the project area, and is not located within the vicinity of a private airstrip or heliport.

The proposed Project is consistent with the applicable General Plan policies, the ECVAP, and the County's zoning regulations (M-SC zone). Because the Project implements the land use designation, zoning standards, and airport land use compatibility requirements of these plans previously analyzed in the RCGP FEIR, it would not result in significant environmental impacts. As such, the proposed Project does not have peculiar effects, new or substantially more severe significant effects, new off-site or cumulative effects, and no new information of substantial importance has been identified that would result in a more severe impact than analyzed in the RCGP FEIR. Therefore, the Project does not require additional environmental review pursuant to CEQA Guidelines Section 15183.

HYDROLOGY AND WATER QUALITY Would the project:					
	Prior EIR Determination	Effect Peculiar to Project Site?	New Significant Effect?	New Significant Off-Site Cumulative Impact	New Information/ More Severe Impact?
23. Water Quality Impacts					
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	LTSM	No	No	No	No
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	SU	No	No	No	No
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?	LTSM	No	No	No	No
d) Result in substantial erosion or siltation on-site or off-site?	LTS	No	No	No	No
e) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-site or off-site?	LTSM	No	No	No	No
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?	LTSM	No	No	No	No
g) Impede or redirect flood flows?	LTSM	No	No	No	No
h) In flood hazard, tsunami, or seiche zones, risk the release of pollutants due to project inundation?	LTS	No	No	No	No
i) Conflict with or obstruct implementation of a water quality control	LTSM	No	No	No	No

plan or sustainable groundwater management plan?

Source(s): Riverside County General Plan Figure S-9 "Special Flood Hazard Areas," Figure S-10 "Dam Failure Inundation Zone," Riverside County Flood Control District Flood Hazard Report/ Condition, GIS database; Preliminary Water Quality Management Plan, Quick Crete Products Manufacturing Facility, prepared by Coachella Valley Engineers. January 2026; Preliminary Hydrology Study for Quick Crete Products Manufacturing Facility, prepared by Coachella Valley Engineers. January 2026.

Impacts Identified in the General Plan EIR

The RCGP FEIR assessed impacts associated with water supply, water quality, and flooding, as discussed below.

Water Supply

The effects of the RCGP on existing or planned water supplies are considered to be significant if:

- The water demand of the RCGP substantially reduces water supplies and/or exceeds existing or planned supplies;
- Consumption of groundwater is in conflict with a groundwater management plan, monitoring program, and/or proposes groundwater extraction that either individually or cumulatively exceeds the safe yield of the groundwater basin and/or causes a net deficit in the aquifer volume or reduction in the local groundwater table level;
- It will threaten or damage unique hydrologic characteristics or will change hydrologic baseline conditions over an extensive area or period of time, so that resultant conditions are highly controversial, highly uncertain, or involve unique or unknown risks;
- The area available for aquifer recharge is reduced, substantially interfering with the process of groundwater recharge; and/or
- It will reduce water availability to, or interfere with, existing users and/or the production of existing wells.

The RCGP FEIR determined that buildout of the General Plan would result in significant and unavoidable impacts related to water supply. While the RCGP includes policies that consider water supply issues, encourage water conservation measures, and reduce or minimize potential effects, these policies do not assure the provision of water supplies adequate to support development that may occur as a result of RCGP implementation, nor do they fully address project-specific water supply impacts. Impacts associated with water supply can be further reduced (though not to a less than significant level) through implementation of project-level water supply assessments that meet certain thresholds (RCGP FEIR Mitigation Measures 4.17.1A and 4.17.1B). Adherence to General Plan policies would also reduce potential impacts to groundwater supply; however, it remains uncertain whether sufficient water supplies are available to accommodate the development envisioned in the Plan. Mitigation measures, such a requiring construction of replacement recharge facilities, would further reduce this impact, but significant impacts could remain. (RCGP FEIR p. 4.17-15 et seq. and 4.17-23 et seq.)

While the RCGP includes policies that support or offer incentives to minimize effects on groundwater recharge and the interruption of hydrologic processes, these policies do not include specific measures to limit or replace lost groundwater recharge capacity, nor do they provide a mechanism to evaluate how development may alter the hydrologic process. Implementation of mitigation measures, such as requiring new development with more than one acre of impervious surface to incorporate on-site infiltration features such as natural drainage systems, detention basins, or porous areas, subject to review prior to grading permits (RCGP FEIR Mitigation Measure 4.17.3A), would reduce potential groundwater recharge impacts and impacts to the hydrologic process to a less than significant level. (RCGP FEIR p. 4.17-24 and 4.17-27 et seq.)

Water Quality

The effects of the RCGP on existing or planned water quality are considered to be significant if:

- It results in the deterioration of the quality of drinking water or a drinking water source;
- The quality of a ground or surface water resource is degraded below the standard established by local/regional water purveyors and/or regulatory agencies; and/or
- It would result in a degradation in water quality (as determined by local/regional water purveyors and/or regulatory agencies) such that an existing use or planned use could no longer be supported.

The RCGP FEIR determined that buildout of the General Plan would result in less than significant impacts related to water quality with mitigation. While the RCGP includes policies that encourage the use of innovative and creative techniques and the consideration of wetlands for water treatment to reduce or minimize potential water quality impacts, these policies do not provide concrete or specific requirements sufficient to reduce impacts below a level of significance. Therefore, mitigation measures have been identified requiring adherence to applicable septic system standards (RCGP FEIR Mitigation Measure 4.17.5A), point source pollution programs (RCGP FEIR Mitigation Measure 4.17.5B), preparation and approval of water quality analyses where development may worsen ground or surface water quality (RCGP FEIR Mitigation Measures 4.17.5C and 4.17.5D), verification of impact-limiting measures, and consideration of principles and policies promoting natural drainages, best management practices, pervious materials, detention features, open space retention, and other controls during construction and operation (RCGP FEIR Mitigation Measure 4.17.5E). Adherence to these measures would reduce potential water quality impacts to a less than significant level. (RCGP FEIR p. 4.17-29)

Flooding
Implementation of the RCGP from flooding and dam inundation shall be considered to cause significant impacts if it:

- Considerably alters existing drainage patterns such that substantial changes to streamflow velocities, erosion patterns, or siltation would occur;
- Creates or contributes runoff that would exceed the capacity of existing or planned stormwater drainage systems;
- Places housing within a 100-year flood hazard zone; and/or
- Exposes people or structures to a significant risk of loss, injury, or death involving flooding or dam inundation.

The RCGP FEIR determined that buildout of the General Plan would result in less than significant impacts related to erosion and sedimentation. While development within Riverside County has the potential to increase the risk of erosion and sedimentation and/or siltation of surface water due to short-term disturbance of large quantities of earth during construction and/or possible increases in erosion in areas of new construction, existing regulations would reduce these risks. Each new development would be required to adhere to applicable provisions of County Ordinance 754.1 (Stormwater/Urban Runoff Management and Discharge Controls), follow Best Management Practices (BMPs), obtain and comply with appropriate building permits, and obtain and comply with NPDES permits. Therefore, potential impacts related to erosion and sedimentation would be less than significant, and no additional mitigation is required. (RCGP FEIR p. 4.17-14 et seq.)

The RCGP FEIR determined that buildout of the General Plan would result in less than significant impacts related to drainage facilities, stormwater runoff, flood hazards, and dam inundation with implementation of mitigation measures. The RCGP includes policies that reduce or minimize the effects of prospective growth on existing drainage facilities by providing incentives to preserve natural watercourses and/or direct storm waters away from existing and planned development in drain systems to protect people, property, and riparian habitats. These policies, however, do not fully address Letter

of Map Amendment (LOMA) or Letter of Map Revision based on fill (LOMR-F) procedures, floodway alteration requirements, or certain land uses that may not require flood control. In conjunction with the policies, identified mitigation measures would reduce impacts associated with stormwater runoff and flood hazards to a less than significant level. (RCGP FEIR pp. 4.9-10 et seq.)

RCGP Policies also prohibit and/or limit development in flood-prone areas, such that risks associated with placing habitable structures and housing within a 100-year flood hazard would not be significantly adverse. The FEIR identified additional mitigation measures to further ensure that impacts from placing housing in or near a floodplain are reduced to a less than significant level. (RCGP FEIR pp. 4.9-13 et seq.) Policies that prohibit and/or limit development in dam inundation areas would similarly reduce effects so that future development would not result in significant adverse impacts from dam inundation hazards, and no additional mitigation is required.

Proposed Project Impacts

a) Groundwater Quality

The Project site is located in the Whitewater River watershed which drains into the Salton Sea and is part of the larger Colorado River Watershed. All water providers in the watershed are required to comply with Regional Water Quality Control Board (RWQCB) standards for the protection of water quality, including the preparation of site-specific Water Quality Management Plans (WQMPs) for surface waters. The proposed Project will generate demand for domestic water and wastewater, which will be governed by the Coachella Water Authority (CWA) standard requirements. Construction of on-site connections will be subject to all CWA requirements. The proposed Project will not violate water quality standards or waste discharge requirements.

Pursuant to the County's National Pollutant Discharge Elimination System (NPDES) permit and in accordance with the Riverside County Code Section 13.12.060(C), the Project prepared a site-specific Preliminary WQMP (Appendix I). The WQMP is a post-construction water quality management program designed to minimize the release of potential waterborne pollutants, including pollutants of concern for downstream receiving waters, under long-term conditions via Best Management Practices (BMPs).

The QCP manufacturing facility will consist of a single building of 88,400 SF housing space for administrative, manufacturing, and warehouse functions. The site will also contain exterior areas for parking, a concrete batch plant for manufacturing purposes, finished product storage area, concrete mold storage area, and retention basins. The surfacing for all non-landscaped areas, except for the retained date palm groves, will be either asphalt concrete (drive aisles and parking area) or concrete, except for the concrete mold storage area which will be aggregate surface consisting of crushed miscellaneous base (CMB) materials.

The WQMP prepared for the QCP Project covered the full site development, excluding two areas that are being deemed as self-retaining and non-improved, as no expansion is currently being anticipated for the non-improved areas. The two non-improved areas of the site are located along the west side of the site at the north end and along the southern property line (outside of the two retention basins) and will be retained as date groves. The Project has been designed to direct stormwater runoff to either of the two proposed retention basins.

The site plan proposes to drain all stormwater runoff to one of two retention basins located just north of the south property line. Stormwater runoff will be conveyed to either the east or west retention basin via a storm drain system or sheet flow. The onsite retention basins have been sized in accordance with County Standards to retain the worst case 100-year event, plus a one-foot freeboard. In general, the western half of the site will drain to the western retention basin, and the eastern half to the east basin, except for Avenue 54 stormwater runoff, which will all be routed to the eastern basin.

Implementation of the WQMP ensures on-going, long-term protection of the watershed basin. The final approved WQMP will include a complete copy of the final Conditions of Approval from the County. Because compliance with an applicable WQMP is a required condition of approval for all development proposals, and long-term maintenance of on-site water quality features would be required by the County to ensure their long-term effectiveness, compliance with the site specific WQMP would ensure that water quality impacts associated with post-development conditions at the Project site and long-term operation of the Project would be less than significant. Therefore, both during construction and the long-term use of the Project site as a concrete product manufacturing facility would not violate any water quality standards or waste discharge requirements and impacts would be less than significant. The Project would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

b) Groundwater Supplies

The Project would not install any water wells; therefore, the Project would not directly extract groundwater from the Coachella Valley Groundwater Basin. The Project would install impervious surfaces on the site and increase the impervious surface cover of the site, which could reduce the amount of water percolating down into the groundwater basin that underlies the Project area. However, approximately 60% of the Project site will remain as open space and pervious areas, not covered with impervious surfaces. This includes existing date palms, grass, landscaping and detention basins which provide for filtering stormwater as it percolates into the ground, eliminating potential adverse effects related to groundwater recharge. Therefore, with buildout of the Project, the local groundwater levels would not be adversely affected and impacts to groundwater supplies and recharge would be less than significant. The Project would comply with County requirements for surface water protection, as described above, and would not impact groundwater quality. The Project would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

c) Alter Drainage Patterns

As described under (a) above, the Preliminary Grading Plan for the Project shows that offsite drainage will be directed through the project to the proposed eastern retention basin, while onsite drainage will be directed to one of two onsite retention basins, contained within a bermed existing permeable date grove.

Existing Drainage
The Proposed Project site is relatively flat and contains no rivers or streams. The Project site consist of planted date trees with existing site drainage that is conveyed as surface flow in a southeasterly direction. Development of the proposed Project will increase impermeable surfaces on-site and therefore increase on-site storm flows.

Proposed Drainage System
Per County of Riverside requirements, the Project shall retain all surface runoff in on-site retention basins. The basins must be designed to retain runoff from the worst-case 100-year storm, and there shall be no standing water in the basins more than 72 hours after any storm event. The Project proposes two on-site stormwater retention basins in the southern portion of the site (one on the south side and one on the east side). A preliminary hydrologic study dated January 16, 2026 (Appendix J) demonstrates that both basins meet County standards for capacity, freeboard, and drainage time. These design features ensure that impacts associated with stormwater retention would remain less than significant.

Summary
The Proposed Project will be required to comply with the County's storm water retention requirements, including the approval of a project-specific final hydrology study and water quality management plan prior to the issuance of building permits. Implementation of these and other applicable requirements will assure that the project will not create or contribute water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. The Project's Plot Plan application materials, which include a conceptual grading plan, show the details of the Project's storm water and water quality infrastructure system. Because the Project would not substantially alter the existing drainage pattern of the site or area, impacts would be less than significant. The Project would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

d) Erosion or Siltation

Implementation of the Project has the potential to result in soil erosion and/or siltation on- or offsite. The analysis below summarizes the likelihood of the Project to result in substantial soil erosion during temporary construction activities and under long-term operation of the Project.

Temporary Construction-Related Activities
Grading and construction would expose soils that could be subject to erosion from rainfall or high winds. Because the Project would disturb more than one acre, the applicant must obtain coverage under the State Water Resources Control Board's Construction General Permit (NPDES) and prepare a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP will identify BMPs to control erosion and prevent sediment from leaving the site in stormwater or non-stormwater discharges. Construction activities must also comply with SCAQMD Rule 403, which limits dust and dirt from leaving the construction site. With mandatory compliance with the SWPPP and Rule 403, water and wind erosion impacts during construction would be less than significant, and no mitigation is required.

Long-Term Operational Activities
After construction, most disturbed areas would be covered by landscaping or impervious surfaces, and drainage would be controlled by an on-site storm drain system. In accordance with the County's MS4 NPDES Permit and Riverside County Ordinance No. 754, the applicant must prepare and implement a WQMP. The WQMP (Appendix I) will incorporate BMPs that remove silt and sediment from stormwater runoff and will include long-term maintenance requirements. Compliance with the Project-specific WQMP will be required as a condition of Project approval. With the implementation of these measures, the Project would not result in substantial erosion or siltation on- or off-site, and impacts would be less than significant.

The Project would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

e) Surface Run-Off Flooding

See the analysis under Thresholds 23 (a) (c) and (d) that describes the potential for stormwater runoff, and the proposed storm drain system and retention basin.

The Project's on-site drainage design will provide flood protection for the proposed facility. The retention basins will adequately capture on-site flows and mitigate increased runoff. Off-site drainage improvements will protect the Project site from regional external flows and ensure the Project does not worsen flooding conditions on upstream or downstream properties. Because the Project would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site, impacts would be less than significant. The Project would not result in peculiar effects, new

or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

f) Stormwater Run-Off

The Project's stormwater plan is described in Thresholds 23 (a) (c) and (d). Adequate capacity exists in the existing and planned stormwater drainage system to service the Project. Therefore, because the Project would not create runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff through the implementation of County requirements, impacts would be less than significant.

The Project would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

g) Impede or Redirect Flows

As discussed under Thresholds 23 (a), (c), and (d), the Project's on-site drainage design will provide flood protection for the proposed facility. The retention basins will adequately capture and treat on-site flows and mitigate increased runoff. Off-site drainage improvements will protect the Project site from external flows and ensure the Project does not worsen flooding conditions on upstream or downstream properties. Because the Project would not impede or redirect flood flows, impacts would be less than significant.

The Project would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

h) Flood Hazard, Tsunami, Seiche Zones

According to FEMA mapping, the Project site is located within Zone X, an area of minimal flood hazard (FEMA FIRM Map No. 06065C2270H). The nearest large body of surface water is the Salton Sea, approximately 12.8 miles southeast of the Project site. Given this distance and intervening topography, the site is not subject to inundation from tsunami or seiche. As discussed under Threshold 23(a), the Project includes two on-site retention basins and a WQMP designed to capture, treat, and infiltrate stormwater runoff. These features further reduce any potential for pollutant release. Because the Project site is not located in a flood hazard, tsunami, or seiche zone that would result in inundation and the release of pollutants, impacts would be less than significant. The Project would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

i) Water Quality and Groundwater Management Plans

The Project site is located within the jurisdiction of the Colorado River RWQCB. Water quality objectives for the region are set forth in the Colorado River Basin Plan, prepared pursuant to the federal Clean Water Act and the California Porter-Cologne Water Quality Control Act.

Construction
Because the Project will disturb more than one acre, the Applicant is required to obtain coverage under the State Water Resources Control Board's Construction General Permit (NPDES) and prepare a SWPPP. The SWPPP will identify BMPs to control pollutant discharges during construction.

Long-Term Operation
The Project's pollutants of concern include bacterial indicators, nutrients, toxic organic compounds, trash and debris, and oil and grease. In accordance with the County's MS4 NPDES Permit, a Project-

specific WQMP has been prepared. The WQMP incorporates BMPs, including two on-site retention basins that will capture, treat, and infiltrate stormwater runoff from the site. Compliance with the Final WQMP, including long-term maintenance of the BMPs, will be required as a condition of Project approval. These measures ensure the Project will not obstruct implementation of the Colorado River Basin Plan.

Groundwater
The Project site is located within the Whitewater Groundwater Management Area. The Project will not install wells or directly extract groundwater. Although the Project will increase impervious surfaces, approximately 60 percent of the site will remain pervious (including landscaping, date palms, and the retention basins). Stormwater will be directed to the two on-site retention basins, which are designed to infiltrate runoff and support groundwater recharge. Therefore, the Project will not conflict with or obstruct implementation of the applicable groundwater management or sustainability plan.

Required Compliance Measures
Prior to issuance of a grading permit, the applicant must:

- Obtain NPDES Construction General Permit coverage and prepare a SWPPP;
- Prepare and obtain County approval of a Final WQMP; and
- Pay applicable Coachella Valley Area Master Drainage Plan (CVMDP) fees.

With implementation of these mandatory measures, the Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Impacts would be less than significant. The Project would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

Section 15183 Finding
The proposed Project is consistent with the applicable General Plan policies, the ECVAP, and the County's zoning regulations (M-SC zone). The RCGP FEIR was prepared at a program level, therefore a site-specific project-level assessment is required to determine Project impacts. The project-level analysis demonstrates that all potential water quality impacts are less than significant. The Project will adhere to all applicable water quality standards, regulations, and requirements, including implementation of BMPs, a SWPPP, and a WQMP as required by the County. The Project would not violate any water quality standards or waste discharge requirements, would not substantially decrease groundwater supplies or interfere with groundwater recharge, would not substantially alter existing drainage patterns, would not result in substantial erosion or siltation, would not substantially increase surface runoff or flooding, would not exceed the capacity of existing or planned stormwater drainage systems, would not impede or redirect flood flows, and would not risk the release of pollutants due to inundation or conflict with any water quality control plan or sustainable groundwater management plan.

Because the Project implements the land use designation, zoning standards, and water quality requirements of these plans previously analyzed in the RCGP FEIR, it would not result in significant environmental impacts. As such, the proposed Project does not have peculiar effects, new or substantially more severe significant effects, new off-site or cumulative effects, and no new information of substantial importance has been identified that would result in a more severe impact than analyzed in the RCGP FEIR. For these reasons, the Project does not require additional environmental review under CEQA Guidelines section 15183.

LAND USE AND PLANNING Would the project:	Prior EIR Determination	Effect Peculiar to Project Site?	New Significant Effect?	New Significant Off-Site Cumulative Impact	New Information/ More Severe Impact?
24. Land Use					
a) Physically divide an established community?	LTS	No	No	No	No
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	LTS	No	No	No	No

Source(s): Riverside County General Plan Final EIR, October 2003; Riverside County General Plan; Project Application Materials.

Impacts Identified in the RCGP EIR

Physically Divide a Community
The RCGP FEIR concluded that impacts related to physically division of communities would be less than significant with implementation of General Plan policy provisions, and no mitigation was required. The General Plan, including its Area Plans, protects existing communities by preserving their unique settings and features, designating Policy Areas of special significance where appropriate, and directing future development in a manner that maintains the physical arrangement of established communities. (RCGP FEIR p. 4.2-15)

Plan, Policy or Regulation Conflict
The RCGP FEIR did not evaluate criterion b) as a standalone issue. Instead, the FEIR addressed the underlying intent of criterion b) by incorporating it into four separate criteria.

- Creates adverse changes in the functional role and/or predominant pattern of uses within the geographical area?
- Result in intensification of development density that results in a negative change of an area's character?
- Result in incremental loss of open space?
- Conflict with any applicable airport land use plan, habitat conservation plan or natural community conservation plan? (GP FEIR p. 4.2-14 et seq.)

The RCGP FEIR determined that implementation of the RCGP would alter land use designations and allow development in currently undeveloped areas, which could intensify development density and potentially result in land use conflicts, changes to community character, and incremental loss of open space. The RCGP FEIR concluded that these impacts would be reduced to less than significant levels with implementation of the RCGP policies designed to guide growth in a consistent and orderly manner. Applicable Land Use Element policies require conformance with the General Plan and Area Plans and mandate buffering, setbacks, and design features to minimize incompatibilities between uses and protect community character. These measures effectively prevent adverse changes to land use patterns, significant degradation of an area's character, and unnecessary loss of open space. No mitigation measures were required. (RCGP FEIR p. 4.2-19 through -27)

The General Plan FEIR concluded that impacts related to other land use plans would be less than significant. With respect to airport land use plans, the FEIR acknowledged that future growth and development could create pressure for urban encroachment near airports. However, the General Plan

and the associated Area Plans identify airport-influenced areas and include specific policies to protect flight paths, minimize land-use conflicts, and safeguard residents and employees (also see Threshold 22 above). These policies are consistent with and supportive of applicable Airport Land Use Plans, thereby reducing potential conflicts to a less than significant level. No mitigation measures were required.

With respect to habitat and natural community conservation plans, the FEIR determined that the RCGP includes policies that affirmatively protect biological resources and ensure consistency with existing habitat conservation plans. By incorporating these policies, the General Plan accommodates and supports applicable conservation plans, resulting in no significant impact to habitat conservation or natural community conservation plans. No mitigation measures were required. (RCGP FEIR p. 4.2-15 et seq.)

Proposed Project Impacts

a) Physically Divide a Community

The subject property is currently developed with agricultural uses consisting of rows of planted palm trees, with no residential uses present on site. The subject site is designated as LI (Light Industrial) and M-SC (Manufacturing Service Commercial) on the General Plan Land Use and Zoning Maps, respectively. The Project site is bounded by Avenue 54 to the north, with the residential subdivision of Vista Escondida (within the City of Coachella) located beyond the roadway. Lands to the south and east are vacant, while the area to the west is mostly vacant with scattered residences in the northwest portion. The Project site is not within an established residential community and will not interfere with the continued operation of the residential community to the north of Avenue 54. Therefore, the proposed Project would not disrupt or divide any established community.

