COUNTY OF RIVERSIDE
ENVIRONMENTAL ASSESSMENT FORM

Environmental Assessment (CEQ / EA) Number: PPT210024R01
Project Case Type (s) and Number(s): Revision No. 1 to Plot Plan No. PPT210024 (PPT210024R1)
Lead Agency Name: County of Riverside Planning Department
Address: 4080 Lemon Street, 12th Floor, Riverside, CA 92501
Contact Person: Russell Brady, Project Planner
Telephone Number**:** (951) 955-3025
Applicant's Name: Ladera Golf Club
Applicant's Address: 69501 Lemon Blossom Lane, Thermal, CA 92274

I. PROJECT INFORMATION

This environmental document is Addendum No. 1 to the Initial Study/Mitigated Negative Declaration (IS/MND) prepared for PPT210024 and adopted on December 13, 2021, by the County of Riverside. Since adoption of the Initial Study, changes to the project have been proposed. The proposed changes are addressed in this Addendum, which has been prepared pursuant to the California Environmental Quality Act (CEQA).

Purpose of the Addendum

Pursuant to State CEQA Guidelines Section 15162 and 15164, when a Lead Agency considers an addendum to a previously approved project, the Lead Agency is required to consider if the previously certified/adopted CEQA document provides adequate basis for rendering a decision on the proposed action. When making such a decision, the Lead Agency must consider any changes to the project or its circumstances that have occurred and any new information that has become available since the project's CEQA document was adopted/certified.

In accordance with State CEQA Guidelines Section 15162(b), prior to approving further discretionary action and depending on the situation, the Lead Agency must either: (1) prepare a Subsequent EIR; (2) prepare a Supplemental EIR; (3) prepare a Subsequent Negative Declaration; (4) prepare an Addendum to the EIR or Negative Declaration; or (5) prepare no further documentation. More specifically, State CEQA Guidelines Section 15162 states:

(a) When an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

> (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
>
> (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
>
> (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:

(A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

(B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

(C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

State CEQA Guidelines Section 15164 explains when an Addendum to an EIR or Negative Declaration is appropriate. Per this section, where some changes or additions are necessary to the previously adopted Negative Declaration, but none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or Negative Declaration (as described above) have occurred, then the Lead Agency is directed to prepare an Addendum to the adopted Negative Declaration (State CEQA Guidelines, Section 15164). Further, the Addendum should include a "brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162," and that "explanation must be supported by substantial evidence" (State CEQA Guidelines, Section 15164 [e]). The Addendum need not be circulated for public review but may simply be attached to the adopted Negative Declaration (State CEQA Guidelines, Section 15164 [c]).

Addendum Finding

On the basis of substantial evidence in the light of the whole record, the modification to the approved project does not meet the criteria in State CEQA Guideline Section 15162 requiring a Subsequent EIR or Negative Declaration (environmental document). There are no substantial changes to the project, no substantial changes in the circumstances under which the project is being undertaken, and no new information of substantial importance that was not known to the Lead Agency at the time the IS/MND was adopted that trigger any of the conditions identified in Public Resources Code Section 21166 or State CEQA Guidelines Section 15162, which would require subsequent or supplemental CEQA documentation.

The proposed changes do not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects discussed in the previous IS/MND. The proposed project does not require any additional mitigation measures. The previously identified mitigation measures remain valid and adequate to reduce potential impacts to less than significant levels; however, it should be noted this modified project would not result in a potential environmental impact requiring mitigation. Therefore, an Addendum to the previously adopted Mitigated Negative Declaration is warranted.

Addendum No. 1 analyses minor improvements to the approved project to modify the facility layout, usage, capacity, membership and staffing, in order to expand club facilities, services and operations at the approved golf club site. The modified project identified and analyzed in this Addendum is limited to site improvements and capacity on a site currently mapped by the Federal Emergency Management Agency (FEMA) as a Special Flood Hazard Area with an AO-1 flood zone (10-foot flood depth) designation (CVWD letter dated July 7, 2022). In order to comply with FEMA, the proposed interim facilities must be designated accessary structures and easily moved or built to comply with FEMA regulation for structures in a flood zone.

Any future potential project change outside of this assessment is considered speculative and would be required to under-go project-specific environmental analysis compliance.

Summary of Original Project Description and Existing Conditions

The Ladera Golf Club (project site) is located in the unincorporated community of Thermal within Riverside County. The project site is generally bound by Van Buren Street to the west, Lemon Blossom Lane to the east, and 70th Avenue to the south (Figure 1, Project Location). The Assessor Parcel Numbers (APNs) associated with the project site are 751-250-001, 751-250-003, and 751-250-005. The entrance to the golf club is located at the northeast corner of the project site, at the terminus of Lemon Blossom Lane. The site is approximately 292.16 acres in size.

The golf course was approved on December 13, 2021, with the approval of PPT210024[1], which allowed for the development of a full-length 18-hole golf course, 9-hole short course/practice area, 5-hole short course/driving range, landscaping and walking paths, 40 space parking lot, irrigation reservoir, lemon/mango grove, and the use of two (2) mobile Star Wagons (restroom and changing facilities) and one mobile cover. The golf club was approved to operate six (6) days a week, seasonally from October through May. Membership was limited to 50 individuals for a maximum of 25 individuals on-site per day. Maintenance staff included a 12-person crew for a maximum of 3 staff persons on-site per day. Refer to PPT210024/CEQ210045 Approved Project Materials (on-file with the County of Riverside).

The project site has undergone significant grading and contouring, including final grading and shaping of the golf course, short course, and driving range with greens, tees, and bunkers for the approved golf course (see Figure 2, Aerial Photo dated January 6, 2023). The project site includes a 2-acre irrigation reservoir (lake) and pump station, well sites, maintenance area, and citrus grove. As of September 1, 2022, construction was underway to develop the remaining features approved under PPT210024/CEQ210045, such as the parking area and perimeter fencing. The golf course is currently operating. The modified project's improvements, described below, are projected to be completed by October 1, 2023.

Modified Project Description

The Revision No. 1 to PPT210024 ("PPT210024R01" or "modified project") involves the addition of member and service facilities to support the golf club and would modify the facility layout, usage, capacity, membership and staffing, in order to expand club facilities, services and operations (Figure 3, Site Plan). The modified project would allow for up to 350 individual memberships (with up to 5 guests per member), and up to 70 full-time staff.

Project Site Improvements

1. The project proposes a clubhouse area located near the northeast corner of the site, which would support the golf club and only be used by its members. Two (2) tent structures with solid and glass wall panels are proposed within the clubhouse area, as detailed below:

    - Club Dining Tent: An approximate 2,657-square-foot tent with occupancy for 76 people. The tent structure would have height of approximately 17 feet, 10 inches. The Club Dining Tent would provide a bar and seating area for food, beverage, and alcohol service, which would be provided by a self-contained mobile kitchen located on a pad adjacent to the Club Dining Tent.
    - Pro Shop Tent: An approximate 1,711-square-foot Pro Shop tent (golfing goods store) would have an occupancy for 34 people. The tent structure would have a height of approximately 18 feet, 10 inches. The Pro Shop Tent would include locker rooms and office space.

[1] Previously referred to as the "Jeule Ranch Golf Club".

2. Mobile kitchen trailer within the clubhouse area.

3. Mobile restroom trailer with self-contained portable septic tank within the clubhouse area.

4. Caddy trailer and golf cart staging areas within the clubhouse area.

5. Valet driveway and drop-off within the clubhouse area.

6. Two (2) outdoor patio seating areas with shade covers, BBQ and fire pit features, and a multi-use open space and turf area, and additional citrus groves are proposed surrounding the clubhouse area.

7. Two (2) self-contained Airstream trailers located near the 1st and 6th tees of the main course. The Airstream trailers would provide food and beverages. A portable restroom trailer and outdoor seating area with shade cover are proposed adjacent each of the Airstream trailers.

8. Administration and maintenance area to be located along the north end of the site, just northwest of the 9-hole practice area/short course. Improvements in this area include three (3) office trailers, three (3) Porta Potty restrooms, and staff-only parking area that can accommodate up to 58 vehicles. One office trailer would be used as a lunchroom for staff, and the second office would house the administration/maintenance staff offices. This area includes three (3) outdoor structures for use as maintenance bays for golf equipment and up to five (5) shipping containers for on-site storage of all golf and agricultural equipment.

9. Additional 105 parking stalls to accommodate members, guests, and staff of the proposed golf club facilities. With this improvement, on-site parking would now accommodate approximately 205 regular parking stalls. An additional 22,000 square-foot area is provided for overflow parking that may accommodate an additional 60 spaces, if necessary.

10. Antenna tower for security and internet service.

11. Domestic water well, water pipeline, two (2) storage tanks, pump station, septic tank, and leach field.

Construction

Minimal construction is required for the concrete pads required for the placement of the two (2) tent structures. Concrete pads for the tent structures would require approximately 153 cubic yards (CY) of cut and 2,785 CY of fill. Construction is anticipated to occur approximately 10 days.

Construction for the well, domestic water pipeline, and septic system is anticipated for a duration of six (6) months. Earthwork quantities are approximately 17,800 cubic yards (CY) of cut and 18,000 CY of fill to be balanced on-site.

The kitchen, restrooms, and caddy trailers are mobile facilities (on wheels) and will be trucked onto the site, and not require permanent foundation.

Operation

<u>Hours of Operation</u>

The golf club would operate from October to June, seven (7) days a week from 7 a.m. to 11 p.m. Maintenance activities would occur daily.

Employees

Approximately 70, full-time, seasonal staff would be employed at the Ladera Golf Club. On-site maintenance staff would total approximately 55 staff persons, and approximately 15 clubhouse and administrative staff. No more than approximately 58 staff members would be on-site at any given time due to multiple shifts.

Membership

The golf course is a private facility requiring membership. The project proposes up to 350 (individual) memberships, which gives access to the facility to one (1) person, rather than one (1) family. For the purpose this environmental analysis, based on routine golf course operations and in light of the traffic count assumptions[2], the project assumes approximately 195 persons would be on the project site on any given day.

Utilities

Drinking (potable) water for the golf club facilities and restrooms (hand washing stations) would be provided by a non-transient non-community water system[3] (NTNC WS). The NTNC WS is a public water system permitted by the State of California, Division of Drinking Water. The water system would be located near the project entrance with the storage tanks and pump station on the west side of the maintenance area. The on-site potable water system would include two (2), 20,000-gallon tanks: one tank would store well water and one tank would store water after it has been treated by a Reverse Osmosis (RO) system. The tanks' dimensions would be approximately 12 feet high and 28 feet long and they would be either mounted on concrete slabs or partially underground. A 100-linear-foot of 6-inch water pipe would be installed from the well to the booster and 2,700 linear-foot 4-inch water pipe booster to the interim clubhouse.

Sanitation water would be temporarily held within the self-contained, mobile restroom trailers (septic tanks). Food and drink facilities would require self-containing holding tanks for the Airstream trailers and a dry well for the bar within the Club Dining Tent for disposal of sink water. A 6,000-gallon septic tank with an Advanced Treatment System (ATS) and a 5,000-square-foot leach field would be installed for wastewater generated at the club house.

Irrigation water for turf and landscaping is provided to the site via an on-site reservoir lake (Colorado River water supplied by the Coachella Canal) and on-site wells (groundwater). The Coachella Valley Water District (CVWD) provides the delivery of the non-potable irrigation water to the reservoir site. The existing well sites would supplement irrigation to the site. The 2-acre reservoir lake is utilized for irrigation water storage. The project site uses approximately 1,422 acre-feet of irrigation water per year to irrigate the golf greens, ornamental landscaping, and citrus groves.

Electrical service is provided to the site by the Imperial Irrigation District (IID) and by use of four (4) on-site generators to power the [existing] pump station reservoir, and proposed tents/kitchen and each Airstream trailer.

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

[2] Per the Transportation Screening Analysis (September 2022), players on site at any time of the day is anticipated as 250 players (members and guests). Assuming four players per Member Group (1 member + 3 guests), a maximum of 62.5 Member Groups (250 people / 4 players per group) would be on site at any given time. This trip generation assumes approximately 125 total Member Groups (62.5 groups x 2-rounds per day) use the golf course facilities throughout the day plus 70 daily employees, which equates to 195 persons.

[3] If the NTNC WS is not approved and constructed by October 1, 2023, then state-approved water delivery trucks would fill an on-site water tank connected to the above facilities as needed for an interim period while the NTNC WS is completed.

B. Total Project Area: Approximately 292.16 acres

Residential Acres: 0	**Lots:** 0	**Units:** 0	**Projected No. of Residents:** 0
Commercial Acres: 0	**Lots:** 0	**Sq. Ft. of Bldg. Area:** 0	**Est. No. of Employees:** 0
Industrial Acres: 0	**Lots:** 0	**Sq. Ft. of Bldg. Area:** 0	**Est. No. of Employees:** 0
Other: 292.16 acres			

C. Assessor's Parcel No(s): 751-250-001, 751-250-003, 751-250-005

Street References: Van Buren Street, 70th Avenue, Lemon Blossom Lane

D. Section, Township & Range Description or reference/attach a Legal Description: Section: 19 Township: 7 South Range: 8 East

E. Brief description of the existing environmental setting of the project site and its surroundings: Under existing conditions, the project site is developed as a golf course. The project site is surrounded by undeveloped desert scrub land and farmland.

F. Other Public Agency Involvement and Required Permits: Coachella Valley Water District and Imperial Irrigation District

II. APPLICABLE GENERAL PLAN AND ZONING REGULATIONS

A. General Plan Elements/Policies:

1. **Land Use:** Agriculture (AG)

2. **Circulation:** Access is provided to the project site by the existing driveway entrance at the terminus of Lemon Blossom Lane. As described herein, implementation of the project would not result in new impacts related to circulation. In addition, the project is planned with adequate internal circulation and is consistent with the Circulation Element of the General Plan.

3. **Multipurpose Open Space:** The project site is an existing golf course. The project would not conflict with the Multipurpose Open Space Element.

4. **Safety:** The project site is located within a Federal Emergency Management Agency designated Special Flood Hazard Area with an AO-1 zone (1-foot flood depth) designation. The project is not located within fault zone, high liquefaction, or dam inundation zone. The modified project has allowed for sufficient provision through the project design and does not include permanent buildings. The project meets applicable Safety Element policies.

5. **Noise:** The project would not generate noise levels in excess of standards established in the General Plan or noise ordinance. The project meets applicable Noise Element Policies.

6. **Housing:** The project does not propose any housing; therefore, the Housing Element of the General Plan is not applicable.

7. **Air Quality:** The project has been conditioned to control fugitive dust during grading and construction activities and would not exceed air quality emissions thresholds during either construction or operation of the project. The project meets applicable Air Quality Element policies.

8. **Healthy Communities / Environmental Justice:** The project site is located in the community of Thermal which is identified as an Environmental Justice Community on Figure

LU-4.1, “Riverside County Environmental Justice Communities,” of the General Plan Land Use Element. The modified project would improve an existing golf course site. The modified project would not result in air quality, hazardous material, or noise impact that would affect Healthy Communities or Environmental Justice topics.

B. General Plan Area Plan(s): Eastern Coachella Valley

C. Foundation Component(s): Agriculture Foundation

D. Land Use Designation(s): AG (Agricultural)

E. Overlay(s), if any: CDO (Community Development Overlay)

F. Policy Area(s), if any: N/A

G. Adjacent and Surrounding:

1. **General Plan Area Plan(s):** Eastern Coachella Valley
2. **Foundation Component(s):** Agriculture Foundation, Open Space Foundation
3. **Land Use Designation(s):** OS-CH (Open Space Conservation Habitat), AG (Agriculture), and OS-RUR (Open Space Rural)
4. **Overlay(s), if any:** CDO
5. **Policy Area(s), if any:** N/A

H. Adopted Specific Plan Information

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

I. Existing Zoning: Controlled Development Areas (W-2)

J. Proposed Zoning, if any: N/A

K. Adjacent and Surrounding Zoning: Controlled Development Areas (W-2)

III. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

IV. DETERMINATION

On the basis of this initial evaluation:

A PREVIOUS ENVIRONMENTAL IMPACT REPORT/NEGATIVE DECLARATION WAS NOT PREPARED
☐ I find that the proposed project **COULD NOT** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.
☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project, described in this document, have been made or agreed to by the project proponent. **A MITIGATED NEGATIVE DECLARATION** will be prepared.
☐ I find that the proposed project MAY have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required.

A PREVIOUS ENVIRONMENTAL IMPACT REPORT/NEGATIVE DECLARATION WAS PREPARED
☐ I find that although the proposed project could have a significant effect on the environment, **NO NEW ENVIRONMENTAL DOCUMENTATION IS REQUIRED** because (a) all potentially significant effects of the proposed project have been adequately analyzed in an earlier EIR or Negative Declaration pursuant to applicable legal standards, (b) all potentially significant effects of the proposed project have been avoided or mitigated pursuant to that earlier EIR or Negative Declaration, (c) the proposed project will not result in any new significant environmental effects not identified in the earlier EIR or Negative Declaration, (d) the proposed project will not substantially increase the severity of the environmental effects identified in the earlier EIR or Negative Declaration, (e) no considerably different mitigation measures have been identified and (f) no mitigation measures found infeasible have become feasible.
☒ I find that although all potentially significant effects have been adequately analyzed in an earlier EIR or Negative Declaration pursuant to applicable legal standards, some changes or additions are necessary but none of the conditions described in California Code of Regulations, Section 15162 exist. An **ADDENDUM** to a previously-certified Mitigated Negative Declaration has been prepared and will be considered by the approving body or bodies.
☐ I find that at least one of the conditions described in California Code of Regulations, Section 15162 exist, but I further find that only minor additions or changes are necessary to make the previous EIR adequately apply to the project in the changed situation; therefore, a **SUPPLEMENT TO THE ENVIRONMENTAL IMPACT REPORT** is required that need only contain the information necessary to make the previous EIR adequate for the project as revised.
☐ I find that at least one of the following conditions described in California Code of Regulations, Section 15162, exist and **a SUBSEQUENT ENVIRONMENTAL IMPACT REPORT** is required: (1)

Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; (2) Substantial changes have occurred with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any the following: (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration; (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR or negative declaration; (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measures or alternatives; or, (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR or negative declaration would substantially reduce one or more significant effects of the project on the environment, but the project proponents decline to adopt the mitigation measures or alternatives.

Signature

4/5/23
Date

Russell Brady, *Project Planner*
Printed Name

For: John Hildebrand, *Planning Director*

V. ENVIRONMENTAL ISSUES ASSESSMENT

In accordance with the California Environmental Quality Act (CEQA) (Public Resources Code Sections 21000-21189.70.10) and the State CEQA Guidelines Sections 15000-15387, this Addendum has been prepared to determine whether the modified project would result in any new or substantially increased significant environmental impacts in comparison to the approved project as analyzed in the 2021 IS/MND. The purpose of this Addendum is to inform the decision-makers, affected agencies, and the public of potential environmental impacts associated with the implementation of the project.

A comparative analysis between the original project and modified project according to each of these environmental topical areas is provided below.

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

Source(s):
County of Riverside. 2015. Riverside County General Plan Figure C-8 “Scenic Highways”

Caltrans (California Department of Transportation). 2019. State Scenic Highway System Map. Accessed March 22, 2023. https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa

Findings of Fact:

a) **No Impact.**

Original Project

According to the 2021 IS/MND, the original project site is not within view of a scenic highway, and the closest eligible state scenic highway is Route 111, which is 6.3 miles east of the project site. Thus, the 2021 IS/MND determined that the original project would have no impact in this regard.

Modified Project

The project involves the same project site as analyzed in the 2021 IS/MND. The project site is not within view of an officially designated scenic highway (County of Riverside, 2015). The closest scenic highway is State Route 111 (SR-111), an eligible state scenic highway, which is located approximately 6.3 miles east of the project site (Caltrans, 2019). However, the distance and topography between the site and highway would prevent the site from being visible from the highway. No impact would occur.

b) **Less Than Significant Impact.**

Original Project

According to the 2021 IS/MND, the original project is located directly east of the Santa Rosa and San Jacinto Mountains, which possess high scenic value for the area. It was determined that construction activities would temporarily affect the visual environment through grading, landscaping, and on-site storage of equipment and materials. However, the visual changes consisting of large construction vehicles, storage areas, and signage would not be permanent, and no buildings would be constructed. Additionally, 2,400 citrus trees would be retained and transplanted along the boundaries of the property to give the appearance that the site has remained a citrus farm. Therefore, the 2021 IS/MND determined that impacts to scenic resources would be less than significant.

Modified Project

The modified project involves the same project site as analyzed in the 2021 IS/MND. Public views onto the project site consist of existing citrus groves and sloped hills which create the northern and eastern perimeter and limit view of the interior of the project site. Construction activities would temporarily affect the visual environment through grading for the installation of foundations required for the tent structures and on-site storage of equipment and materials, and installation of a water well and septic system. Temporary visual changes would include views of construction vehicles and earth moving equipment and staging/storage areas. The presence of these items within a scenic view would not be permanent because construction equipment would vacate the project site upon completion of construction. The project would not construct permanent buildings. Upon completion of the proposed improvements to the existing golf club facility, the site would continue to be largely open space with citrus groves and landscaping. Impacts would be less than significant.

c) **No Impact.**

Original Project

According to the 2021 IS/MND, the original project site supported agriculture use in a non-urbanized area. The original project developed a new golf course and discontinued commercial agricultural production, while retaining and incorporating citrus trees around and on the site. Additionally, 2,400 citrus trees would be retained and transplanted along the boundaries of the property to give the appearance that the site has remained a citrus farm. Therefore, the 2021 IS/MND determined impacts would be less than significant.

Modified Project

The modified project involves the same project site as analyzed in the 2021 IS/MND. The project site is located in a non-urbanized area with a substantial amount of adjacent agricultural uses and currently supports existing recreational uses (18-hole golf course, 9-hole golf course and driving range). The project includes the expansion of golf course facility services and operations, including the installation of interim structures (tents and trailers) and a water well and septic system. No permanent buildings are

proposed. As such, the minimal nature of improvements associated with the project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings. In addition, the project site is zoned W-2 (Controlled Development), which permits agricultural uses and standard-length golf courses. As no change is required in the project site's zoning and the project site provides largely open space, there would be no change in the project's underlying land use. Consistent with the original project, the modified project would maintain approximately 2400 citrus trees on-site. Thus, the visual character of the project site would remain similar to the existing condition and no impacts would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
2. Mt. Palomar Observatory. Would the project: a) Interfere with the nighttime use of the Mt. Palomar Observatory, as protected through Riverside County Ordinance No. 655?	☐	☐	☒	☐

Source(s):
County of Riverside. 2021. Eastern Coachella Valley Area Plan (ECVAP). Accessed March 22, 2023. https://planning.rctlma.org/Portals/14/genplan/GPA%202022/Compiled%20ECVAP_4-2022%20rev.pdf?ver=2022-06-27-145207-383.

County of Riverside. Ordinance No. 655 (Regulating Light Pollution)

Findings of Fact:

a) **Less Than Significant Impact.**

Original Project

According to the 2021 IS/MND, the original project did not propose to develop buildings or light fixtures beyond nominal external security lighting and internal lighting of trailers. Therefore, the 2021 IS/MND determined that lighting was not anticipated to introduce a significant source of light to the area and impacts would be less than significant.

Modified Project

The modified project involves the same project site as analyzed in the 2021 IS/MND. The project site is approximately 40 miles east of the Mt. Palomar Observatory. The project site is located within Zone B of the Palomar Nighttime Lighting Policy. As such, the project would be subject to Ordinance No. 655 and would comply with all lighting regulations defined in the ordinance. Additionally, per the County's General Plan, Eastern Coachella Valley Area Plan, Policy ECVAP 4.2, the project would be required to 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 (County of Riverside 2021). The project does not propose the development of permanent buildings or exterior light fixtures beyond nominal security lighting that would introduce light to the surrounding area. The proposed trailers and

tent structures would be located on-site, which would contain interior lighting; however, lighting would not be anticipated to introduce a significant source of light to the area. As such, the project would not interfere with the nighttime use of the Mt. Palomar Observatory. Impacts would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
3. Other Lighting Issues. Would the project: a) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐
b) Expose residential property to unacceptable light levels?	☐	☐	☒	☐

Source(s):
N/A

Findings of Fact:

a) **Less Than Significant Impact.**

Original Project

According to the 2021 IS/MND, construction of the original project would generally not require nighttime lighting, except during winter months when hours of daylight are shorter than in other seasons of the year. However, nighttime lighting would only be used at the required minimum intensity for safe construction activity and would be shielded and focused on construction areas. Once construction has been finalized, the original project would be largely open space, with no buildings or lighting infrastructure, beyond nominal security lighting, as discussed previously. Additionally, the site would be bordered by 2,400 existing lemon trees, so trailers with internal lighting would not be visible from outside the site. Therefore, the 2021 IS/MND determined that impacts would be less than significant.

Modified Project

Similar to the original project, nighttime lighting would not generally be needed for construction activities of the modified project; however, lighting may be needed during winter months when the hours of daylight are shorter than in other seasons of the year. When in use, nighttime lighting for construction would be focused on construction areas and would not spill over into other areas. In addition, construction lighting would be shielded and directed downward and would be of the minimum required intensity to provide for safe construction activity. Upon completion of construction, the modified project would continue to be largely open space with minimal improvements being implemented (interim structures including tents and trailers and a water well and septic system). However, light generated from the interim structures would be interior lighting only and would not be expected to contribute to any light and glare impacts. Impacts would be less than significant.

b) **Less Than Significant Impact.**

Original Project

According to the 2021 IS/MND, the nearest residential property to the original project site is located approximately 1.2 miles east of the site. However, lighting associated with construction activities would not be significant due to the distance and applied light shielding techniques. Therefore, the 2021 IS/MND determined that impacts would be less than significant.

Modified Project

The modified project involves the same project site as analyzed in the 2021 IS/MND and existing conditions continue to exist onsite as described above. Additionally, no permanent buildings or structures are proposed under the modified project. Therefore, the modified project would not expose residential property to unacceptable light levels and impacts would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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

Source(s):
California Department of Conservation (CDOC). 2023. California Important Farmland Finder. Accessed March 20, 2023. https://maps.conservation.ca.gov/dlrp/ciff/.

County of Riverside. 2023. Riverside County Municipal Code. Updated through July 27, 2022. Accessed March 20, 2023. https://library.municode.com/ca/riverside_county/codes/code_of_ordinances

Findings of Fact:

a) **Less Than Significant Impact.**

Original Project

According to the 2021 IS/MND, the original project site was classified as a mix of Unique Farmland, Prime Farmland, and Other Land. At the date that the original project was approved, it was designated by the General Plan with a land use of Agriculture (AG) and was zoned as Controlled Development (W-2). Chapter 17.144, W-2 Controlled Development Areas Zone, of the Riverside County Municipal Code,

stated that golf courses with standard length fairways are permitted provided a plot plan is approved. Since no change was required in the project's zoning, and the golf course consisted of largely open space, impacts to Prime Farmland, Unique Farmland, or Farmland of Statewide Impacts were determined to be less than significant.

Modified Project

The modified project involves the same project site as analyzed in the 2021 IS/MND. According to the California Important Farmland Finder database, the project site is still classified as a mix of Unique Farmland, Prime Farmland, and Other Land (CDOC 2023). The CDOC defines Prime Farmland as farmland with the best combination of physical and chemical features able to sustain long term agricultural production. Unique Farmland is of lesser quality soils used for the production of the state's leading agricultural crops. This land may include orchards or vineyards. Other Land is not included in any other mapping category. Common examples include low density rural developments: brush, timber, wetland, and riparian areas not suitable for livestock grazing (CDOC 2023). The project site currently has a General Plan land use designation of Agriculture (AG) and is zoned as Controlled Development (W-2), just as it was for the approved project. Additionally, the modified project would retain a 45-acre area of citrus groves from the property's previous agricultural use. The modified project would add facilities (primarily interim tents, trailers, a water well and septic system) to support the existing golf course and modify the facility layout and capacity. Given that no change is required in the project site's zoning, and the golf course would remain largely open space as well as retain 45 acres of citrus groves, impacts would be less than significant.

b) **Determination: Less Than Significant Impact.**

Original Project

According to the 2021 IS/MND, the original project is not located within a County agricultural preserve or land subject to a Williamson Act contract. Impacts were determined to be less than significant.

Modified Project

Refer to discussion in response a), above. Additionally, the project site is not located within a County agricultural preserve or land subject to a Williamson Act contract. Further, the site will maintain its existing use as an 18-hole golf course, while maintaining 45 acres of citrus groves around the border of the site. Thus, the modified project would not conflict with existing agricultural zoning, agricultural use or with land subject to a Williamson Act contract or land within a Riverside County Agricultural Preserve. Impacts would be less than significant.

c) **Less Than Significant Impact.**

Original Project

According to the 2021 IS/MND, existing land uses surrounding the project site to the north and east support agricultural uses, however, the project site and surrounding area is zoned W-2 (Controlled Development). Therefore, the surrounding areas are not zoned for agricultural use. The project was determined to comply with Ordinance No. 625 in regard to developing non-agricultural uses within 300 feet of agriculturally zoned property. Impacts were determined to be less than significant.

Modified Project

The modified project involves the same site as the original project. The project site provides approximately 45 acres of citrus groves primarily along the northern and eastern perimeter, as well as

intermittent ornamental and native-type desert vegetation throughout the golf courses. The modified project would not result in development of non-agricultural uses within 300 feet of agriculturally zoned property; therefore, impacts would be less than significant.

d) **Less Than Significant Impact.**

Original Project

The 2021 IS/MND determined that the original project would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use. Impacts were determined to be less than significant.

Modified Project

Refer to discussion in responses a) through c). No change is required to the project site's zoning and there will be no change in the project's land use. Additionally, the project site provides approximately 2,400 citrus trees over 45 acres. The project would not result in conversion of Farmland to non-agricultural use. Therefore, impacts would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
5. Forest. Would the project:				
a) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Govt. Code section 51104(g))?	☐	☐	☐	☒
b) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of forest land to non-forest use?	☐	☐	☐	☒

Source(s):
County of Riverside. 2023. Map My County. Accessed March 20, 2023
https://gis1.countyofriverside.us/Html5Viewer/index.html?viewer=MMC_Public

Findings of Fact:

a-c) **No Impact.**

Original Project

According to the 2021 IS/MND, the original project site has a zoning designation of Controlled Development Areas (W-2). The site is not zoned for forest land, timberland, or zoned Timberland

Production, and does not contain any forest land. The 2021 IS/MND determined that there would be no impact.

Modified Project

The modified project involves the same site as the original project. The modified project would not conflict with existing zoning for forestland, nor would it result in the loss or conversion of forestland to non-forest use. No impact would occur in this regard.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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

Source(s):
Riverside County General Plan, Riverside County Climate Action Plan ("CAP"), SCAQMD CEQA Air Quality Handbook (1993)

Findings of Fact:

REGULATORY SETTING

South Coast Air Quality Management District

Air Quality Thresholds

Under the California Environmental Quality Act (CEQA), the South Coast Air Quality Management District (SCAQMD) is an expert commenting agency on air quality within its jurisdiction or impacting its jurisdiction. Under the Federal Clean Air Act (FCAA), the SCAQMD has adopted Federal attainment plans for Ozone(O_3) and Coarse Particulate Matter (PM_{10}). The SCAQMD provides guidance to lead agencies on how to evaluate project air quality impacts related to the following criteria: (1) cause or contribute to any new violation of any air quality standard; (2) increase the frequency or severity of any existing violation of any air quality standard; or (3) delay timely attainment of any air quality standard or any required interim emission reductions or other milestones of any Federal attainment plan.

The SCAQMD's *CEQA Air Quality Handbook* also provides significance thresholds for both construction and operation of projects within the SCAQMD jurisdictional boundaries. If the SCAQMD thresholds are exceeded, a potentially significant impact could result. However, ultimately the lead agency determines the thresholds of significance for impacts. If a project generates emissions in excess of the established mass daily emissions thresholds, as outlined in Table Air-1, *South Coast Air Quality Management District Mass Daily Emissions Thresholds*, a significant air quality impact may occur and additional analysis is warranted to fully assess the significance of impacts. In addition, SCAQMD establishes odor thresholds, which identifies those projects creating an odor nuisance pursuant to SCAQMD Rule 402 would cause a significant impact.

Table Air-1
South Coast Air Quality Management District Mass Daily Emissions Thresholds

Phase	Pollutant (lbs/day)					
	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Construction	75	100	550	150	150	55
Operational	55	55	550	150	150	55
Notes: ROG = reactive organic gases; NO_X = nitrogen oxides; CO = carbon monoxide; SO_X = sulfur oxides; PM_{10} = particulate matter up to 10 microns; $PM_{2.5}$ = particulate matter up to 2.5 microns; lbs = pounds						
Source: South Coast Air Quality Management District, *CEQA Air Quality Handbook,* November 1993.						

Localized Significance Thresholds

Localized Significance Thresholds (LSTs) were developed in response to SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4). The SCAQMD provided the *Final Localized Significance Threshold Methodology* (dated July 2008) for guidance. The LST methodology assists lead agencies in analyzing localized impacts associated with proposed projects. The SCAQMD provides the LST lookup tables for one-, two-, and five-acre projects emitting carbon monoxide (CO), nitrogen oxides (NO_X), PM_{10}, or particulate matter up to 2.5 microns ($PM_{2.5}$). The LST methodology and associated mass rates are not designed to evaluate localized impacts from mobile sources traveling over the roadways.

Cumulative Emissions Thresholds

The SCAQMD's *2016 Air Quality Management Plan* (2016 AQMP) was prepared to accommodate growth, meet State and Federal air quality standards, and minimize the fiscal impact that pollution control measures have on the local economy. According to the SCAQMD *CEQA Air Quality Handbook*, project-related emissions that fall below the established construction and operational thresholds should be considered less than significant unless there is pertinent information to the contrary. If a project exceeds these emission thresholds, the SCAQMD *CEQA Air Quality Handbook* states that the significance of a project's contribution to cumulative impacts should be determined based on whether the rate of growth in average daily trips exceeds the rate of growth in population.

Riverside County General Plan

The General Plan Air Quality Element includes policies focusing on air quality improvements within the County. The following policies are applicable to the project:

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

- **Policy AQ 2.3.** Encourage the use of pollution control measures such as landscaping, vegetation and other materials, which trap particulate matter or control pollution.
- **Policy AQ 4.1**. Require the use of all feasible building materials/methods which reduce emissions.
- **Policy AQ 4.2**. Require the use of all feasible efficient heating equipment and other appliances, such as water heaters, swimming pool heaters, cooking equipment, refrigerators, furnaces and boiler units.
- **Policy AQ 4.6**. Require stationary air pollution sources to comply with applicable air district rules and control measures.
- **Policy 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.

a) **Less than Significant Impact.**

Original Project

The 2021 IS/MND addressed consistency with the SCAQMD's 2016 AQMP to ensure the original project was consistent with the goals, objectives, and assumptions set forth in the 2016 AQMP. According to the 2021 IS/MND, the original project would be consistent with the 2016 AQMP. In addition, the 2021 IS/MND determined that the original project would not generate criteria air pollutant emissions that would exceed the SCAQMD thresholds, and would be consistent with the project site's zoning designation and population forecasts. Thus, it was determined that the original project would not result in a long-term impact on the region's ability to meet state and federal air quality standards and a less than significant impact was determined.

Modified Project

The modified project involves the same project site as analyzed in the 2021 IS/MND, which is located within the Salton Sea Air Basin (Basin) and is governed by the SCAQMD. On March 3, 2017, the SCAQMD Governing Board adopted the 2016 AQMP. The 2016 AQMP incorporates the latest scientific and technical information and planning assumptions, including the latest applicable growth assumptions, updated emission inventory methodologies for various source categories. Additionally, the 2016 AQMP utilized information and data from the Southern California Association of Governments (SCAG) and its *2016-2040 Regional Transportation Plan/Sustainable Communities Strategy* (2016-2040 RTP/SCS). While SCAG has adopted the *2020-2045 Regional Transportation Plan/Sustainable Communities Strategy* (2020-2045 RTP/SCS), SCAQMD has not released an updated AQMP. As such, this consistency analysis is based off the 2016 AQMP and the RTP/SCS that was adopted at the time, the 2016-2040 RTP/SCS. According to the SCAQMD's CEQA Air Quality Handbook, two main criteria must be addressed.

Criterion 1:

With respect to the first criterion, SCAQMD methodologies require that an air quality analysis for a project include forecasts of project emissions in relation to contributing to air quality violations and delay of attainment.

i) Would the project result in an increase in the frequency or severity of existing air quality violations?

Since the consistency criteria identified under the first criterion pertains to pollutant concentrations, rather than to total regional emissions, an analysis of the project's pollutant emissions relative to localized pollutant concentrations is used as the basis for evaluating project

consistency. As discussed in response c), below, localized concentrations of CO, NO_X, PM_{10}, and $PM_{2.5}$ would be less than significant during project construction and operations. Therefore, the modified project would not result in an increase in the frequency or severity of existing air quality violations.[4]

ii) Would the project cause or contribute to new air quality violations?

As discussed below in response b) and response c), the modified project would result in emissions that would be below the SCAQMD thresholds. Therefore, the modified project would not have the potential to cause or affect a violation of the ambient air quality standards.

iii) Would the project delay timely attainment of air quality standards or the interim emissions reductions specified in the AQMP?

As shown in response c), below, the modified project would result in less than significant impacts with regard to localized concentrations during project construction and operations. As such, the modified project would not delay the timely attainment of air quality standards or 2016 AQMP emissions reductions.

Criterion 2:

With respect to the second criterion for determining consistency with SCAQMD and SCAG air quality policies, it is important to recognize that air quality planning within the Basin focuses on attainment of ambient air quality standards at the earliest feasible date. Projections for achieving air quality goals are based on assumptions regarding population, housing, and growth trends. Thus, the SCAQMD's second criterion for determining project consistency focuses on whether or not the proposed project exceeds the assumptions utilized in preparing the forecasts presented in the *2016 AQMP*. Determining whether or not a project exceeds the assumptions reflected in the *2016 AQMP* involves the evaluation of the three criteria outlined below. The following discussion provides an analysis of each of these criteria.

i) Would the project be consistent with the population, housing, and employment growth projections utilized in the preparation of the AQMP?

A project is consistent with the AQMP in part if it is consistent with the population, housing, and employment assumptions that were used in the development of the AQMP. In the case of the *2016 AQMP*, three sources of data form the basis for the projections of air pollutant emissions: the County's General Plan, SCAG's *Growth Management* Chapter of the *Regional Comprehensive Plan and Guide* (RCPG), and SCAG's 2016-2040 RTP/SCS. The 2016-2040 RTP/SCS also provides socioeconomic forecast projections of regional population growth.

The project proposes the addition of member and service facilities to support the golf club. As discussed in "Population and Housing" section of this IS/MND, the golf course is presumed to be utilized by residents in the local area, and would not directly or indirectly lead to unplanned population growth.

According to the General Plan, the project site is designated Agriculture (AG). The project site is zoned as Controlled Development (W-2). Based on Chapter 17.144, *W-2 Controlled Development Areas Zone*, of the Riverside County Municipal Code, golf courses with standard length fairways are permitted provided a plot plan is approved. As such, the project would be consistent with the project site's zoning. Additionally, the project would largely be open space.

[4] Because reactive organic gases (ROGs) are not a criteria pollutant, there is no ambient standard or localized threshold for ROGs. Due to the role ROG plays in ozone formation, it is classified as a precursor pollutant and only a regional emissions threshold has been established.

The project would maintain open space that protects County environmental and other nonrenewable resources. Therefore, the modified project is consistent with the General Plan Land Use Element and does not propose any changes to the existing framework; refer to "Land Use" section of this IS/MND for a discussion on project consistency with applicable General Plan Land Use Element regulations.

As such, the modified project is considered consistent with the General Plan, and is consistent with the types, intensity, and patterns of land use envisioned for the site vicinity in the RCPG. The population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on the local plans and policies applicable to the County. As the SCAQMD has incorporated these same projections into the 2016 AQMP, it can be concluded that the modified project would be consistent with the 2016 AQMP.

ii) Would the project implement all feasible air quality mitigation measures?

The modified project would result in less than significant air quality impacts and would comply with all applicable SCAQMD rules and regulations, including Rule 403 that requires excessive fugitive dust emissions controlled by regular watering or other dust prevention measures. As such, the modified project meets this AQMP consistency criterion.

iii) Would the project be consistent with the land use planning strategies set forth in the AQMP?