The Project proposes a concrete furniture manufacturing facility on a site designated for Light Industrial and Manufacturing Service Commercial uses, consistent with what was envisioned in the General Plan and evaluated in the RCGP FEIR. Therefore, the proposed Project would not result in any peculiar effects and would not result in new or more severe impacts related to division of an established community beyond what was previously analyzed in the RCGP FEIR.

b) Plan, Policy or Regulation Conflict

The Project site is located within the Eastern Coachella Valley Plan (ECVAP) of the Riverside County General Plan. The RCGP and ECVAP designate the site for Light Industrial land uses. The Light Industrial land use designation allows for a wide variety of industrial and related uses, including assembly and light manufacturing, repair and other service facilities, warehousing, distribution centers, and supporting retail uses. The subject site is zoned M-SC. This zone promotes industrial and manufacturing activities and permits uses such as the manufacturing of concrete products and warehousing, subject to approval of a Plot Plan (Riverside County Zoning Code § 17.100.020).

The proposed Project is consistent with the allowable uses, intensity, and scale envisioned by the General Plan, ECVAP, and M-SC zoning. Because the Project introduces permitted industrial uses on a site already designated and zoned for such development, it would not create adverse changes in the functional role or predominant pattern of uses in the geographical area. It would not result in an intensification of development density that causes a negative change in the area's character, nor would it result in an incremental loss of open space, as the site is not designated or used as open space and is already planned for industrial development.

With respect to airport land use plans, the Project site is located within "Compatibility Zone D" of the JCRA Influence Area and is therefore subject to the JCRA Airport Land Use Compatibility Plan

(ALUCP). Within Compatibility Zone D, there are no restrictions on the intensity (per acre) of non-residential development. While land uses that would attract very high concentrations of people in confined areas are generally discouraged, the proposed Project does not include any such uses and is consistent with the compatibility criteria for Zone D. (Also see Section 22. Airports)

With respect to habitat conservation plans, the Project site lies within the planning boundary and Local Development Mitigation Fee (LDMF) Area of the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP) but is outside of any designated Conservation Area, biological corridor, or linkage. The Project applicant will pay the required LDMF in accordance with CVMSHCP requirements. The site contains no oak trees or other native trees protected under Riverside County Ordinance No. 559 (Regulating the Removal of Trees) or the County's Oak Tree Management Guidelines. Because these tree protection ordinances are not applicable to the Project, and the site is not located in a conservation area, the Project would not conflict with the CVMSHCP or any other applicable habitat or natural community conservation plan. (Also see Section 7. Wildlife and Vegetation)

In conclusion, the proposed Project is consistent with applicable land use plans and zoning regulations and would result in no adverse impacts related to (1) creating adverse changes in the functional role or predominant pattern of uses within the geographical area, (2) resulting in intensification of development density that causes a negative change in the area's character, (3) resulting in incremental loss of open space, or (4) conflicting with any applicable airport land use plan, habitat conservation plan, or natural community conservation plan. Therefore, the proposed Project would not result in any peculiar effects and would not result in new or more severe impacts related to land use beyond what was previously analyzed in the RCGP FEIR.

Section 15183 Finding

As demonstrated in the analysis above, the proposed Project is consistent with the applicable General Plan policies, the ECVAP, and the County's zoning regulations (M-SC zone). The Project is also consistent with other applicable land use plans, including the CVMSHCP and the ALUCP. Because the Project implements the land use designation, zoning standards, and requirements of these plans previously analyzed in the RCGP FEIR, it would not result in significant environmental impacts. As such, the proposed Project does not have peculiar effects, new or substantially more severe significant effects, new off-site or cumulative effects, and no new information of substantial importance has been identified that would result in a more severe impact than analyzed in the RCGP FEIR. For these reasons, the Project does not require additional environmental review under CEQA Guidelines section 15183.

MINERAL RESOURCES Would the project:	Prior EIR Determination	Effect Peculiar to Project Site?	New Significant Effect?	New Significant Off-Site Cumulative Impact	New Information/ More Severe Impact?
25. Mineral Resources					
a) Result in the loss of availability of a known mineral resource that would be of value to the region or the residents of the State?	LTS	No	No	No	No
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?	LTS	No	No	No	No

c) Potentially expose people or property to hazards from proposed, existing, or abandoned quarries or mines?	LTS	No	No	No	No

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

Impacts Identified in the General Plan EIR

According to the RCGP FEIR, the RCGP would have a significant impact on mining resources if it:

- Directly alters land use in areas designated as MRZs established by the State of California, or alters adjacent land uses resulting in uses that are not compatible with mineral resource extraction; and/or
- Results in a depletion of a regional resource availability that will result in a long duration decrease in revenue to the regional economy.

The RCGP FEIR determined that buildout of the General Plan would not result in significant adverse impacts related to mineral resources. While the RCGP includes policies directed toward the conservation and extraction of mineral resources, these policies ensure that future development would not have any significant adverse impacts on mineral resources, nor would future mineral resource extraction have any significant adverse impacts on future development. Avoidance of adverse impacts is achieved through adherence to these policies by restricting development on land designated as MRZ-2 by the State; reviewing all development proposals adjacent to MRZs or mining activity to safeguard against incompatible land uses; providing buffer zones between urban development and mining activity; and requiring that development adhere to State mining policies and regulations. With the projected growth and increasing pressure to develop vacant lands within unincorporated Riverside County, implementation of these management strategies will reduce or eliminate adverse impacts caused by mineral extraction and/or urbanization. Future development will also be reviewed on a project-specific basis to ascertain impacts to mineral resources and ensure compliance with applicable County policies. (RCGP FEIR p. 4.12-5 et seq.)

Proposed Project Impacts

a) Loss of State/Regional Mineral Resources

RCGP Figure OS-6 shows that the Project site and surrounding area is located within Mineral Resource Zone 3 (MRZ-3), meaning the significance of mineral deposits is undetermined and the site is not located within an area designated by the State Mining and Geology Board as being of regional or Statewide significance. Because the site is not located within an area known for mineral resources that are of value to the region and the residents of the State, no impact would occur. Therefore, the proposed Project would not result in any peculiar effects and would not result in new or more severe impacts related to land use beyond what was previously analyzed in the RCGP FEIR.

b) Loss of Locally-Important Designated Mineral Resources

The Project site is designated Light Industrial under the RCGP and is zoned M-SC. It does not have a General Plan designation or zoning that allows mining. As discussed above in Threshold 25(a), the Project site is not located within an area designated by the State Mining and Geology Board as being of regional or Statewide significance. Therefore, there is no potential for the Project to 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 proposed Project would not result in any peculiar effects and would not result in new or more severe impacts related to land use beyond what was previously analyzed in the RCGP FEIR.

c) Quarries and Mines

As discussed above in Thresholds 25(a) and (b), the site is not located in a State designated sector of valuable resources and there are no known quarries or mines in the immediate vicinity of the Project site. Therefore, no impact would occur, and the proposed Project would not result in any peculiar effects and would not result in new or more severe impacts related to land use beyond what was previously analyzed in the RCGP FEIR.

Section 15183 Finding

The proposed Project is consistent with the applicable General Plan policies, the ECVAP, and the County's zoning regulations (M-SC zone). The RCGP FEIR was prepared at a program level, therefore a site-specific project-level assessment is required to determine Project impacts. The project-level analysis demonstrates that all potential impacts to mineral resources are less than significant. The Project site is not located within an area known for mineral resources of value to the region and the residents of the State, nor is it located within an area designated by the State Mining and Geology Board as being of regional or statewide significance. There are no known quarries or mines in the immediate vicinity of the Project site. The Project would not result in the loss of availability of a known mineral resource or a locally-important mineral resource recovery site and would not expose people or property to hazards from proposed, existing, or abandoned quarries or mines.

Because the Project implements the land use designation, zoning standards, and mineral resource requirements of these plans previously analyzed in the RCGP FEIR, it would not result in significant environmental impacts. As such, the proposed Project does not have peculiar effects, new or substantially more severe significant effects, new off-site or cumulative effects, and no new information of substantial importance has been identified that would result in a more severe impact than analyzed in the RCGP FEIR. For these reasons, the Project does not require additional environmental review under CEQA Guidelines section 15183.

NOISE Would the project result in:	Prior EIR Determination	Effect Peculiar to Project Site?	New Significant Effect?	New Significant Off-Site Cumulative Impact	New Information/ More Severe Impact?
26. Airport Noise a) For a project located within an airport land use plan or, where such a plan has not been adopted, within two (2) miles of a public airport or public use airport would the project expose people residing or working in the project area to excessive noise levels?	LTSM	No	No	No	No
b) For a project located within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	LTSM	No	No	No	No

Source(s): Riverside County General Plan Figure S-20 "Airport Locations," County of Riverside Airport Facilities Map, QCP Facility Noise Impact Analysis, Urban Crossroads, (January 2025).

Impacts Identified in the General Plan EIR

The RCGP FEIR determined that buildout of the General Plan would not result in significant adverse impacts related to airport noise after implementation of applicable policies and mitigation measures. While the RCGP includes policies and strategies in the Noise Element that address existing noise issues and promote separation between noise-sensitive uses (residences, schools, churches) and noise generators (airports), significant impacts could still occur with regard to mobile noise sources. These policies incorporate specific land-use compatibility standards (e.g., discouraging noise-sensitive uses where noise exceeds 65 dBA CNEL and requiring interior noise mitigation to 45 dBA for certain uses). Additional mitigation, including ensuring that all new schools (particularly in subdivisions and specific plans) are sited more than two miles from any airport, guarantees that mobile noise impacts will be reduced to less than significant levels. With respect to airport land use plans, the FEIR acknowledged that future growth and development could create pressure for urban encroachment near airports. However, the General Plan and associated Area Plans identify airport-influenced areas and include specific policies to protect flight paths, minimize land-use conflicts, and safeguard residents and employees. These policies are consistent with and supportive of applicable Airport Land Use Plans, thereby reducing potential conflicts to a less than significant level. (RCGP FEIR p. 4.13-100 et seq. (Noise) and p. 4.2-15 et seq. (Land Use Plans))

Proposed Project Impacts

a) Excessive Noise: Public Airport, Airport Land Use Plan

The JCRA is located approximately 1.3 miles to the south of the Project site. The Project is within Compatibility Zone D of the JCRA Influence Area and is therefore subject to the JCRA ALUCP. According to the Project Noise Study (Appendix K), the Project site lies outside the 55 dBA CNEL contour for the JCRA. Therefore, impacts from aircraft noise would be less than significant, and the Project would not expose people working on the site to excessive noise levels. The Project would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

b) Excessive Noise: Private Airstrip

There are no private airfields or airstrips in the vicinity of the Project site. Therefore, the Project would not expose people to excessive noise levels associated with operations at a private airstrip. No impact would occur. The proposed Project would not result in any peculiar effects and would not result in new or more severe impacts related to land use beyond what was previously analyzed in the RCGP FEIR.

Section 15183 Finding

The proposed Project is consistent with the applicable General Plan policies, the ECVAP, and the County's zoning regulations (M-SC zone). The RCGP FEIR was prepared at a program level, therefore a site-specific project-level assessment is required to determine Project impacts. The project-level analysis demonstrates that all potential impacts related to airport noise are less than significant. The Project site is located within Compatibility Zone D of the JCRA Influence Area and is subject to the JCRA ALUCP. The Project would not expose people residing or working in the project area to excessive noise levels from a public airport or public use airport, and the Project is not located within the vicinity of a private airstrip.

Because the Project implements the land use designation, zoning standards, and airport land use compatibility requirements of these plans previously analyzed in the RCGP FEIR, it would not result in significant environmental impacts. As such, the proposed Project does not have peculiar effects, new or substantially more severe significant effects, new off-site or cumulative effects, and no new information of substantial importance has been identified that would result in a more severe impact than

analyzed in the RCGP FEIR. For these reasons, the Project does not require additional environmental review under CEQA Guidelines section 15183.

	Prior EIR Determination	Effect Peculiar to Project Site?	New Significant Effect?	New Significant Off-Site Cumulative Impact	New Information/ More Severe Impact?
27. Noise Effects by the Project					
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan, noise ordinance, or applicable standards of other agencies?	LTSM	No	No	No	No
b) Generation of excessive ground-borne vibration or ground-borne noise levels?	LTSM	No	No	No	No

Source(s): Riverside County General Plan, Table N-1 ("Land Use Compatibility for Community Noise Exposure"), Federal interagency Committee on Noise (FICON), Project Application Materials, QCP Facility Noise Impact Analysis, Urban Crossroads, (January 2025).

Impacts Identified in the General Plan EIR

The RCGP FEIR determined that buildout of the General Plan would not result in significant adverse impacts related to noise after implementation of applicable policies and mitigation measures. While the RCGP contains policies and strategies that address existing noise issues and reduce noise generation associated with new development and redevelopment (including short-term construction impacts, long-term operational impacts such as traffic, and stationary noise sources), and while new projects would be subject to the County's noise ordinances, significant impacts could still occur with regard to construction, mobile/vehicular, and stationary noise sources. Additional mitigation measures are provided to further reduce these effects to less than significant levels. These include requirements for construction-related noise mitigation plans, adherence to specified exterior and interior noise exposure standards for new residential development, and preparation of acoustical studies for residential, commercial, and industrial projects that may affect noise-sensitive land uses (RCGP FEIR Mitigation Measure 4.13.3C). Because the policies and mitigation measures address noise impacts on a project-by-project basis, they will remain effective in reducing impacts associated with short-term construction, long-term vehicular traffic, and stationary noise sources to a less than significant level. (RCGP FEIR p. 4.13-97 et seq., p. 4.13-100 et seq., and p. 4.13-103 et seq.)

Proposed Project Impacts

a) Exceed Ambient Noise Thresholds

The Project is located south of Avenue 54 and east of Harrison Street in the unincorporated community of Thermal. The nearest residential land uses are located to the north across Avenue 54 (in the City of Coachella) and west of the Project site. The properties immediately to the east and south are undeveloped. The closest major roadway is Highway 111, located approximately 1.24 miles east of the Project site, and the closest airport is the JCRA, located 1.3 miles south of the Project site.

As required by RCGP FEIR Mitigation 4.13.3C, a Noise Impact Study (Appendix K) was prepared to evaluate the Project's potential noise impacts and to ensure noise levels do not exceed County noise requirements. The study concluded that the Project would result in less than significant noise impacts and would not require mitigation. A summary of the findings is provided below.

RCGP Noise Standards

The RCGP Noise Element Table N-1 (Land Use Compatibility for Community Noise Exposure) establishes the acceptable exterior noise levels for different land uses. For industrial, manufacturing, and similar non-noise-sensitive land uses, exterior noise levels up to 75 dBA CNEL are considered normally acceptable, and levels between 70 and 80 dBA CNEL are considered conditionally acceptable. The proposed Project is a light industrial manufacturing facility and is therefore considered normally acceptable in exterior noise environments of up to 75 dBA CNEL. Because residential uses surround the Project site, the more restrictive residential compatibility criteria in Table N-1 will also apply when evaluating the Project's potential noise impacts on those nearby noise-sensitive receptors. For single-family residential land uses, exterior noise levels up to 60 dBA CNEL are generally considered normally acceptable, and up to 70 dBA CNEL is conditionally acceptable. The Noise Element does not establish interior noise standards for industrial or commercial uses.

Significance Thresholds

Noise impacts shall be considered significant if any of the following occur as a direct result of the Project.

Table 13
Noise Significance Criteria Summary

Analysis	Land Use	Condition(s)	Significance Criteria	
			Daytime	**Nighttime**
Offsite Noise	Noise-Sensitive	if ambient is < 60 dBA Leq[1]	≥ 5 dBA Leq Project increase	
		if ambient is 60 - 65 dBA Leq[1]	≥ 3 dBA Leq Project increase	
		if ambient is > 65 dBA Leq[1]	≥ 1.5 dBA Leq Project increase	
Operational Noise	Noise-Sensitive	Exterior Noise Level Standards[3]	55 dBA Leq	45 dBA Leq
		if ambient is < 60 dBA Leq[1]	≥ 5 dBA Leq Project increase	
		if ambient is 60 - 65 dBA Leq[1]	≥ 3 dBA Leq Project increase	
		if ambient is > 65 dBA Leq[1]	≥ 1.5 dBA Leq Project increase	
Construction Noise & Vibration	Permitted Construction Hours[4]	**October 1st to May 31st** 7:00 a.m. to 6:00 p.m. Within ¼ mile of inhabited dwelling	**June 1st to September 30th** 6:00 a.m. to 6:00 p.m. Within ¼ mile of inhabited dwelling	
		All Year: 8:00 a.m. to 5:00 p.m. Saturdays, Sundays, and holidays		
Construction Noise & Vibration	Noise-Sensitive	Noise Level Threshold[5]	80 dBA Leq	n/a
		Noise Level Increase[6]	20 dBA Leq	n/a
		Vibration Level Threshold[7]	0.30 PPV (in/sec)	n/a

[1] Source: FICON, 1992.
[2] Source: Riverside County ALUCP, 2004
[3] Source: Riverside County Code of Ordinances § 9.52.040
[4] Source: Riverside County Code of Ordinances § § 9.52.020
[5] Source: Federal Transit Administration, Transit Noise Vibration Impact Assessment Manual.
[6] Source: Caltrans Traffic Noise Analysis Protocol for New Highway Construction, Reconstruction, and Retrofit Barrier Projects
[7] Source: U.S. Department of Transportation Federal Transit Administration, Transit Noise and Vibration Impact Assessment, 2006.
"Daytime" = 6:00 a.m. to 10:00 p.m.; "Nighttime" = 10:00 p.m. to 6:00 a.m.; "n/a" = No nighttime operation is anticipated at the Project site and no nighttime construction activity is permitted, and therefore, no nighttime noise level thresholds are identified.

Noise Measurement Locations

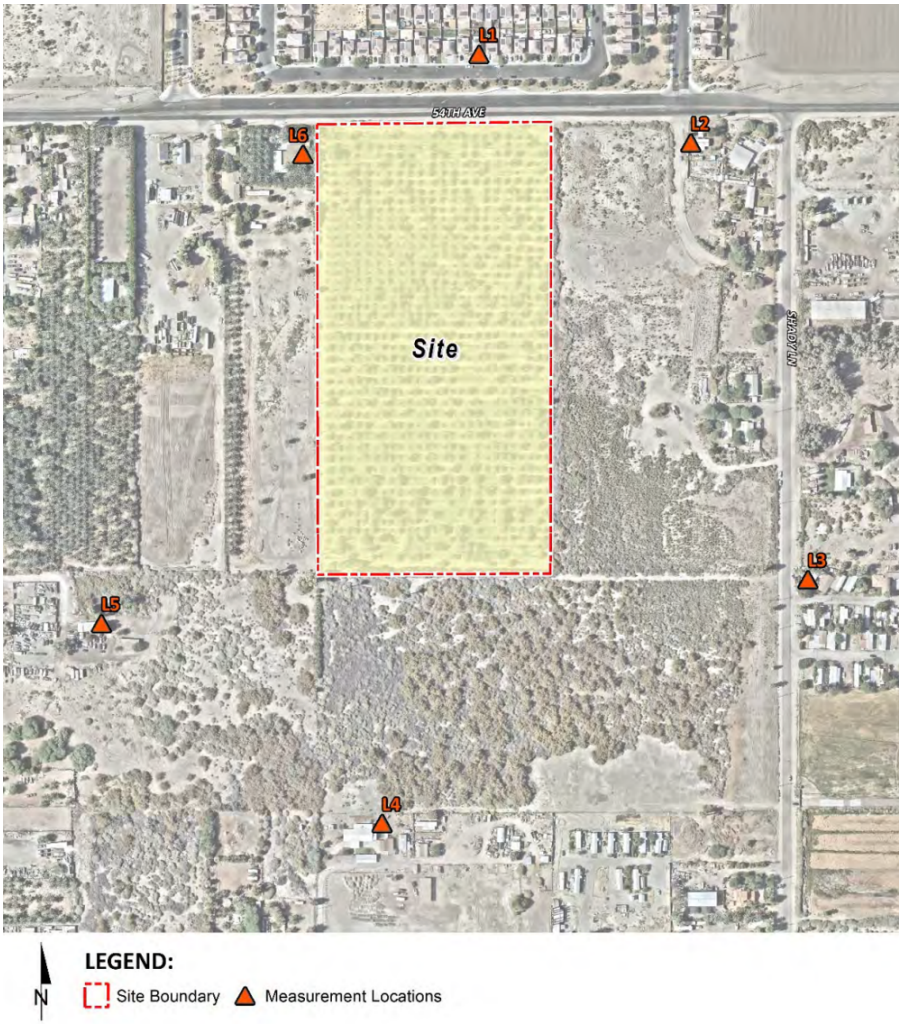
Long-term ambient noise measurements were taken near the closest sensitive receivers to characterize existing hourly noise levels around the Project site. Consistent with FTA guidance, measurements at representative locations are sufficient because each receiver represents a group of buildings with

similar acoustical conditions (shielding, terrain, and geometry relative to noise sources). These reference levels enable comparison of pre- and post-Project conditions and evaluation of the Project's contribution to ambient noise.

Table 14
24-Hour Ambient Noise Level Measurements

Measurement	Location	Energy Average Hourly Noise Level (dBA Leq)	
		Daytime	Nighttime
L1	Located north of the site near the residence at 85186 Corte del Roble	62.2	59.7
L2	Located east of the site near the residence at 85467 Avenue 54	72.3	57.7
L3	Located east of the site near the residence at 54350 Shady Ln	56.1	49.4
L4	Located south of the site near the residence at 85300 Ave 55	48.6	44.0
L5	Located southwest of the site near the residence at 54684 Harrison St	45.2	41.1
L6	Located west of the site near the residence at 85265 Avenue 54	65.4	56.7

Figure 2: Noise Measurement Locations



Sensitive Receiver Locations
To describe the potential off-site Project noise levels, six receiver locations in the vicinity of the Project site were identified. Other sensitive land uses in the Project study area that are located at greater

distances than those identified will experience lower noise levels than those presented in the study due to the additional attenuation from distance and the shielding of intervening structures. Distance was measured in a straight line from the Project boundary to each receiver location.

R1: Location R1 represents the private residence at 85186 Corte del Roble (City of Coachella), approximately 191 feet north of the Project site. R1 is placed in the residence's outdoor living area (backyard) facing the Project site. A 24-hour noise measurement was taken near this location to describe the existing ambient noise environment.

R2: Location R2 represents the private residence at 85467 Avenue 54, approximately 391 feet east of the Project site. Receiver R2 is placed at the facade facing the Project site. A 24-hour noise measurement was taken near this location to describe the existing ambient noise environment.