Land use planning strategies set forth in the 2016 AQMP are primarily based on the 2016-2040 RTP/SCS. In accordance with the goals of the General Plan, the modified project would be consistent with the land use envisioned for the project site. Further, the project would utilize energy efficient lighting and appliances. In addition, as discussed above, the modified project would be consistent with the General Plan land use policies and zoning designation. As such, the modified project meets this AQMP consistency criterion.

In conclusion, the determination of AQMP consistency is primarily concerned with the long-term influence of a project on air quality in the Basin. The modified project would not result in a long-term impact on the region's ability to meet State and Federal air quality standards. As discussed above, the modified project's long-term influence would also be consistent with the goals and policies of the AQMP and is, therefore, considered consistent with the SCAQMD's 2016 AQMP.

b) Less than Significant Impact.

<u>Original Project</u>

According to the 2021 IS/MND, construction activities associated with the original project would result in the temporary addition of pollutants to the local airshed caused by on-site sources (i.e., off-road construction equipment and soil disturbance) and off-site sources (i.e., on-road haul trucks, delivery trucks, and worker vehicle trips). Daily construction emissions of VOC, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$ would not exceed the SCAQMD significance thresholds. The original project would be required to adhere with SCAQMD Rule 403 to reduce fugitive dust emissions. The 2021 IS/MND concluded that construction of the original project would not result in a cumulatively considerable increase in emissions of nonattainment pollutants, and impacts would be less than significant.

According to the 2021 IS/MND, operation of the original project would generate criteria pollutant emissions from mobile sources (vehicular traffic), area sources (consumer products, landscaping equipment), and energy sources (electrical consumption). Maximum daily operational emissions of VOC, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$ would not exceed the SCAQMD significance thresholds. Criteria air pollutant emissions associated with construction activity of future cumulative projects would be

reduced through implementation of control measures required by the SCAQMD, including Rule 403 and Rule 1113. The 2021 IS/MND concluded that operations of the original project would not result in a cumulatively considerable increase in emissions of nonattainment pollutants, and impacts would be less than significant during operation.

Modified Project

Short-Term Construction Emissions

The project involves minimal construction activities for the concrete foundations required for the placement of the two tent structures. The grading, building construction, and paving activities would last for approximately six months and be completed by October 1, 2023. December 2022. Exhaust emission factors for typical diesel-powered heavy equipment are based on the California Emissions Estimator Model version 2020.4.0 (CalEEMod) program defaults. Variables factored into estimating the total construction emissions include the level of activity, length of construction period, number of pieces and types of equipment in use, site characteristics, weather conditions, number of construction personnel, and the amount of materials to be transported on- or off-site. The analysis of daily construction emissions has been prepared utilizing CalEEMod; refer to Appendix A, *Air Quality/Greenhouse Gas/Energy Data*, for the CalEEMod outputs and results. Table Air-2, *Construction Emissions*, presents the anticipated daily short-term construction emissions.

Table Air-2
Construction Emissions

Emissions Source	Pollutant (pounds/day)[1,2]					
	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Construction Emissions[2]						
Year 1	5.07	50.06	44.74	0.09	6.00	3.49
SCAQMD Thresholds	*75*	*100*	*550*	*150*	*150*	*55*
Threshold Exceeded?	*No*	*No*	*No*	*No*	*No*	*No*

Notes: ROG = reactive organic gases; NO_X = nitrous oxides; CO = carbon monoxide; SO_2 = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter

1. Emissions were calculated using CalEEMod version 2020.4.0, as recommended by the SCAQMD. Winter emissions represent worst-case.
2. The reduction/credits for construction emissions are based on "mitigation" included in CalEEMod and are required by the SCAQMD Rules. The "mitigation" applied in CalEEMod includes the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; cover stock piles with tarps; water all haul roads twice daily; and limit speeds on unpaved roads to 15 miles per hour. The emissions results in this table represent the "mitigated" emissions shown in Appendix A.

Refer to Appendix A, *Air Quality/Greenhouse Gas /Energy Data*, for assumptions used in this analysis.

Fugitive Dust Emissions

Construction activities are a source of fugitive dust emissions that may have a substantial, temporary impact on local air quality. In addition, fugitive dust may be a nuisance to those living and working in the project area. Fugitive dust emissions are associated with land clearing, ground excavation, cut-and-fill, and truck travel on unpaved roadways (including demolition as well as construction activities). Fugitive dust emissions vary substantially from day to day, depending on the level of activity, specific operations, and weather conditions. Fugitive dust from grading, site preparation, and construction is expected to be short-term and would cease upon project completion. Most of this material is inert silicates, rather than the complex organic particulates released from combustion sources, which are more harmful to health.

Dust (larger than 10 microns) generated by above activities usually becomes more of a local nuisance than a serious health problem. Of particular health concern is the amount of PM_{10} generated as a part of fugitive dust emissions. PM_{10} poses a serious health hazard alone or in combination with other pollutants. $PM_{2.5}$ is typically produced by mechanical processes, such as automobile tire wear, industrial processes such as cutting and grinding, and re-suspension of particles from the ground or road surfaces by wind and human activities such as construction or agriculture. $PM_{2.5}$ is mostly derived from combustion sources, such as automobiles, trucks, and other vehicle exhaust, as well as from stationary sources. These particles are either directly emitted or are formed in the atmosphere from the combustion of gases such as NO_X and SO_X combining with ammonia. $PM_{2.5}$ components from material in the Earth's crust, such as dust, are also present, with the amount varying in different locations.

The project would implement all required SCAQMD dust control techniques (i.e., daily watering), limitations on construction hours, and adhere to SCAQMD Rules 402 and 403 (which require watering of inactive and perimeter areas, track out requirements, etc.), to reduce PM_{10} and $PM_{2.5}$ concentrations. As noted in Table Air-2, total PM_{10} and $PM_{2.5}$ emissions would not exceed SCAQMD thresholds during construction. Thus, construction air quality impacts would be less than significant.

Construction Equipment and Worker Vehicle Exhaust

Exhaust emissions from construction activities include emissions associated with the transport of machinery and supplies to and from the project site, employee commutes to the project site, emissions produced on-site as equipment is used, and emissions from trucks transporting materials to/from the site. As presented in Table Air-2, construction equipment and worker vehicle exhaust emissions would not exceed the established SCAQMD threshold for all criteria pollutants. Therefore, impacts in this regard would be less than significant.

ROG Emissions

In addition to gaseous and particulate emissions, the application of asphalt and surface coatings creates ROG emissions, which are O_3 precursors. It should be noted that the project would not involve architectural coating activities. In accordance with the methodology prescribed by the SCAQMD, the ROG emissions associated with paving have been quantified with the CalEEMod model. ROG emissions associated with the modified project would be less than significant; refer to Table Air-2.

Total Construction Emissions

As shown in Table Air-2, the total project construction emissions would be below the established SCAQMD thresholds. Thus, the project would not emit a significant amount of construction air emissions and this impact would be less than significant.

Naturally Occurring Asbestos

Asbestos is a term used for several types of naturally occurring fibrous minerals that are human health hazards when airborne. The most common type of asbestos is chrysotile, but other types such as tremolite and actinolite are also found in California. Asbestos is classified as a known human carcinogen by State, Federal, and international agencies and was identified as a toxic air contaminant by CARB in 1986.

Asbestos can be released from serpentinite and ultramafic rocks when the rock is broken or crushed. At the point of release, the asbestos fibers may become airborne, causing air quality and human health hazards. These rocks have been commonly used for unpaved gravel roads, landscaping, fill projects, and other improvement projects in some localities. Asbestos may be released to the atmosphere due to vehicular traffic on unpaved roads, during grading for development projects, and at quarry operations.

All of these activities may have the effect of releasing potentially harmful asbestos into the air. Natural weathering and erosion processes can act on asbestos bearing rock and make it easier for asbestos fibers to become airborne if such rock is disturbed. According to the Department of Conservation Division of Mines and Geology, *A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos Report* (August 2000),[5] serpentinite and ultramafic rocks are not known to occur within the project area. Thus, there would be no impact in this regard.

Long-Term Operational Emissions

Long-term air quality impacts would consist of mobile source emissions generated from project-related traffic, and emissions from stationary area and energy sources. It should be noted that as a conservative analysis, stationary area and energy sources emissions generated from the approved golf course were not deducted from project emissions. Emissions associated with each of these sources are shown in Table Air-3, *Long-Term Air Emissions* and discussed below.

Table Air-3
Long-Term Air Emissions

Emissions Source	Pollutant (pounds/day)[1]					
	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Project Summer Emissions						
Area	0.82	<0.01	0.05	0.00	<0.01	<0.01
Energy	0.02	0.20	0.16	<0.01	0.01	0.01
Mobile	2.26	2.41	17.26	0.04	3.52	0.96
Total Summer Emissions[2]	*3.10*	*2.61*	*17.47*	*0.04*	*3.54*	*0.97*
SCAQMD Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Is Threshold Exceeded? (Significant Impact?)	*No*	*No*	*No*	*No*	*No*	*No*
Project Winter Emissions						
Area	0.82	<0.01	0.05	0.00	<0.01	<0.01
Energy	0.02	0.20	0.16	<0.01	0.01	0.01
Mobile	1.87	2.56	15.67	0.03	3.52	0.96
Total Winter Emissions[2]	*2.71*	*2.75*	*15.89*	*0.03*	*3.54*	*0.97*
SCAQMD Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Is Threshold Exceeded? (Significant Impact?)	*No*	*No*	*No*	*No*	*No*	*No*

Notes:1. Emissions were calculated using CalEEMod version 2020.4.0, as recommended by the SCAQMD.
2. The numbers may be slightly off due to rounding.

Refer to Appendix A, *Air Quality/Greenhouse Gas /Energy Data*, for assumptions used in this analysis.

Mobile Source

Mobile sources are emissions from motor vehicles, including tailpipe and evaporative emissions. Depending upon the pollutant being discussed, the potential air quality impact may be of either regional or local concern. For example, ROG, NO_X, SO_X, PM_{10}, and $PM_{2.5}$ are all pollutants of regional concern (NO_X and ROG react with sunlight to form O_3 [photochemical smog], and wind currents readily transport SO_X, PM_{10}, and $PM_{2.5}$). However, CO tends to be a localized pollutant, dispersing rapidly at the source. Project-generated vehicle emissions have been estimated using CalEEMod. Based on the *Jeule Ranch Golf Club Expansion – Transportation Screening Analysis* (Transportation Analysis) prepared by Michael Baker International (dated September 28, 2022), the project is projected to generate a net

[5] Department of Conservation Division of Mines and Geology, *A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos Report*, https://www.capcoa.org/Docs/noa/%5B28%5D%20USGS%20Location%20Guide%20Report%202000-19.pdf, accessed October 3, 2022.

increase of 843 daily trips, which includes 48 a.m. peak hour trips and 80 p.m. peak hour trips. As shown in Table Air-3, mobile source emissions due to the project would not exceed SCAQMD thresholds.

Area Source Emissions

Area source emissions are generated from consumer products and landscaping. As seen in Table Air-3, the modified project's ROG emissions would not exceed SCAQMD thresholds.

Energy Source Emissions

Energy source emissions would be generated as a result of electricity usage associated with the modified project; refer to Table Air-3. According to the project applicant, the project would not consume natural gas during operation. However, as a conservative analysis, CalEEMod default natural gas consumption rate was used in the modeling and reflected in Table Air-3. The primary use of electricity by the project would be for space heating and cooling, water heating, ventilation, lighting, appliances, and electronics.

Total Operational Emissions

As shown in Table Air-3, the total operational emissions for both summer and winter would not exceed established SCAQMD thresholds. Therefore, impacts in this regard would be less than significant.

Air Quality Health Impacts

Adverse health effects induced by criteria pollutant emissions are highly dependent on a multitude of interconnected variables (e.g., cumulative concentrations, local meteorology and atmospheric conditions, and the number and character of exposed individual [e.g., age, gender]). In particular, O_3 precursors, VOCs and NO_X, affect air quality on a regional scale. Health effects related to O_3 are therefore the product of emissions generated by numerous sources throughout a region. Existing models have limited sensitivity to small changes in criteria pollutant concentrations and, as such, translating project-generated criteria pollutants to specific health effects or additional days of nonattainment would produce meaningless results. In other words, the project's less than significant increases in regional air pollution from criteria air pollutants during construction would have negligible impacts on human health.

As noted in the Brief of Amicus Curiae by the SCAQMD,[6] the SCAQMD acknowledged it would be extremely difficult, if not impossible to quantify health impacts of criteria pollutants for various reasons including modeling limitations as well as where in the atmosphere air pollutants interact and form. Further, as noted in the Brief of Amicus Curiae by the San Joaquin Valley Air Pollution Control District (SJVAPCD),[7] SJVAPCD has acknowledged that currently available modeling tools are not equipped to provide a meaningful analysis of the correlation between an individual development project's air emissions and specific human health impacts.

The SCAQMD acknowledges that health effects quantification from O_3, as an example, is correlated with the increases in ambient level of O_3 in the air (concentration) that an individual person breathes. SCAQMD's Brief of Amicus Curiae states that it would take a large amount of additional emissions to

6 South Coast Air Quality Management District, Application of the South Coast Air Quality Management District for Leave to File Brief of Amicus Curiae in Support of Neither Party and Brief of Amicus Curiae. In the supreme Court of California. Sierra Club, Revive the San Joaquin, and League of Women Voters of Fresno v. County of Fresno, 2014.

7 San Joaquin Valley Air Pollution Control District, Application for Leave to File Brief of Amicus Curiae Brief of San Joaquin Valley Unified Air Pollution Control District in Support of Defendant and Respondent, County of Fresno and Real Party In Interest and Respondent, Friant Ranch, L.P. In the Supreme Court of California. Sierra Club, Revive the San Joaquin, and League of Women Voters of Fresno v. County of Fresno, 2014.

cause a modeled increase in ambient O_3 levels over the entire region. The SCAQMD further states that based on their own modeling in the SCAQMD's *2012 Air Quality Management Plan*, a reduction of 432 tons (864,000 pounds) per day of NO_X and a reduction of 187 tons (374,000 pounds) per day of VOCs would reduce O_3 levels at highest monitored site by only nine parts per billion. As such, the SCAQMD concludes that it is not currently possible to accurately quantify O_3-related health impacts caused by NO_X or VOC emissions from relatively small projects (defined as projects with regional scope) due to photochemistry and regional model limitations. Thus, as the project would not exceed SCAQMD thresholds for construction and operational air emissions, the project would have a less than significant impact for air quality health impacts.

Cumulative Short-Term Construction Impacts

With respect to the modified project's construction-period air quality emissions and cumulative Basin-wide conditions, the SCAQMD has developed strategies to reduce criteria pollutant emissions outlined in the 2016 AQMP pursuant to Federal Clean Air Act mandates. As such, the project would comply with SCAQMD Rule 403 requirements and implement all feasible SCAQMD rules to reduce construction air emissions to the extent feasible. Rule 403 requires that fugitive dust be controlled with the best available control measures in order to reduce dust so that it does not remain visible in the atmosphere beyond the property line of the project. In addition, the project would comply with adopted 2016 AQMP emissions control measures. Implementation of SCAQMD Rule 403 and the 2016 AQMP emissions control measures would help the project reduce its emissions from construction activities. Pursuant to SCAQMD rules and mandates, as well as the CEQA requirement that significant impacts be mitigated to the extent feasible, these same requirements (i.e., Rule 403 compliance, implementation of all feasible mitigation measures, and compliance with adopted AQMP emissions control measures) would also be imposed on construction projects throughout the Basin, which would include related projects.

The modified project's short-term construction emissions would be below the SCAQMD thresholds and would result in less than significant air quality impacts. Thus, it can be reasonably inferred that the project's construction emissions would not contribute to a cumulatively considerable air quality impact for nonattainment criteria pollutants in the Basin. A less than significant impact would occur in this regard.

Cumulative Long-Term Operational Impacts

The project would not result in long-term operational air quality impacts. Additionally, adherence to SCAQMD rules and regulations would alleviate potential impacts related to cumulative conditions on a project-by-project basis. Furthermore, project adherence to SCAQMD rules and regulations would help reduce operational air emissions. Emission reduction technology, strategies, and plans are constantly being developed. As a result, the project would not contribute a cumulatively considerable net increase of any nonattainment criteria pollutant. Therefore, no cumulative operational impacts associated with implementation of the project would result.

b) **Less than Significant Impact.**

<u>Original Project</u>

The 2021 IS/MND determined that construction activities of the original project would not generate emissions in excess of site-specific LSTs; therefore, site-specific construction impacts during construction of the original project would be less than significant.

According to the 2021 IS/MND, due to the short duration of exposure during construction and lack of long-term sources of toxic air contaminants (TACs) during operation, the original project would not result

in a long-term (i.e., 9-year, 30-year, or 70-year) source of TAC emissions. Therefore, the exposure of project-related TAC emission impacts to sensitive receptors would be less than significant.

According to the 2021 IS/MND, because operation of the original project would not increase daily traffic volumes at any study intersection to more than 100,000 vehicles per day, a CO hotspot is not anticipated to occur, and associated impacts would be less than significant.

Modified Project

Sensitive receptors are defined as facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. CARB has identified the following groups of individuals as the most likely to be affected by air pollution: the elderly over 65, children under 14, athletes, and persons with cardiovascular and chronic respiratory diseases such as asthma, emphysema, and bronchitis. The closest sensitive receptor to the project site is a single-family residence located approximately 4,000 feet to the north. In order to identify impacts to sensitive receptors, the SCAQMD recommends addressing Localized Significance Thresholds (LSTs) for construction and operations impacts (area sources only). The CO hotspot analysis following the LST analysis addresses localized mobile source impacts.

Localized Significance Thresholds (LST)

LSTs were developed in response to SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4). The SCAQMD provided the *Final Localized Significance Threshold Methodology* (dated June 2003 [revised 2008]) for guidance. The LST methodology assists lead agencies in analyzing localized air quality impacts. The SCAQMD provides the LST lookup tables for one-, two-, and five-acre projects emitting CO, NO_X, $PM_{2.5}$, or PM_{10}. The LST methodology and associated mass rates are not designed to evaluate localized impacts from mobile sources traveling over the roadways. The SCAQMD notes that any project over five acres may need to perform air quality dispersion modeling to assess impacts to nearby sensitive receptors. The project is located within Sensitive Receptor Area (SRA) 30, Coachella Valley.

Construction

Based on the CalEEMod results, the project would disturb approximately 63 acres over 21 days (three acres per day); therefore, the LST thresholds for two acres were conservatively utilized for the construction LST analysis. As noted above, the closest sensitive receptor to the project site is a residential property located approximately 4,000 feet to the north of the project's construction limits. This sensitive land uses may be potentially affected by air pollutant emissions generated during on-site construction activities. LST thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters. As the nearest sensitive use is located approximately 4,000 feet (1,219 meters) to the project site, the LST values of 500 meters were utilized. Table Air-4, *Localized Significance of Construction Emissions*, shows the construction-related emissions with incorporation of SCAQMD Rule 402 and 403. It is noted that the localized emissions presented in Table Air-4 are less than those in Table Air-2 because localized emissions include only on-site emissions (i.e., from construction equipment and fugitive dust), and do not include off-site emissions (i.e., from hauling activities). As seen in Table Air-4, on-site emissions with SCAQMD rules applied would not exceed the LSTs for SRA 30.

Table Air-4
Localized Significance of Construction Emissions

Source	Pollutant (pounds/day)[3]			
	NO_X	CO	PM_{10}	$PM_{2.5}$
On-Site Construction Emissions with SCAQMD Rules Applied[1]	38.84	29.04	5.04	2.86
Localized Significance Threshold[2]	*769*	*26,212*	*223*	*112*
Thresholds Exceeded?	*No*	*No*	*No*	*No*

Notes:
1. The grading phase is presented as the worst-case scenario for NO_X, CO, PM_{10}, and $PM_{2.5}$ emissions.
2. The Localized Significance Threshold was determined using Appendix C of the SCAQMD *Final Localized Significant Threshold Methodology* guidance document for pollutants NO_X, CO, PM_{10}, and $PM_{2.5}$. The Localized Significance Threshold was based on the anticipated daily acreage disturbance for construction (approximately three acres; therefore, the 2-acre thresholds were conservatively used), the distance to sensitive receptors (500 meters), and the source receptor area (SRA 30).
3. The reduction/credits for construction emissions are based on "mitigation" included in CalEEMod and are required by the SCAQMD Rules. The "mitigation" applied in CalEEMod includes the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; cover stockpiles with tarps; water all haul roads twice daily; and limit speeds on unpaved roads to 15 miles per hour. The emissions results in this table represent the "mitigated" emissions shown in Appendix A.

Refer to Appendix A, *Air Quality/Greenhouse Gas /Energy Data*, for detailed model input/output data.

Operations

According to SCAQMD localized significance threshold methodology, LSTs would apply to the operational phase of a proposed project if the project includes stationary sources or attracts mobile sources that may spend extended periods queuing and idling at the site (e.g., warehouse or transfer facilities). The project consists of a golf course and would not include such sources. Thus, due to the lack of such emissions, no long-term LST analysis is needed.

Carbon Monoxide Hotspots

CO emissions are a function of vehicle idling time, meteorological conditions, and traffic flow. Under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthful levels (i.e., adversely affecting residents, school children, hospital patients, the elderly, etc.).

The Basin is designated as an attainment/maintenance area for the Federal CO standards and an attainment area for State standards. There has been a decline in CO emissions even though vehicle miles traveled on U.S. urban and rural roads have increased. Nationwide estimated anthropogenic CO emissions have decreased 68 percent between 1990 and 2014. In 2014, mobile sources accounted for 82 percent of the nation's total anthropogenic CO emissions.[8] CO emissions have continued to decline since this time. The Basin was re-designated as attainment in 2007 and is no longer addressed in the SCAQMD's AQMP. Three major control programs have contributed to the reduced per-vehicle CO emissions: exhaust standards, cleaner burning fuels, and motor vehicle inspection/maintenance programs.

A detailed CO analysis was conducted in the *Federal Attainment Plan for Carbon Monoxide* (CO Plan) for the SCAQMD's *2003 Air Quality Management Plan*.[9] The locations selected for microscale modeling in the CO Plan are worst-case intersections in the SCAQMD jurisdiction and would likely experience the highest CO concentrations. Thus, CO analysis within the CO Plan is utilized in a comparison to the modified project, since it represents a worst-case scenario with heavy traffic volumes within the SCAQMD jurisdiction.

[8] United States Environmental Protection Agency, *Carbon Monoxide Emissions*, https://cfpub.epa.gov/roe/indicator_pdf.cfm?i=10, accessed by September 27, 2022.

[9] The Carbon Monoxide Plan was not updated as part of the 2016 AQMP.

Of these locations, the Wilshire Boulevard/Veteran Avenue intersection in Los Angeles experienced the highest CO concentration (4.6 parts per million [ppm]), which is well below the 35-ppm 1-hour CO Federal standard. The Wilshire Boulevard/Veteran Avenue intersection is one of the most congested intersections in Southern California with an average daily traffic (ADT) volume of approximately 100,000 vehicles per day. As the CO hotspots were not experienced at the Wilshire Boulevard/Veteran Avenue intersection, it can be reasonably inferred that CO hotspots would not be experienced at any intersections near the project site due to net increase in volume of traffic of 843 daily trips that would occur as a result of project implementation. Impacts would be less than significant in this regard.

c) **Less than Significant Impact.**

Original Project

It was determined in the 2021 IS/MND that impacts associated with odors during construction and operation of the original project would be less than significant.

Modified Project

According to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The project does not include uses identified by the SCAQMD as being associated with odors.

Construction activities associated with the project may generate detectable odors from heavy-duty equipment exhaust. However, construction-related odors would be short-term in nature and cease upon project completion. In addition, the project would be required to comply with the California Code of Regulations, Title 13, Sections 2449(d)(3) and 2485, which minimizes the idling time of construction equipment either by shutting it off when not in use or by reducing the time of idling to no more than five minutes. This would reduce detectable odors from heavy-duty equipment exhaust. As such, the modified project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. Impacts would be less than significant in this regard.

Mitigation**:** No mitigation is required.

Monitoring**:** No monitoring is required.

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

Source(s):

Dudek. November 8, 2021. *Biological Resources Assessment for the Lemon Blossom – Coachella Golf Club Project Site, Thermal, Riverside County, California*.

Coachella Valley Association of Governments (CVAG). 2016. *Coachella Valley Multiple Species Habit Conservation Plan.* As amended August 2016. Accessed March 20, 2023. http://www.cvmshcp.org/Plan_Documents

Findings of Fact:

a) **Less Than Significant With Mitigation Incorporated.**

Original Project

The 2021 IS/MND determined that the original project site is not located within a Coachella Valley

Multiple Species Habitat Conservation Plan (CVMSHCP) conservation area; however, it is adjacent to the Santa Rosa and San Jacinto Mountains Conservation Area. A fee is required for all projects located within the CVMSHCP plan area. With payment of this fee and adherence to Land Use Adjacency Guidelines in Section 4.5 of the CVMSHCP, the original project was determined to be consistent with the CVMSHCP, and mitigation measures (MM) MM-BIO-1 (payment of a local development mitigation fee) and MM-BIO-2 (implementation of applicable CVMSHCP Land Use Adjacency Guidelines) were incorporated into the original project to reduce potential impacts to a less than significant level.

Modified Project

The modified project involves the same project site as analyzed in the 2021 IS/MND. As such, the project site is not located within a conservation area; however, the project site is adjacent east of the Santa Rosa and San Jacinto Mountains Conservation Area. This Conservation Area is physically bisected from the project site by a concrete retaining wall along the project's western perimeter. Further, the modified improvement activities, identified under this proposal, are limited to the northern and eastern areas of the project site.

The project is not subject to MM-BIO-1 because the payment of local development mitigation fees has already occurred under the original project. However, due to the modified project's proximity of the conservation area, the project continues to be subject to the adherence to the CVMSHCP Land Use Adjacency Guidelines identified below in MM-BIO-2**.** With adherence to the required Land Use Adjacency Guidelines [related to drainage, toxics, lighting, noise, invasives, barriers and grading], the modified project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state conservation plan. Impacts would be reduced to less than significant.

b-c) **Less Than Significant With Mitigation Incorporated.**

Original Project

A Biological Resources Assessment was prepared for the project site in 2021; refer PPT210024/CEQ210045 Approved Project Materials (on-file with the County of Riverside). As concluded in the 2021 Biological Resources Assessment, no listed or non-listed special-status wildlife species were observed during the August and September 2021 surveys, and no federally or state-listed plant species have a potential to occur within the project site. The 2021 IS/MND determined that the original project may have a substantial adverse effect on threatened or endangered species, and/or candidate, sensitive, or special status species, and on a riparian habitat or other sensitive natural community, based on the 2021 Biological Resources Assessment that was prepared for the original project. As such, the original project was required to implement MM-BIO-3 (pre-construction nesting bird survey), MM-BIO-4 (pre-construction burrowing owl survey), and MM-BIO-5 (jurisdictional water permits) to reduce these impacts to a less than significant level.

Modified Project

As discussed above, a Biological Resources Assessment was prepared for the original project site in 2021. As concluded in the Biological Resources Assessment, no listed or non-listed special-status wildlife species were observed during the August and September 2021 surveys, and no federally or state-listed plant species have a potential to occur within the project site. As discussed above, mitigation measures were required and implemented during construction of the original project. The modified project is also subject to MM-BIO-3 (pre-construction nesting bird survey) and MM-BIO-4 (pre-construction burrowing owl survey). With implementation of these measures, the modified project would not have a substantial adverse effect, either directly or through habitat modifications to endangered or

threatened species or candidate, sensitive, or special status species. Impacts would be reduced to less than significant.

d) **Less Than Significant Impact.**

Original Project

The 2021 Biological Resource Assessment prepared for the original project concluded that the project site does not function as a wildlife corridor and does not support any wildlife nursery sites. Based on the 2021 IS/MND, wildlife movement within the original project site is unlikely due to the surrounding active agriculture to the north, east, and southeast of the project site that extends for several miles in all three directions. However, the area west of the project site and the surrounding environment consist of open desert scrub habitat that likely function as open habitat but do not function as a corridor for wildlife. Therefore, the 2021 IS/MND determined that implementation of the original project would not result in significant impacts to these resources.

Modified Project

The project involves the same project site as analyzed in the 2021 IS/MND. Therefore, similar to the original project, the modified project would not substantially interfere with the movement of any native resident or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Impacts would be less than significant.

e-g) **No Impact.**

Original Project

As discussed in the 2021 IS/MND, the original project site does not contain riparian habitat or other sensitive natural community identified by CDFW or USFWS. However, the original project site [previously] included creosote bush wash, which is a natural community covered under the CVMSHCP; as such, development fees were required to mitigate habitat loss. The project applicant was responsible for the payment of fees as required by mitigation measures included in the 2021 IS/MND and has adhered to the CVMSHCP Land Use Adjacency Guidelines.

The 2021 Biological Resources Assessment concluded that within the study area (original project site and 500-foor buffer), unvegetated wash and river bottom was located within the eastern study area buffer, but lies outside of the project footprint, and traversing south to north. Further, there are no wetlands on-site; and therefore, the 2021 IS/MND concluded that the original project would not result in an adverse effect on State or federally protected wetlands.

In addition, the General Plan's Multipurpose Open Space Element Policies OS 9.3 and OS 9.4 protect native trees, natural vegetation, stands of established trees, oak trees and other features for ecosystem, aesthetic, and water conservation purposes within the County (County of Riverside, 2015). The original project did not remove or affect any protected trees located on or adjacent to the original project site, and the original project complied with local policies and ordinances protecting biological resources. Therefore, the 2021 IS/MND concluded that the original project activities would have no impact related to conflicts with local policies or ordinances protecting biological resources.

Modified Project

The project site continues to have similar existing conditions with respect to biological resources as the original project. There are no riparian habitat or other sensitive natural community or wetlands onsite,

nor would the project remove or affect any protected trees. The project would comply with local policies and ordinances protecting biological resources and no impact would occur.

Mitigation:

MM-BIO-2 As a requirement of the Coachella Valley Multiple Species Habitat Conservation Plan, the Applicant and Contractor shall implement the following Land Use Adjacency Guidelines (Coachella Valley Multiple Species Habitat Conservation Plan [CVMSHCP], Section 4.5) during project construction and operation to minimize and avoid indirect/direct effects from the development (project site) to the adjacent to the Santa Rosa and San Jacinto Mountains Conservation Area:

- **Drainage**: Proposed development adjacent to or within a Conservation Area shall incorporate plans to ensure that the quantity and quality of runoff discharged to the adjacent Conservation Area is not altered in an adverse way when compared with existing conditions. Stormwater systems shall be designed to prevent the release of toxins, chemicals, petroleum products, exotic plant materials, or other elements that might degrade or harm biological resources or ecosystem processes within the adjacent Conservation Area.

- **Toxics**: Land uses proposed adjacent to or within a Conservation Area that use chemicals or generate bioproducts such as manure that are potentially toxic or may adversely affect wildlife and plant species, habitat, or water quality shall incorporate measures to ensure that application of such chemicals does not result in any discharge to the adjacent Conservation Area.

- **Lighting**: Proposed development adjacent to or within a Conservation Area, lighting shall be shielded and directed toward the developed area. Landscape shielding or other appropriate methods shall be incorporated in project designs to minimize the effects of lighting adjacent to or within the adjacent Conservation Area in accordance with the guidelines to be included in the Implementation Manual.

- **Noise**: Proposed development adjacent to or within a Conservation Area that generates noise in excess of 75 A-weighted decibels sound equivalent level hourly shall incorporate setbacks, berms, or walls, as appropriate, to minimize the effects of noise on the adjacent Conservation Area in accordance with the guidelines to be included in the Implementation Manual.

- **Invasives**: Invasive, non-native plant species shall not be incorporated in the landscape for land uses adjacent to or within a Conservation Area. Landscape treatments within or adjacent to a Conservation Area shall incorporate native plant materials to the maximum extent feasible; recommended native species are listed in Table 4-112 [CVMSHCP, Section 4.5.5]. The plants listed in Table 4-113 shall not be used within or adjacent to a Conservation Area. This list may be amended from time to time through a Minor Amendment with Wildlife Agency Concurrence.

- **Barriers**: Land uses adjacent to or within a Conservation Area shall incorporate barriers in individual project designs to minimize unauthorized public access, domestic animal predation, illegal trespass, or dumping in a Conservation Area. Such barriers may include native landscaping, rocks/boulders, fencing, walls and/or signage.

- **Grading/Land Development**: Manufactured slopes associated with site development shall not extend into adjacent land in a Conservation Area.

MM-BIO-3 To maintain compliance with the Migratory Bird Treaty Act and California Fish and Game Code, if ground-disturbing and/or vegetation clearance activities are scheduled to occur during the avian nesting season (typically February 15 through August 31), a qualified biologist shall conduct a pre-construction nesting bird survey within the project impact footprint and a 500-foot buffer where legal access is granted around the disturbance footprint. Surveys shall be conducted within 3 days prior to initiation of ground-disturbing activities.

If an active nest is detected during the nesting bird survey, avoidance buffers shall be implemented as determined by a qualified biologist (typically 300 feet for passerines and 500 feet for raptors and special-status species). The buffer shall be of a distance to ensure avoidance of adverse effects to the nesting bird by accounting for topography, ambient conditions, species, nest location, and activity type. All nests shall be monitored as determined by the qualified biologist until nestlings have fledged and dispersed or it is confirmed that the nest has been unsuccessful or abandoned. The qualified biologist shall halt all construction activities within proximity to an active nest if it is determined that the activities are harassing the nest and may result in nest abandonment or take. The qualified biologist shall also have the authority to require implementation of avoidance measures related to noise, vibration, or light pollution if indirect impacts are resulting in harassment of the nest.

MM-BIO-4 Pre-construction surveys for burrowing owls shall be completed within areas of suitable habitat (i.e., flatter portions of the site) in accordance with the *Staff Report on Burrowing Owl Mitigation* (CDFG 2012), with the first survey no less than 14 days prior to initiation of project-related activities, and the second within 24 hours of project-related activities. If an active burrowing owl burrow is detected within 500 feet of the impact footprint, avoidance and minimization measures shall be implemented in accordance with the *Staff Report on Burrowing Owl Mitigation* guidelines or agreed upon by the California Department of Fish and Wildlife, including implementation of a non-disturbance buffer and monitoring of the nest to ensure activities are not adversely affecting the nest. If the project will occur within this zone, then work must occur outside the nesting season, or until it can be shown that the birds have finished nesting, at which point passive relocation may occur.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
CULTURAL RESOURCES. Would the project:				
8. Historic Resources a) Alter or destroy a historic site?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of a historical resource, pursuant to California Code of Regulations, Section 15064.5?	☐	☐	☐	☒

Source(s):
Dudek. 2021. Phase I Cultural Resources Assessment, Lemon Blossom Lane and Avenue 60 Project, Riverside County.

Findings of Fact:

a-b) **No Impact.**

Original Project

The Cultural Resources Assessment prepared for the original project in 2021 included a cultural resources records search, review of literature and archival resources (historic maps, aerial photographs, topographic maps) and a pedestrian field survey. The California Historical Resources Information System (CHRIS) records search identified 17 previously recorded cultural resources within the 1-mile records search buffer; however, none of these resources intersect, overlap or are adjacent to the project site. Of the 17 previously recorded cultural resources identified within the records search area, 12 are prehistoric archaeological sites and five are prehistoric isolates. No historic sites were identified within the records search area of the original project site or the 1-mile radius. The review of historic topographic maps and aerial photographs shows the original project site as vacant and undeveloped within an alluvial fan as early as 1950 and transformation of the property for agricultural use since at least 1989. No cultural resources were found within the original project site as a result of the intensive-level pedestrian survey completed on July 23, 2021. No newly or previously recorded historic sites were identified within the original project site as a result of the CHRIS records search, archival research, or the intensive-level pedestrian survey. The 2021 IS/MND concluded that there was no evidence to demonstrate that the original project would alter, destroy or adversely affect a historic site. Therefore, the 2021 IS/MND determined that the original project would not result in a substantial adverse change to the significance of a historical resource as defined in State CEQA Guidelines Section 15064.5 and no impact would occur.

Modified Project

The project site continues to have similar existing conditions relative to historic resources as the original project. There are no historic resources located on the project site. Therefore, the modified project would not result in a substantial adverse change to the significance of a historical resource as defined in State CEQA Guidelines Section 15064.5. No impact would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
9. Archaeological Resources. Would the project:				
a) Alter or destroy an archaeological site?	☐	☐	☒	☐
b) Cause a substantial adverse change in the significance of an archaeological resource, pursuant to California Code of Regulations, Section 15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐

Source(s):
Dudek. 2021. Phase I Cultural Resources Assessment, Lemon Blossom Lane and Avenue 60 Project, Riverside County.

Findings of Fact:

a-c) **Less Than Significant with Mitigation Incorporated.**

Original Project

As discussed in the 2021 IS/MND, no new or previously recorded cultural resources were identified within the original project site as a result of the CHRIS records search, archival research, or the intensive-level pedestrian survey. However, prior to its development as a golf course, the original project site had not been subjected to significant previous ground disturbance (outside of agricultural activities). As a result, the potential of encountering unknown cultural resources during ground disturbing activities associated with the development of golf course was considered low within fill soils and moderate within native soils. Considering the potential sensitivity for archaeological resources, the original project was required to implement MM-CUL-1 (Worker Environmental Awareness Program (WEAP); MM-CUL-2 (Construction Monitoring and Treatment Plan (CMTP); MM-CUL-3 (archaeological monitoring during initial disturbance): MM-CUL-4 (cultural resource inadvertent discovery protocol); and MM-CUL-5 (human remains protocol). The original project implemented these measures during construction activities and the 2021 IS/MND determined that the original project would result in a less than significant impact to archaeological resources with mitigation.

Modified Project

Mass grading and contouring of the project site was conducted as part of the original project. The modified project includes grading and earthwork for the installation of foundations required for the tent structures, and installation of the water well and septic system. Consistent with the original project, the modified project would implement MM-CUL-1 through MM-CUL-5, as needed, to avoid or reduce potential impact to cultural resources. With adherence to the 2021 IS/MND mitigation program, potential impacts to archaeological resources would be less than significant.

Mitigation:

MM-CUL-1 Prior to commencement of construction activities for all phases of project implementation, the Project applicant shall retain a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology, to prepare a Worker Environmental Awareness Program (WEAP). The WEAP shall be submitted to the County for review and approval. All construction personnel and monitors who are not trained archaeologists shall be briefed regarding inadvertent discoveries prior to the start of construction activities. A basic presentation and handout or pamphlet shall be prepared in order to ensure proper identification and treatment of inadvertent discoveries. The purpose of the Workers Environmental Awareness Program (WEAP) training is to provide specific details on the kinds of archaeological materials that may be identified during construction of the project and explain the importance of and legal basis for the protection of significant archaeological resources. Each worker shall also learn the proper procedures to follow in the event that cultural resources or human remains are uncovered during ground-disturbing activities. These procedures include work curtailment or redirection, and the immediate contact of the site supervisor and archaeological monitoring and if appropriate, Tribal representative. Necessity of training attendance should be stated on all construction plans.

MM-CUL-2 Impacts to cultural resources should be minimized through implementation of pre- and post- construction tasks. Tasks pertaining to cultural resources include the development of a Construction Monitoring and Treatment Plan (CMTP). The purpose of the CMTP is to outline a program of monitoring procedures and protocols as well as treatment and mitigation in the case of an inadvertent discovery of cultural resources during ground-disturbing phases (including but not limited to preconstruction site mobilization and testing, grubbing, removal of soils for remediation, construction ground disturbance, construction grading, trenching, and landscaping) and to provide for the proper identification, evaluation, treatment, and protection of any cultural resources throughout the duration of the Project. This CMTP should define the process to be followed for the identification and management of cultural resources in the Project area during construction. Existence of and importance of adherence to the CMTP should be stated on all Project site plans intended for use by those conducting the ground disturbing activities.