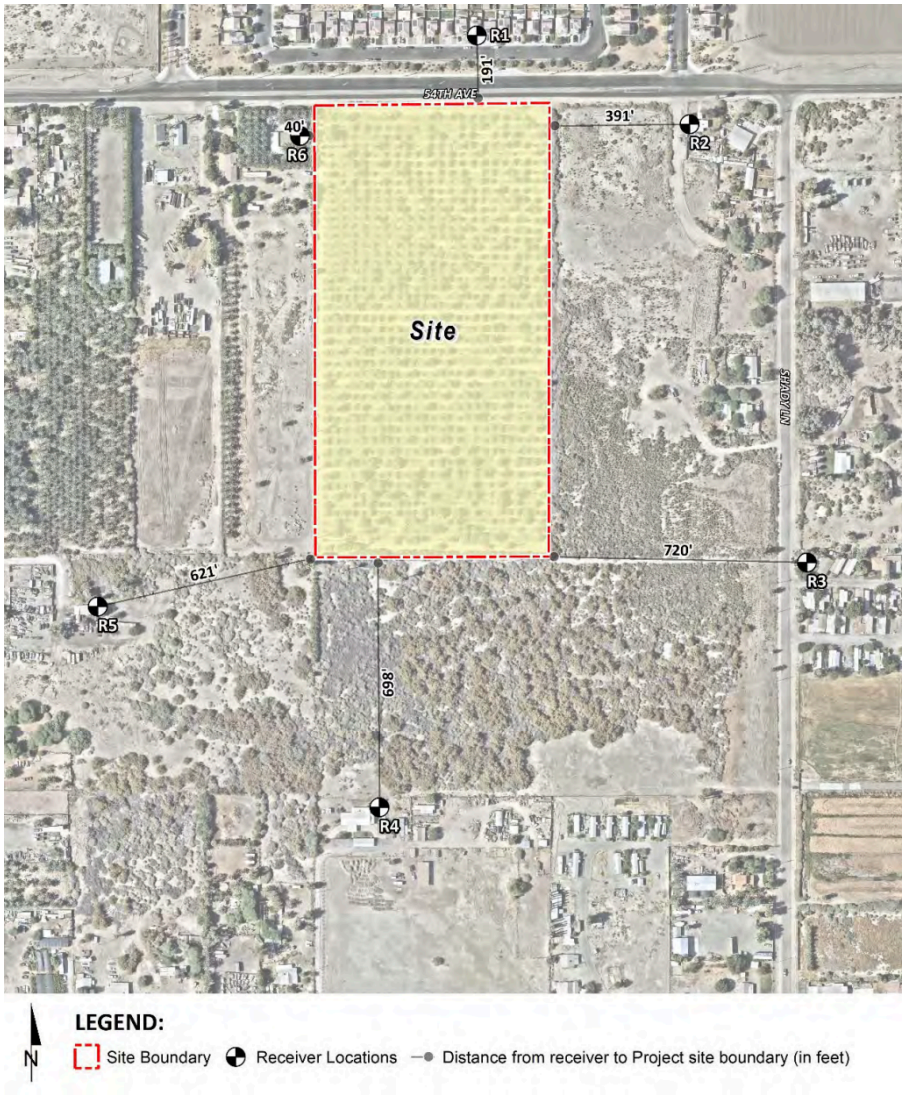
R3: Location R3 represents the private residence at 54540 Shady Lane, approximately 720 feet east of the Project site. Receiver R3 is placed at the facade facing the Project site. A 24-hour noise measurement was taken near this location to describe the existing ambient noise environment.

R4: Location R4 represents the existing noise sensitive residence at 85300 Avenue 55, approximately 698 feet south of the Project site. Receiver R4 is placed at the facade facing the Project site. A 24-hour noise measurement was taken near this location to describe the existing ambient noise environment.

R5: Location RS represents the existing noise sensitive residence at 54684 Harrison Street, approximately 621 feet southwest of the Project site. Receiver RS is placed in the outdoor living area (backyard) facing the Project site. A 24-hour noise measurement was taken near this location to describe the existing ambient noise environment.

R6: Location R6 represents the existing noise sensitive residence at 85265 Avenue 54, approximately 40 feet west of the Project site. Receiver R6 is placed in the outdoor living area (backyard) facing the Project site. A 24-hour noise measurement was taken near this location to describe the existing ambient noise environment.

Figure 3: Receiver Locations



Construction Noise Impacts

The Noise Study analyzed potential impacts resulting from the activities associated with the construction of the Project. The construction noise analysis described noise level impacts associated with the expected typical daytime construction activities at the Project site. 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. To assess the worst-case construction noise levels, the Project construction noise analysis relies on the highest noise level impacts when the equipment with the highest reference noise level is operating at the closest point from the edge of primary construction activity (Project site boundary) to each receiver location.

Table 15
Construction Equipment Noise Summary

Receiver Location	Construction Noise Levels (dBA Leq)					
	Site Preparation	Grading	Building Construction	Paving	Architectural Coating	Highest Levels
R1	58.2	59.2	52.2	53.2	51.2	59.2
R2	55.2	56.2	49.2	50.2	48.2	56.2
R3	52.3	53.3	46.3	47.3	45.3	53.3

R4	52.2	53.2	46.2	47.2	45.2	53.2
R5	52.6	53.6	46.6	47.6	45.6	53.6
R6	62.7	63.7	56.7	57.7	55.7	63.7

Source: Table 10-2 of Noise Study, Appendix K.

Construction Noise Level Compliance

To evaluate whether the Project will generate potentially significant short-term noise levels at the nearest receiver locations, a construction-related daytime 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 will satisfy the reasonable daytime 80 dBA Leq significance threshold during Project construction activities, as shown in Table 16. Therefore, the noise impacts due to Project construction noise are considered less than significant at all receiver locations.

Table 16
Construction Noise Level Compliance

Receiver Location	Construction Noise Levels (dBA Leq)		
	Highest Construction Noise Levels	Threshold	Threshold Exceeded?
R1	59.2	80	No
R2	56.2	80	No
R3	53.3	80	No
R4	53.2	80	No
R5	53.6	80	No
R6	63.7	80	No

Source: Table 10-3 of Noise Study, Appendix K.

Project construction noise levels were combined with existing ambient measurements at the nearest off-site sensitive receiver locations to quantify temporary contributions to the ambient noise environment. As shown in Table 17, daytime construction noise would increase ambient levels by 0.1 to 9.0 dBA Leq at these receivers. Because none of the increases would exceed the 20 dBA Leq threshold considered potentially significant, temporary construction noise impacts would be less than significant.

Table 17
Daytime Construction Noise Level Increase

Receiver Location	Total Project Construction Noise Level	Measurement Location	Reference Ambient Noise Levels	Combined Project and Ambient	Project Increase	Increase Criteria	Increase Criteria Exceeded?
R1	59.2	L1	62.2	64.0	1.8	20	No
R2	56.2	L2	72.3	72.4	0.1	20	No
R3	53.3	L3	56.1	57.9	1.8	20	No
R4	53.2	L4	48.6	54.5	5.9	20	No
R5	53.6	L5	45.2	54.2	9.0	20	No
R6	63.7	L6	65.4	67.6	2.2	20	No

Source: Table 10-4 of Noise Study, Appendix K.

Operational Noise Impacts

The Noise Study analyzed potential impacts resulting from the activities associated with the operation of the Project. The operational noise analysis described noise level impacts associated with the expected typical daytime and nighttime activities at the Project site.

Table 18 indicates that the hourly noise levels associated with the roof top air conditioners, a compressor, mixer, sandblaster air filters, trash enclosures, parking lot vehicle movements and a truck staging/loading area are expected to range from 26.6 to 45.1 dBA Leq at the nearby sensitive receiver locations for the daytime. Table 19 indicates a range of 22.5 to 37.1 dBA Leq for the nighttime

Table 18
Daytime Project Stationary/Area-Source Noise Levels (dBA Leq)

Noise Source	R1	R2	R3	R4	R5	R6
Roof-Top Air Conditioning Units	39.5	33.9	24.9	25.9	28.0	39.2
Compressor	32.3	22.5	21.7	38.3	39.0	43.8
Mixer	27.0	34.3	29.6	18.0	10.8	15.7
Sandblaster Air Filter	41.5	49.2	43.4	27.3	21.4	29.1
Trash Enclosure	20.4	12.7	22.7	22.1	22.4	22.6
Parking Vehicle Movements	28.0	21.9	10.8	10.8	13.5	30.9
Staging/Loading Activities	42.9	35.5	38.9	41.2	42.7	46.1
Total All Noise Sources	**40.3**	**34.2**	**26.6**	**38.5**	**39.3**	**45.1**

Source: Table 9-2 of Noise Study, Appendix K.

Table 19
Nighttime Project Stationary/Area-Source Noise Level (dBA Leq)

Noise Source	R1	R2	R3	R4	R5	R6
Roof-Top Air Conditioning Units	37.1	31.5	22.5	23.5	25.6	36.8
Compressor	0.0	0.0	0.0	0.0	0.0	0.0
Mixer	0.0	0.0	0.0	0.0	0.0	0.0
Sandblaster Air Filter	0.0	0.0	0.0	0.0	0.0	0.0
Trash Enclosure	19.4	11.7	21.7	21.2	21.5	21.7
Parking Vehicle Movements	0.0	0.0	0.0	0.0	0.0	0.0
Staging/Loading Activities	0.0	0.0	0.0	0.0	0.0	0.0
Total All Noise Sources	**37.1**	**31.5**	**22.5**	**23.5**	**25.6**	**36.8**

Source: Table 9-3 of Noise Study, Appendix K.

Operational Noise Level Compliance
The Noise Study evaluated the potential operational noise levels against the County's exterior noise standards at the closest noise-sensitive receiver locations (R-1 is within the City of Coachella). As shown in Table 20, Project-related operational noise levels at these locations range from 22.5 to 45.1 dBA Leq during the day and 22.5 to 37.1 dBA Leq at night. These levels comply with the residential standards of 55 dBA Leq daytime and 45 dBA Leq nighttime.

Table 20
Operational Noise Level Compliance

Receiver Location	Project Operational Noise Levels (dBA Leq)		Noise Level Standards (dBA Leq)		Threshold Exceeded?	
	Day	Night	Day	Night	Day	Night
R1	40.3	37.1	55	45	No	No
R2	34.2	31.5	55	45	No	No
R3	26.6	22.5	55	45	No	No
R4	38.5	23.5	55	45	No	No
R5	39.3	25.6	55	45	No	No
R6	45.1	36.8	55	45	No	No

Source: Table 9-4 of Noise Study, Appendix K.

Project operational noise levels were logarithmically combined with existing ambient measurements at the nearest off-site sensitive receivers. As shown in Tables 21 and 22, the Project would increase daytime ambient levels by up to 1.0 dBA Leq and nighttime levels by approximately 0.01 dBA Leq. These contributions satisfy the applicable significance criteria and would not result in a substantial temporary, periodic, or permanent increase in ambient noise levels; therefore, operational stationary-source noise impacts would be less than significant.

Table 21
Daytime Operational Noise Level Contributions (dBA Leq)

Receiver Location	Total Project Operational Noise Level	Measurement Location	Reference Ambient Noise Levels	Combined Project and Ambient	Project Increase	Increase Criteria	Increase Criteria Exceeded?
R1	40.3	L1	62.2	62.2	0.0	3.0	No
R2	34.2	L2	72.3	72.3	0.0	1.5	No
R3	26.6	L3	56.1	56.1	0.0	5.0	No
R4	38.5	L4	48.6	49.0	0.4	5.0	No
R5	39.3	L5	45.2	46.2	1.0	5.0	No
R6	45.1	L6	65.4	65.4	0.0	1.5	No

Source: Table 9-5 of Noise Study, Appendix K.

Table 22
Nighttime Operational Noise Level Contributions (dBA Leq)

Receiver Location	Total Project Operational Noise Level	Measurement Location	Reference Ambient Noise Levels	Combined Project and Ambient	Project Increase	Increase Criteria	Increase Criteria Exceeded?
R1	37.1	L1	59.7	59.7	0.0	5.0	No
R2	31.5	L2	57.7	57.7	0.0	5.0	No
R3	22.5	L3	49.4	49.4	0.0	5.0	No
R4	23.5	L4	44.0	44.0	0.0	5.0	No
R5	25.6	L5	41.1	41.1	1.0	5.0	No
R6	36.8	L6	56.7	56.7	0.0	5.0	No

Source: Table 9-6 of Noise Study, Appendix K.

Summary

As analyzed above, the Project would not cause a substantial temporary or periodic increase in ambient noise levels, and construction noise impacts would be less than significant. No mitigation is required. In addition, consistent with Riverside County Code Section 9.52.020, private construction within one-quarter mile of an inhabited dwelling is limited to 6:00 a.m. to 6:00 p.m. from June through September and 7:00 a.m. to 6:00 p.m. from October through May.

Project-related operational noise increases would likewise remain below applicable significance thresholds and would not contribute to a substantial permanent increase in ambient noise levels. Compliance with Riverside County Ordinance No. 847 further ensures that outdoor operational noise impacts would be less than significant. No mitigation is required.

The proposed Project would not result in any peculiar effects and would not result in new or more severe impacts related to land use beyond what was previously analyzed in the RCGP FEIR.

b) Excessive Ground-Borne Vibration or Noise

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. Based on the representative vibration levels presented for various construction equipment types, it is possible to estimate the potential for human response (annoyance) and building damage using a vibration assessment method defined by Caltrans.

The Noise Study (Appendix K) analyzed the expected Project-related vibration levels at the nearby receiver building facade locations. At distances ranging from 40 to 720 feet from the building facade to the Project construction activities, construction vibration velocity levels are estimated to range from less than 0.01 up to 0.10 (in/sec). Based on the maximum acceptable continuous vibration threshold of 0.30 PPV (in/sec), the typical Project construction vibration levels will fall below the building damage thresholds at all noise-sensitive receiver locations. 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. Therefore, the Project-related vibration impacts are considered less than significant during typical construction activities at the Project site. The proposed Project would not result in any peculiar effects and would not result in new or more severe impacts related to land use beyond what was previously analyzed in the RCGP FEIR.

Section 15183 Finding

As required by RCGP FEIR Mitigation 4.13.3C, a Noise Impact Study (Appendix K) was prepared to evaluate the Project's potential noise impacts and to ensure noise levels do not exceed County noise requirements. The study concluded that the Project would result in less than significant noise impacts and would not require mitigation. The Project would not generate 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, and would not generate excessive ground-borne vibration or ground-borne noise levels.

The proposed Project is consistent with the applicable General Plan policies, the ECVAP, and the County's zoning regulations (M-SC zone). Because the Project implements the land use designation, zoning standards, and noise requirements of these plans previously analyzed in the RCGP FEIR, it would not result in significant environmental impacts. As such, the proposed Project does not have peculiar effects, new or substantially more severe significant effects, new off-site or cumulative effects, and no new information of substantial importance has been identified that would result in a more severe impact than analyzed in the RCGP FEIR. For these reasons, the Project does not require additional environmental review under CEQA Guidelines section 15183.

PALEONTOLOGICAL RESOURCES:	Prior EIR Determination	Effect Peculiar to Project Site?	New Significant Effect?	New Significant Off-Site Cumulative Impact	New Information/ More Severe Impact?
28. Paleontological Resources a) Directly or indirectly destroy a unique paleontological resource, site, or unique geologic feature?	LTS	No	No	No	No

Source(s): Riverside County General Plan Figure OS-8 "Paleontological Sensitivity," Paleontological Assessment for the QCP Fabrication Facility Project, Brian F. Smith & Associates, (December 2024).

Impacts Identified in the General Plan EIR

The RCGP FEIR determined that buildout of the General Plan could result in significant adverse impacts related to paleontological resources, but that these impacts would be reduced to less than significant levels through implementation of applicable General Plan policies, with no formal mitigation required. Paleontological resources are known to be present within unincorporated areas of the County, and due to the large amounts of undisturbed land remaining, implementation of the RCGP could result in impacts from individual private development and public works projects. The General Plan would allow development of structures within areas of high paleontological resource sensitivity, constituting a potentially significant adverse impact. While the RCGP includes policies requiring that, when existing information indicates a site proposed for development may contain paleontological resources, a qualified paleontologist shall monitor site grading activities (with authority to halt grading to collect uncovered resources), curate any resources collected with an appropriate repository, and file a report with the Planning Department documenting findings, these policies are adequate to reduce the effects of growth and development. No further mitigation is required. (RCGP FEIR p. 4.7-27 et seq.)

Proposed Project Impacts

a) Paleontological Resources

A Paleontological Assessment prepared for the QCP Manufacturing Facility (Appendix L)) determined that the project site is underlain by fossiliferous Holocene fluvial and lacustrine deposits of ancient Lake Cahuilla. These deposits are known to yield fossils at the surface and at shallow depths throughout the Salton Basin and have been assigned a “High” paleontological sensitivity rating. Based on these findings, and as required by RCGP Open Space Policy 19.9, full-time paleontological monitoring from the surface is required during mass grading and excavation activities in undisturbed sediments to mitigate potential adverse impacts (loss or destruction) to nonrenewable paleontological resources. Monitoring of artificial fill or previously disturbed soils is not warranted.

The submittal and approval of a Paleontological Resource Impact Mitigation Program (PRIMP) is required prior to issuance of grading permits, when requested by the Riverside County Planning Department. The specific guidelines contained within a PRIMP are listed below, which are consistent with the provisions of CEQA, the County of Riverside, and the guidelines of the Society of Vertebrate Paleontology (2010) for any mass grading and excavation-related activities, including utility trenching, during Project construction. Paleontological monitoring may be reduced based upon the observations and recommendations of the County-approved project paleontologist. The following list provides the required items typically expanded upon in PRIMPs submitted to the County of Riverside:

1. Description of the proposed site and planned grading operations.
2. Description of the level of monitoring required for all earthmoving activities in the project area.

3. Identifications and qualifications of the qualified paleontological monitor to be employed for grading operations monitoring.
4. Identification of personnel with authority and responsibility to temporarily halt or divert grading equipment to allow for the recovery of large specimens.
5. Direction for any fossil discoveries to be immediately reported to the property owner, who in turn, will immediately notify the County of Riverside of the discovery.
6. Means and methods to be employed by the paleontological monitor to quickly salvage fossils as they are unearthed to avoid construction delays.
7. Sampling of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates.
8. Procedures and protocol for collecting and processing samples and specimens.
9. Fossil identification and curation procedures to be employed.
10. Identification of the permanent repository to receive any recovered fossil material.
11. All pertinent exhibits, maps, and references.
12. Procedures for reporting finding.
13. Identification and acknowledgement of the developer for the content of the PRIMP, as well as acceptance of financial responsibility for monitoring, reporting, and curation fees.

Implementation of this County policy, consistent with the findings of the Paleontological Assessment, would ensure the proper identification and subsequent treatment of any significant paleontological resource, site, or unique geologic feature that may be encountered during ground-disturbing activities associated with Project excavation activities on the Project site. With implementation of this requirement, the Project's potential to impact paleontological resources on the Project site would be less than significant. The proposed Project would not result in any peculiar effects and would not result in new or more severe impacts related to land use beyond what was previously analyzed in the RCGP FEIR.

RCGP FEIR Implementation Measure

Open Space Policy 19.9 This policy requires that when existing information indicates that a site proposed for development may contain paleontological resources, a paleontologist shall monitor site grading activities with the authority to halt grading to collect uncovered paleontological resources, curate any resources collected with an appropriate reposition, and file a report with the Planning Department documenting any paleontological resources that are found during site grading. (RCGP FEIR p. 4.7-28)

Consistent with RCGP Open Space Policy 19.9, the following paleontological monitoring requirements apply to the Project:

Paleontological Monitoring

The Project paleontologist retained shall review the approved development plan and grading plan and shall 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 Paleontological Resource Impact Mitigation Program (PRIMP). This PRIMP shall be submitted to the County Geologist for review and approval prior to issuance of a Grading Permit. Information to be contained in the PRIMP, at a minimum and in addition to other industry standard and Society of Vertebrate Paleontology standards, are as follows:

1. Description of the proposed site and planned grading operations.
2. Description of the level of monitoring required for all earth-moving activities in the project area.
3. Identification and qualifications of the qualified paleontological monitor to be employed for grading operations monitoring.

4. Identification of personnel with authority and responsibility to temporarily halt or divert grading equipment to allow for recovery of large specimens.
5. Direction for any fossil discoveries to be immediately reported to the property owner who in turn will immediately notify the County Geologist of the discovery.
6. Means and methods to be employed by the paleontological monitor to quickly salvage fossils as they are unearthed to avoid construction delays.
7. Sampling of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates.
8. Procedures and protocol for collecting and processing of samples and specimens.
9. Fossil identification and curation procedures to be employed
10. Identification of the permanent repository to receive any recovered fossil material. The County of Riverside must be consulted on the repository/museum to receive the fossil material and a written agreement between the property owner/developer and the repository must be in place prior to site grading.
11. All pertinent exhibits, maps and references.
12. Procedures for reporting of findings.
13. Identification and acknowledgement of the developer for the content of the PRIMP as well as acceptance of financial responsibility for monitoring, reporting and curation fees.

All reports shall be signed by the Project paleontologist and all other professionals responsible for the report's content (e.g., Professional Geologist), as appropriate. Two wet-signed original copies of the report(s) shall be submitted to the office of 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, the Plan Check staff, the Land Use Counter or any other County office. In addition, the 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.

Section 15183 Finding

The RCGP FEIR was prepared at a program level; therefore, a site-specific project-level assessment is required to determine Project impacts pursuant to RCGP Open Space Policy 19.9. Consistent with this policy, a paleontological assessment was prepared for the Project, and preparation and implementation of a PRIMP is required in accordance with County requirements.

The proposed Project is consistent with the applicable General Plan policies, the ECVAP, and the County's zoning regulations (M-SC zone). Because the Project implements the land use designation, zoning standards, and paleontological resource requirements previously analyzed in the RCGP FEIR, it would not result in significant environmental impacts. The requirement for paleontological monitoring implements existing County policy and is not considered a new mitigation measure. As such, the Project would not result in peculiar effects, new or substantially more severe significant effects, or new off-site or cumulative effects. No new information of substantial importance has been identified that would result in a more severe impact than analyzed in the RCGP FEIR. For these reasons, the Project does not require additional environmental review under CEQA Guidelines section 15183.

POPULATION AND HOUSING Would the project:					
	Prior EIR Determination	Effect Peculiar to Project Site?	New Significant Effect?	New Significant Off-Site Cumulative Impact	New Information/ More Severe Impact?
29. Housing a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new	NI	No	No	No	No

homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?					
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	LTS	No	No	No	No
c) Create a demand for additional housing, particularly housing affordable to households earning 80% or less of the County's median income?	LTS	No	No	No	No

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

Impacts Identified in the General Plan EIR

According to the RCGP FEIR, potential impacts related to housing and population shall be considered significant if implementation of the RCGP results in any of the following conditions:

- Existing population and housing projections are substantially exceeded;
- The displacement of substantial numbers or residential units, requiring the construction of replacement housing elsewhere; and/or
- The displacement of a substantial number of persons, necessitating the construction of replacement housing.
- Exacerbate (make worse) the jobs to housing balance in Riverside County.

Unplanned Population Growth

The RCGP FEIR analyzed population, employment, and residential projections for the RCGP based on the land use categories and density assumptions contained in the Plan. Using historical growth rates of approximately 3.38 percent annually and starting from the SCAG-projected 2025 population of 985,945, the FEIR determined that build-out population for unincorporated Riverside County would be reached in 2040. Because the build-out year and associated population increases are based on projected annual SCAG increases, the annual and build-out growth associated with the General Plan would be consistent with SCAG regional projections and is expressly planned for in the General Plan. Direct and indirect growth-inducing effects are addressed in the applicable General Plan sections (Transportation/Circulation and Public Services). Therefore, the project would not result in population growth exceeding county or regional projections, resulting in no impact. (RCGP FEIR p. 4.3-4 and -5)

Displace People or Housing

The RCGP FEIR concluded that build-out of the RCGP would result in approximately 591,209 residential units and 458 million square feet of commercial/industrial space in unincorporated Riverside County. Development would occur primarily on vacant land and would not displace existing housing or substantial numbers of people. In the limited cases where redevelopment could displace residents or housing, State and federal relocation laws would require preparation of a relocation analysis and provision of adequate compensation and replacement housing. Implementation of General Plan policies and the Housing Element would further ensure that adequate housing opportunities are maintained. Impacts were found to be less than significant. (RCGP FEIR p. 4.3-4)

Create Demand for Additional, Affordable Housing

The affordable housing topic was not discussed as a standalone threshold of significance but was addressed generally in Section 5.5 of the FEIR (Consistency with Applicable Plans). As discussed in the RCGP FEIR, the General Plan includes policies and an action plan that support efforts to increase the supply and quality of housing and provide affordable housing consistent with the Regional Housing Needs Assessment, and that related impacts would be less than significant because it is the nature of

the Housing Element to ensure affordable housing needs are met. The Housing Element identifies and establishes the County's policies with respect to meeting the needs of existing and future residents in Riverside County. It sets forth commitments that guide County decision-making and implement housing goals over a seven-year period, in furtherance of the statewide housing goal of "early attainment of decent housing and a suitable living environment for every California family," as well as addressing concerns unique to the County of Riverside. (RCGP FEIR p. 5-21)

Proposed Project Impacts

a) Induce Substantial Unplanned Growth

The Project entails the proposed development of a QCP Fabrication Facility including approximately 100 employees. The Project would relocate an existing manufacturing facility from the City of Norco to the subject site. It is anticipated that a portion of the employment base for both the construction and operational phases of the proposed Project would come from the existing population in Riverside County. According to the Bureau of Labor Statistics, in October 2024, the Riverside-San Bernardino-Ontario region's civilian labor force was 2,185,800 persons, with 2,065,800 persons employed and 120,000 persons unemployed, for an unemployment rate of 5.5 percent.[4] The anticipated jobs generated as part of the Project could be filled from the local area, as the surrounding area contains an ample supply of potential employees. Applying the unincorporated Riverside County persons-per-household factor of 3.08 from the California Department of Finance Table E-5 to the 50 relocating employees, the Project could result in an indirect local population increase of approximately 154 persons.[5] This potential increase would not constitute substantial unplanned growth. The Project does not propose housing, is consistent with the site's existing LI designation and M-SC zoning, and would not trigger the need for additional housing beyond what has already been planned in the General Plan. Therefore, no significant impact associated with unanticipated growth would occur. The proposed Project would not result in any peculiar effects and would not result in new or more severe impacts related to land use beyond what was previously analyzed in the RCGP FEIR.

The on-site employment generation would not induce substantial growth in the area because 50 of the Project's employees would relocate from existing Norco operations and the remaining employees are anticipated to already be living in the Riverside County area. The Project does not propose the construction of any new homes or dwelling units that would directly result in the introduction of new residents to the area. Indirect population growth has the potential to occur when infrastructure improvements are proposed. Increased road access and availability of utility connections are a byproduct of the proposed Project. However, the proposed improvements are specific to the Project and Project-related improvements would not extend beyond the Project site's frontage.

The Project would not improve any roadways beyond what was already planned by the County of Riverside. Surrounding property that would have access to or benefit from such improvements have a General Plan land use designation of LI and M-SC Zoning. Riverside County has planned for residential uses in this area and future inhabitants would most likely come from within the County for the same reasons as those discussed for this Project. Accordingly, the proposed Project would have a less than significant impact related to directly or indirectly inducing substantial population growth in the area. The proposed Project would not result in any peculiar effects and would not result in new or more severe impacts related to population and housing beyond what was previously analyzed in the RCGP FEIR.

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4 U.S. Bureau of Labor Statistics (via California Employment Development Department, Local Area Unemployment Statistics), Riverside-San Bernardino-Ontario MSA, October 2024. Available at: https://www.sbcounty.gov/uploads/WDD/BusinessServices/LMI/2024/11-2024LMI.pdf

5 State of California, Department of Finance, E-5 Population and Housing Estimates for Cities, Counties and the State — January 1, 2021–2026 (Sacramento, California, May 2026).

b) Displace People or Housing

The Project site is currently comprised of agricultural land with planted date trees and with no residential structures. Therefore, development of the Project would not displace any housing or displace any people and thus would not necessitate the construction of replacement housing elsewhere. No impact would occur and the proposed Project would not result in any peculiar effects and would not result in new or more severe impacts related to land use beyond what was previously analyzed in the RCGP FEIR.

c) Create Demand for Additional, Affordable Housing

As discussed above in Threshold 29(a), the Project entails the proposed development of a QCP Fabrication Facility including 100 employees. The Project would relocate an existing manufacturing facility from the City of Norco, and 50 employees from the existing Norco operations would relocate to the proposed facility. It is anticipated that the remaining employment base for both the construction and operational phases of the proposed Project would come from the existing population in Riverside County. Applying the unincorporated Riverside County persons-per-household factor of 3.08 from DOF Table E-5 to the 50 relocating employees would result in an indirect population increase of approximately 154 persons, which would not create a substantial demand for additional affordable housing. his increment is not substantial and would not create a significant demand for additional affordable housing. The Project does not construct housing and does not convert residential land. An increase of approximately 154 persons represents a de minimis share of the unincorporated County's existing population (approximately 420,000 residents, or about 0.04 percent) and an even smaller share of Riverside County's planned population growth under the RCGP. Any housing demand associated with 50 relocating employee households would be absorbed by the existing and planned housing stock already analyzed in the RCGP FEIR, rather than generating a new, unplanned need for affordable housing construction attributable to the Project. Therefore, it is not anticipated that the labor demand caused by the proposed Project would result in the need for affordable housing.

Section 15183 Finding

The proposed Project is consistent with the applicable General Plan policies, the ECVAP, and the County's zoning regulations (M-SC zone). The RCGP FEIR was prepared at a program level, therefore a site-specific project-level assessment is required to determine Project impacts. The project-level analysis demonstrates that all potential impacts related to housing and population are less than significant. The Project site is currently undeveloped agricultural land with no existing residential structures. The Project would generate a limited number of jobs that can be filled from the local labor force given the ample supply of potential employees in the surrounding area. The Project would relocate an existing manufacturing facility from Norco and would generate approximately 100 employees, of which 50 employees would relocate from existing Norco operations, resulting in a potential indirect population increase of approximately 154 persons.

The Project would not induce substantial unplanned population growth, would not displace existing people or housing, and would not create a significant demand for additional housing. Any associated demand would be limited to 50 households and would be met through existing and planned housing supply, the Project would not result in a significant demand for additional housing. Because the Project implements the land use designation, zoning standards, and population/housing requirements of these plans previously analyzed in the RCGP FEIR, it would not result in significant environmental impacts. As such, the proposed Project does not have peculiar effects, new or substantially more severe significant effects, new off-site or cumulative effects, and no new information of substantial importance has been identified that would result in a more severe impact than analyzed in the RCGP FEIR. For

these reasons, the Project does not require additional environmental review under CEQA Guidelines section 15183.

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

	Prior EIR Determination	Effect Peculiar to Project Site?	New Significant Effect?	New Significant Off-Site Cumulative Impact	New Information/ More Severe Impact?
30. Fire Services	LTS	No	No	No	No

Source(s): Riverside County General Plan Safety Element

Impacts Identified in the General Plan EIR

According to the RCGP FEIR, an impact to fire protection is considered significant if one or more of the following conditions would result from implementation of the General Plan:

- Place residents or the general public in a situation of endangerment as a result of inadequate services, resources, and/or safety measures;
- Create or exacerbate an existing fire hazard, or expose people to high fire hazard conditions without adequate fire protection;
- Result in an increase in response times in excess of seven minutes for urban areas or 20 minutes for rural areas, as established by the Riverside County Fire Department (e.g., urban development is located more than 3 miles from a county fire station or rural development is located more than 5 miles from a county fire station); and /or
- Locate development in a High Fire Hazard Area that does not provide a community water system.

The RCGP FEIR determined that buildout of the General Plan would not result in significant adverse impacts related to fire protection services after implementation of applicable General Plan policies and related regulations. Although the RCGP does not include a Public Services Element, it contains policies intended to address the effects of fire hazards on future residents and habitable structures by both reducing the fire threat and maintaining adequate fire protection plans. Implementation of the RCGP policies, along with Riverside County Ordinance No. 787, the Riverside County Master Fire Protection Plan, California Public Resources Code Section 4290, the Uniform Fire Code, and the Uniform Building Code, will reduce the effects of development on fire protection service impacts to a less than significant level with no need for mitigation. (RCGP FEIR p. 4.15-3 et seq.)

Proposed Project Impacts

The Project site receives fire protection services from the Riverside County Fire Department (RCFD). Development of the Project has the potential to increase the frequency of fire protection calls to the site. RCFD Station 79 is the closest fire station to the Project site located at 1377 6th St, Coachella, CA 92236, is approximately 1.45 miles north of the Project site. The next nearest station is RCFD Station 39 located approximately 2.5 miles to the southeast of the site at 86911 58th Ave, Thermal, CA 92274. The site would be served by existing Station 79, which would be the closest responding station. That distance is consistent with RCFD station-location and travel-time goals used to implement the General Plan Safety Element (generally about 4 minutes of travel in urban areas and 8 minutes in rural/outlying areas). The Project is an industrial use with limited on-site occupancy, not a residential subdivision that would generate a large, ongoing increase in emergency calls. Incremental demand from the facility

would not, by itself, cause response times from Station 79 to exceed those service goals or require a new or physically altered fire station.

To ensure adequate fire protection for all residents of Riverside County, the Riverside County Department of Building and Safety and the RCFD enforce fire standards as they review building plans, and conduct building inspections and review structures for compliance with the California Code, including Public Resources Code Sections 4290-4299 and California Government Code Section 51178 that address fire safety and Riverside County Ordinance No. 787 (Fire Code Standards).

Although the Project's increased demand on fire services could increase the RCFD's calls, the impact is determined to be less than significant because the Project will conform to all County regulations, the Project would be served from existing RCFD fire stations and would not require the construction of a new fire station or physical alteration of an existing fire station. The Project would be required to comply with Riverside County Ordinance No. 659 (the County Development Impact Fee (DIF)), which requires a fee payment by developers for the funding of public facilities, including fire protection facilities. Therefore, impacts would be less than significant.

Applicable Regulatory Requirements

- Prior to building permit inspection, the Project is required to comply with the County's DIF Ordinance (Riverside County Ordinance No. 659), which requires payment of a development fee to assist in providing revenue that the County can use to improve public facilities and/or equipment, to offset the incremental increase in the demand for public services, including the need for fire protection services that would be created by the Project.

The proposed Project would not result in any peculiar effects and would not result in new or more severe impacts related to land use beyond what was previously analyzed in the RCGP FEIR.

Section 15183 Finding

The RCGP FEIR was prepared at a program level, therefore a site-specific project-level assessment is required to determine Project impacts. The project-level analysis demonstrates that all potential impacts to public services are less than significant. The Project is required to comply with the County's DIF Ordinance (Riverside County Ordinance No. 659), which requires payment of development impact fees to offset the incremental increase in demand for public services, including fire protection services. The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities for fire services in order to maintain acceptable service ratios, response times, or other performance objectives.

The proposed Project is consistent with the applicable General Plan policies, the ECVAP, and the County's zoning regulations (M-SC zone). Because the Project implements the land use designation, zoning standards, and public services requirements of these plans previously analyzed in the RCGP FEIR, it would not result in significant environmental impacts. As such, the proposed Project does not have peculiar effects, new or substantially more severe significant effects, new off-site or cumulative effects, and no new information of substantial importance has been identified that would result in a more severe impact than analyzed in the RCGP FEIR. For these reasons, the Project does not require additional environmental review under CEQA Guidelines section 15183.

	Prior EIR Determination	Effect Peculiar to Project Site?	New Significant Effect?	New Significant Off-Site Cumulative Impact	New Information/ More Severe Impact?
31. Sheriff Services	LTSM	No	No	No	No

Source(s): Riverside County General Plan

Impacts Identified in the General Plan EIR

The RCGP FEIR determined that buildout of the General Plan would result in less than significant impacts related to sheriff protection services through implementation of applicable General Plan policies and mitigation measures. Although the RCGP does not include a Public Services Element, it contains policies intended to address the effects of future residents on sheriff protection services and ensure adequate protection as development occurs. These policies focus on ensuring that development does not exceed the County's ability to provide supporting infrastructure and sheriff services, monitoring service capacities, and requiring new development to contribute its fair share to fund facilities.

While the policies alone do not fully ensure private security for communities and large facilities or set specific levels of service, additional mitigation measures are provided to further address these issues. These measures include requirements for on-site security at certain new commercial and recreational developments (RCGP FEIR Mitigation Measure 4.15.2A), coordination with new homeowners' associations to establish Neighborhood Watch programs (RCGP FEIR Mitigation Measure 4.15.2B), maintaining a target ratio of sworn officers to population (RCGP FEIR Mitigation Measure 4.15.2C), and payment of development impact fees to fund public facilities (RCGP FEIR Mitigation Measure 4.15.2D). Implementation of the RCGP policies and mitigation measures would ensure the provision of security and funding for additional personnel and facilities, thereby reducing potential impacts related to future development's effects on sheriff protection services to a less than significant level. (RCGP FEIR p. 4.15-7 et seq.)

Proposed Project Impacts

The Project site receives police protection services from the Riverside County Sherriff Department (RCSD). Development of the Project site has the potential to increase the frequency of sheriff calls to the site due to the addition of structures, traffic, and workers. The RCSD Thermal Station, located at 86625 Airport Blvd, Thermal, CA 92274 (1.5 miles southeast of the Project site) would provide sheriff services to the Project site and vicinity of the site.

Consistent with the RCGP FEIR, the Project would be required to comply with applicable General Plan policies (including LU 5.1–5.2 and LU 9.1) that ensure development does not exceed the County's ability to provide supporting infrastructure and sheriff services, and that new development contributes its fair share toward funding facilities. In addition, the Project would be required to pay the County Sheriff's established development impact fee (pursuant to RCGP FEIR Mitigation Measure 4.15.2D and Riverside County Ordinance No. 659) prior to issuance of a certificate of occupancy. These fees fund the acquisition and construction of public facilities needed to serve new development. The Project would also comply with requirements for on-site security (RCGP FEIR Mitigation Measure 4.15.2A).

With implementation of these existing regulatory requirements, General Plan policies, and mitigation measures previously analyzed in the RCGP FEIR, impacts related to sheriff protection services would be less than significant. The proposed Project would not result in any peculiar effects and would not result in new or substantially more severe impacts related to police protection beyond what was previously analyzed in the RCGP FEIR.

Section 15183 Finding

The RCGP FEIR was prepared at a program level; therefore, a site-specific project-level assessment is required to determine Project impacts. The project-level analysis demonstrates that all potential impacts related to public services, including sheriff protection services, are less than significant. The Project is required to comply with the County's Development Impact Fee Ordinance (Riverside County Ordinance No. 659), which mandates payment of development impact fees to offset the incremental increase in demand for public services, including sheriff services. The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered

governmental facilities for sheriff services in order to maintain acceptable service ratios, response times, or other performance objectives.

The proposed Project is consistent with the applicable General Plan policies, the ECVAP, and the County's zoning regulations (M-SC zone). Because the Project implements the land use designation, zoning standards, and public services requirements previously analyzed in the RCGP FEIR, it would not result in significant environmental impacts. As such, the Project would not result in peculiar effects, new or substantially more severe significant effects, or new off-site or cumulative effects. No new information of substantial importance has been identified that would result in a more severe impact than analyzed in the RCGP FEIR. For these reasons, the Project does not require additional environmental review under CEQA Guidelines section 15183.

	Prior EIR Determination	Effect Peculiar to Project Site?	New Significant Effect?	New Significant Off-Site Cumulative Impact	New Information/ More Severe Impact?
32. Schools	LTS	No	No	No	No

Source(s): School District correspondence, GIS database

Impacts Identified in the General Plan EIR

According to the RCGP FEIR, a significant impact on school districts and schools would occur if the existing or planned facilities are not adequate to serve the County's public educational needs or when the capacity of the affected school district is exceeded and any additional students would exacerbate the problem.

The RCGP FEIR determined that buildout of the General Plan would not result in significant adverse impacts related to schools. Although the RCGP does not contain a Public Services Element, it includes a policy encouraging the County to monitor the capacities of infrastructure and services in coordination with service providers, utilities, and outside agencies and jurisdictions to ensure that growth does not exceed acceptable levels of service. While policies alone do not protect school districts from the increase in school children anticipated with buildout, State law limits the power of the County to impose mitigation for development impacts on schools. Senate Bill 50 provides that the exclusive method of mitigating the impact of school facilities under CEQA is payment of the maximum school fees, and that such fees are deemed to provide full and complete school facilities mitigation. Because compliance with SB 50 constitutes full and complete mitigation under Government Code Sections 65996(a) and (b), no significant impact would occur. (RCGP FEIR p. 4.15-22 et seq.)

Proposed Project Impacts

Because the Project proposes non-residential light industrial uses (a QCP Fabrication Facility), it would not directly generate any school-aged children requiring public education. Development of the Project would therefore not create a direct demand for public school services. Of the Project's approximately 100 employees, 50 would relocate from existing Norco operations and could result in an indirect local population increase of approximately 154 persons. The remaining future Project employees are expected to consist primarily of existing County residents. As a result, the Project would not substantially affect the existing or projected housing supply or generate substantial new school-aged population in the County. Any school-aged children associated with the 154-person increment would be limited and would not constitute a significant increase in demand for public school services.

The Project would not directly cause, physically alter, or contribute to the need to construct new or expanded public school facilities. However, the Project would be required to pay applicable school

impact fees pursuant to SB 50, which constitutes full and complete mitigation under Government Code Sections 65996(a) and (b). Impacts would be less than significant. The proposed Project would not result in any peculiar effects and would not result in new or substantially more severe impacts related to schools beyond what was previously analyzed in the RCGP FEIR.

Section 15183 Finding

The RCGP FEIR was prepared at a program level; therefore, a site-specific project-level assessment is required to determine Project impacts. The project-level analysis demonstrates that all potential impacts related to public services, including schools, are less than significant. Because the Project proposes non-residential light industrial uses that would not directly generate school-aged children, it would not create a direct or indirect demand for additional public-school services. Relocation of 50 employees from existing Norco operations could result in an indirect population increase of approximately 154 persons. Future employees are expected to consist primarily of existing County residents and would not generate a new school-aged population. The Project would be required to pay any applicable school impact fees pursuant to SB 50, which constitutes full and complete mitigation under Government Code Sections 65996(a) and (b). The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities for schools in order to maintain acceptable service ratios or other performance objectives.

The proposed Project is consistent with the applicable General Plan policies, the ECVAP, and the County's zoning regulations (M-SC zone). Because the Project implements the land use designation, zoning standards, and public services requirements previously analyzed in the RCGP FEIR, it would not result in significant environmental impacts. As such, the Project would not result in peculiar effects, new or substantially more severe significant effects, or new off-site or cumulative effects. No new information of substantial importance has been identified that would result in a more severe impact than analyzed in the RCGP FEIR. For these reasons, the Project does not require additional environmental review under CEQA Guidelines section 15183.

	Prior EIR Determination	Effect Peculiar to Project Site?	New Significant Effect?	New Significant Off-Site Cumulative Impact	New Information/ More Severe Impact?
33. Libraries	LTSM	No	No	No	No

Source(s): Riverside County General Plan

Impacts Identified in the General Plan EIR

According to the RCGP FEIR, a significant impact on library services would occur if the existing or planned facilities and supplies are not adequate to serve the County's future residents.

The RCGP FEIR determined that buildout of the General Plan could result in significant adverse impacts related to library facilities, but that these impacts would be reduced to less than significant levels through implementation of applicable General Plan policies and mitigation measures. Although the RCGP does not include a Public Services Element, it contains Policy LU 5.1, which is intended to address the effects of future development on library facilities by ensuring that development does not exceed the County's ability to adequately provide supporting infrastructure and services.

While Policy LU 5.1 helps ensure adequate library facilities as development occurs, it does not set specific standards. Therefore, an additional mitigation measure is provided requiring the County to maintain a minimum of approximately 0.5 square foot of library space and 2.5 volumes per resident (RCGP FEIR Mitigation Measure 4.15.6A). Implementation of Policy LU 5.1 and Mitigation Measure

4.15.6A would reduce potential impacts on library facilities and services to less than significant levels. (RCGP FEIR p. 4.15-25 et seq.)

Proposed Project Impacts

Development of the Project site would not directly create a demand for public library facilities and would not directly result in the need to modify existing or construct new library buildings. Demand for library services is based on the generation of a resident population associated with a person's place of residence, not their place of employment. Because the Project proposes non-residential light industrial uses, it would not directly generate a new resident population. Fifty employees would relocate from the existing Norco facility and would result in an indirect population increase of approximately 154 persons. This increase is de minimis relative to the unincorporated County's existing population and planned growth under the RCGP and would not create a substantial demand for additional library facilities. The Project would be required to comply with the County's Development Impact Fee Ordinance (Riverside County Ordinance No. 659), which requires payment of development impact fees to fund public facilities, including public libraries, which would offset any indirect impacts associated with employment at the site. Impacts would be less than significant. The proposed Project would not result in any peculiar effects and would not result in new or substantially more severe impacts related to libraries beyond what was previously analyzed in the RCGP FEIR.

Section 15183 Finding

The RCGP FEIR was prepared at a program level; therefore, a site-specific project-level assessment is required to determine Project impacts. The project-level analysis demonstrates that all potential impacts related to public services, including libraries, are less than significant. Because the Project proposes non-residential light industrial uses, it would not directly generate a new resident population. Any indirect population associated with the 50 relocating employees (approximately 154 persons) would not create a substantial demand for additional library facilities or services. The Project is required to comply with the County's Development Impact Fee Ordinance (Riverside County Ordinance No. 659), which requires payment of development impact fees to offset the incremental increase in demand for public services, including libraries. The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities for libraries in order to maintain acceptable service ratios or other performance objectives.

The proposed Project is consistent with the applicable General Plan policies, the ECVAP, and the County's zoning regulations (M-SC zone). Because the Project implements the land use designation, zoning standards, and public services requirements previously analyzed in the RCGP FEIR, it would not result in significant environmental impacts. As such, the Project would not result in peculiar effects, new or substantially more severe significant effects, or new off-site or cumulative effects. No new information of substantial importance has been identified that would result in a more severe impact than analyzed in the RCGP FEIR. For these reasons, the Project does not require additional environmental review under CEQA Guidelines section 15183.