MM-CUL-3 A qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards, and a Native American observer, preferably ancestrally connected to the general Project area, should monitor all initial ground disturbances. Initial ground disturbance is defined as initial construction-related earth moving of sediments from their place of deposition. As it pertains to archaeological and Native American monitoring, this definition excludes movement of sediments after they have been initially disturbed or displaced by current project-related construction. A County qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards, should oversee and adjust monitoring efforts as needed (increase, decrease, or discontinue spot monitoring frequency) based on the observed potential for construction activities to encounter cultural deposits. The archaeological monitor should be responsible for maintaining monitoring logs. Following the completion of construction, the County-qualified archaeologist should provide an archaeological monitoring report to the County and the EIC with the results of the cultural monitoring program.

MM-CUL-4 In the event that archaeological resources (sites, features, or artifacts) are exposed during construction activities for the Project, all construction work occurring within 100 feet of the find should immediately stop until a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards, can evaluate the significance of the find and determine whether or not additional study is warranted. Depending upon the significance of the find under the California Environmental Quality Act (14 CCR 15064.5(f); California PRC Section 21082), the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work, such as preparation of an archaeological treatment plan, testing, or data recovery, may be warranted. If the discovery is Native American in nature, consultation with and/or monitoring by a Tribal representative may be necessary.

MM-CUL-5 In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found, the County coroner shall be immediately notified of the discovery. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County coroner has determined, within two working days of notification of the discovery, the appropriate treatment and disposition of the human remains. If the County coroner determines that the remains are, or are believed to be, Native American, he or she shall notify the NAHC in Sacramento within 24 hours. In accordance with California Public Resources Code, Section 5097.98, the NAHC must immediately notify those persons it believes to be the most likely descendant from the deceased Native American. The most likely descendant shall complete their inspection within 48 hours of being granted access to the site. The designated Native

American representative would then determine, in consultation with the property owner, the disposition of the human remains.

Monitoring: No monitoring is required.

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

Source(s):
Riverside County General Plan, 2019 Riverside County Climate Action Plan Update ("CAP"), Project Application Materials.

Findings of Fact:

REGULATORY FRAMEWORK

California Building Energy Efficiency Standards (Title 24)

The 2019 California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6), commonly referred to as "Title 24," became effective on January 1, 2020. In general, Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. Under 2019 Title 24 standards, nonresidential buildings would use about 30 percent less energy, mainly due to lighting upgrades, when compared to those constructed under 2016 Title 24 standards.[10] The 2019 Title 24 standards require installation of energy efficient windows, insulation, lighting, ventilation systems, and other features that reduce energy consumption in homes and businesses. Additionally, new buildings constructed after January 1, 2023, need to comply with 2022 Title 24 standards.

California Green Building Standards (CALGreen)

The CALGreen Code (California Code of Regulations, Title 24, Part 11), is a statewide mandatory construction code that was developed and adopted by the California Building Standards Commission and the California Department of Housing and Community Development. CALGreen standards require new residential and commercial buildings to comply with mandatory measures under five topical areas: planning and design; energy efficiency; water efficiency and conservation; material conservation and resource efficiency; and environmental quality. CALGreen also provides voluntary tiers and measures that local governments may adopt which encourage or require additional measures in the five green building topics. The most recent update to the CALGreen Code was adopted in 2019 and went into

[10] California Energy Commission, *2019 Building Energy Efficiency Standards*, March 2018.

effect on January 1, 2020. CALGreen requires new buildings to reduce water consumption by 20 percent, divert 50 percent of construction waste from landfills, and install low pollutant-emitting materials. There is growing recognition among developers and retailers that sustainable construction is not prohibitively expensive, and that there is a significant cost-savings potential in green building practices and materials.[11]

Senate Bill 100

Senate Bill (SB) 100 (Chapter 312, Statutes of 2018) requires that retail sellers and local publicly owned electric utilities procure a minimum quantity of electricity products from eligible renewable energy resources so that the total kilowatt-hours (kWh) of those products sold to their retail end-use customers achieve 44 percent of retail sales by December 31, 2024; 52 percent by December 31, 2027; 60 percent by December 31, 2030; and 100 percent by December 31, 2045. The bill requires the California Public Utilities Commission (CPUC), California Energy Commission (CEC), California Air Resources Board (CARB), and all other State agencies to incorporate the policy into all relevant planning. In addition, SB 100 requires the CPUC, CEC, and CARB to utilize programs authorized under existing statutes to achieve that policy and, as part of a public process, issue a joint report to the Legislature by January 1, 2021, and every four years thereafter, that includes specified information relating to the implementation of SB 100.

California Public Utilities Commission Energy Efficiency Strategic Plan

The CPUC prepared the Long-Term Energy Efficiency Strategic Plan (Strategic Plan) in September 2008 with the goal of promoting energy efficiency and a reduction in greenhouse gases. In January 2011, a lighting chapter was adopted and added to the Strategic Plan. The Strategic Plan is California's single roadmap to achieving maximum energy savings in the State between 2009 and 2020, and beyond 2020. The Strategic Plan contains the practical strategies and actions to attain significant statewide energy savings, as a result of a year-long collaboration by energy experts, utilities, businesses, consumer groups, and governmental organizations in California, throughout the West, nationally and internationally. The plan includes the four big bold strategies:

1. All new residential construction in California will be zero net energy by 2020.
2. All new commercial construction in California will be zero net energy by 2030.
3. Heating, ventilation and air condition (HVAC) will be transformed to ensure that its energy performance is optimal for California's climate.
4. All eligible low-income customers will be given the opportunity to participate in the low-income energy efficiency program by 2020.

California Energy Commission Integrated Energy Policy Report

In 2002, the California State legislature adopted Senate Bill (SB) 1389, which requires the CEC to develop an Integrated Energy Policy Report (IEPR) every two years. SB 1389 requires the CEC to conduct assessments and forecasts of all aspects of energy industry supply, production, transportation, delivery and distribution, demand, and prices, and use these assessments and forecasts to develop energy policies that conserve resources, protect the environment, ensure energy reliability, enhance the State's economy, and protect public health and safety.

The CEC adopted the 2021 Integrated Energy Policy Report (2021 IEPR) Volume I, Volume II, and Volume IV on February 1, 2022 and Volume III on February 24, 2022.[12] The 2021 IEPR provides

[11] US Green Building Council, *Green Building Costs and Savings*, https://www.usgbc.org/articles/green-building-costs-and-savings, accessed June 24, 2021.

[12] California Energy Commissions, *2021 Integrated Energy Policy Report*, https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2021-integrated-energy-policy-report, accessed September 27, 2022.

information and policy recommendations on advancing a clean, reliable, and affordable energy system for all Californian.[13] Volume I of the 2021 IEPR addresses actions needed to reduce the greenhouse gas emissions related to the buildings in which California live and work, with an emphasis on energy efficiency; Volume II examines actions needed to increase the reliability and resiliency of California's energy system; Volume III looks at the evolving role of gas in California' energy system; and Volume IV reports on California's energy demand outlook, including a forecast to 2035 and long-term energy demand scenarios of 2050. The 2021 IEPR builds on the goals and work in response to AB 758 (Energy: energy audit), SB 350 (Clean Energy and Pollution Reduction Act), AB 3232 (Zero-emissions buildings and sources of heat energy), and the 2019 IEPR to further a comprehensive approach toward decarbonizing buildings in a cost-effective and equitable manner. For the 2021 IEPR, the CEC extends the forecast timeframe to 15 years to coincide with several State goals that are planned for 2035 and improves methodologies to better quantify and predict the likelihood, severity, and duration of future extreme heat events.

Executive Order N-79-20

Executive Order N-79-20, issued September 23, 2020, directs the State to require all new cars and passenger trucks sold in the State to be zero-emission vehicles by 2035. Executive Order N-79-20 further states that all medium- and heavy-duty vehicles sold in the State will be zero-emission by 2045.

Riverside County General Plan

The Air Quality Element of Riverside County General Plan (General Plan) includes policies focusing on energy efficiency. The following policies are applicable to the project.

- **Policy AQ 5.4**: Encourage the incorporation of energy-efficient design elements, including appropriate site orientation and the use of shade and windbreak trees to reduce fuel consumption for heating and cooling.
- **Policy AQ 20.10**: Reduce energy consumption of the new developments (residential, commercial and industrial) through efficient site design that takes into consideration solar orientation and shading, as well as passive solar design.
- **Policy AQ 20.11**: Increase energy efficiency of the new developments through efficient use of utilities (water, electricity, natural gas) and infrastructure design. Also, increase energy efficiency through use of energy efficient mechanical systems and equipment.

2019 Riverside County Climate Action Plan Update

The 2019 Riverside County Climate Action Plan (CAP) Update was approved on December 17, 2019.[14] The 2019 CAP Update refines the County's efforts to meet GHG reduction strategies, specifically for the years 2035 and 2050. The 2019 CAP Update builds upon the GHG reduction strategies in the 2015 Climate Action Plan. The 2019 CAP Update includes the following measures related to energy efficiency and clean energy that are applicable to the project:

- **R2-EE11**: Exceed Energy Efficiency Standards in New Commercial Units
  - Comply with State requirements on new non-residential buildings, such as Net-Zero Energy Buildings for all new non-residential development meeting zero net-energy use by 2030.

METHODOLOGY

[13] California Energy Commissions, *Final 2021 Integrated Energy Policy Report Volume I Building Decarbonization*, February 2022.

[14] Riverside County, *2019 Climate Action Plan Update*, November 2019, https://planning.rctlma.org/Portals/14/CAP/2019/2019_CAP_Update_Full.pdf.

State CEQA Guidelines Appendix F is an advisory document that assists in determining whether a project will result in the inefficient, wasteful, and unnecessary consumption of energy. The analysis on response a), below, relies upon Appendix F of the State CEQA Guidelines, which includes the following criteria to determine whether this threshold of significance is met:

- Criterion 1: The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance and/or removal. If appropriate, the energy intensiveness of materials maybe discussed.
- Criterion 2: The effects of the project on local and regional energy supplies and on requirements for additional capacity.
- Criterion 3: The effects of the project on peak and base period demands for electricity and other forms of energy.
- Criterion 4: The degree to which the project complies with existing energy standards.
- Criterion 5: The effects of the project on energy resources.
- Criterion 6: The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

Quantification of the project's energy usage is presented and addresses Criterion 1. The discussion on construction-related energy use focuses on Criteria 2, 4, and 5. The discussion on operational energy use is divided into transportation energy demand and building energy demand. The transportation energy demand analysis discusses Criteria 2, 3, and 6, and the building energy demand analysis discusses Criteria 2, 3, 4, and 5.

a) **Less Than Significant Impact.**

Original Project

The 2021 IS/MND concluded that the original project would not result in wasteful, inefficient, and unnecessary consumption of energy during construction or operation. Therefore, impacts would be less than significant.

Modified Project

Project-Related Sources of Energy Consumption

This analysis focuses on three sources of energy that are relevant to the project: electricity and fuel for off-road equipment and vehicle trips associated with project construction and operations. The analysis of operational electricity usage is based on the California Emissions Estimator Model version 2020.4.0 (CalEEMod) modeling results for the project, which quantifies energy use for occupancy. The project's estimated electricity consumption is based primarily on CalEEMod's default settings for Riverside County, and consumption factors provided by Imperial Irrigation District (IID). Additionally, according to the project applicant, the project would not consume natural gas. As a conservative analysis, electricity consumption from the approved golf course IS/MND were not deducted from the project's consumption during operation. The results of the CalEEMod modeling and energy usage calculations are included in Appendix A, *Air Quality/Greenhouse Gas/Energy Data*. The amount of operational fuel consumption was estimated using CARB's EMission FACtor Model 2017 (EMFAC2017) computer program, which provides projections for typical daily fuel usage in Riverside County, and the project's annual vehicle miles traveled (VMT) outputs from CalEEMod. The estimated construction fuel consumption is based on the project's construction equipment list, timing/phasing, and duration of use.

The modified project's estimated energy consumption is summarized in Table Energy-1, *Project and Countywide Energy Consumption*. As shown in Table Energy-1, the project's usage would constitute

an approximate 0.0010 percent increase over the County's typical annual electricity consumption. Additionally, the project's construction and operational fuel consumption would increase the County's consumption by 0.0059 percent and 0.0133 percent, respectively (Criterion 1).

Table Energy-1
Project and Countywide Energy Consumption

Energy Type	Modified Project Annual Energy Consumption[1]	Riverside County Annual Nonresidential Energy Consumption[2]	Percentage Increase Countywide[2]
Electricity Consumption	170 MWh	16,857,931 MWh	0.0010%
Fuel Consumption			
• Construction Fuel Consumption[3]	11,383 gallons	194,496,204 gallons	0.0059%
• Operational Automotive Fuel Consumption[3]	100,159 gallons	752,896,971 gallons	0.0133%

Notes: N/A=Not Applicable
1. As modeled in CalEEMod version 2020.4.0. and the California Air Resources Board EMission FACtor model 2017 (EMFAC2017).
2. The project increases in electricity consumption are compared to the total consumption in Riverside County in 2020. The project increases in automotive fuel consumption are compared with the projected Countywide fuel consumption in 2023.
   Riverside County electricity consumption data source: California Energy Commission, *Electricity Consumption by County*, http://www.ecdms.energy.ca.gov/elecbycounty.aspx, accessed September 27, 2022.
3. Project fuel consumption calculated based on CalEEMod results. Countywide fuel consumption is from the California Air Resources Board's EMFAC2017 model. The project fuel consumption is compared with the projected Countywide fuel consumption in 2023.

Refer to Appendix A for assumptions used in this analysis.

Construction-Related Energy Consumption

During construction, the modified project would consume energy in two general forms: (1) the fuel energy consumed by construction vehicles and equipment; and (2) bound energy in construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

Fossil fuels for construction vehicles and other energy-consuming equipment would be used during demolition, grading, building construction, paving, and architectural coating. As indicated in Table Energy-1, the overall fuel consumption during project construction would be approximately 11,383 gallons, which would result in a nominal increase (0.0059 percent) in fuel use in the County. As such, project construction would have a minimal effect on the local and regional energy supplies and would not require additional capacity (Criterion 2).

Some incidental energy conservation would occur during construction through compliance with State requirements that equipment not in use for more than five minutes be turned off (i.e., Title 13, California Code of Regulations Section 2485). Project construction equipment would also be required to comply with the latest U.S. Environmental Protection Agency (EPA) and CARB engine emissions standards. These emissions standards require highly efficient combustion systems that maximize fuel efficiency and reduce unnecessary fuel consumption. In addition, because the cost of fuel and transportation is a significant aspect of construction budgets, contractors and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction (Criterion 4).

Substantial reductions in energy inputs for construction materials can be achieved by selecting building materials composed of recycled materials that require substantially less energy to produce than nonrecycled materials.[15] It is reasonable to assume that production of building materials such as concrete, steel, etc., would employ all reasonable energy conservation practices in the interest of

[15] California Department of Resources Recycling and Recovery, *Green Building Materials*, https://www.calrecycle.ca.gov/greenbuilding/materials, accessed September 27, 2022.

minimizing the cost of doing business. It is noted that construction fuel use is temporary and would cease upon completion of construction activities. There are no unusual project characteristics that would necessitate the use of construction equipment, or building materials, or methods that would be less energy efficient than at comparable construction sites in the region or State. Therefore, fuel energy and construction materials consumed during construction would not represent a significant demand on energy resources (Criterion 5). Impacts will be less than significant.

Operational Energy Consumption

Transportation Energy Demand

Pursuant to the Federal Energy Policy and Conservation Act of 1975, the National Highway Traffic and Safety Administration (NTSA) is responsible for establishing additional vehicle standards and for revising existing standards. Compliance with Federal fuel economy standards is not determined for each individual vehicle model. Rather, compliance is determined based on each manufacturer's average fuel economy for the portion of their vehicles produced for sale in the United States. One of the key drivers of transportation-related fuel consumption during project operation is the members' and employees' trips to the proposed golf course. Table Energy-1 provides an estimate of the daily fuel consumed by vehicles traveling to and from the project site. As indicated in Table Energy-1, project operations are estimated to consume approximately 100,159 gallons of fuel per year, which would increase the County's automotive fuel consumption by 0.0133 percent. The modified project would not result in any unusual characteristics that would result in excessive operational fuel consumption (Criterion 2).

Other key drivers of transportation-related fuel consumption are job locations/commuting distance and many personal choices on when and where to drive for various purposes. Those factors are outside of the scope of the design of the modified project. Additionally, the vehicle associated with the project site would be required to comply all CARB regulations, including the low carbon fuel standards (LCFS) and newer engine standards (Criterion 4 and Criterion 6).

Therefore, fuel consumption associated with project-related vehicle trips would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region. As such, impacts will be less than significant.

Building Energy Demand

The CEC developed 2020 to 2035 forecasts for energy consumption and peak demand in support of the 2021 IEPR for each of the major electricity and natural gas planning areas and the State based on the economic and demographic growth projections.[16] CEC forecasts that the Statewide annual average growth rates of energy demand between 2021 and 2030 would be 1.3 percent to 2.3 percent for electricity and less than 0.1 percent to 0.8 percent increase for natural gas.[17] The project site would be serviced by IID for electricity and no natural gas would be used during operation. As indicated in Table Energy-1, operational energy consumption would represent an approximate 0.0010 percent increase in electricity consumption over the current Countywide usage, which are significantly lower than the IID's energy demand forecasts and the current Countywide usage. The project would be operational during typical business hours (7:00 a.m. to 11:00 p.m., Monday through Sunday). Additionally, as a golf course development, the project would consume less electricity than other commercial developments in the area. As a result, the project would not result in unique or more intensive peak or base period electricity demand (Criterion 2 and Criterion 3).

[16] California Energy Commission, *Final 2021 Integrated Energy Policy Report Volume IV California Energy Demand Forecast*, February 2022. Annual average growth rates of electricity demand and natural gas per capita demand are shown in Figure 10 and Figure 14, respectively

[17] Ibid.

The modified project does not include any unusual project characteristics or require special equipment that would be more energy intensive than typical commercial uses. The project would consume energy for interior and exterior lighting, HVAC units, electronic systems, refrigeration, appliances (including stacked convection ovens), and security systems. The project would be required to include energy efficient appliance, water-efficient landscaping and irrigation systems in compliance with the most current Title 24 energy efficiency standards. The project would be required to comply with 2019 Title 24 standards, which provide minimum efficiency standards related to various building features, including energy efficient appliances and lighting (Criterion 4).

Further, the electricity provider, IID, is subject to California's Renewables Portfolio Standard (RPS) reflected in SB 100. The RPS requires investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 44 percent by the end of 2024, 52 percent by the end of 2027, and 60 percent of total procurement by 2030. Renewable energy is generally defined as energy that comes from resources which are naturally replenished within a human timescale such as sunlight, wind, tides, waves, and geothermal heat. The increase in reliance of such energy resources further ensures that new development projects will not result in the waste of the finite energy resources (Criterion 5). Therefore, the modified project would not cause wasteful, inefficient, and unnecessary consumption of building energy during project operation, or preempt future energy development or future energy conservation. Impacts would be less than significant.

b) **Less Than Significant Impact.**

Original Project

The 2021 IS/MND concluded that the original project would not result in wasteful, inefficient, and unnecessary consumption of energy during construction or operation. Therefore, no impacts associated with the potential of the original project to conflict with a state or local renewable energy or energy efficiency plan would occur.

Modified Project

The County's General Plan Air Quality Element and the 2019 CAP Update identifies policies and measures focusing on transportation, energy efficiency, and clean energy that are applicable to the project. Table Energy-2, *Riverside County General Plan and 2019 Climate Action Plan Update Consistency*, discusses the project's consistency with the applicable General Plan policies and CAP update measures.