	Prior EIR Determination	Effect Peculiar to Project Site?	New Significant Effect?	New Significant Off-Site Cumulative Impact	New Information/ More Severe Impact?
34. Health Services	LTSM	No	No	No	No

Source(s): Riverside County General Plan

Impacts Identified in the General Plan EIR

According to the RCGP FEIR, a significant impact on medical services and facilities would occur if the existing or planned facilities and services/supplies are not adequate to serve the County's future residents.

The RCGP FEIR determined that buildout of the General Plan could result in significant adverse impacts related to medical facilities, but that these impacts would be reduced to less than significant levels through implementation of applicable General Plan policies and mitigation measures. Although the RCGP does not include a Public Services Element, it contains Policy LU 5.1, which is intended to address the effects of future development on medical facilities by ensuring that development does not exceed the County's ability to provide adequate supporting infrastructure and services. While Policy LU 5.1 focuses on the ability to provide adequate medical facilities and services, it does not specifically detail how and when adequacy will be determined. Therefore, additional mitigation measures are provided. These measures require the County to perform periodic medical needs assessments every three years to evaluate current demand and service levels within each Area Plan (RCGP FEIR Mitigation Measure 4.15.7A), and to fund the construction or expansion of medical facilities according to the demand identified in those assessments (RCGP FEIR Mitigation Measure 4.15.7B). Implementation of Policy LU 5.1 and these mitigation measures would reduce potential impacts on medical facilities and services to less than significant levels. (RCGP FEIR p. 4.15-28 et seq.)

Proposed Project Impacts

Implementation of the proposed Project is not anticipated to result in an increase in the County's population because the Project proposes a non-residential light industrial use. The Project would not directly generate a new resident population. Fifty employees would relocate from the existing Norco facility and would result in an indirect population increase of approximately 154 persons. This increase is de minimis relative to the unincorporated County's existing population and planned growth under the RCGP. As such, the Project would not result in a substantial increase in demand for public or private health care facilities. The Project could result in a nominal increase in demand for health services associated with the addition of employees in the area; however, existing public health facilities would accommodate this incremental demand. Project implementation would not result in or require the physical construction, expansion, or alteration of public health facilities. The Project would be required to comply with the County's Development Impact Fee Ordinance (Riverside County Ordinance No. 659), which requires payment of development impact fees to fund public facilities, including public health facilities. Impacts would be less than significant. The proposed Project would not result in any peculiar effects and would not result in new or substantially more severe impacts related to health services beyond what was previously analyzed in the RCGP FEIR.

Section 15183 Finding

The RCGP FEIR was prepared at a program level; therefore, a site-specific project-level assessment is required to determine Project impacts. The project-level analysis demonstrates that all potential impacts related to public services, including health services, are less than significant. Because the Project proposes non-residential light industrial uses that would not directly generate a new resident population, any indirect population associated with the 50 relocating employees (approximately 154 persons) would not create a significant demand for additional medical facilities or services. The Project is required to comply with the County's Development Impact Fee Ordinance (Riverside County Ordinance No. 659), which requires payment of development impact fees to offset the incremental increase in demand for public services, including health services. The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities for health services in order to maintain acceptable service ratios or other performance objectives.

The proposed Project is consistent with the applicable General Plan policies, the ECVAP, and the County's zoning regulations (M-SC zone). Because the Project implements the land use designation,

zoning standards, and public services requirements previously analyzed in the RCGP FEIR, it would not result in significant environmental impacts. As such, the Project would not result in peculiar effects, new or substantially more severe significant effects, or new off-site or cumulative effects. No new information of substantial importance has been identified that would result in a more severe impact than analyzed in the RCGP FEIR. For these reasons, the Project does not require additional environmental review under CEQA Guidelines section 15183.

RECREATION Would the project:	Prior EIR Determination	Effect Peculiar to Project Site?	New Significant Effect?	New Significant Off-Site Cumulative Impact	New Information/ More Severe Impact?
35. Parks and Recreation					
a) 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?	LTS	No	No	No	No
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	LTS	No	No	No	No
c) Be located within a Community Service Area (CSA) or recreation and park district with a Community Parks and Recreation Plan (Quimby fees)?	LTS	No	No	No	No

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

Impacts Identified in the General Plan EIR

According to the RCGP FEIR, the General Plan would result in a significant impact on parks and recreational facilities and/or services if growth anticipated with implementation of the RCGP would:

- Require additional staff and/or equipment to maintain acceptable facilities and/or levels of service;
- Result in a substantial need for new, altered, or expanded parks and/or recreational facilities and/or services; and /or
- Does not meet a standard of three (3) acres of neighborhood or community parkland per 1,000 population.

The RCGP FEIR determined that buildout of the General Plan could result in significant adverse impacts related to parks and recreation due to increased demand requiring construction of new facilities, but that these impacts would be reduced to less than significant levels through implementation of applicable General Plan policies, with no formal mitigation required. Anticipated growth and development would increase demand for park and recreation facilities and necessitate construction of new parks, which could result in adverse physical effects on the environment depending on location and function. While the physical effects of constructing new parks and recreational facilities are addressed through policies and mitigation measures provided in the land use, air quality, noise, traffic, public services, and biological resources sections of the FEIR, the RCGP also includes policies with performance standards that require replacement of any dedicated recreational lands absorbed by non-recreational uses with

similar or improved facilities and programs, concurrent construction of recreation facilities with other development, and compliance with parkland requirements established in the Quimby Act and County enabling ordinances. Implementation of these policies would minimize the effects of growth and development, guarantee adequate parks and recreation facilities for future residents, and reduce potential impacts to less than significant levels. No further mitigation is required. (RCGP FEIR p. 4.14-6 et seq.)

Proposed Project Impacts

a) Increase Park Use

The Project does not propose to construct any recreational facilities; therefore, no impacts from the construction or operation of recreational facilities would result. Because the Project proposes non-residential light industrial uses, it would not directly generate a new resident population that would increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration would occur or be accelerated. Fifty employees would relocate from the existing Norco facility and would result in an indirect population increase of approximately 154 persons. This increase is de minimis relative to the unincorporated County's existing population and planned growth under the RCGP and would not create a substantial demand for parks or other recreational facilities. Impacts would be less than significant. The proposed Project would not result in any peculiar effects and would not result in new or more severe impacts related to land use beyond what was previously analyzed in the RCGP FEIR.

b) Recreational Facility Construction/Expansion

The Project proposes a manufacturing facility that would not directly result in an increase in the County's population. Although the jobs generated by the Project have the potential to result in some new residents within the County, the majority of jobs are expected to be filled by existing County residents. Any indirect population increase associated with the 50 relocating employees (approximately 154 persons) would not result in a substantial increase in demand for the construction or expansion of recreational facilities. As such, the Project would not result in a substantial increase in demand for the construction or expansion of recreational facilities. No impact would occur. The proposed Project would not result in any peculiar effects and would not result in new or more severe impacts related to land use beyond what was previously analyzed in the RCGP FEIR.

c) Community Service Areas and Recreation Districts

The Project is not located within a Community Service Area (CSA) or a recreation and park district with a Community Parks and Recreation Plan that would require payment of Quimby fees, nor is it subject to Quimby fees. Therefore, no impacts related to Community Service Areas or Quimby Act requirements would result. The proposed Project would not result in any peculiar effects and would not result in new or substantially more severe impacts related to parks and recreation beyond what was previously analyzed in the RCGP FEIR.

Section 15183 Finding

The RCGP FEIR was prepared at a program level; therefore, a site-specific project-level assessment is required to determine Project impacts. The project-level analysis demonstrates that all potential impacts related to parks and recreation are less than significant. The Project does not propose any recreational facilities. Because the Project proposes non-residential light industrial uses, it would not directly generate a new resident population. Any indirect population increase associated with the 50 relocating employees (approximately 154 persons) would not increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration would occur or be accelerated. The Project would not include or require the construction or expansion of recreational

facilities and is not located within a Community Service Area or recreation district subject to Quimby fees.

The proposed Project is consistent with the applicable General Plan policies, the ECVAP, and the County's zoning regulations (M-SC zone). Because the Project implements the land use designation, zoning standards, and parks and recreation requirements previously analyzed in the RCGP FEIR, it would not result in significant environmental impacts. As such, the Project would not result in peculiar effects, new or substantially more severe significant effects, or new off-site or cumulative effects. No new information of substantial importance has been identified that would result in a more severe impact than analyzed in the RCGP FEIR. For these reasons, the Project does not require additional environmental review under CEQA Guidelines section 15183.

	Prior EIR Determination	Effect Peculiar to Project Site?	New Significant Effect?	New Significant Off-Site Cumulative Impact	New Information/ More Severe Impact?
36. Recreational Trails					
a) Include the construction or expansion of a trail system?	LTS	No	No	No	No

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

Impacts Identified in the General Plan EIR
See Section 35. Parks and Recreation for summary of findings.

Proposed Project Impacts

There are no planned recreation trails in proximity to the Project site. No trail system or recreational facilities are proposed as part of the Project. Thus, the Project would not result in the use of existing recreational trails that could have a significant environmental effect. No impact would occur.

Section 15183 Finding
The proposed Project is consistent with the applicable General Plan policies, the ECVAP, and the County's zoning regulations (M-SC zone). The RCGP FEIR was prepared at a program level, therefore a site-specific project-level assessment is required to determine Project impacts. The project-level analysis demonstrates that all potential impacts are less than significant. No trail system or recreational facilities are proposed as part of the Project. The Project would not include the construction or expansion of a trail system and would not result in the use of existing recreational trails that could have a significant environmental effect. Because the Project implements the land use designation, zoning standards, and parks and recreation requirements of these plans previously analyzed in the RCGP FEIR, it would not result in significant environmental impacts. As such, the proposed Project does not have peculiar effects, new or substantially more severe significant effects, new off-site or cumulative effects, and no new information of substantial importance has been identified that would result in a more severe impact than analyzed in the RCGP FEIR. For these reasons, the Project does not require additional environmental review under CEQA Guidelines section 15183.

TRANSPORTATION Would the project:	Prior EIR Determination	Effect Peculiar to Project Site?	New Significant Effect?	New Significant Off-Site Cumulative Impact	New Information/ More Severe Impact?
37. Transportation					
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	SU	No	No	No	No
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	SU	No	No	No	No
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?	LTSM	No	No	No	No
d) Cause an effect upon, or a need for new or altered maintenance of roads?	LTSM	No	No	No	No
e) Cause an effect upon circulation during the project's construction?	LTSM	No	No	No	No
f) Result in inadequate emergency access or access to nearby uses?	LTSM	No	No	No	No

Source(s): Riverside County General Plan, Project Application Materials, Quick Crete Products (QCP) Trip Generation Assessment for the proposed QCP Fabrication Facility Plot Plan, Urban Crossroads (December 2025); QCP Manufacturing Facility Vehicle Miles Traveled Screening Evaluation, Urban Crossroads (January 2025).

Impacts Identified in the General Plan EIR

According to the RCGP FEIR, impacts to transportation and circulation are considered to be significant if any of the following would occur.

- Decrease the level of service on a County-maintained road or conventional State highway below LOS D within Community Development Areas designated by the proposed County General Plan and within adjacent jurisdictions, or below LOS C within those portions of unincorporated Riverside County outside of Community Development Areas;
- Decrease the level of service on a freeway segment below Level of Service E.
- Increase traffic on a County-maintained road, conventional State highway, or freeway segment that is currently operating at less than the level of service standards identified in thresholds 1 or 2 above.

The RCGP FEIR determined that buildout of the General Plan would result in significant and unavoidable impacts related to transportation. Circulation Element policies (including C 2.1 through C 2.5) provide a framework for development and implementation of the multi-modal transportation system; however, they do not provide a clear mechanism whereby traffic impacts from individual land development projects are reviewed in relation to roadway capacity and level of service standards. In conjunction with these policies, the following mitigation measures were adopted:

- Mitigation Measure 4.16.1A: Require project proponents to make fair-share contributions toward required intersection and roadway improvements based on maintaining the appropriate levels of service (LOS D within Community Development Areas and adjacent jurisdictions; LOS C outside Community Development Areas).

- Mitigation Measure 4.16.1B: Ensure sufficient right-of-way is reserved on critical roadways and at critical intersections to implement the approach lane geometrics necessary to provide the appropriate levels of service.
- Mitigation Measure 4.16.1C: Add a transportation corridor to the Circulation Element (if feasible) connecting I-15 to the Orange County freeway system and complete the relevant portion of the CETAP program as a means of relieving congestion along State Route 91.

Implementation of the Circulation Element policies and these mitigation measures would reduce a majority of potential impacts on the County's arterial system to less than significant levels. However, significant impacts would remain at certain arterial locations that would operate below the County's LOS D threshold. In addition, Circulation Element policy allowing approval of projects that do not meet LOS standards if determined to be beneficial could result in additional significant impacts. These residual impacts are considered significant and unavoidable. For freeways, implementation of the policies and mitigation measures would similarly reduce a majority of impacts to less than significant levels. However, certain freeway locations would operate below the County's LOS E threshold. Because all freeways are under Caltrans authority and no feasible mechanism exists for development projects to contribute toward mainline freeway improvements, these impacts would remain significant and unavoidable. (RCGP FEIR p. 4.16-13 et seq.)

The RCGP FEIR, as a program-level document, evaluated transportation impacts primarily against level-of-service thresholds for County roads, State highways, and freeways and did not analyze project-level impacts. It also did not explicitly address several of the questions required under the current environmental checklist, including consistency with CEQA Guidelines § 15064.3(b) (added in 2018), geometric design hazards, construction-period circulation effects, or emergency access. Although the FEIR did not directly evaluate consistency with CEQA Guidelines § 15064.3(b), it indirectly addressed vehicle miles traveled by noting that implementation of the RCGP would result in changes in regional vehicular traffic trips and associated VMT, contributing to significant and unavoidable long-term operational air quality impacts after all feasible mitigation (RCGP FEIR p. 5-2). For the purposes of this document, it is assumed that impacts related to project-level thresholds would be less than significant with mitigation requiring subsequent project-specific transportation analysis.

Proposed Project Impacts

a) Conflict with Program, Plan or Policy

The Project site is currently a date grove and generates no quantifiable traffic other than occasional maintenance trips. Access to Avenue 54 will be provided via two proposed gated entrances. The west gate will be restricted to right-in/right-out access only, while the east gate will allow westbound left turns into the site for both passenger cars and trucks. All Project driveway exits will be stop-sign controlled. Sight distances at each driveway will be reviewed by the County of Riverside during the improvement plan and building permit stage to ensure compliance with minimum County safety standards.

The Project site is served by the Sunline Transit Agency (STA). STA Route 8 travels directly along the Project site's frontage, and existing bus stops are within walking distance. Because public transit facilities already exist along the Project frontage, the Project has no potential to conflict with a transit service program or plan.

Currently, there are no sidewalk or bike lane improvements along the site's frontage on Avenue 54. The Project is designed to accommodate pedestrians and bicyclists by constructing sidewalk and bike lane improvements along this frontage. Specifically, the Project would be required to install AC pavement, driveway approaches, bike lane improvements, sidewalk, curb, and gutter along Avenue 54. All improvements would be reviewed by the County of Riverside Transportation Department during the improvement plan and building permit stages to ensure compliance with minimum County standards.

Also, the construction of the bike lane will implement the Bikeways and Trails Plan. Because the Project improvements would comply with these standards, the Project would not conflict with any bicycle or pedestrian program, policy, or plan.

A Trip Generation Assessment prepared for the Project by Urban Crossroads (Appendix M) forecasts that the Project would generate approximately 210 daily trips, including 24 peak-hour trips (15 AM and 9 PM). Under the County's Transportation Analysis Guidelines, projects generating fewer than 50 peak-hour trips are generally exempt from the requirement to prepare a Level of Service (LOS) transportation impact analysis. Because the Project is anticipated to generate fewer than 50 net new peak-hour trips, additional peak-hour traffic operations analyses are not required.

Table 23
Project Trip Generation

Land Use	ITE LU Code	Quantity	AM Peak Hour	PM Peak Hour	Peak Hour Total	Daily
Manufacturing (Processing) & Administration	140	100 Employees	15	9	24	210
Total	-	----------	15	9	**24**	**210**

Based on the above, the Project would not conflict with any program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Impacts would be less than significant.

The proposed Project would not result in any peculiar effects and would not result in new or more severe impacts related to land use beyond what was previously analyzed in the RCGP FEIR.

b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

In accordance with Senate Bill (SB) 743, the California Natural Resources Agency adopted changes to the CEQA Guidelines in December 2018. Beginning July 1, 2020, vehicle miles traveled (VMT) became the appropriate metric for evaluating a project's transportation impacts. Automobile delay, as measured by level of service (LOS) and similar metrics, no longer constitutes a significant environmental effect under CEQA. Lead agencies are required to use VMT to evaluate project-related transportation impacts pursuant to CEQA Guidelines section 15064.3.A Vehicle Miles Traveled (VMT) Screening Evaluation was prepared for the Project (Appendix E) and evaluated the Project against Riverside County's small-project screening criteria. The County Guidelines identify two applicable screening thresholds:

1. Projects generating fewer than 110 vehicle trips per day may screen out of further VMT analysis. The Project is estimated to generate 210 daily vehicle trips and therefore exceeds this threshold.

2. Land use projects forecast to generate fewer than 3,000 Metric Tons of Carbon Dioxide Equivalent ($MTCO_2e$) of greenhouse gas emissions per year are presumed to result in a less-than-significant VMT impact. Consistent with the Project's Greenhouse Gas Analysis (Appendix G), the Project is forecast to generate a net reduction of 492.43 $MTCO_2e$ per year, which is well below the 3,000 $MTCO_2e$ threshold.

Because the Project satisfies the County's small-project screening criteria based on greenhouse gas emissions, it is presumed to have a less than significant VMT impact, and no additional VMT analysis is required. Therefore, the Project would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). Impacts would be less than significant. The proposed Project would not result in any peculiar effects and would not result in new or substantially more severe impacts related to transportation beyond what was previously analyzed in the RCGP FEIR.

c) Increase Hazards

The Project site is located in a portion of Thermal that is developing as an employment center containing a mix of tourist commercial, residential, and light industrial uses. The site is bounded on the north by Avenue 54. Surrounding properties to the west, south, and east are designated Light Industrial (LI) in the RCGP and ECVAP. Land north of Avenue 54 (within the City of Coachella) is designated R-1.

The Project would be required to construct AC pavement, driveway approaches, sidewalk, curb, and gutter along the Project frontage on Avenue 54. All Project driveways would be stop-sign controlled. Sight distances at each driveway would be reviewed by the County of Riverside Transportation Department during the improvement plan and building permit stage to ensure compliance with minimum County safety standards.

The types of traffic generated by the Project (primarily passenger vehicles and trucks, with limited commercial truck activity) would be compatible with the existing traffic on area roadways. All proposed roadway improvements would occur within existing and planned public rights-of-way and would be constructed in accordance with Riverside County design standards. The County Transportation Department would review the Project's Plot Plan materials to confirm that no hazardous transportation design features would be introduced. All improvements would conform to applicable Riverside County roadway design standards and would not result in hazards due to a design feature or inadequate emergency access. Impacts would be less than significant.

The proposed Project would not result in any peculiar effects and would not result in new or substantially more severe impacts related to transportation hazards beyond what was previously analyzed in the RCGP FEIR.

d) Maintenance of Roads

The proposed Project would construct frontage improvements along Avenue 54, which is a General Plan roadway. The improved roadway would require routine, intermittent maintenance; however, maintenance of public streets is an inherent operational activity and would not result in significant environmental impacts. The Project would also contribute traffic to off-site public roadways, which similarly require periodic maintenance as part of normal operations. Such maintenance activities would not result in substantial adverse environmental effects.

Public roadway maintenance would be funded through the Project's payment of Development Impact Fees (pursuant to Riverside County Ordinance No. 659) and through future property tax payments by the Project site owner(s). Maintenance of roads associated with the Project would not result in any new or more severe impacts beyond those already disclosed in this document. Therefore, the Project's potential to cause an effect upon, or create a need for new or altered maintenance of roads, would be less than significant.

The proposed Project would not result in any peculiar effects and would not result in new or substantially more severe impacts related to roadway maintenance beyond what was previously analyzed in the RCGP FEIR.

e) Construction Circulation Impacts

During the construction phase, traffic to and from the Project site would be generated by construction employee trips, delivery of construction materials, and delivery/removal of heavy equipment. Vehicular traffic associated with construction employees would be substantially lower than the daily and peak-hour volumes generated during Project operation. Construction activities typically begin and end outside peak hours; therefore, the majority of construction employees would not travel to or from the site during

periods of peak travel. Construction worker trips are not expected to result in a substantial adverse effect on the local roadway system.

Deliveries of construction materials and heavy equipment (which would arrive via flatbed trucks, as most heavy equipment is not authorized to travel on public roadways) would occur periodically based on need rather than on a daily basis and would primarily occur during non-peak hours. These activities would have a nominal effect on the local roadway network.

Avenue 54 would remain open during construction, with no reasonably foreseeable lane closures. Any work within the public right-of-way would be subject to an encroachment permit from the Riverside County Transportation Department and would implement temporary traffic control measures consistent with the California Manual on Uniform Traffic Control Devices (CA MUTCD) and County requirements, as is required for all projects. Therefore, the Project's potential to cause an effect upon circulation during construction would be less than significant.

The proposed Project would not result in any peculiar effects and would not result in new or substantially more severe impacts related to construction-period circulation beyond what was previously analyzed in the RCGP FEIR.

f) Emergency Access

The Project site does not provide access to any abutting parcels or nearby uses. Therefore, there is no potential for the Project to result in inadequate emergency access to nearby uses. During the County of Riverside's review of the proposed Project, the County will evaluate the Project's design, including the layout of the buildings, drive aisles, and parking areas, to ensure that adequate emergency access is provided at Project buildout. As described previously, the Project would also maintain adequate emergency access along Avenue 54 during temporary construction activities within the public right-of-way. In addition, the Project would be required to comply with Riverside County Ordinance No. 461.11, which regulates access road provisions.

Prior to issuance of building permits, the Project would be required to pay appropriate Development Impact Fees at the rates then in effect pursuant to Riverside County Ordinance No. 659. Prior to final building inspection, the Project would also be required to pay appropriate Coachella Valley Association of Governments (CVAG) Transportation Uniform Mitigation Fees at the rates then in effect pursuant to Riverside County Ordinance No. 673.

With required adherence to County ordinances, emergency access and design standards, impacts would be less than significant. The proposed Project would not result in any peculiar effects and would not result in new or substantially more severe impacts related to emergency access beyond what was previously analyzed in the RCGP FEIR.

Section 15183 Finding

The RCGP FEIR was prepared at a program level; therefore, a site-specific project-level assessment is required to determine Project impacts. A Trip Generation Assessment and VMT Screening Evaluation were prepared for the Project. The project-level analysis demonstrates that all potential impacts related to transportation and circulation are less than significant. The Project would not conflict with any program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. The Project would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). The Project would not substantially increase hazards due to a geometric design feature or incompatible uses, would not result in inadequate emergency access, and would not cause significant effects upon road maintenance or circulation during construction. All improvements would conform to applicable Riverside County roadway design standards, and the Project would comply with Riverside County Ordinance No. 461.11. The Project would also be required

to pay Development Impact Fees pursuant to Ordinance No. 659 and Transportation Uniform Mitigation Fees pursuant to Ordinance No. 673.

The proposed Project is consistent with the applicable General Plan policies, the ECVAP, and the County's zoning regulations (M-SC zone). Because the Project implements the land use designation, zoning standards, and transportation requirements previously analyzed in the RCGP FEIR, it would not result in significant environmental impacts. As such, the Project would not result in peculiar effects, new or substantially more severe significant effects, or new off-site or cumulative effects. No new information of substantial importance has been identified that would result in a more severe impact than analyzed in the RCGP FEIR. For these reasons, the Project does not require additional environmental review under CEQA Guidelines section 15183.

	Prior EIR Determination	Effect Peculiar to Project Site?	New Significant Effect?	New Significant Off-Site Cumulative Impact	New Information/ More Severe Impact?
38. Bike Trails					
a) Include the construction or expansion of a bike system or bike lanes?	NA	No	No	No	No

Source(s): Riverside County General Plan

Impacts Identified in the General Plan EIR

The RCGP FEIR did not directly address thresholds or impacts specific to bike trails. However, the Circulation Element includes policies that address non-motorized transportation and bikeways, including a policy requiring implementation of the County trail system as depicted in the Bikeways and Trails Plan. Bicycling occurs throughout the County but is more concentrated in the cities and urbanized portions of unincorporated areas and is more recreational than commute oriented. For a discussion of related RCGP FEIR impact findings and project-level impacts, refer to Section 35 (Parks and Recreation).

Proposed Project Impacts

The Project is proposing to construct site-adjacent roadway improvements on the southern side of Avenue 54, including sidewalk and bicycle lanes. However, impacts associated with the roadway improvement is inherent to the Project's construction phase, and such impacts have been evaluated throughout this document. There are no impacts associated with the bike lane installation not already addressed herein. The construction of the bike lane will implement the Bikeways and Trails Plan and contribute to expanded bike access in this part of the County. As such, impacts would be less than significant.

Section 15183 Finding

The proposed Project is consistent with the applicable General Plan policies, the ECVAP, and the County's zoning regulations (M-SC zone). The RCGP FEIR was prepared at a program level, therefore a site-specific project-level assessment is required to determine Project impacts. The project-level analysis demonstrates that all potential impacts are less than significant. The Project proposes site-adjacent roadway improvements on the southern side of Avenue 54, including sidewalk and bicycle lanes. Because the Project implements the land use designation, zoning standards, and transportation requirements of these plans previously analyzed in the RCGP FEIR, it would not result in significant environmental impacts. As such, the proposed Project does not have peculiar effects, new or substantially more severe significant effects, new off-site or cumulative effects, and no new information of substantial importance has been identified that would result in a more severe impact than analyzed

in the RCGP FEIR. For these reasons, the Project does not require additional environmental review under CEQA Guidelines section 15183.

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

	Prior EIR Determination	Effect Peculiar to Project Site?	New Significant Effect?	New Significant Off-Site Cumulative Impact	New Information/ More Severe Impact?
39. Tribal Cultural Resources a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?	LTSM	No	No	No	No
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? (In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.)	LTSM	No	No	No	No

Source(s): Native American Consultation, BFSA Environmental Services

Impacts Identified in the General Plan EIR

Tribal cultural resources were not a standalone CEQA topic or threshold of significance when the RCGP FEIR was prepared.

The RCGP FEIR determined that buildout of the General Plan could result in potentially significant impacts to archaeological resources and human remains through disturbance or destruction of known and unknown resources during development of vacant lands. The RCGP policies require site-specific cultural resources surveys and technical reports. In addition to implementation of these policies, Mitigation Measures 4.7.1A (notification and handling of human remains in accordance with State Health and Safety Code §7050.5 and Public Resources Code §5097.98), 4.7.1B (avoidance where feasible, including capping and conservation easements), and 4.7.1C (data recovery where avoidance is not possible), along with project-level review and compliance with applicable laws and regulations, were found to reduce potential impacts to archaeological resources and human remains to less than significant levels. (RCGP FEIR p. 4.7-22 et seq.)

Proposed Project Impacts

a, b) Tribal/Historical Resources

A Phase I Cultural Resource Study was prepared for the Project by Brian F. Smith & Associates (BFSA) in March 2025 (Appendix C). An archaeological records search for the project and the surrounding area within a one-mile radius was requested from the SCIC at SDSU on October 22, 2024. The SCIC

identified 38 cultural resources (19 prehistoric, four multicomponent, and 15 historic) within a one-mile radius of the Project, none of which are located on the subject property. Of the 37 previous studies identified within one mile, one (Van Horn et al. 1990) included the property but consisted only of a cultural resources overview and did not include a survey. Review of historic maps, aerial photographs (1953–2024), and other archival sources found no historic resources on the Project site. The property was historically vacant and repeatedly cleared, and agricultural rows and later palm trees appear in photographs after 2006. The analysis concluded that no historic resource occurs on the Project site.

BFSA field archaeologists conducted a pedestrian survey of the Project site on November 11, 2024, with active participation by a representative from the Agua Caliente Band of Cahuilla Indians. The entire property was surveyed in 15- to 20-meter transects. Ground visibility was moderate to poor due to the site's use as an active date palm nursery. The survey confirmed prior impacts from clearing and agricultural use, and no cultural resources were identified.

Although Assembly Bill 52 consultation is not required for a project processed solely under CEQA Guidelines section 15183, the County conducted tribal outreach for the Project. Notices regarding the Project were mailed to all requesting tribes on November 8, 2024. No response was received from any of the groups, including the Agua Caliente Band of Cahuilla Indians, the Augustine Band of Cahuilla Indians, the Pechanga Band of Luiseno Indians, Rincon Band of Luiseno Indians, Soboba Band of Indians, Cahuilla Band of Indians, Ramona Band, Morongo Band, San Manuel Band, the Torres-Martinez Band of Cahuilla Indians Twenty-Nine Palms Band, Cabazon Band, Colorado River Indian Tribes, the Quechan Nation or the Pala Band of Mission Indians.

Although no cultural resources were found on the Project site, and no tribal resources were identified during the AB 52 consultation process, the surrounding area is considered sensitive for prehistoric and historic resources based on the records search. Given the property's prior disturbance, limited survey visibility, and proximity to known prehistoric resource areas (including Lake Cahuilla and the Whitewater River), there remains a potential for inadvertent discovery of tribal resources during grading.

Consistent with RCGP FEIR Mitigation Measure 4.7.1C, all earthwork shall be monitored by a qualified archaeologist and a Native American representative. A detailed monitoring program will also be implemented, including onsite monitors, staff training, and protocols for handling any inadvertent discoveries at the Project site. These measures, in conformance with RCGP FEIR Mitigation Measure 4.7.1C, will reduce impacts to less than significant levels. The Project would not result in peculiar effects, new or substantially more severe significant effects, or new cumulative impacts beyond those already analyzed in the RCGP FEIR.

<u>RCGP FEIR Implementation Measures</u>
RCGP FEIR Mitigation Measures 4.7.1A through 4.7.1C require notification and handling of human remains in accordance with State Health and Safety Code 7050.5 and Public Resources Code 5097.98, avoidance of cultural resources where feasible, and data recovery where avoidance is not possible.

4.7.1A If human remains are encountered during a public or private construction activity, State Health and Safety Code 7050.5 states that no further disturbance shall occur until the Riverside County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. The Riverside County Coroner must be notified within 24 hours.

a. If the coroner determines that the burial is not historic, but prehistoric, the Native American Heritage Commission (NAHC) must be contacted to determine the most likely descendent (MLD) for this area. The MLD may become involved with the disposition of the burial following scientific analysis.

4.7.1B Avoidance is the preferred treatment for cultural resources. Where feasible, project plans shall be developed to allow avoidance of cultural resources. Where avoidance of construction impacts is possible, capping of the cultural resource site and avoidance planting (e.g., planting of prickly pear cactus) shall be employed to ensure that indirect impacts from increased public availability to the site are avoided. Where avoidance is selected, cultural resource sites shall be placed within permanent conservation easements or dedicated open space.

4.7.1C If avoidance and/or preservation in place of cultural resources is not possible, the following mitigation measures shall be initiated for each impacted site:

a. A participant-observer from the appropriate Indian Band or Tribe shall be used during archaeological testing or excavation in the project site.

b. Prior to the issuance of a grading permit for the project, the project proponent shall develop a test level research design detailing how the cultural resource investigation shall be executed and providing specific research questions that shall be addressed through the excavation program. In particular, the testing program shall characterize the site constituents, horizontal and vertical extent, and, if possible, period of use. The testing program shall also address the California Register and National Register eligibility of the cultural resource and make recommendations as to the suitability of the resource for listing on either Register. The research design shall be submitted to the County of Riverside Regional Park and Open-Space District for review and comment. For sites determined, through the Testing Program, to be ineligible for listing on either the California or National Register, execution of the Testing Program will suffice as mitigation of project impacts to this resource.

c. After approval of the research design and prior to the issuance of a grading permit, the project proponent shall complete the excavation program as specified in the research design. The results of this excavation program shall be presented in a technical report that follows the County of Riverside outline for Archaeological Testing. The Test Level Report shall be submitted to the County of Riverside Regional Park and Open-Space District for review and comment. If cultural resources that would be affected by the project are found ineligible for listing on the California or National Register, test level investigations will have depleted the scientific value of the sites and the project can proceed.

d. If the resource is identified as being potentially eligible for either the California or National Register, and project designs cannot be altered to avoid impacting the site, a Treatment Program to mitigate project effects shall be initiated. A Treatment Plan detailing the objectives of the Treatment Program shall be developed. The Treatment Plan shall contain specific, testable hypotheses relative to the sites under study and shall attempt to address the potential of the sites to address these research questions. The Treatment Plan shall be submitted to the County of Riverside Regional Park and Open-Space District for review and comment.

e. After approval of the Treatment Plan, the Treatment Program for affected, eligible sites shall be initiated. Typically, a Treatment Program involves excavation of a statistically representative sample of the site to preserve those resource values that qualify the site as being eligible for the California or National Register. At the conclusion of the excavation or research program, a Treatment Report, following the outline of the County of Riverside for Archaeological Mitigation or Data Recovery, shall be developed. This data recovery report shall be submitted to the County of Riverside Regional Park and Open-Space District for review and comment.

Consistent with Mitigation Measures 4.7.1C of the RCGP FEIR, all earthwork shall be monitored by a Native American representative, and a detailed monitoring program will also be implemented as described below:

Tribal Monitoring

Prior to issuance of grading permits, the developer/permit applicant shall enter into agreement(s) with the consulting tribe(s) for the appropriate number of Native American Monitor(s). A fully executed copy of the agreement(s) shall be submitted to the County Archaeologist for verification. Upon verification, the Archaeologist shall clear this condition. The agreement shall not modify any other condition of approval or mitigation measure.

In conjunction with the Archaeological Monitor(s), the Native American Monitor(s) shall attend the pre-grading meeting with the contractors to provide Cultural Sensitivity Training for all construction personnel.

Tribal Cultural Resource Monitor(s) shall be employed for all ground-disturbing activities (including archaeological testing and surveys). An adequate number of Native American Monitor(s) shall be on-site during all initial ground-disturbing activities and excavation of soils in each portion of the Project site, including clearing, grubbing, tree removals, grading, and trenching. In conjunction with the Archaeological Monitor(s), the Native American Monitor(s) shall have the authority to temporarily divert, redirect, or halt ground-disturbance activities to allow identification, evaluation, and potential recovery of cultural resources.

Should buried cultural deposits be encountered, the Monitor may request that construction halt. The Monitor shall notify a Qualified Archaeologist (meeting the Secretary of the Interior's Standards and Guidelines) to investigate and, if necessary, prepare a mitigation plan for submission to the requesting Tribal Historic Preservation Office and any other consulting tribal preservation offices that request a copy.

All monitoring activities shall be documented in Tribal Monitoring Notes, which shall be submitted to the County Archaeologist prior to grading final inspection.

At the completion of grading, excavation, and ground-disturbing activities, a Phase IV Monitoring Report shall be submitted to the Riverside County Planning Department within 60 days. The report shall document monitoring activities conducted by the Project Archaeologist and Native Tribal Monitors; describe impacts to known resources on the property; describe how each mitigation measure was fulfilled; document the type of cultural resources recovered and their disposition; provide evidence of the required cultural sensitivity training held during the pre-grade meeting; and, in a confidential appendix, include the daily/weekly monitoring notes from the archaeologist. All reports shall also be submitted to the consulting tribes, the Eastern Information Center, and any other interested tribes.

Also see Section 9. Archaeological Resources for additional monitoring requirements.

Section 15183 Finding

The RCGP FEIR was prepared at a program level, therefore a site-specific project-level assessment is required to determine Project impacts. Consistent with RCGP FEIR Mitigation Measure 4.7.1A, and as recommended by the Project-level Cultural Resources Study (Appendix C), all earthwork shall be monitored by a qualified archaeologist and a Native American representative, and a detailed monitoring program will also be implemented. Archeological and tribal monitoring implements existing RCGP policies and RCGP FEIR mitigation measures rather than introduce new requirements. The project-level analysis demonstrates that all potential impacts to tribal resources would be less than significant with implementation of these measures.

The proposed Project is consistent with the applicable General Plan policies, the ECVAP, and the County's zoning regulations (M-SC zone). Because the Project implements the land use designation, zoning standards, and archeological resource requirements previously analyzed in the RCGP FEIR, it would not result in new or significant environmental impacts. As such, the Project would not result in peculiar effects, new or substantially more severe significant effects, new off-site or cumulative effects, or new information that would result in a more severe impact than already identified in the RCGP FEIR. For these reasons, the Project does not require additional environmental review under CEQA Guidelines section 15183.

UTILITIES AND SERVICE SYSTEMS Would the project:	Prior EIR Determination	Effect Peculiar to Project Site?	New Significant Effect?	New Significant Off-Site Cumulative Impact	New Information/ More Severe Impact?
40. Water					
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage systems, whereby the construction or relocation would cause significant environmental effects?	LTS	No	No	No	No
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	SU	No	No	No	No

Source(s): Project Application Materials, Coachella Water Authority (CWA).

Impacts Identified in the General Plan EIR

See Section 41. Sewer for summary of wastewater treatment systems impacts.
See Section 23. Water Quality for summary of water supply and stormwater drainage system impacts.

Proposed Project Impacts

a) New/Expanded Systems

The Proposed Project would connect to existing domestic water and sewer lines located in Avenue 54 and would not require or result in the relocation or construction of new or expanded water or wastewater treatment facilities. On-site water demand would be limited to concrete production processes, interior plumbing fixtures (sinks, toilets, faucets), and outdoor landscape irrigation. Stormwater runoff would be directed to two on-site detention basins located in the southern portion of the Project site which have been designed to control the 100-year storm; no new or expanded off-site stormwater drainage systems would be required.

Construction of the limited on-site utility connections and Project improvements is evaluated throughout this document. Standard construction practices and regulatory requirements would reduce any construction-phase effects to less-than-significant levels. There would be no significant environmental effects specifically attributable to the installation of water, wastewater, or storm-drain infrastructure beyond the overall construction-related impacts of the Project as a whole. Therefore, impacts would be less than significant.

The Project would not result in any peculiar effects and would not result in new or more severe impacts related to water, wastewater, or stormwater infrastructure beyond those previously analyzed in the RCGP FEIR.

b) Water Supplies

The Coachella Water Authority (CWA) is the potable water purveyor for the Project site. The Project is consistent with the Riverside County General Plan land use designation of Light Industrial. Commercial and industrial developments are assigned an average-day water demand rate of 2,000 gallons per day (gpd) per acre.[6] Applying this rate to the approximately 19-acre Project site results in an estimated average-day demand of 38,000 gpd, or approximately 42.57 acre-feet per year (AFY).

As documented in the 2025 Coachella Valley Regional Urban Water Management Plan (2025 CV RUWMP), herein incorporated by reference, which was prepared collaboratively by CWA and five other Coachella Valley urban water suppliers and adopted in 2026, adequate water supplies are projected to be available to meet CWA's estimated water demand through 2050 under normal, single-dry-year, and multiple-dry-year conditions. CWA's demand forecasts in the 2025 CV RUWMP are based on SCAG population projections, which in turn rely on the adopted land-use designations in the general plans covering CWA's service area. Because the Project's water demand is consistent with the demand already projected for the site's existing LI land use designation, the estimated 42.57 AFY of Project demand is already accounted for in the regional projections. Therefore, CWA would have sufficient water supplies available to serve the Project from existing entitlements and resources, and no new or expanded entitlements would be required.

Pursuant to CEQA Guidelines Section 15155(a)(1)(E), a Water Supply Assessment is not required for the proposed Project because it does not involve a land use that would house more than 1,000 persons, occupy more than 40 acres of land, or have more than 650,000 square feet of floor area. Therefore, impacts would be less than significant. The Project would not result in any peculiar effects and would not result in new or more severe impacts related to water supply beyond those previously analyzed in the RCGP FEIR.

Section 15183 Finding

The RCGP FEIR was prepared at a program level, therefore a site-specific project-level assessment is required to determine Project impacts. The project-level analysis demonstrates that all potential impacts related to water supply and utilities are less than significant. The Project would not require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage systems that would cause significant environmental effects, and sufficient water supplies are available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years.

The proposed Project is consistent with the applicable General Plan policies, the ECVAP, and the County's zoning regulations (M-SC zone). Because the Project implements the land use designation, zoning standards, and utility requirements of these plans previously analyzed in the RCGP FEIR, it would not result in significant environmental impacts. As such, the proposed Project does not have peculiar effects, new or substantially more severe significant effects, new off-site or cumulative effects, and no new information of substantial importance has been identified that would result in a more severe impact than analyzed in the RCGP FEIR. For these reasons, the Project does not require additional environmental review under CEQA Guidelines section 15183.

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[6] A water demand factor of 2,000 gpd per acre for commercial and industrial uses is published by the Mission Springs Water District (a neighboring Coachella Valley water agency) and is referenced as a locally adopted factor from the district's 2025 Water Master Plan (Table 5).

	Prior EIR Determination	Effect Peculiar to Project Site?	New Significant Effect?	New Significant Off-Site Cumulative Impact	New Information/ More Severe Impact?
41. Sewer a) Require or result in the construction of new wastewater treatment facilities, including septic systems, or expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects?	LTS	No	No	No	No
b) Result in a determination by the wastewater treatment provider that serves or may service the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	LTS	No	No	No	No

Source(s): Department of Environmental Health Review

Impacts Identified in the General Plan EIR

According to the RCGP FEIR, a significant impact on wastewater service would occur if existing or planned facilities and supplies are not adequate to serve proposed land uses or if existing wastewater service is significantly disrupted.

The RCGP FEIR determined that buildout of the General Plan would not result in significant adverse impacts related to wastewater facilities after implementation of applicable General Plan policies. Although the RCGP does not include a Public Services Element, it contains policies intended to address the effects of future development on wastewater facilities and ensure adequate facilities as development occurs. Implementation of these policies would reduce the effects of development to a less than significant level. Additionally, the RCGP includes a policy addressing the effects of future development in rural areas on septic facilities. Implementation of this policy, along with Riverside County Government Code Section 8.124.030 regulating construction of septic facilities, would ensure that future development in rural areas of the County would not have any significant adverse impacts on water quality from septic facilities. (RCGP FEIR p. 4.15-18 et seq.)

Proposed Project Impacts

a) New Wastewater Treatment Facility

The Project's sewer lines would be connected to existing sewer lines in Avenue 54. The Project would not require or result in the construction of new wastewater treatment facilities, the expansion of existing wastewater treatment facilities, or the use of septic systems.

Installation of the limited on-site and off-site sewer connections would result in physical construction-related effects; however, these effects are part of the Project's overall construction phase and are evaluated throughout this document. All utility improvements would be designed and constructed in accordance with Riverside County and CWA standards and requirements. The construction of the sewer lines and connections necessary to serve the Project would not result in any significant environmental effects beyond those already identified and disclosed for the Project as a whole. No mitigation measures would be required. Impacts would be less than significant. The Project would not

result in any peculiar effects and would not result in new or more severe impacts related to wastewater infrastructure beyond those previously analyzed in the RCGP FEIR.

b) Wastewater Capacity

Wastewater generated by the Project would be conveyed via existing facilities and treated by the Coachella Water Authority (CWA) / Coachella Sanitary District, which maintains a 12-inch sewer line in Avenue 54 and operates the Wastewater Treatment Plant (WWTP) located at Avenue 54 and Polk Street. The WWTP has a current design/permitted treatment capacity of 4.5 million gallons per day (MGD) with an average daily flow of 3.054 MGD according to the Quarterly Activity Report (January 2026-March 2026.[7, 8] The Project's average-day water demand is approximately 38,020 gallons per day (gpd) based on the industrial demand rate of 2,000 gpd per acre applied to the 19.01-acre site. Applying a standard 85% return-to-sewer factor (typical for light industrial uses with limited process water),[9] the Project is estimated to generate approximately 32,317 gpd (or 0.032 MGD) of wastewater (38,020 gpd × 0.85). The existing WWTP has more than sufficient capacity to treat the Project's projected wastewater flows.

The Project would not require or result in the construction of any new or expanded wastewater facilities (including conveyance lines, treatment facilities, or lift stations). Because adequate capacity exists at the existing treatment facilities to serve the Project's projected sewer demand, impacts would be less than significant. The Project would not result in any peculiar effects and would not result in new or more severe impacts related to wastewater treatment capacity beyond those previously analyzed in the RCGP FEIR.

Section 15183 Finding

The RCGP FEIR was prepared at a program level, therefore a site-specific project-level assessment is required to determine Project impacts. The project-level analysis demonstrates that all potential impacts related to sewer and wastewater are less than significant. The Project would not require or result in the construction or expansion of new wastewater treatment facilities or septic systems that would cause significant environmental effects. The wastewater treatment provider has confirmed adequate capacity to serve the Project's projected demand in addition to existing commitments.

The proposed Project is consistent with the applicable General Plan policies, the ECVAP, and the County's zoning regulations (M-SC zone). Because the Project implements the land use designation, zoning standards, and utility requirements of these plans previously analyzed in the RCGP FEIR, it would not result in significant environmental impacts. As such, the proposed Project does not have peculiar effects, new or substantially more severe significant effects, new off-site or cumulative effects, and no new information of substantial importance has been identified that would result in a more severe impact than analyzed in the RCGP FEIR. For these reasons, the Project does not require additional environmental review under CEQA Guidelines section 15183.

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7 Coachella Sanitary District Wastewater Treatment Plant design/permitted capacity = 4.5 MGD (California Regional Water Quality Control Board, Colorado River Basin Region, NPDES Order R7-2026-0006; City of Coachella / Coachella Sanitary District utility reports).