Table Energy-2
Riverside County General Plan and 2019 Climate Action Plan Update Consistency

Policies and Measures	Modified Project Consistency
General Plan	
Policy AQ 5.4: Encourage the incorporation of energy-efficient design elements, including appropriate site orientation and the use of shade and windbreak trees to reduce fuel consumption for heating and cooling.	Consistent. The modified project would comply with the most current version of the Title 24 and CALGreen Code. In addition, as a golf course, the project would include appropriate landscaping and lemon/mango grove that could provide shade and reduce energy consumption. The modified project would be consistent in this regard.
Policy AQ 20.10: Reduce energy consumption of the new developments (residential, commercial and industrial) through efficient site design that takes into consideration solar orientation and shading, as well as passive solar design.	Consistent. As stated above, landscaping of the modified project would provide shading for the area. The modified project would be consistent in this regard.
Policy AQ 20.11: Increase energy efficiency of the new developments through efficient use of utilities (water, electricity, natural gas) and infrastructure design. Also, increase energy efficiency through use of energy efficient mechanical systems and equipment.	Consistent. The modified project would comply with the most current version of the Title 24 and CALGreen Code, which includes high efficiency mechanical systems and equipment in the proposed dining tent and shop tent. Additionally, the modified project would not consume natural gas. The modified project would be consistent in this regard.
2019 CAP Update	
R2-EE11: Exceed Energy Efficiency Standards in New Commercial Units	Consistent. The modified project would comply with the most current version of the Title 24 and CALGreen code. The 2016 Title 24 was the applicable energy efficiency standard in the 2019 CAP Update, and the 2019 Title 24 is 30 percent more energy efficient than 2016 Title 24. Upon mandatory compliance with the 2019 Title 24, the modified project would be consistent in this regard.
Sources: Riverside County General Plan, *Air Quality Element*, December 8, 2015. Riverside County, *2019 Climate Action Plan Update*, December 17, 2019.	

As noted in Table Energy-2, the modified project would adhere to 2019 Title 24 and 2019 CALGreen standards. Compliance with 2019 Title 24 standards and 2019 CALGreen Code would ensure the project incorporates energy-efficient building design that would also be consistent with the goals of the County's General Plan Air Quality Element and the 2019 CAP Update. Additionally, the modified project would utilize electricity provided by IID. Per the RPS, IID is composed of 33 percent renewable energy as of 2020 and would achieve at least 60 percent renewable energy by 2030. Therefore, the modified project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency and Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
GEOLOGY AND SOILS. Would the project directly or indirectly:				
11. Alquist-Priolo Earthquake Fault Zone or County Fault Hazard Zones a) Be subject to rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	☐	☐	☐	☒

Source(s):
Riverside County General Plan Figure S-2 "Earthquake Fault Study Zones"

California Department of Conservation (CDOC). 2023b. "Regulatory Maps." Accessed March 22, 2023. http://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=regulatorymaps.

Findings of Fact:

a) **No Impact.**

Original Project

The Alquist-Priolo Zones Special Studies Act defines active faults as those that have experienced surface displacement or movement during the last 11,000 years. As shown on General Plan Figure S-2, the original project site is not located within an Alquist-Priolo Zone or a County designated fault hazard zone. The nearest Alquist-Priolo Zone is located approximately 13.9 miles east of the original project site and the nearest County fault hazard zone is located approximately 14 miles east of the project site (County of Riverside 2019a). Furthermore, a review of the California Department of Conservation regulatory maps (CDOC 2021b) showed that the original project site is not located in a designated earthquake fault zone. Therefore, the 2021 IS/MND concluded that no impact associated with fault rupture would occur.

Modified Project

The modified project involves the same project site as analyzed in the 2021 IS/MND and is not located in a designated earthquake fault zone. Similar to the original project, the modified project would not be subject to rupture of a known earthquake fault. No impact would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
12. Liquefaction Potential Zone a) Be subject to seismic-related ground failure, including liquefaction?	☐	☐	☒	☐

Source(s):
Riverside County General Plan Figure S-3 "Generalized Liquefaction"

Findings of Fact:

a) **Less Than Significant Impact.**

Original Project

Liquefaction occurs when partially saturated soil loses its effective stress and enters a liquid state, which can result in the soil's inability to support structures above. Liquefaction can be induced by ground-shaking events and is dependent on soil saturation conditions. According to the County's General Plan, the potential for liquefaction at the project site is low (County of Riverside 2019a). Additionally, a review of the California Department of Conservation regulatory maps (CDOC 2022b) showed that the original project site is located in an area that has not been evaluated for liquefaction. The project site would continue to be largely open space with interim structures after construction and the project does not propose any permanent buildings. Therefore, the 2021 IS/MND determined that impacts associated with liquefaction would be less than significant.

Modified Project

The modified project involves the same project site as analyzed in the 2021 IS/MND and is located in an area with a low liquefaction potential. Similar to the original project, the modified project would not be subject to seismic-related ground failure, including liquefaction. The project site would continue to be largely open space with interim structures with a water well and septic system after construction and the modified project does not propose any permanent buildings. Therefore, impacts associated with liquefaction would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
13. Ground-shaking Zone a) Be subject to strong seismic ground shaking?	☐	☐	☒	☐

Source(s):
Riverside County General Plan Figure S-4 "Earthquake-Induced Slope Instability Map," and Figures S-13 through S-21 (showing General Ground Shaking Risk)

Findings of Fact:

a) **Less Than Significant Impact.**

Original Project

Similar to other areas located in the seismically active Southern California region, the County is susceptible to strong ground shaking during an earthquake. According to the 2021 IS/MND, the original project site is not located within an active fault zone, and the site would not be affected by ground shaking more than any other area in this seismic region. The original project did not propose any habitable structures or other structural development intended for human occupancy. Therefore, the 2021 IS/MND concluded that the original project would not directly or indirectly cause potential adverse effects involving strong seismic ground shaking, and impacts would be less than significant.

Modified Project

Similar to the original project, the modified project does not propose any permanent buildings or structures. Further, the proposed interim structures (tents and trailers) would be constructed in conformance with the applicable section(s) of the California Building Code (CBC) (Section 108, Temporary Structures and Uses). Therefore, the modified project would not directly or indirectly cause potential adverse effects involving strong seismic ground shaking, and impacts would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
14. Landslide Risk a) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, collapse, or rockfall hazards?	☐	☐	☒	☐

Source(s):
Riverside County General Plan Figure S-5 “Regions Underlain by Steep Slope”

Findings of Fact:

a) **Less Than Significant Impact.**

Original Project

As shown on Riverside County General Plan Safety Element Figure S-5, the original project site is not located in an area susceptible to landslides. The original project site is located approximately 0.3-mile east of areas that are considered low to locally moderate landslide zones (County of Riverside 2019a). The original project site would continue to be largely open space with interim structures and no permanent buildings are proposed. Therefore, the 2021 IS/MND concluded that impacts associated with landslides would be less than significant.

Modified Project

Similar to the original project, the modified project does not propose any permanent buildings or structures. Further, the proposed modified structures (tents and trailers) would be constructed in conformance with the applicable section(s) of the California Building Code (CBC) (Section 108, Temporary Structures and Uses). Therefore, the modified project site is not located on a geologic unit or soil that is unstable and impacts associated with landslides would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
15. Ground Subsidence a) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in ground subsidence?	☐	☐	☒	☐

Source(s):
Riverside County General Plan Figure S-7 "Documented Subsidence Areas Map"

Sladden Engineering. 2021. Geotechnical Investigation, Coachella Golf Course.

Findings of Fact:

a) **Less Than Significant Impact.**

Original Project

Subsidence is the gradual, local setting or sinking of the earth's surface with little or no horizontal motion. According to the County's General Plan Safety Element, the original project site is located in an area with documented subsidence (County of Riverside 2019a).

The Geotechnical Investigation prepared for the original project site in August 2021 included a soil map which identifies the soil composition of the site as Carsitas gravelly sand, 0 to 9 percent slopes (44.3 percent), Myoma fine sand, 0 to 5 percent slopes (35.7 percent), Carsitas cobbly sand, 2 to 9 percent slopes (15.2 percent), Carrizo stony sand, 2 to 9 percent slopes (4.9 percent). Based on the Geotechnical Investigation, the properties of the on-site soils range from somewhat excessively drained to excessively drained. Soils like sand and gravel are less susceptible to shrinkage and growth as compared to clay soils. Additionally, the original project site would continue to be largely open space with interim structures and does not propose any permanent buildings that could be impacted by subsidence. Therefore, the 2021 IS/MND determined that impacts would be less than significant.

Modified Project

The modified project involves the same project site as analyzed in the 2021 IS/MND and existing geologic conditions onsite continue to be similar to those analyzed in the 2021 IS/MND. Therefore, the project is not located on a geologic unit or soil that is unstable and impacts associated with subsidence would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
16. Other Geologic Hazards a) Be subject to geologic hazards, such as seiche, mudflow, or volcanic hazard?	☐	☐	☒	☐

Source(s):
N/A

Findings of Fact:

a) **Less Than Significant Impact.**

Original Project

A seiche is a wave that reverberates on the surface of water in an enclosed or semi-enclosed basin, such as a reservoir, lake, bay, or harbor, in response to ground shaking during an earthquake. According to the 2021 IS/MND, the project site contains a 2-acre reservoir/lake which is below surface elevation with a perimeter berm; and while highly unlikely to occur, in the event of a seiche, any wave movement would be contained within the depressed reservoir site and not significantly impact the site. Off-site, the closest body of water to the original project site is Salton Sea, located approximately 7 miles east of the site. However, due to the distance between the site and Salton Sea, it is unlikely the original project site would be susceptible to seiche. Additionally, the original project site is not subject to mudflows due to the surrounding topography. Furthermore, the 2021 IS/MND concluded that the original project would not be affected by geologic hazards such as volcanic hazards and impacts were determined to be less than significant.

Modified Project

The modified project involves the same project site as analyzed in the 2021 IS/MND and existing geologic conditions onsite continue to be similar to those analyzed in the 2021 IS/MND. Therefore, the modified project would not be subject to geologic hazards, such as seiche, mudflow, or volcanic hazard, and impacts would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
17. Slopes a) Change topography or ground surface relief features?	☐	☐	☐	☒
b) Create cut or fill slopes greater than 2:1 or higher than 10 feet?	☐	☐	☐	☒
c) Result in grading that affects or negates subsurface sewage disposal systems?	☐	☐	☒	☐

Source(s):
N/A

Findings of Fact:

a-b) **No Impact.**

Original Project

The 2021 IS/MND concluded that no impact relative to slopes would occur under the original project because the original project site is predominately flat and no slopes were proposed to be constructed. The 2021 IS/MND also determined that construction of the original project would not result in a significant change to the site's topography and a less than significant impact would occur.

Modified Project

The modified project involves the same project site as analyzed in the 2021 IS/MND and does not involve significant change to the site topography nor does the modified project propose any slopes or mass grading. The only additional grading that would occur for the modified project would be for installation of the onsite water well and septic system. In addition, historically, the site was used for agricultural crops and has not supported structures. Therefore, no impact relative to topography changes, or slopes would occur with implementation of the modified project.

c) **Less Than Significant Impact**.

Original Project

Because the original project site is not connected to the sewer system, the 2021 IS/MND determined that no impact relative to subsurface sewage disposal systems would occur.

Modified Project

The modified project would install an onsite septic system. Sanitation water would be temporarily held within the self-contained, mobile restroom trailers (septic tanks). Food and drink facilities would require self-containing holding tanks for the Airstream trailers and a dry well for the bar within the Club Dining Tent for disposal of sink water. A 6,000-gallon septic tank with an Advanced Treatment System (ATS) and a 5,000-square-foot leach field would be installed for wastewater generated at the club house. However, these facilities would be designed and installed (including grading) in accordance with County regulations. Therefore, the project would not result in grading that affects or negates subsurface sewage disposal systems. A less than significant impact would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
18. Soils a) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
b) Be located on expansive soil, as defined in Section 1803.5.3 of the California Building Code (2019), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
c) Have soils incapable of adequately supporting use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☒	☐

Source(s):
Sladden Engineering. 2021. Geotechnical Investigation, Coachella Golf Course.

Findings of Fact:

a) **Less Than Significant Impact.**

Original Project

Because the project would disturb one or more acres of soil, the project is subject to the California State Water Resources Control Board National Pollutant Discharge Elimination System Construction General Permit. Construction activities would be required to incorporate various temporary best management practices (BMPs) designed to prevent erosion and siltation during excavation activities. Additionally, upon completion of construction, all exposed areas would be landscaped. Therefore, impacts associated with soil erosion were determined to be less than significant.

Modified Project

The project site currently supports existing recreational uses (golf course) and the modified project includes the expansion of golf course facility services and operations, including the installation of interim structures (tents and trailers) with a water well and septic system. As discussed previously, mass grading of the project site has already been conducted as part of the original project and the only additional grading that would occur for the modified project would be for installation of the onsite water well and septic system. The modified project site has been sodded and sprigged with grass as well as landscaped. As such, the minimal nature of improvements associated with the modified project would not result in substantial erosion or the loss of topsoil. Less than significant impacts would occur.

b) **Less Than Significant Impact.**

Original Project

As discussed above, a soil map prepared for the original project identifies the soil composition of the site as Carsitas gravelly sand, 0 to 9 percent slopes (44.3 percent), Myoma fine sand, 0 to 5 percent slopes (35.7 percent), Carsitas cobbly sand, 2 to 9 percent slopes (15.2 percent), Carrizo stony sand,

2 to 9 percent slopes (4.9 percent). The properties of the on-site soils range from somewhat excessively drained to excessively drained. The soil on-site is not made up of clay materials typically associated with expansive soils. Therefore, the 2021 IS/MND concluded that the original project would not create substantial direct or indirect risks to life or property from being located on expansive soils. Impacts were determined to be less than significant.

Modified Project

The modified project involves the same project site as analyzed in the 2021 IS/MND and existing soils conditions onsite continue to be similar to those analyzed in the 2021 IS/MND. Therefore, the modified project is not located on expansive soil and impacts would be less than significant.

c) **Less Than Significant Impact.**

Original Project

The original project would not connect to the municipal sewer system, and no septic tanks or alternative wastewater disposal system are proposed. Therefore, the 2021 IS/MND determined that no impacts associated with septic tanks or alternative wastewater disposal systems would occur.

Modified Project

The modified project would install an onsite septic system. Sanitation water would be temporarily held within the self-contained, mobile restroom trailers (septic tanks). Food and drink facilities would require self-containing holding tanks for the Airstream trailers and a dry well for the bar within the Club Dining Tent for disposal of sink water. A 6,000-gallon septic tank with an Advanced Treatment System (ATS) and a 5,000-square-foot leach field would be installed for wastewater generated at the club house. However, these facilities would be designed and installed (including grading) in accordance with County regulations. Therefore, a less than significant impact would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
19. Wind Erosion and Blowsand from project either on or off site. a) Be impacted by or result in an increase in wind erosion and blowsand, either on or off site?	☐	☐	☐	☒

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

Findings of Fact:

a) **No Impact.**

Original Project

According to Figure S-8 in the Safety Element of the County's General Plan, the original project area has a high wind erodibility rating (County of Riverside 2019a). The 2021 IS/MND determined that the original project would be influenced by wind erosion and blowsand issues during grading. Per the Geotechnical Report prepared for the original project, the soils onsite are assigned to group 1 which are the most susceptible to wind erosion. However, the original project would comply with any general conditions regarding dust control, project dust control plan and restricting grading to the project site and any Building and Safety Department Grading Section requirements. Upon completion of construction, the original project site would largely be open space with landscaped areas. Therefore, the 2021 IS/MND concluded that impacts would be less than significant.

Modified Project

Mass grading of the project site has already been conducted as part of the original project and the only additional grading that would occur for the modified project would be for installation of the onsite water well and septic system. The modified project site has been sodded and sprigged with grass as well as landscaped. As such, the minimal nature of improvements associated with the modified project would not be impacted by or result in an increase in wind erosion and blowsand. No impact would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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

Source(s):
Riverside County General Plan, Riverside County Climate Action Plan Update ("CAP"), Southern California Association of Governments Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, California Air Resources Board 2017 Scoping Plan

Global Climate Change

California is a substantial contributor of global greenhouse gases (GHGs), emitting over 418 million tons of carbon dioxide (CO_2) per year.[18] Climate studies indicate that California is likely to see an increase of three to four degrees Fahrenheit over the next century. Methane (CH_4) is also an important GHG that potentially contributes to global climate change. GHGs are global in their effect and increase the Earth's ability to absorb heat in the atmosphere. As primary GHGs have a long lifetime in the atmosphere,

18 California Environmental Protection Agency, *California Greenhouse Gas Emissions for 2000 to 2019*, https://ww2.arb.ca.gov/sites/default/files/classic/cc/inventory/2000_2019_ghg_inventory_trends_20220516.pdf, accessed September 27, 2022.

accumulate over time, and are generally well-mixed, their impact on the atmosphere is mostly independent of the point of emission.

The impact of human activities on global climate change is apparent in observational records. Air trapped by ice has been extracted from core samples taken from polar ice sheets to determine the global atmospheric variation of CO_2, CH_4, and nitrous oxide (N_2O) from before the start of industrialization (approximately 1750) to over 650,000 years ago. For that period, it was found that CO_2 concentrations ranged from 180 to 300 parts per million. For the period from approximately 1750 to the present, global CO_2 concentrations increased from a pre-industrialization period concentration of 280 to 379 parts per million in 2005, with the 2005 value far exceeding the upper end of the pre-industrial period range.

The Intergovernmental Panel on Climate Change (IPCC) developed several emission trajectories of GHGs needed to stabilize global temperatures and climate change impacts. It concluded that a stabilization of GHGs at 400 to 450 parts per million CO_2 equivalent[19] (CO_2e) concentration is required to keep global mean warming below two degrees Celsius, which in turn is assumed to be necessary to avoid significant levels of climate change.

REGULATORY SETTING

State

Various Statewide and local initiatives to reduce the State's contribution to GHG emissions have raised awareness that, even though the various contributors to and consequences of global climate change are not yet fully understood, global climate change is underway, and there is a real potential for severe adverse environmental, social, and economic effects in the long term. Every nation emits GHGs and as a result makes an incremental cumulative contribution to global climate change; therefore, global cooperation is necessary to reduce the rate of GHG emissions enough to slow or stop the human-caused increase in average global temperatures and associated changes in climatic conditions.

Assembly Bill 32 (California Global Warming Solutions Act of 2006). California passed the California Global Warming Solutions Act of 2006 (AB 32; California Health and Safety Code Division 25.5, Sections 38500 - 38599). Assembly Bill (AB) 32 establishes regulatory, reporting, and market mechanisms to achieve quantifiable reductions in GHG emissions and establishes a cap on Statewide GHG emissions. AB 32 requires that Statewide GHG emissions be reduced to 1990 levels by 2020. AB 32 specifies that regulations adopted in response to AB 1493 should be used to address GHG emissions from vehicles. However, AB 32 also includes language stating that if the AB 1493 regulations cannot be implemented, then the California Air Resources Board (CARB) should develop new regulations to control vehicle GHG emissions under the authorization of AB 32.

Executive Order S-3-05. Executive Order S-3-05 set forth a series of target dates by which Statewide emissions of GHGs would be progressively reduced, as follows:

- By 2010, reduce GHG emissions to 2000 levels;
- By 2020, reduce GHG emissions to 1990 levels; and
- By 2050, reduce GHG emissions to 80 percent below 1990 levels.

Senate Bill 32. Signed into law in September 2016, Senate Bill (SB) 32 codifies the 2030 GHG reduction target in Executive Order B-30-15 (40 percent below 1990 levels by 2030). The bill authorizes CARB to adopt an interim GHG emissions level target to be achieved by 2030.

[19] Carbon Dioxide Equivalent (CO_2e) – A metric measure used to compare the emissions from various greenhouse gases based upon their global warming potential.

CARB Scoping Plan. On December 11, 2008, CARB adopted the *Climate Change Scoping Plan* (Scoping Plan), which functions as a roadmap to achieve GHG reductions in California required by AB 32 through subsequently enacted regulations. The Scoping Plan contains the main strategies California will implement to reduce CO_2e emissions by 174 million metric tons (MT), or approximately 30 percent, from the State's projected 2020 emissions level of 596 million $MTCO_2e$ under a business as usual (BAU)[20] scenario. This is a reduction of 42 million $MTCO_2e$, or almost ten percent, from 2002 to 2004 average emissions, but requires the reductions in the face of population and economic growth through 2020.

The Scoping Plan calculates 2020 BAU emissions as the emissions that would be expected to occur in the absence of any GHG reduction measures. The 2020 BAU emissions estimate was derived by projecting emissions from a past baseline year using growth factors specific to each of the different economic sectors (e.g., transportation, electrical power, commercial and residential, industrial, etc.). CARB used three-year average emissions, by sector, for 2002 to 2004 to forecast emissions to 2020. The measures described in the Scoping Plan are intended to reduce the projected 2020 BAU to 1990 levels, as required by AB 32.