8 Quarterly Activity Report (January 2026 – March 2026), Coachella Water Authority and Sanitary District. https://mccmeetingspublic.blob.core.usgovcloudapi.net/coachelaca-meet-38a1c26b731d49bab767734eb2878d51/ITEM-Attachment-001-299fed3f494840ae92640d2049be27dc.pdf

9 A return-to-sewer factor of 80–90% of indoor water use is a standard engineering assumption for commercial and light industrial developments with limited process water. An 85% factor is applied here as a conservative midpoint

	Prior EIR Determination	Effect Peculiar to Project Site?	New Significant Effect?	New Significant Off-Site Cumulative Impact	New Information/ More Severe Impact?
42. Solid Waste					
a) Generate solid waste in excess of State or Local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	LTSM	No	No	No	No
b) Comply with federal, state, and local management and reduction statutes and regulations related to solid wastes including the CIWMP (County Integrated Waste Management Plan)?	LTSM	No	No	No	No

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

Impacts Identified in the General Plan EIR

According to the RCGP FEIR, an impact to the County's waste management system would occur if the build out of the General Plan would create demands for waste management services that exceed the capabilities of the County's waste management system. The impact would be considered significant if:

- There is no expansion capability or an expansion project, or a new waste facility cannot be approved due to environmental constraints, land use conflicts, or political factors;
- The RCGP land use policies preclude or do not promote expansion or development of waste facilities and new technologies and/or create compatibility issues or land use conflicts; and/or,
- The existing solid waste services are significantly disrupted (e.g., natural disasters, land use constraints, political factors).

The RCGP FEIR determined that buildout of the General Plan could result in significant adverse impacts related to solid waste, but that these impacts would be reduced to less than significant levels through implementation of applicable General Plan policies and mitigation measures. Although the RCGP does not include a Public Services Element or policies that protect existing and future waste facilities from conflicting land uses (which could result in premature facility closure), it contains policies intended to address the effects of future development on solid waste facilities by ensuring that development does not exceed the ability to provide supporting infrastructure and by monitoring landfill capacities. While these policies focus on preventing the solid waste management system from being overwhelmed but do not address waste reduction, recycling, or specific goals and progress reporting, additional mitigation measures are provided. These measures include expanding recycling services (RCGP FEIR Mitigation Measure 4.15.3A), achieving and maintaining waste diversion goals through source reduction, reuse, recycling, and composting (RCGP FEIR Mitigation Measure 4.15.3B), preparing progress reports and periodic plan reviews (RCGP FEIR Mitigation Measures 4.15.3C and 4.15.3D), requiring adequate recycling collection areas in new development (RCGP FEIR Mitigation Measure 4.15.3E), and coordinating to ensure sufficient disposal capacity while promoting waste reduction practices (RCGP FEIR Mitigation Measure 4.15.3F). Although the total amount of solid waste to be disposed of at buildout would increase, the increase is not substantial and adequate capacity at the County's landfills would still exist. Implementation of the RCGP policies and mitigation measures would reduce potential impacts to a less than significant level. (RCGP FEIR p. 4.15-13 et seq.)

Proposed Project Impacts

a) Solid Waste Capacity

Implementation of the proposed Project would generate an incremental increase in solid waste volumes requiring off-site disposal during short-term construction and long-term operational activities. The Project would be required to comply with AB 939, which requires a minimum of 50 percent of all construction waste and debris to be recycled. Additionally, the Project would be required to comply with mandatory waste reduction requirements as described below. Solid waste generated by the Project would be disposed at the Lamb Canyon Sanitary Landfill, El Sobrante Landfill and/or the Badlands Sanitary Landfill. Existing capacities at each of these landfills is discussed below and shown on Table 25, Permitted and Remaining Capacity of Area Landfills, shows the maximum daily capacity and total remaining capacity for these landfills.

Table 24
Permitted and Remaining Capacity of Area Landfills

Landfill	Maximum Capacity (Tons/Day)	Maximum Permitted Capacity (Cubic Yards)	Remaining Capacity (Cubic Yards)
Lamb Canyon	5,000	38,935,653	19,242,9502
El Sobrante	16,054	209,910,000	143,977,1701
Badlands	4,800	34,400,000	15,748,7993

Remaining capacity as of April 1, 2018, which is the most recent information reported by CalRecycle. (CalRecycle, 2019a)

Construction
Solid waste requiring disposal would be generated by the construction process, primarily consisting of discarded materials and packaging. Based on the size of the Project (88,400 SF of buildings) and the U.S. Environmental Protection Agency's construction waste generation factor of 4.34 pounds per square foot for non-residential construction, approximately 191.83 tons of construction and demolition waste is expected to be generated during the Project's construction phase.[10]

California Assembly Bill 939 (AB 939) requires that a minimum of 50% of all solid waste be diverted from landfills through recycling, reuse, and other waste-reduction strategies. The Project's construction phase is estimated to last up to 400 days; therefore, even without accounting for required diversion, the Project would generate approximately 0.48 tons of solid waste per day. Non-recyclable construction waste would be disposed of at the Lamb Canyon Sanitary Landfill, El Sobrante Landfill, and/or the Badlands Sanitary Landfill.

As described above, these landfills receive well below their maximum permitted daily disposal volumes. The relatively minimal construction waste generated by the Project is not anticipated to cause any of these facilities to exceed their maximum permitted daily disposal volumes, nor are the landfills expected to reach their total maximum permitted disposal capacities during the Project's construction period. The Lamb Canyon Sanitary Landfill, El Sobrante Landfill, and Badlands Sanitary Landfill have sufficient daily capacity to accept solid waste generated by the Project's construction phase. Therefore, impacts to landfill capacity associated with the Project's near-term construction activities would be less than significant.

[10] U.S. Environmental Protection Agency, Estimating 2003 Building-Related Construction and Demolition Materials Amounts (EPA530-R-09-002, March 2009), p. 10 (weighted average non-residential construction generation rate of 4.34 lb/ft²). Available at: https://www.epa.gov/sites/production/files/2017-09/documents/estimating2003buildingrelatedcanddmaterialsamounts.pdf

Operation
Non-recyclable solid waste generated during long-term operation of the Project would be disposed at the Lamb Canyon Sanitary Landfill, El Sobrante Landfill, and/or the Badlands Sanitary Landfill. As described above, these landfills receive well below their maximum permitted daily disposal volume; thus, waste generated by the Project's operation is not anticipated to cause the landfill to exceed its maximum permitted daily disposal volume. In addition, AB 939 requirements for 50% diversion will also apply to daily operational trash generation. Because the Project would generate a relatively small amount of solid waste per day as compared to the permitted daily capacities at receiving landfills, impacts to regional landfill facilities during the Project's long-term operational activities would be less than significant.

Table 25
Estimated Solid Waste Disposal at Project Buildout

Proposed Land Use	Riv. Co. Disposal Rates	Proposed	Solid Waste Disposal (pounds per day)	Solid Waste Disposal (tons per year)
Light Industrial	41.64/lb/employee/day	100	4,164	520.05
Total			(with 50% diversion)	**260.25**

The proposed Project would not result in any peculiar effects and would not result in new or more severe impacts related to land use beyond what was previously analyzed in the RCGP FEIR.

b) Federal, State, and Local Regulations

The California Integrated Waste Management Act (AB 939), signed into law in 1989, established an integrated waste management system focused on source reduction, recycling, composting, and land disposal of waste. The Act also established a 50 percent waste reduction requirement for cities and counties by the year 2000, along with a process to ensure environmentally safe disposal of waste that could not be diverted. Pursuant to the requirements of AB 939, the Riverside County Board of Supervisors adopted the County of Riverside Countywide Integrated Waste Management Plan (CIWMP). The CIWMP outlines the goals, policies, and programs that the County and its cities implement to create an integrated and cost-effective waste management system that complies with the provisions of AB 939 and its diversion mandates.

To assist the County of Riverside in achieving the mandated goals of AB 939, the Project's building tenant(s) would be required to work with future refuse haulers to develop and implement feasible waste reduction programs, including source reduction, recycling, and composting. In accordance with the California Solid Waste Reuse and Recycling Access Act of 1991 (Public Resources Code § 42911), the Project is required to provide adequate areas for collecting and loading recyclable materials where solid waste is collected. These collection areas must be shown on construction drawings and must be in place before occupancy permits are issued. In compliance with AB 341 (Mandatory Commercial Recycling Program), the future occupant(s) of the proposed Project would be required to arrange for recycling services if the occupant generates four or more cubic yards of solid waste per week. Implementation of these mandatory requirements would reduce the amount of solid waste generated by the Project that is diverted to landfills and would thereby aid in extending the life of affected disposal sites. The Project would be required to comply with all applicable solid waste statutes and regulations. As such, impacts related to solid waste statutes and regulations would be less than significant.

Section 15183 Finding

The RCGP FEIR was prepared at a program level, therefore a site-specific project-level assessment is required to determine Project impacts. The project-level analysis demonstrates that all potential impacts related to solid waste are less than significant. Local landfills have sufficient capacity to accept solid waste generated during both construction and operation of the Project. The Project would generate a relatively small amount of solid waste compared to permitted daily capacities at receiving landfills. The Project would comply with all applicable federal, state, and local solid waste management and reduction statutes and regulations, including the CIWMP.

The proposed Project is consistent with the applicable General Plan policies, the ECVAP, and the County's zoning regulations (M-SC zone). Because the Project implements the land use designation, zoning standards, and solid waste requirements of these plans previously analyzed in the RCGP FEIR, it would not result in significant environmental impacts. As such, the proposed Project does not have peculiar effects, new or substantially more severe significant effects, new off-site or cumulative effects, and no new information of substantial importance has been identified that would result in a more severe impact than analyzed in the RCGP FEIR. For these reasons, the Project does not require additional environmental review under CEQA Guidelines section 15183.

	Prior EIR Determination	Effect Peculiar to Project Site?	New Significant Effect?	New Significant Off-Site Cumulative Impact	New Information/ More Severe Impact?
43. Utilities					
Would the project impact the following facilities requiring or resulting in the construction of new facilities or the expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects?					
a) Electricity?	LTS	No	No	No	No
b) Natural gas?	LTS	No	No	No	No
c) Communications systems?	LTS	No	No	No	No
d) Street lighting?	LTS	No	No	No	No
e) Maintenance of public facilities, including roads?	LTS	No	No	No	No
f) Other governmental services?	LTS	No	No	No	No

Source(s): Project Application Materials, Utility Service Providers

Impacts Identified in the General Plan EIR

The RCGP FEIR did not address utilities as a standalone environmental topic or threshold of significance. Although the RCGP does not contain a Public Services Element, it includes a policy encouraging the County to coordinate with public service agencies. Specifically, Land Use Policy 5.2 requires monitoring the capacities of infrastructure and services in coordination with service providers, utilities, and outside agencies and jurisdictions to ensure that growth does not exceed acceptable levels of service. See Section 10. Energy for summary of impacts related to natural gas and electricity.

Proposed Project Impacts

a-f) Utilities

The proposed Project would include connections to existing electricity, natural gas, and communications infrastructure that already exists in the area, and all such connections would be accomplished in conformance with the rules and standards enforced by the applicable service provider. Impacts associated with the construction and operation of electricity, natural gas, communications systems, street lighting, public facilities maintenance, and other governmental services are an inherent part of

the Project's construction process and operational characteristics, and the environmental effects associated with the Project's construction phase have been evaluated throughout this document. There are no unique conditions associated with the Project's proposed utility service connections that would result in impacts to the environment that have not already been addressed by this document. Impacts would be less than significant.

The proposed Project would not result in any peculiar effects and would not result in new or more severe impacts related to land use beyond what was previously analyzed in the RCGP FEIR.

Section 15183 Finding

The RCGP FEIR was prepared at a program level, therefore a site-specific project-level assessment is required to determine Project impacts. The project-level analysis demonstrates that all potential impacts related to utilities and service systems are less than significant. The Project would include connections to existing electricity, natural gas, communications infrastructure, street lighting, and other public facilities that are already present in the area. All connections would be made in conformance with the applicable service providers' rules and standards. Impacts associated with construction and operation of these utilities are inherent to the Project and have been evaluated throughout this document, with mitigation measures incorporated where necessary to reduce effects to the maximum feasible extent. The Project would not require or result in the construction or expansion of new facilities for electricity, natural gas, communications systems, street lighting, public facility maintenance, or other governmental services that would cause significant environmental effects.

The proposed Project is consistent with the applicable General Plan policies, the ECVAP, and the County's zoning regulations (M-SC zone). Because the Project implements the land use designation, zoning standards, and utility/service system requirements of these plans previously analyzed in the RCGP FEIR, it would not result in significant environmental impacts. As such, the proposed Project does not have peculiar effects, new or substantially more severe significant effects, new off-site or cumulative effects, and no new information of substantial importance has been identified that would result in a more severe impact than analyzed in the RCGP FEIR. For these reasons, the Project does not require additional environmental review under CEQA Guidelines section 15183.

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

	Prior EIR Determination	Effect Peculiar to Project Site?	New Significant Effect?	New Significant Off-Site Cumulative Impact	New Information/ More Severe Impact?
44. Wildfire Impacts a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	LTS	No	No	No	No
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?	LTS	No	No	No	No
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	LTS	No	No	No	No

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?	LTS	No	No	No	No
e) Expose people or structures either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	LTS	No	No	No	No

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

Impacts Identified in the General Plan EIR

Wildfire was not a standalone CEQA threshold or Appendix G checklist topic when the 2003 RCGP FEIR was prepared. The current Wildfire section was added as part of the 2018 CEQA Guidelines updates.

The RCGP FEIR addressed wildfire-related issues indirectly, primarily under Public Services (Section 4.15.1, Fire Protection) and through analysis of the Safety Element, Geology and Slope Stability (Section 4.10), and Flood and Dam Inundation Hazards (Section 4.9). The FEIR noted that foothill and wildland/urban interface areas have a greater chance of exposure to wildland fires due to dense vegetation with high oil content, topography, and increasing development in intermix zones, creating complex fire conditions that pose safety threats. High fire hazard areas were also identified as environmental constraints limiting maximum development.

The RCGP Safety Element policies were found to reduce the effects of fire hazards by both reducing the fire threat and maintaining adequate fire protection plans. Although these policies constitute public policy rather than CEQA mitigation, their implementation, together with Riverside County Ordinance No. 787, the Riverside County Master Fire Protection Plan, California Public Resources Code Section 4290, the Uniform Fire Code, and the Uniform Building Code, would reduce effects of development on fire protection services (and related exposure to wildland fire risks) to a less than significant level. (RCGP FEIR p. 4.15-3 et seq., 4.10, and 4.9; Safety Element discussion.)

Proposed Project Impacts

a-e) Wildfire

CAL FIRE adopted Fire Hazard Severity Zone (FHSZ) maps for State Responsibility Areas (SRAs) on November 7, 2007. The fire hazard model considers wildland fuels (the natural vegetation that burns during a wildfire), topography (especially slope steepness, as fires burn faster upslope), weather (temperature, humidity, and wind), the frequency and severity of wildfires in different regions of California, and the production and movement of burning embers. All SRAs are rated moderate, high, or very high fire hazard.

According to the Riverside County General Plan, there are three primary types of fires: urban fires (typically limited in extent), wildland fires (occurring in open, vegetated, and largely undeveloped lands), and wildland-urban interface (WUI) fires (occurring where development intermixes with open wildland areas). The Project site is located in a developed area of Riverside County and is not subject to significant wildland fire risk due to its location, the sparse vegetation on the valley floor, and intervening development and distance from wildlands.

According to the adopted CAL FIRE FHSZ maps for SRAs, the Project site is not located within a Fire Hazard Severity Zone in a State Responsibility Area.[11] The Project site is also not classified as a Very High Fire Hazard Severity Zone or other hazardous fire area designated by the Fire Chief. Because the Project site is not located in an SRA, the Project is not subject to the wildfire thresholds set forth in CEQA Guidelines Appendix G, Section XX(a) through (e).

A number of California regulations, including Public Resources Code Sections 4290–4299 and California Government Code Section 51178, apply to development in or near fire hazard areas and establish minimum statewide fire-safety standards for road access, signage, emergency water supply, and fuel breaks. Mandatory compliance with these regulations would reduce any potential for the Project to expose people or structures to significant wildland fire risks.

In addition, the Riverside County Department of Building and Safety and the Riverside County Fire Department enforce fire standards through building plan review and inspections, including compliance with Riverside County Ordinance No. 787 (which requires adequate emergency vehicle access, fire hydrant placement, and fire flows). No impact would occur. The Project would not result in any peculiar effects and would not result in new or more severe impacts related to wildfire beyond those previously analyzed in the RCGP FEIR.

Section 15183 Finding

The RCGP FEIR was prepared at a program level in 2003. At that time, wildfire was not a standalone CEQA impact topic. However, fire hazards, emergency response, and public safety were analyzed in the Safety Element, geology and slope stability, and public services sections of the RCGP FEIR.

Project-level analysis shows that all wildfire-related impacts are less than significant. The Project site is not located in a Fire Hazard Severity Zone within a State Responsibility Area and is not classified as a Very High Fire Hazard Severity Zone. The site is in a developed area of Riverside County and is not subject to significant wildland fire risk. The Project will comply with all applicable fire safety regulations, including Riverside County Ordinance No. 787, and will be reviewed by the County Department of Building and Safety and the Riverside County Fire Department for adequate emergency access, fire hydrant placement, and fire flows. The Project will not impair emergency response or evacuation plans, exacerbate wildfire risks, require infrastructure that increases fire risk, or expose people or structures to significant wildfire-related hazards.

The Project is consistent with the General Plan Light Industrial designation, the ECVAP, and the M-SC zoning designation. Because the Project implements the land use, zoning, and fire-safety requirements previously analyzed in the RCGP FEIR, it would not result in significant environmental impacts. The Project has no peculiar effects, no new or substantially more severe significant effects, and no new off-site or cumulative effects. No new information of substantial importance has been identified that would result in a more severe impact than analyzed in the RCGP FEIR. Therefore, the Project does not require additional environmental review under CEQA Guidelines Section 15183.

[11] CAL FIRE, Fire Hazard Severity Zones in State Responsibility Areas, adopted November 7, 2007. Official maps and information available at: https://osfm.fire.ca.gov/fhsz

MANDATORY FINDINGS OF SIGNIFICANCE Does the Project:	Prior EIR Determination	Effect Peculiar to Project Site?	New Significant Effect?	New Significant Off-Site Cumulative Impact	New Information/ More Severe Impact?
45. Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self- sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	SU	No	No	No	No

Source(s): Project Application Materials

All impacts to the environment, including impacts to habitat for fish and wildlife species, fish and wildlife populations, plant and animal communities, rare and endangered plants and animals, and historical and prehistorical resources, were evaluated as part of this 15183 analysis. Throughout this document, where impacts were determined to be potentially significant, measures consistent with RCGP policies or required by RCGP FEIR mitigation measures have been incorporated to reduce those impacts to less than significant. These are not new mitigation measures but rather the implementation of existing policies and requirements.

Accordingly, with adherence to RCGP FEIR mitigation requirements and RCGP policies, the Project would not substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory. Impacts would be reduced to less than significant levels.

	Prior EIR Determination	Effect Peculiar to Project Site?	New Significant Effect?	New Significant Off-Site Cumulative Impact	New Information/ More Severe Impact?
46. Have impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, other current projects and probable future projects)?	SU	No	No	No	No

Source(s): Project Application Materials

As discussed throughout this document, implementation of the proposed Project has the potential to result in effects to the environment that are individually limited but may be cumulatively considerable. Where the Project has the potential to contribute to a cumulatively considerable impact to the

environment, adherence to standard County RCGP policies and RCGP FEIR mitigation measures would reduce potential effects to less than significant levels.

Aesthetics

The RCGP FEIR determined impacts to Aesthetic/Visual Resources would be cumulatively significant (RCGP FEIR p. 5-12). New development on the Project site and in the surrounding area would change the existing character of the Project's viewshed; however, the proposed Project, as well as all development in the immediate vicinity of the Project would be required to comply with the development regulations and design standards contained in the County's Development Code, which would ensure that minimum standards related to visual character and quality are met to preclude adverse aesthetic effects (e.g., size, scale, building materials, lighting). Accordingly, the Project's aesthetic impacts would not be cumulatively considerable. The Project would not result in any peculiar effects and would not result in new or more severe impacts related to aesthetics beyond those previously analyzed in the RCGP FEIR.

Agriculture

The RCGP FEIR determined impacts to Agricultural Resources would be cumulatively significant (RCGP FEIR p. 5-12). The Project's conversion of approximately 19.01 acres of Prime Farmland falls within the scope and scale of impacts evaluated in the RCGP FEIR, which determined that the overall loss of Prime, Unique, and Statewide Important Farmland would be significant and unavoidable. Because the Project implements the land use designation, zoning standards, and planning requirements previously analyzed in the RCGP FEIR, it would not result in peculiar effects, new or substantially more severe significant effects, new off-site or cumulative effects, and there is no new information that would result in a more severe impact than already identified in the RCGP FEIR.

Air Quality

The RCGP FEIR determined impacts to Air Quality would be cumulatively significant and unavoidable (RCGP FEIR p. 5-13). The Project would not conflict with or obstruct implementation of the applicable air quality plan; would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is in non-attainment; would not expose sensitive receptors located within one mile of the site to substantial pollutant concentrations; and would not result in other emissions, such as those leading to odors, that would adversely affect a substantial number of people. As such, impacts would not be cumulatively considerable. The Project would not result in any peculiar effects and would not result in new or more severe impacts related to air quality beyond those previously analyzed in the RCGP FEIR.

Biological Resources

The RCGP FEIR determined impacts to Biological Resources would be cumulatively significant and unavoidable (RCGP FEIR p. 5-13). The Project Site is located within the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP) planning boundary/fee area and outside of a designated conservation area, biological corridor or linkage area. The Project applicant shall pay a local development mitigation fee established by the CVMSHCP. The Project will have less than significant impacts. The Project would not result in any peculiar effects and would not result in new or more severe impacts related to biological resources beyond those previously analyzed in the RCGP FEIR.

Cultural Resources

The RCGP FEIR determined impacts to Cultural Resources would be cumulatively significant (RCGP FEIR p. 5-14). As discussed under Thresholds 8 and 9, consistent with RCGP FEIR Mitigation Measure 4.7.1A, and as recommended by the Project-level Cultural Resources Study (Appendix C), all earthwork shall be monitored by a qualified archaeologist and a Native American representative, and a detailed monitoring program will also be implemented. Monitoring and properly identifying and treating resources that may be uncovered during the Project's earth-moving activities would reduce impacts to less than significant levels, reducing impacts on a direct and cumulatively considerable basis. The Project would

not result in any peculiar effects and would not result in new or more severe impacts related to cultural resources beyond those previously analyzed in the RCGP FEIR.

Energy

The RCGP FEIR determined impacts to Energy would be cumulatively significant (RCGP FEIR p. 5-14). As discussed under Threshold 10, Energy Impacts, during construction and operation, the Project and other cumulative developments would be subject to regional, State, and federal requirements related to energy consumption, including requirements related to energy efficiency (e.g., Title 24 energy efficiency requirements) and fuel efficiency. Moreover, energy consumed by the Project is expected be comparable to other light industrial uses of similar scale and intensity that are constructed and operating in California, because the Project does not propose uses or operations that would inherently result in excessive and wasteful energy consumption. There are no components of the warehouse uses proposed by the Project that would result in the inefficient, wasteful, or otherwise unnecessary use of energy resources on either a direct or cumulatively considerable basis. Additionally, the Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. As such, Project-related impacts due to energy consumption would be less-than-cumulatively considerable. The Project would not result in any peculiar effects and would not result in new or more severe impacts related to energy beyond those previously analyzed in the RCGP FEIR.