AB 32 requires CARB to update the Scoping Plan at least once every five years. CARB adopted the first major update to the Scoping Plan on May 22, 2014. The updated Scoping Plan identifies the actions California has already taken to reduce GHG emissions and focuses on areas where further reductions could be achieved to help meet the 2020 target established by AB 32. The Scoping Plan update also looks beyond 2020 toward the 2050 goal, established in Executive Order S-3-05, and observes that "a mid-term statewide emission limit will ensure that the State stays on course to meet our long-term goal."

In December 2017, CARB approved the *California's 2017 Climate Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target* (2017 Scoping Plan). This update focuses on implementation of a 40 percent reduction in GHGs by 2030 compared to 1990 levels. To achieve this, the updated 2017 Scoping Plan draws on a decade of successful programs that addresses the major sources of climate changing gases in every sector of the economy.

California Building Energy Efficiency Standards (Title 24). The 2019 Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6), commonly referred to as "Title 24," became effective on January 1, 2020. In general, Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. Under 2019 Title 24 standards, nonresidential buildings will use about 30 percent less energy, mainly due to lighting upgrades, when compared to 2016 Title 24 standards.[21] The standards offer developers better windows, insulation, lighting, ventilation systems, and other features that reduce energy consumption in homes and businesses.

California Green Building Standards (CALGreen). California Green Building Standards (CALGreen) is the first-in-the-nation mandatory green buildings standards code. The California Building Standards Commission developed the green building standards in an effort to meet the goals of California's landmark initiative AB 32, which established a comprehensive program of cost-effective reductions of GHGs to 1990 levels by 2020. CALGreen was developed to (1) reduce GHGs from buildings; (2) promote environmentally responsible, cost-effective, healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the environmental directives of the administration.

20 "Business as Usual" refers to emissions that would be expected to occur in the absence of GHG reductions; refer to http://www.arb.ca.gov/cc/inventory/data/bau.htm. Note that there is significant controversy as to what BAU means. In determining the GHG 2020 limit, CARB used the above as the "definition." It is broad enough to allow for design features to be counted as reductions.

21 California Energy Commission, *2019 Building Energy Efficiency* Standards, dated March 2018.

The 2019 CALGreen Code went into effect on January 1, 2020. CALGreen requires that new buildings employ water efficiency and conservation, increase building system efficiencies (e.g., lighting, heating/ventilation and air conditioning [HVAC], and plumbing fixtures), divert construction waste from landfills, and incorporate electric vehicles charging infrastructure. There is growing recognition among developers and retailers that sustainable construction is not prohibitively expensive, and that there is a significant cost-savings potential in green building practices and materials.[22]

Regional

Southern California Association of Governments 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy

On September 3, 2020, the Regional Council of Southern California Association of Governments (SCAG) formally adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments – Connect SoCal (2020–2045 RTP/SCS). The SCS portion of the 2020-2045 RTP/SCS highlights strategies for the region to reach the regional target of reducing GHGs from autos and light-duty trucks by 8 percent per capita by 2020, and 19 percent by 2035 (compared to 2005 levels). Specially, these strategies are:

- Focus growth near destinations and mobility options;
- Promote diverse housing choices;
- Leverage technology innovations;
- Support implementation of sustainability policies; and
- Promote a green region.

Furthermore, the 2020-2045 RTP/SCS discusses a variety of land use tools to help achieve the state-mandated reductions in GHG emissions through reduced per capita vehicle miles traveled (VMT). Some of these tools include center focused placemaking, focusing on priority growth areas, job centers, transit priority areas, as well as high quality transit areas and green regions.

County of Riverside General Plan

The General Plan Air Quality Element includes policies focusing on reducing GHG emissions within the County. The following policies are applicable to the project.

- **Policy AQ 19.2**: Utilize County's CAP as the guiding document for determining County's greenhouse gas reduction thresholds and implementation programs. Implementation of the CAP and its monitoring program shall include the ability to expand upon, or where appropriate, update or replace the Implementation Measures established herein such that the implementation of the CAP accomplishes the GHG reduction targets.
- **Policy AQ 20.10**: Reduce energy consumption of the new developments (residential, commercial and industrial) through efficient site design that takes into consideration solar orientation and shading, as well as passive solar design.
- **Policy AQ 20.11**: Increase energy efficiency of the new developments through efficient use of utilities (water, electricity, natural gas) and infrastructure design. Also, increase energy efficiency through use of energy efficient mechanical systems and equipment.
- **Policy AQ 20.13**: Reduce water use and wastewater generation in both new and existing housing, commercial and industrial uses. Encourage increased efficiency of water use for agricultural activities.

[22] U.S. Green Building Council, *Green Building Costs and Savings*, https://www.usgbc.org/articles/green-building-costs-and-savings, accessed September 28, 2022.

- **Policy AQ 20.14**: Reduce the amount of water used for landscaping irrigation through implementation of County Ordinance 859 and increase use of non-potable water.
- **Policy AQ 20.16**: Preserve and promote forest lands and other suitable natural and artificial vegetation areas to maintain and increase the carbon sequestration capacity of such areas within the County. Artificial vegetation could include urban forestry and reforestation, development of parks and recreation areas, and preserving unique farmlands that provide additional carbon sequestration potential.
- **Policy AQ 20.17:** Protect vegetation from increased fire risks associated with drought conditions to ensure biological carbon remains sequestered in vegetation and not released to the atmosphere through wildfires.

County of Riverside Climate Action Plan

The 2019 Riverside County Climate Action Plan (CAP) Update was approved on December 17, 2019.[23] The 2019 CAP Update refines the County's efforts to meet GHG reduction strategies, specifically for the years 2035 and 2050. The 2019 CAP Update builds upon the GHG reduction strategies in the 2015 Climate Action Plan. The 2019 CAP Update includes the following reduction measures that are applicable to the project:

- **R2-EE11**: Exceed Energy Efficiency Standards in New Commercial Units
    - Comply with State requirements on new non-residential buildings, such as Net-Zero Energy Buildings for all new non-residential development meeting zero net-energy use by 2030.

Furthermore, the 2019 CAP Update has adopted a numerical significance threshold of 3,000 $MTCO_2e$ per year for assessing project impacts related to GHG emissions. A project with emissions higher than 3,000 $MTCO_2e$ per year would be required to utilize the screening tables in the 2019 CAP Update and implement all feasible GHG mitigation measures to reduce impacts, if any.

Greenhouse Gas Emissions Thresholds

The 2019 CAP Update 3,000 $MTCO_2e$ per year screening threshold has been selected as the significance threshold for the modified project. The 3,000 $MTCO_2e$ per year threshold is used in addition to the qualitative thresholds of significance set forth below from Appendix G of the State CEQA Guidelines.

a) Impacts will be less than Significant.

<u>Original Project</u>

According to the 2021 IS/MND, construction of the original project would result in GHG emissions, which are primarily associated with use of off-road construction equipment, on-road vendor trucks, and worker vehicles. Operation of the original project would generate GHG emissions through motor vehicle trips to and from the project site; landscape maintenance equipment operation; energy use (generation of electricity consumed by the project); solid waste disposal; and generation of electricity associated with water supply, treatment, and distribution and wastewater treatment. After summing the original project's amortized construction emissions, total GHGs generated by the original project would not exceed the County's screening threshold of 3,000 MT CO_2e per year. The 2021 IS/MND concluded that the original project's GHG emissions impacts would be less than significant.

[23] Riverside County, *2019 Climate Action Plan Update*, https://planning.rctlma.org/Portals/14/CAP/2019/2019_CAP_Update_Full.pdf, accessed September 29, 2022.

Modified Project

Project-Related Sources of Greenhouse Gases

Project-related GHG emissions would include emissions from direct and indirect sources. The modified project would result in direct and indirect emissions of CO_2, CH_4, and N_2O, and would not result in other GHGs that would facilitate a meaningful analysis. Therefore, this analysis focuses on these three forms of GHG emissions. Direct project-related GHG emissions include emissions from construction activities, while indirect sources include emissions from electricity consumption, mobile, water, and waste sources consumption. According to the project applicant, the modified project would not consume natural gas during operation. However, as a conservative analysis, CalEEMod default natural gas consumption rate was used in the modeling.

The modified project involves the addition of golf and service facilities to support the golf club site and would modify the facility layout, usage, capacity, membership and staffing, in order to expand facility service and operations. The modified project would allow for up to 350 individual memberships and up to 70, full-time staff. Golf activities would operate 7 days a week, from October to June. As a conservative analysis, the modified project would not take credit from the original project for emissions. According to the *Jeule Ranch Golf Club Expansion – Transportation Screening Analysis* (Transportation Screening Analysis) prepared by Michael Baker International (dated September 28, 2022), the modified project is projected to generate a net increase of 843 daily trips, which includes 48 a.m. peak hour trips and 80 p.m. peak hours trips. The California Emissions Estimator Model version 2020.4.0. (CalEEMod) and EMission FACtor Model (EMFAC2017) were utilized to calculate the modified project's construction and operational GHG emissions. The CalEEMod outputs are contained within Appendix A, *Air Quality/Greenhouse Gas/Energy Data*. Table GHG-1, *Estimated Greenhouse Gas Emissions*, presents the estimated CO_2, CH_4, and N_2O emissions of the modified project.

Table GHG-1
Estimated Greenhouse Gas Emissions

Source	CO_2	CH_4		N_2O		Total Metric Tons of CO_2e
	Metric Tons/yr	Metric Tons/yr	Metric Tons of CO_2e[1,2]	Metric Tons/yr	Metric Tons of CO_2e[1,2]	
Direct Emissions						
Construction (amortized over 30 years)[4]	4.63	<0.01	0.03	<0.01	0.01	4.67
Area Source	0.01	<0.01	<0.01	0.00	0.00	0.01
Mobile Source	572.06	0.04	0.92	0.03	9.60	582.53
Total Direct Emissions	*576.70*	*0.04*	*0.95*	*0.03*	*9.61*	*587.21*
Indirect Emissions						
Energy Source	53.51	<0.01	0.08	<0.01	0.30	53.90
Solid Waste Generation	61.40	3.63	90.70	0.00	0.00	153.11
Water Demand	312.46	0.08	2.10	<0.01	2.20	316.75
Total Indirect Emissions	*427.37*	*3.72*	*92.88*	*0.01*	*2.50*	*523.76*
Total Project GHG Emissions[3,4,5]	*1,110.97 $MTCO_2e/yr$*					
CAP Screening Threshold	*3,000 $MTCO_2e/yr$*					
GHG Significance Threshold Exceeded?	*No*					

Notes:
1. Emissions calculated using California Emissions Estimator Model Version 2020.4.0 (CalEEMod) computer model as well the California Air Resources Board EMission FACtor 2017 model (EMFAC 2017).

2. CO_2 Equivalent values calculated using the EPA Website, *Greenhouse Gas Equivalencies Calculator*, http://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator, accessed September 27, 2022.
3. Totals may be slightly off due to rounding.
4. The amortized construction emissions were added to the total project GHG emissions, in compliance with SCAQMD guidance.
Source: Refer to Appendix A, for detailed model input/output data.

Direct Project-Related Sources of Greenhouse Gases

- *Construction Emissions.* Construction GHG emissions are typically summed and amortized over the lifetime of the project (assumed to be 30 years), then added to the operational emissions.[24] As shown in Table GHG-1, the modified project would result in 4.67 $MTCO_2e$ per year (amortized over 30 years), which represents a total of 140.06 $MTCO_2e$ from construction activities.

- *Area Source.* Area source emissions were calculated using CalEEMod and project-specific land use data. As noted in Table GHG-1, the modified project would result in less than 0.01 $MTCO_2e$ per year of area source GHG emissions.

- *Mobile Source.* The CalEEMod model relies upon trip data within the Transportation Screening Analysis and project-specific land use data to calculate mobile source emissions. According to the Transportation Screening Analysis, the modified project would generate approximately 843 total daily trips. As modeled in CalEEMod, the project would directly result in 587.26 $MTCO_2e$ per year of mobile source-generated GHG emissions; refer to Table GHG-1.

Indirect Project-Related Source of Greenhouse Gases

- *Energy Consumption.* Electricity would be provided to the modified project site by Imperial Irrigation District. The modified project would indirectly result in 53.90 $MTCO_2e$ per year due to energy consumption; refer to Table GHG-1.

- *Water Demand*. The modified project operations would result in a demand of approximately 325.90 million gallons of water per year. As a conservative analysis, the modified project would not take credits from the original project IS/MND. Emissions from indirect energy impacts due to water supply would result in 316.75 $MTCO_2e$ per year; refer to Table GHG-1.

- *Solid Waste*. The modified project's solid waste generation would result in 152.10 $MTCO_2e$ per year; refer to Table GHG-1.

Total Project-Related Sources of Greenhouse Gases

As shown in Table GHG-1, the modified project would emit a total of 1,110.97 $MTCO_2e$ pear year, which is below the GHG emissions threshold of 3,000 $MTCO_2e$ per year established by the 2019 CAP Update. A less than significant impact would occur in this regard.

b) Impacts will be less than Significant.

Original Project

According to the 2021 IS/MND, the original project does not conflict with any of the GHG-reducing measures of the County's 2019 CAP Update and is consistent with this plan. The original project is also consistent with the SCAG's 2020-2045 RTP/SCS and CARB's 2017 Scoping Plan and would not conflict

[24] The interim project lifetime is based on the standard 30-year assumption of the South Coast Air Quality Management District (SCAQMD). SCAQMD, *Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #13,* August 26, 2009.

with the state's trajectory toward future GHG reductions. The original project's consistency would assist in meeting the County's contribution to GHG emission reduction targets under SB 32 and EO S-3-05. The 2021 IS/MND concluded that the original project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, and impacts would be less than significant.

Modified Project

Consistency with Applicable GHG Plans, Policies, or Regulations

The GHG plan consistency analysis for the project is based on the project's consistency with the General Plan, Climate Action Plan Update, 2017 Scoping Plan, and 2020-2045 RTP/SCS. The most applicable and local plan for the purpose of reducing GHG emissions is the County's 2019 CAP Update. The 2019 CAP Update summarizes various State and local policies that would contribute to reduced GHG emissions in the County by the year 2020 and beyond. Some of these policies include updated building codes for energy efficiency, the low carbon fuel standard, Pavley (California Assembly Bill) vehicle emissions standards, and the Renewable Portfolio Standards (RPS) for utility companies. In order to reach the reduction target, the 2019 CAP Update includes measures that encourage energy efficiency and renewable energy, development of infrastructures that encourages utilization of zero-emission vehicles (ZEVs), water conservation, and increased waste diversion. The 2017 Scoping Plan describes the approach California will take to reduce GHG emissions by 40 percent below 1990 levels by the year 2030. The 2020-2045 RTP/SCS is a regional growth management strategy that targets per-capita GHG reduction from passenger vehicles and light-duty trucks in the Southern California region and incorporates local land use projections and circulation networks in city and county general plans.

Consistency with General Plan and Climate Action Plan

As shown in "Energy" section of this IS/MND, the modified project would be consistent with the applicable goals found within the General AQ 20.10, and AQ 20.20, and 2019 CAP Update. In addition, the modified project would comply with the 2019 CALGreen Code which requires low-flow plumbing fixtures, water-efficiency irrigation, and draught tolerant landscape and compliance with the California Department of Water Resources Model Water Efficiencies Landscape Ordinance (MWELO), which would reduce outdoor water use, consistent with General Plan Policy AQ 20.13 and AQ 20.14. The modified project would also install energy efficient appliance in compliance with the 2019 Title 24 and CALGreen standards, as well as General Plan Policy AQ 20.11. As a golf course development, the modified project would have large landscaping area, and lemon/mango grove that could provide shade and vegetation area in compliance with General Plan Policy 20.16 and 20.17. Furthermore, as discussed above, the modified project would not exceed the 2019 CAP Update 3,000 $MTCO_2e$ per year threshold, consistent with General Plan Policy AQ 19.2. Therefore, operation of the modified project would not result in substantial operational GHG emissions, and the modified project would be consistent with the 2019 CAP Update.

Consistency with the SCAG 2020-2045 RTP/SCS

The SCAG's 2020-2045 RTP/SCS includes performance goals that were adopted to help focus future investments on the best-performing projects, as well as different strategies to preserve, maintain, and optimize the performance of the existing transportation system. The 2020-2045 RTP/SCS is forecasted to help California reach its GHG reduction goals by reducing GHG emissions from passenger cars by 8 percent below 2005 levels by 2020 and 19 percent by 2035 in accordance with the most recent CARB targets, adopted in March 2018. Five key SCS strategies are included in the 2020-2045 RTP/SCS to help the region meet its regional VMT and GHG reduction goals, as required by the State. Table GHG-2, *Consistency with the 2020-2045 RTP/SCS* shows the project's consistency with these five strategies

found within the 2020-2045 RTP/SCS. As shown, the modified project would be consistent with the GHG emission reduction strategies contained in the 2020-2045 RTP/SCS.

Table GHG-2
2020-2045 RTP/SCS Project Consistency Analysis

Reduction Strategy	Applicable Land Use Tools	Modified Project Consistency Analysis
Focus Growth Near Destinations and Mobility Options		
• Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations • Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets • Plan for growth near transit investments and support implementation of first/last mile strategies • Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses	Center Focused Placemaking, Priority Growth Areas (PGA), Job Centers, High Quality Transit Areas (HQTAs), Transit Priority Areas (TPA), Neighborhood Mobility Areas (NMAs), Livable Corridors, Spheres of Influence (SOIs), Green Region, Urban Greening.	Consistent. The modified project involves development of a golf course with dining tent and shop tent. The newly proposed tents would promote members to dine and shop in the golf course instead of driving elsewhere. Therefore, the modified project is consistent with the strategy.
Leverage Technology Innovations		
• Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space • Improve access to services through technology—such as telework and telemedicine as well as other incentives such as a "mobility wallet," an app-based system for storing transit and other multi-modal payments • Identify ways to incorporate "micro-power grids" in communities, for example solar energy, hydrogen fuel cell power storage and power generation	HQTA, TPAs, NMA, Livable Corridors.	Consistent. The modified project would comply with all applicable Title 24 and CALGreen building codes at the time of construction. The modified project would install high efficiency lighting, use energy efficient appliances. Therefore, the proposed development would leverage technology innovations and help the City, County, and State meet its GHG reduction goals. The modified project would be consistent with this reduction strategy.
Support Implementation of Sustainability Policies		
• Pursue funding opportunities to support local sustainable development implementation projects that reduce greenhouse gas emissions Support Statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations • Support local jurisdictions in the establishment of Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), or other tax increment or value capture tools to finance sustainable infrastructure and development projects, including parks and open space • Work with local jurisdictions/communities to	Center Focused Placemaking, Priority Growth Areas (PGA), Job Centers, High Quality Transit Areas (HQTAs), Transit Priority Areas (TPA), Neighborhood Mobility Areas (NMAs), Livable Corridors, Spheres of Influence (SOIs), Green Region, Urban Greening.	Consistent. As previously discussed, the modified project would provide on-site dining tent and shop tent which would reduce trips for members. Further, the modified project would comply with sustainable practices included in the 2019 Title 24 standards and CALGreen Code, such as energy efficient appliance, low flow features, water-efficient irrigation, and drought-tolerant landscaping. Thus, the modified

Reduction Strategy	Applicable Land Use Tools	Modified Project Consistency Analysis
identify opportunities and assess barriers to implement sustainability strategies • Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region • Continue to support long range planning efforts by local jurisdictions • Provide educational opportunities to local decisions makers and staff on new tools, best practices and policies related to implementing the Sustainable Communities Strategy		project would be consistent with this reduction strategy.
Promote a Green Region		
• Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards • Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration • Integrate local food production into the regional landscape • Promote more resource efficient development focused on conservation, recycling and reclamation • Preserve, enhance and restore regional wildlife connectivity • Reduce consumption of resource areas, including agricultural land • Identify ways to improve access to public park space	Green Region, Urban Greening, Greenbelts and Community Separators.	Consistent. As discussed above, the modified project involves development of a golf course. As a golf course, the modified project would provide landscaping and a lemon/mango grove to provide vegetation and shade for the members. As such, the modified project would be consistent with the strategy.

Source: Southern California Association of Governments, Connect SoCal: *2020-2045 Regional Transportation Plan/Sustainable Communities Strategy,* September 3, 2020.