Geology and Soils

The RCGP FEIR determined impacts to Geology and Slope Stability would be cumulatively significant (RCGP FEIR p. 5-14 et seq.) Potential effects related to geology and soils are inherently site-specific; therefore, there is no potential for the Project to contribute to a cumulatively considerable impact under this topic. Furthermore, the proposed Project is required by law to comply with the California Building Standards Code which addresses construction standards including those related to geologic and soil conditions. As a standard condition of Project approval, the Project shall be required to comply with the site-specific recommendations contained in the geotechnical investigation prepared for the Project site. Impacts to 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 would be less than significant. The Project would not result in any peculiar effects and would not result in new or more severe impacts related to geology and soils beyond those previously analyzed in the RCGP FEIR.

Greenhouse Gas Emissions

The RCGP FEIR did not evaluate impacts related to greenhouse gas emissions as a standalone issue because the specific CEQA Appendix G questions concerning GHG emissions and climate change had not yet been added to the CEQA Guidelines at the time of the 2003 FEIR's preparation (they were incorporated in 2010). As discussed in Threshold 20, Greenhouse Gas Emissions, global climate change (GCC) occurs as the result of global emissions of GHGs. An individual development Project does not have the potential to result in direct and significant GCC-related effects in the absence of cumulative sources of GHGs. The CEQA Guidelines also emphasize 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)).

At Project buildout, the Project's total annual GHG emissions would not exceed the Riverside County CAP's annual GHG emissions threshold of 3,000 MTCO2e. With implementation of Project design features, mitigation and adherence to applicable regulations, the Project would not cause a significant impact due to a conflict with the County's CAP and impacts related to GHG emissions would not be cumulatively considerable basis. The Project would not result in any peculiar effects and would not result in new or more severe impacts related to greenhouse gases beyond those previously analyzed in the RCGP FEIR.

Hazards and Hazardous Materials

The RCGP FEIR determined impacts related to Hazards and Hazardous Materials would not be cumulatively significant with compliance with federal, State, and local regulations concerning the storage and handling of hazardous materials and/or waste would reduce the potential for significant public health and safety impacts from hazardous materials to occur (RCGP FEIR p. 5-15). Potential effects related to hazards and hazardous materials are inherently site-specific; therefore, there is no potential for the Project to contribute to a cumulatively considerable impact under this topic. The Project would not result in any peculiar effects and would not result in new or more severe impacts related to hazards and hazardous materials beyond those previously analyzed in the RCGP FEIR.

Hydrology and Water Quality

The RCGP FEIR determined impacts to Water Resources would be cumulatively significant (RCGP FEIR p. 5-18), and Flood and Dam Inundation Hazards would not be cumulatively significant (RCGP FEIR p. 5-14.) Construction and operation of the Project and other projects in the Whitewater River watershed would have the potential to result in a cumulatively considerable water quality impact, including erosion and sedimentation. However, in accordance with applicable federal, State, and local regulations, all development projects would be required to implement plans during construction and operation (e.g., SWPPP and WQMP) to minimize adverse effects to water quality, which would avoid a cumulatively considerable impact. Compliance with federal, State, and local regulations would require on-site areas to be protected, at a minimum, from flooding during peak storm events (i.e., 100-year storm) and ensure that proposed development projects would not expose downstream properties to increased flooding risks during peak storm events. Accordingly, a cumulatively considerable effect related to hydrology and water quality would not occur. The Project would not result in any peculiar effects and would not result in new or more severe impacts related to hydrology and water quality beyond those previously analyzed in the RCGP FEIR.

Land Use and Planning

The RCGP FEIR determined impacts to Land Use would be cumulatively significant (RCGP FEIR p. 5-12 et seq.) The Project would not physically divide an established community, or conflict with applicable land use/planning documents and the Project is consistent with the County's land use designation and zoning classifications for the Project site; therefore, there is no potential for the Project to contribute to a cumulatively considerable impact related to land use and planning. The Project would not result in any peculiar effects and would not result in new or more severe impacts related to land use and planning beyond those previously analyzed in the RCGP FEIR.

Mineral Resources

The RCGP FEIR determined impacts to Mineral Resources would not be cumulatively significant (RCGP FEIR p. 5-15). The Project would have no impact on mineral resources. Therefore, there is no potential for the Project to contribute to a cumulatively considerable impact under this topic. The Project would not result in any peculiar effects and would not result in new or more severe impacts related to mineral resources beyond those previously analyzed in the RCGP FEIR.

Noise

The RCGP FEIR determined Noise impacts would not be cumulatively significant (RCGP FEIR p. 5-15). Noise levels diminish rapidly with distance; therefore, for a development project to contribute to a noise-related cumulative impact it must be located in close proximity to another development project or source of substantial noise. There are no construction projects in the immediate vicinity of the Project site that would overlap with Project-related construction activities. Accordingly, cumulatively considerable impacts related to periodic noise and construction-related vibration would not occur. Under long-term operating conditions the Project would comply with the County's Noise Ordinance and would not produce noticeable levels of vibration; therefore, cumulatively considerable impacts related to these issue areas would not occur. The analysis under Threshold 27, Noise, demonstrates that the Project would not result in a cumulatively considerable impact related to transportation noise under long-term

conditions. The Project would not result in any peculiar effects and would not result in new or more severe impacts related to noise beyond those previously analyzed in the RCGP FEIR.

Paleontological Resources

The RCGP FEIR determined impacts to Cultural Resources (including paleontological resources) would be cumulatively significant (RCGP FEIR p. 5-14). No paleontological resources are identified on or near the Project site; however, grading and excavation activities on the Project site that occur deeper than 4.0 feet in depth in areas of the Project site that are composed of very old alluvial fan sediments (which are mapped by Riverside County as having "High A" paleontological sensitivity), have the potential to unearth paleontological resources that may exist below the ground surface. Similarly, cumulative development in this same geologic formation has the potential to unearth paleontological resources. Consistent with RCGP Open Space Policy 19.9, paleontological monitoring is required for the Project thus reducing potential impacts to paleontological resources. The Project would not result in any peculiar effects and would not result in new or more severe impacts related to paleontological resources beyond those previously analyzed in the RCGP FEIR.

Population and Housing

The RCGP FEIR determined impacts to Housing and Population would be cumulatively significant (RCGP FEIR p. 5-12). The Project proposes non-residential light industrial uses and would not directly generate new residents or require the construction of replacement housing. Fifty employees would relocate from the existing Norco facility and would result in an indirect population increase of approximately 154 persons. This increase is de minimis relative to the unincorporated County's existing population and planned growth under the RCGP and would be absorbed by existing and planned housing stock already analyzed in the RCGP FEIR. Accordingly, the County has anticipated - and planned for - the growth that would occur on the Project site and there is no potential for the Project to result in an adverse, cumulatively considerable environmental effect related to population and housing. The Project would not result in any peculiar effects and would not result in new or more severe impacts related to population and housing beyond those previously analyzed in the RCGP FEIR.

Public Services

The RCGP FEIR determined impacts to Public Services would be cumulatively significant (RCGP FEIR p. 5-15 et seq.) All development projects in the County of Riverside, including the Project, would be required to pay DIF, a portion of which would be used by the County for the provision of public services to offset the incremental increase in demand for public services which is caused, in part by cumulative development projects. Furthermore, future development would generate an on-going stream of property tax revenue and sales tax revenue, which would provide funds that could be used by the County for the provision of public services. The Project would not directly result in the introduction of new residents to the County. Any indirect population increase associated with the 50 relocating employees (approximately 154 persons) is de minimis and would not result in a cumulatively considerable impact to resident-serving public facilities such as schools, parks, libraries, and other public facilities or services. The Project would not result in any peculiar effects and would not result in new or more severe impacts related to wildfire beyond those previously analyzed in the RCGP FEIR.

Recreation

The RCGP FEIR determined impacts to Parks and Recreation would be cumulatively significant (RCGP FEIR p. 5-15). The Project does not propose recreational facilities and would not directly generate a new resident population. Any indirect population increase associated with the 50 relocating employees (approximately 154 persons) is de minimis and would not increase the use of existing parks or recreational facilities such that substantial physical deterioration would occur or be accelerated. Therefore, there is no potential for the Project to contribute to a cumulatively considerable impact under this topic. The Project would not result in any peculiar effects and would not result in new or more severe impacts related to parks and recreation beyond those previously analyzed in the RCGP FEIR.

Transportation

The RCGP FEIR determined impacts to Transportation and Circulation would be cumulatively significant (RCGP FEIR p. 5-17 et seq.) As discussed in Threshold 37, Transportation, the Project's impacts on the transportation network would be less than significant, when taking in to account ambient growth, cumulative projects, and County guidance for VMT analysis which is based on regional transportation data. Therefore, the Project will not contribute a cumulatively considerable impact under this topic. The Project would not result in any peculiar effects and would not result in new or more severe impacts related to transportation beyond those previously analyzed in the RCGP FEIR.

Tribal Cultural Resources

The RCGP FEIR determined impacts to Cultural Resources would be cumulatively significant (RCGP FEIR p. 5-14). As discussed in Threshold 39, Tribal Cultural Resources, development activities on the Project site would not impact any known tribal cultural resources. Compliance with tribal consultation requirements required under State law is required by all projects subject to CEQA, which ensures that no cumulatively considerable impact to tribal cultural resources occurs statewide. The County has complied with tribal consultation requirements for the Project and with mitigation. Consistent with RCGP FEIR Mitigation Measure 4.7.1A, and as recommended by the Project-level Cultural Resources Study (Appendix C), all earthwork shall be monitored by a qualified archaeologist and a Native American representative, and a detailed monitoring program will also be implemented. Monitoring and properly identifying and treating resources that may be uncovered during the Project's earth-moving activities would reduce impacts to less than significant levels, reducing impacts on a direct and cumulatively considerable basis. The Project would not result in any peculiar effects and would not result in new or more severe impacts related to tribal cultural resources beyond those previously analyzed in the RCGP FEIR.

Utilities/Service Systems

The RCGP FEIR did not have a cumulative impact statement for Utilities/Service Systems. The Project would require water and wastewater infrastructure, as well as solid waste disposal. Development of public utility infrastructure is part of an extensive planning process involving service providers and jurisdictions with discretionary review authority. The coordination process associated with the preparation of infrastructure plans is intended to ensure that adequate public utility services and resources are available to serve both individual development projects and cumulative growth in the region. Each individual development project is subject to review for utility capacity to avoid unanticipated interruptions in service or inadequate supplies. Coordination with the utility providers would allow for the provision of utility services to the Project and other developments. The Project and other planned projects are subject to connection and service fees to offset increased demand and assist in facility expansion and service improvements (at the time of need). Because of the utility planning and coordination activities described above, cumulatively considerable impacts to utilities and service systems would not occur. The Project would not result in any peculiar effects and would not result in new or more severe impacts related to utilities/services beyond those previously analyzed in the RCGP FEIR.

Wildfire

The RCGP FEIR did not have a cumulative impact statement for Wildfire Impacts. The Project site is not located in an SRA; therefore, no cumulatively considerable impacts associated with wildfire would occur as a result of development of the Project. The Project would not result in any peculiar effects and would not result in new or more severe impacts related to wildfire beyond those previously analyzed in the RCGP FEIR.

	Prior EIR Determination	Effect Peculiar to Project Site?	New Significant Effect?	New Significant Off-Site Cumulative Impact	New Information/ More Severe Impact?
47. Have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	SU	No	No	No	No

Source(s): Project Application Materials

The Project's potential to result in environmental effects that could adversely affect human beings, either directly or indirectly, has been discussed throughout this 15183 analysis. In instances where the Project has the potential to result in direct or indirect adverse effects to human beings (air quality and associated effects on human health from air pollutants, and construction-related noise and potential effects on hearing impairment), adherence to RCGP policies and the requirements of RCGP FEIR mitigation measures would ensure impacts do not rise above a level of significance. With required adherence to these existing policies and requirements, construction and operation of the proposed Project would not involve any activities that would result in environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly.

SECTION 5. FINDINGS

As illustrated in the preceding Environmental Checklist, the proposed Project is found to be in conformance with the analysis and conclusions of the General Plan FEIR, the General Plan FEIR adequately anticipated and described the impacts of the proposed project. Consistent with the mandate in the State CEQA Guidelines Section 15183, no further environmental review is required based on the following findings:

1. The proposed project is consistent with the development density established by the General Plan policies for which an EIR was certified on October 7, 2003 (State Clearinghouse No. 2002051143);
2. There are no new significant effects peculiar to the proposed project or its site;
3. There are no new significant effects that were not previously evaluated in the General Plan FEIR;
4. There are no new significant off-site or cumulative impacts that were not analyzed in the General Plan FEIR; and
5. There are no adverse impacts that are more severe than those previously identified in the General Plan FEIR.

Conclusions
No further action is required, and a Notice of Determination (pursuant to CEQA Guidelines Section 15094) can be filed indicating that the project is eligible for an exemption from additional environmental review under CEQA Guidelines Section 15183

SECTION 6. REFERENCES

AESTHETICS

1. Scenic Resources

Source(s): Riverside County General Plan Final EIR, October 2003; Riverside County General Plan; Project Application Materials.

2. Mt. Palomar Observatory

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

3. Other Lighting Issues

Source(s): Project Application Materials; Riverside County Ordinance No. 655 (Riverside County, 1988); Riverside County Ordinance No. 915 (Riverside County, 2012)

AGRICULTURE & FOREST RESOURCES

4. Agriculture

Source(s): Riverside County General Plan Final EIR, October 2003; Riverside County General Plan; Project Application Materials.

5. Forest

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

AIR QUALITY

6. Air Quality Impacts

Source(s): Riverside County General Plan, Riverside County Climate Action Plan (“CAP”), SCAQMD CEQA Air Quality Handbook, Trip Generation & Vehicle Miles Traveled Screening Analysis for the proposed QCP Fabrication Facility Plot Plan, Air Quality Impact Analysis, Urban Crossroads, (August 2026).

BIOLOGICAL RESOURCES

7. Wildlife & Vegetation

Source(s): GIS database, WRCMSHCP and/or CVMSHCP, On-site Inspection, Biological Resources Assessment Memorandum and Coachella Valley Multiple Species Habitat Conservation Plan Analysis for the QCP Fabrication Facility Plot Plan Thermal, Riverside County, California, Biological Resources Technical Report, CADRE Environmental, October 2024.

CULTURAL RESOURCES

8. Historic Resources

Source(s): On-Site Inspection; Project Application Materials; Phase I Cultural Resource Study, Brian F. Smith & Associates, revised March 2025.

9. Archaeological Resources

Source(s): On-Site Inspection; Project Application Materials; Phase I Cultural Resource Study, Brian F. Smith & Associates, revised March 2025.

ENERGY

10. Energy Impacts

Source(s): Riverside County General Plan, Riverside County Climate Action Plan ("CAP"), Project Application Materials, Vehicle Miles Traveled Analysis (VMT) & Energy Analyses prepared by Urban Crossroads (August 2026).

GEOLOGY AND SOILS

11. Alquist-Priolo Earthquake Fault Zone or County Fault Hazard Zones

Source(s): Riverside County General Plan Figure S-2 “Earthquake Fault Study Zones”; GIS database; Geologist Comments, Geotechnical Investigation, Proposed QCP Facility, Sladden Engineering (January 2025).

12. Liquefaction Potential Zone

Source(s): Riverside County General Plan Figure S-3 "Generalized Liquefaction," Geotechnical Investigation, Proposed QCP Facility, Sladden Engineering (January 2025).

13. Ground-shaking Zone

Source(s): Riverside County General Plan Figure S-4 “Earthquake-Induced Slope Instability Map,” and Figures S-13 through S-21 (showing General Ground Shaking Risk), Geotechnical Investigation, Proposed QCP Fabrication Facility, Sladden Engineering (January 2025).

14. Landslide Risk

Source(s): On-site Inspection, Riverside County General Plan Figure S-5 "Regions Underlain by Steep Slope," Geotechnical Investigation, Proposed QCP Fabrication Facility, Sladden Engineering (January 2025).

15. Ground Subsidence

Source(s): Riverside County General Plan Figure S-7 “Documented Subsidence Areas Map,” Geotechnical Investigation, Proposed QCP Fabrication Facility, Sladden Engineering (January 2025).

16. Other Geologic Hazards

Source(s): Riverside County General Plan Figure S-7 "Documented Subsidence Areas Map," Geotechnical Investigation, Proposed QCP Fabrication Facility, Sladden Engineering (January 2025).

17. Slopes

Source(s): Riv. Co. 800-Scale Slope Maps, Project Application Materials, Slope Stability Report, Geotechnical Investigation, Proposed QCP Facility, Sladden Engineering (January 2025).

18. Soils

Source(s): U.S.D.A. Soil Conservation Service Soil Surveys, Project Application Materials, On-site Inspection, Geotechnical Investigation, Proposed QCP Facility, Sladden Engineering (January 2025).

19. Wind Erosion and Blowsand from project either on or off site.

Source(s): Riverside County 2019 General Plan Safety Element Figure S-8 “Wind Erosion Susceptibility Areas,” Ord. No. 460, Article XV & Ord. No. 484

GREENHOUSE GAS EMISSIONS

20. Greenhouse Gas Emissions

Source(s): Riverside County General Plan, Riverside County Climate Action Plan ("CAP"), Project California Emissions Estimator Model (CalEEMod), Greenhouse Gas Analysis, Urban Crossroads, (January 2025).

HAZARDS AND HAZARDOUS MATERIALS

21. Hazards and Hazardous Materials

Source(s): Project Application Materials; Phase II ESI, QCP Facility Plot Plan, Coachella Valley Engineers, (January 2025) with reference to Phase I ESA, Nova Group, (May 2024) within.

22. Airports

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

HYDROLOGY AND WATER QUALITY

23. Water Quality Impacts

Source(s): Riverside County General Plan Figure S-9 "Special Flood Hazard Areas," Figure S-10 "Dam Failure Inundation Zone," Riverside County Flood Control District Flood Hazard Report/ Condition, GIS database; Preliminary Water Quality Management Plan, Quick Crete Products Manufacturing Facility, prepared by Coachella Valley Engineers. January 2026; Preliminary Hydrology Study for Quick Crete Products Manufacturing Facility, prepared by Coachella Valley Engineers. January 2026.

LAND USE AND PLANNING

24. Land Use

Source(s): Riverside County General Plan Final EIR, October 2003; Riverside County General Plan; Project Application Materials.

MINERAL RESOURCES

25. Mineral Resources

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

NOISE

26. Airport Noise

Source(s): Riverside County General Plan Figure S-20 "Airport Locations," County of Riverside Airport Facilities Map, QCP Facility Noise Impact Analysis, Urban Crossroads, (January 2025).

27. Noise Effects by the Project

Source(s): Riverside County General Plan, Table N-1 ("Land Use Compatibility for Community Noise Exposure"), Federal interagency Committee on Noise (FICON), Project Application Materials, QCP Facility Noise Impact Analysis, Urban Crossroads, (January 2025).

PALEONTOLOGICAL RESOURCES

28. Paleontological Resources

Source(s): Riverside County General Plan Figure OS-8 "Paleontological Sensitivity," Paleontological Assessment for the QCP Fabrication Facility Project, Brian F. Smith & Associates, (December 2024).

POPULATION AND HOUSING

29. Housing

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

PUBLIC SERVICES

30. Fire Services

Source(s): Riverside County General Plan Safety Element

31. Sheriff Services

Source(s): Riverside County General Plan

32. Schools

Source(s): School District correspondence, GIS database

33. Libraries

Source(s): Riverside County General Plan

34. Health Services

Source(s): Riverside County General Plan

RECREATION

35. Parks and Recreation

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

36. Recreational Trails

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

TRANSPORTATION

37. Transportation

Source(s): Riverside County General Plan, Project Application Materials, Quick Crete Products (QCP) Trip Generation Assessment for the proposed QCP Fabrication Facility Plot Plan, Urban Crossroads (December 2025); QCP Manufacturing Facility Vehicle Miles Traveled Screening Evaluation, Urban Crossroads (January 2025).

38. Bike Trails

Source(s): Riverside County General Plan

TRIBAL CULTURAL RESOURCES

39. Tribal Cultural Resources

Source(s): Native American Consultation, BFSA Environmental Services

UTILITIES AND SERVICE SYSTEMS

40. Water

Source(s): Project Application Materials, Coachella Water Authority (CWA).

41. Sewer

Source(s): Department of Environmental Health Review

42. Solid Waste

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

43. Utilities

Source(s): Project Application Materials, Utility Service Providers

WILDFIRE

44. Wildfire Impacts

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

APPENDIX A
Air Quality Impact Analysis

Available at Riverside County Planning Department,
Environmental Notices (CEQA) Webpage:
https://planning.rctlma.org/environmental-notices-ceqa

APPENDIX B
Biological Resources Technical Report

Available at Riverside County Planning Department,
Environmental Notices (CEQA) Webpage:
https://planning.rctlma.org/environmental-notices-ceqa

APPENDIX C
A Phase I Cultural Resources Study

Available at Riverside County Planning Department,
Environmental Notices (CEQA) Webpage:
https://planning.rctlma.org/environmental-notices-ceqa

APPENDIX D
QCP Manufacturing Facility Energy Tables

Available at Riverside County Planning Department,
Environmental Notices (CEQA) Webpage:
https://planning.rctlma.org/environmental-notices-ceqa

APPENDIX E
Vehicle Miles Traveled (VMT) Screening Evaluation

Available at Riverside County Planning Department,
Environmental Notices (CEQA) Webpage:
https://planning.rctlma.org/environmental-notices-ceqa

APPENDIX F
Geotechnical Investigation

Available at Riverside County Planning Department,
Environmental Notices (CEQA) Webpage:
https://planning.rctlma.org/environmental-notices-ceqa

APPENDIX G
Greenhouse Gas Analysis

Available at Riverside County Planning Department,
Environmental Notices (CEQA) Webpage:
https://planning.rctlma.org/environmental-notices-ceqa

APPENDIX H
Phase II Environmental Site Investigation

Available at Riverside County Planning Department,
Environmental Notices (CEQA) Webpage:
https://planning.rctlma.org/environmental-notices-ceqa

APPENDIX I
Preliminary Water Quality Management Plan

Available at Riverside County Planning Department,
Environmental Notices (CEQA) Webpage:
https://planning.rctlma.org/environmental-notices-ceqa

APPENDIX J
Preliminary Hydrology Study

Available at Riverside County Planning Department,
Environmental Notices (CEQA) Webpage:
https://planning.rctlma.org/environmental-notices-ceqa

APPENDIX K
Noise Impact Analysis

Available at Riverside County Planning Department,
Environmental Notices (CEQA) Webpage:
https://planning.rctlma.org/environmental-notices-ceqa

APPENDIX L
Paleontological Assessment

Available at Riverside County Planning Department,
Environmental Notices (CEQA) Webpage:
https://planning.rctlma.org/environmental-notices-ceqa

APPENDIX M
Trip Generation Assessment

Available at Riverside County Planning Department,
Environmental Notices (CEQA) Webpage:
https://planning.rctlma.org/environmental-notices-ceqa