Consistency with the 2017 Scoping Plan

The 2017 Scoping Plan identifies GHG reduction measures necessary to achieve the 2030 target. Although a number of these measures are currently established as policies and measures, some measures have not yet been formally proposed or adopted. It is expected that these measures or similar actions to reduce GHG emissions will be adopted as required to achieve statewide GHG emissions targets. Table GHG-3, *Consistency with the 2017 Scoping Plan*, provides an evaluation of applicable reduction actions/strategies by emissions source category, and demonstrates that the modified project would be consistent with the reduction actions/strategies outlined in the 2017 Scoping Plan.

Table GHG-3
Consistency with the 2017 Scoping Plan

Actions and Strategies	Project Consistency Analysis
SB 350	
Achieve a 50 percent Renewables Portfolio Standard (RPS) by 2030, with a doubling of energy efficiency savings by 2030.	Consistent. The modified project would not be an electrical provider and would not delay the goals of SB 350. As such, the modified project would be in compliance with SB 350.
Low Carbon Fuel Standard (LCFS)	
Increase stringency of carbon fuel standards; reduce the carbon intensity of fuels by 18 percent by 2030, which is up from 10 percent in 2020.	Consistent. The LCFS applies to manufacturers of automotive fuels, not to individual land uses. Mobile emissions associated with the modified project in Table GHG-1 reflect compliance with this regulation.
Mobile Source Strategy (Cleaner Technology and Fuels Scenario)	
Maintain existing GHG standards of light and heavy-duty vehicles while adding an addition 4.2 million zero-emission vehicles (ZEVs) on the road. Increase the number of ZEV buses, delivery trucks, or other trucks.	Consistent. The modified project would involve golf course with dining tent and shop tent. The project would consist of truck deliveries up to five times per weeks. The truck use associated with the modified project site would be required to comply all CARB regulations, including the LCFS and newer engine standards. As such, the modified project would not conflict with the CARB's goal of adding 4.2 million zero-emission (ZEVs) on the road, and the project would not conflict with the goals of the Mobile Source Strategy.
Sustainable Freight Action Plan	
Improve the freight system efficiency and maximize the use of near zero emission vehicles and equipment powered by renewable energy. Deploy over 100,000 zero-emission trucks and equipment by 2030.	Not Applicable. The modified project would not include any freight systems. Therefore, the project would not conflict with the Sustainable Freight Action Plan.
Short-Lived Climate Pollutant (SLCP) Reduction Strategy	
Reduce the GHG emissions of methane and hydrofluorocarbons by 40 percent below the 2013 levels by 2030. Furthermore, reduce the emissions of black carbon by 50 percent below the 2013 levels by the year 2030.	Consistent. The modified project would not emit a large amount of CH_4 (methane) emissions; refer to Table GHG-2. Additionally, the project would not consume natural gas on-site. As such, the modified project would not conflict with the SLCP reduction strategy.
SB 375 Sustainable Communities Strategies	
Increase the stringency of the 2035 GHG emission per capita reduction target for metropolitan planning organizations (MPO).	Consistent. As shown in Table GHG-2, the key strategies associated with the 2020-2045 RTP/SCS are not applicable to the modified project. Thus, the modified project would not conflict with the goals of SB 375.
Post-2020 Cap and Trade Programs	
The Cap-and-Trade Program will reduce greenhouse gas (GHG) emissions from major sources (covered entities) by setting a firm cap on statewide GHG emissions while employing market mechanisms to cost-effectively achieve the emission-reduction goals.	Not Applicable. As shown in Table GHG-1, the modified project would generate approximately 1,110.97 $MTCO_2e$ per year, which is below the 25,000 $MTCO_2e$/yr Cap-and-Trade screening level. Therefore, the modified project would not be applicable to the program.
Source: California Air Resources Board, *2017 Scoping Plan*, November 2017.	

Conclusion

In summary, the plan consistency analysis provided above demonstrates that the modified project complies with or exceeds the plans, policies, regulations and GHG reduction actions/strategies outlined in the General Plan, Climate Action Plan, 2020-2045 RTP/SCS and CARB 2017 Scoping Plan. Therefore, the modified project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing GHG emissions. Impacts in this regard would be less than significant.

Mitigation**:** No mitigation is required.

Monitoring**:** No monitoring is required.

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

Source(s):

CalEPA (California Environmental Protection Agency). 2023. Cortese List: Section 65962.5(a). Accessed March 20, 2023. https://calepa.ca.gov/sitecleanup/corteselist/section-65962-5a/.

DTSC (California Department of Toxic Substances Control). 2023. EnviroStor [database]. Accessed March 20, 2023. https://www.envirostor.dtsc.ca.gov/public/.

RWQCB (Regional Water Quality Control Board). 2010. Order No. R8-2010-0062. Accessed March 20, 2023. https://geotracker.waterboards.ca.gov/search.asp.

RTM Engineering Consultants. 2023. Ladera Golf Club Water Quality Management Plan.

Findings of Fact:

a-b) **Less Than Significant Impact.**

Original Project

A Phase I Environmental Site Assessment (Phase I ESA) was prepared for the original project site in 2021. According to the Phase I ESA, during the project site reconnaissance, a portable restroom disposal pad that drains to a septic tank and leach field was found on-site. Although the leach field represents a conduit from the surface to the subsurface, no indication of illicit disposal or disposal of unintended materials such as pesticides or petroleum products was noted. The Phase I ESA also identified several areas of poor housekeeping along the eastern portion of the site. These included piles of pallet and wood storage, equipment storage on unpaved ground, and staging of empty buckets and containers previously containing petroleum products. Staining was observed on the ground in proximity to several pieces of equipment in the eastern portion of the site, where vehicles or equipment had previously been stored, and near several empty buckets. These stains were concentrated in the eastern portion of the site.

In addition, two deep water production wells are located on the site and are used to fill the on-site irrigation reservoir. Water from these wells is processed through a filtration system and diverted to the reservoir. The wells represent conduits from the surface to the subsurface through which contaminants could be introduced to the aquifer below. However, no evidence of materials (hazardous or otherwise) being injected or put into the wells was observed. Lastly, aerial photographs indicated that portions of the site or adjacent properties were cleared in the 1980s for agricultural use, including mango, grape, and lemon farming. It is likely that pesticides or herbicides (considered hazardous substances) were used on-site; however, no indication of improper pesticide/herbicide usage/application was identified in the Phase I ESA. These conditions identified in the Phase I ESA generally do not present a threat to human health or the environment and generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.

Based on the 2021 IS/MND, construction and operation of the original project would require the use of hazardous or potentially hazardous materials to be handled, transported, used, and disposed of both on- and off-site. These materials include gasoline, diesel fuel, lubricants, and other petroleum-based products used to operate and maintain construction and maintenance equipment and vehicles, as well as fertilizers for ongoing maintenance. Potential impacts to public and the environment from accidental spills of small amounts of hazardous materials from construction equipment during construction could occur with the transport, use, or disposal of these materials. The materials used would not be in such quantities or stored in such a manner as to pose a significant safety or environmental hazard. Project construction workers would be trained in safe handling and hazardous materials use, as required by state regulation. Activities at the project site, including those conducted by a contractor, shall comply with existing federal, state, and local regulations regarding hazardous material use, storage, disposal, training, and transport to prevent project-related risks to public health and safety. All on-site generated waste that meets hazardous criteria shall be stored, manifested, transported, and disposed of in accordance with federal, state, and local requirements. Operation of the project would include use of minor quantities of commercially available hazardous materials, such as cleaning materials and landscaping maintenance materials. Handling, storage, and disposal of these hazardous materials would comply with all federal, state, and local requirements. Therefore, the 2021 IS/MND concluded that the original project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. The 2021 IS/MND concluded that this impact is less than significant.

Modified Project

Like the original project, construction activities associated with the modified project could involve the routine transport, use, or disposal of hazardous materials, such as petroleum-based fuels or hydraulic fluid used for construction equipment. As part of the modified project, approximately 17,800 cubic yards

of cut and fill would be balanced on site to accommodate the construction of a water well, domestic water pipeline, and sewer system. To reduce hazards to the public or environment, standard construction practices would be observed which minimize the potential for hazards and ensure that any materials released are appropriately contained and remediated as required by local, state, and federal law.

Relative to operational impacts, the modified project would involve similar operations (i.e. golf course) as those analyzed under the original project, and would not involve the storage of hazardous substances other than minor quantities of commercially available hazardous materials, such as cleaning materials and landscaping maintenance materials. Thus, construction and operation of the modified project would result in less than significant impacts.

c) **Less Than Significant Impact.**

Original Project

Based on the 2021 IS/MND, construction activities are required to implement adequate and appropriate measures to facilitate the passage of persons and vehicles through and around any required road closures in accordance with the County's EOP. Operation of the original project would not interfere with the County's EOP because the project site entrance would remain accessible for emergency vehicles. The project applicant would be required to design, construct, and maintain the project to comply with applicable local, regional, state, and federal requirements related to emergency access and evacuation plans. Therefore, the 2021 IS/MND concluded that this impact would be less than significant.

Modified Project

Similar to the original project, the modified project must comply with the County's Emergency Operations Plan (EOP) for both construction and operation. Adherence to these requirements would ensure that potential impacts related to this issue would be less than significant.

d) **No Impact.**

Original Project

The closest school to the original project site is Toro Canyon Middle School (86150 Avenue 66), located about 1.8 miles northeast from the site. As previously mentioned, during construction, any hazardous materials would be stored, handled, and disposed of in accordance with all federal, state, and local requirements. Therefore, the 2021 IS/MND determined this impact to be less than significant.

Modified Project

The modified project would provide the expansion of golf course facility services and operations upon completion of construction and the project site would continue to be largely open space. In addition, existing conditions regarding the location of schools relative to the site have not changed since approval of the original project. Thus, the modified project would not expose nearby schools to hazardous materials. No impact would occur.

e) **No Impact.**

Original Project

The Hazardous Waste and Substances Sites (Cortese List) is a planning document providing information about the location of hazardous materials release sites. California Government Code

Section 65962.5 requires the California Environmental Protection Agency to develop, at least annually, an updated Cortese List. The Department of Toxic Substances Control is responsible for a portion of the information contained in the Cortese List. Other state and local government agencies are required to provide additional hazardous materials release information for the Cortese List (CalEPA 2021). Based on the 2021 IS/MND, a review of Cortese List online data resources does not identify hazardous materials or waste sites on or adjacent to the original project site (DTSC 2021; RWQCB 2021). Therefore, the 2021 IS/MND concluded that no impact would occur.

Modified Project

The modified project involves the same project site as analyzed in the 2021 IS/MND and existing hazards and hazardous materials conditions onsite continue to be similar to those analyzed in the 2021 IS/MND. Therefore, the modified project site is not located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would not create a significant hazard to the public or the environment. No impact would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with green Incorporated	Less Than Significant Impact	No Impact
22. Airports a) Result in an inconsistency with an Airport Master Plan?	☐	☐	☐	☒
b) Require review by the Airport Land Use Commission?	☐	☐	☐	☒
c) For a project located within an airport land use plan or, where such a plan has not been adopted, within two (2) miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
d) For a project within the vicinity of a private airstrip, or heliport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒

Source(s):
RCALUCP (Riverside County Airport Land Use Compatibility Plan). 2006. Jacqueline Cochran Regional Airport Land Use Compatibility Plan. Accessed March 20, 2023. http://www.rcaluc.org/Plans/New-Compatibility-Plan

Findings of Fact:

a-d) **No Impact.**

Original Project

Based on the 2021 IS/MND, the closest public airport to the project site is Jacqueline Cochran Regional Airport, which is located approximately 4.8 miles northeast of the project site. According to the Land Use Plan for the Jacqueline Cochran Regional Airport, the original project is not located within an impact

zone and is outside the airport planning area (RCALUCP 2006). Additionally, the closest private airstrip is Desert Air Sky Ranch-63CA, located approximately 18.4 miles east of the site. The original project site is located outside of any airport impact zones, and as such, the original project would not result in a safety hazard for people residing in the project area. The original project would not result in an inconsistency with an Airport Master Plan and is not required to be reviewed by the Airport Land Use Commission. Therefore, the 2021 IS/MND concluded that no impact would occur.

Modified Project

The modified project involves the same project site as analyzed in the 2021 IS/MND and existing hazards and hazardous materials conditions onsite continue to be similar to those analyzed in the 2021 IS/MND. Therefore, similar to the original project, the modified project is not subject to an airport land use plan, nor is it located within the vicinity of a private airstrip. As a result, the modified project would not create a significant hazard to the public or the environment in this regard. No impact would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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

Source(s):
Riverside County General Plan Figure S-9 "Special Flood Hazard Areas" and Figure S-10 "Dam Failure Inundation Zone"

Coachella Valley Water District. July 7, 2022. Correspondence letter.

RTM Engineering Consultants. 2023. Onsite Hydrology Report.

RTM Engineering Consultants. 2023. Ladera Golf Club Water Quality Management Plan.

Findings of Fact:

a) **Less Than Significant Impact.**

Original Project

Based on the 2021 IS/MND, because the original project proposed more than 1 acre of ground disturbance, the original project was subject to the NPDES stormwater program, which includes obtaining coverage under the State Water Resources Control Board's Construction General Permit. Construction activities subject to the Construction General Permit include clearing, grading, and disturbances to the ground such as stockpiling or excavation. During construction, the original project developed and implemented a Stormwater Pollution Prevention Plan (SWPPP) and implementation of BMPs. Therefore, the 2021 IS/MND concluded that the original project's short-term construction-related water quality impacts were less than significant.

In addition, the original project's operational activities are required to comply with the Riverside County Ordinance No. 754, (as amended through 754.2), *an Ordinance of the County of Riverside Amending Ordinance No. 754, Establishing Stormwater/Urban Runoff Management and Discharge Control*. This ordinance includes conditions and requirements established by the County related to the control of urban pollutants to stormwater runoff, including a requirement for project applicants to prepare a stormwater management plan in conformance with standard urban stormwater mitigation plan requirements and implement stormwater quality BMPs. The original project implements stormwater quality BMPs, including source control, site design, and structural treatment BMPs. Further, the original project complies with all applicable local and regional water quality and stormwater plans. Therefore, the 2021 IS/MND concluded that the original project's long-term operational activities would result in less than significant impacts to water quality.

Modified Project

As part of the modified project, approximately 17,800 cubic yards of cut and fill would be balanced on site to accommodate the construction of a water well, domestic water pipeline, and sewer system. The modified project also requires minimal grading for the two (2) concrete pads. However, since the proposed disturbed area is less than one acre in size, the modified project would not be subject to the requirements of the Construction General Permit under the NPDES program. Short-term construction impacts would be minimal since mass grading of the project site has already been conducted with cut and fill to a balanced site. The only additional grading that would occur for the modified project would be for installation of the onsite water well and septic system. Therefore, the modified project's short-term construction activities would result in less than significant impacts to water quality.

In addition, similar to the original project, the modified project's operational activities are also required to comply with the Riverside County Ordinance No. 754, (as amended through 754.2), *an Ordinance of the County of Riverside Amending Ordinance No. 754, Establishing Stormwater/Urban Runoff*

Management and Discharge Control. Therefore, the modified project's long-term operational activities would result in less than significant impacts to water quality.

b) **Less Than Significant Impact.**

Original Project

According to the 2021 IS/MND, the original project site is located within the Coachella Valley Groundwater Basin (DWR 2021). Based on the CVWD 2020 Urban Water Management Plan (UWMP), regional water supply comes from the following sources (CVWD UWMP 2021):

- Groundwater
- Colorado River water imported through the Coachella Canal
- State Water Project water exchanged for Colorado River water delivered by the Metropolitan Water District (MWD) of Southern California through the Colorado River Aqueduct
- Local surface water
- Recycled water

According to the 2020 UWMP, in addition to agricultural irrigation, canal water is currently delivered to 30 golf courses and an additional 9-holes on another course in the Indio Subbasin in-lieu of groundwater to reduce groundwater pumping. This usage is considered in the Alternative Plans approved for Sustainable Groundwater Management Act compliance. Golf courses served with canal water are required to meet at least 80 percent of their water needs with Colorado River water. Additional programs focusing on conversion of groundwater pumpers to recycled and imported Coachella Canal water over the next ten years are intended to prevent future groundwater overdraft. During extended drought periods when State Water Project (SWP) exchange water deliveries for replenishment are reduced, continued groundwater pumping could result in short-term overdraft. Reduced replenishment could result in lower groundwater levels, which are expected to recover when normal supply conditions resume. However, short-term reductions in replenishment due to droughts are not expected to affect long-term supply reliability (CVWD UWMP 2021). Therefore, the 2021 IS/MND determined that impacts in this regard would be less than significant.

Modified Project

The modified project would provide the expansion of golf course facility services and operations upon completion of construction and the site would continue to be largely open space. As part of the modified project, approximately 17,800 cubic yards of cut and fill would be balanced on site to accommodate the construction of a water well, domestic water pipeline, and sewer system. Mass grading of the site has already occurred as part of the original project development and no significant grading of the site would occur with the modified project. The modified project would use limited amounts of water resources for construction activities. As with the original project, irrigation water used at the project site would continue to be provided from canal water from a recently constructed delivery system owned and operated by CVWD for irrigation (non-potable) water to the site for the existing citrus groves and golf club landscape. As such, this impact would be less than significant.

Drinking water for the golf club facilities and restrooms would be provided by a non-transient non-community water system. The water system would be located near the project entrance with the storage tanks and pump station on the west side of the maintenance area. The on-site potable water system would include two (2), 20,000-gallon tanks: one tank would store well water and one tank would store water after it has been treated by a reverse osmosis system. Sanitation water would be temporarily held within septic tanks. A 6,000-gallon septic tank with an Advanced Treatment System and a 5,000-square-foot leach field would be installed for wastewater generated at the club house.

With these improvements, the modified project would not substantially decrease groundwater supplies or interfere with groundwater management of the basin. A less than significant impact would occur.

c) **Less Than Significant Impact.**

Original Project

Based on the 2021 IS/MND, the original project site is located on an alluvial fan associated with the adjacent Martinez Canyon and related tributary areas of the Santa Rosa Mountains. The storm water flows and related hydrologic conditions are summarized in the Oasis Area of the Eastern Coachella Valley Stormwater Master Plan, developed by the Coachella Valley Water District (CVWD). The storm water flows and related flood hazards were analyzed by CVWD in 2014 and reflected in FEMA's Letter of Map Revision (LOMR) and updated Flood Insurance Rate Map (FIRM) Panels for the area dated 2018. Flood water associated with the 100-year storm event exits the apex of the alluvial fan at the mouth of Martinez Canyon and is radially distributed in sheet flows in a manner that dissipates relative to velocity and flow depth with increasing distance from the apex of the Canyon. These sheet flows intersect the original project site with a depth of flow of approximately 1 foot. This incident flow carries quantities of debris typical of a mountain canyon environment, consisting of silt, gravels and rock cobble which is evident on the project site, as well as in the surrounding natural terrain. CVWD addresses these types of conditions with a combination of training levees, diversion dikes, debris basins and receiving channels, which ultimately convey drainage to the Salton Sea. The drainage in the greater project area was addressed in the CVWD's Master Plan Alternatives Study for Oasis Area, and reflected a combination of training levees to intercept storm flows associated with tributary portions of the alluvial fan, a debris basin, and associated outlet channel as part of the 68th Avenue Drain improvements. The original project design provides for debris and drainage attenuation facilities that are consistent with the intent of the CVWD Master Plan. Therefore, the 2021 IS/MND concluded that impacts would be less than significant.

Modified Project

Existing hydrological conditions onsite continue to be similar to those analyzed in the 2021 IS/MND. Similar to the original project, the modified project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces. The proposed improvements have been sited to be hydrologically isolated from any offsite flows and the 100-year, 24-hour storm water will be retained onsite. A less than significant impact would occur.

d) **Less Than Significant Impact.**

Original Project

Based on the 2021 IS/MND, original project construction involved some earth-disturbing activities, including grading, that had the potential expose on-site soils to erosion and surface water runoff. However, the original project's BMPs implementation reduced erosion and siltation from construction activities. As such, the 2021 IS/MND concluded that the development of the original project would not cause a significant change to surface bodies of water in a manner that could cause siltation or erosion. Impacts associated with altering of the existing drainage patterns and erosion were determined to be less than significant.

Modified Project

Similar to the original project, short-term grading and excavation activities associated with the modified project could result in erosion or siltation on- or -off-site. The modified project would provide the

expansion of golf course facility services and operations upon completion of construction and the site would continue to be largely open space. As part of the modified project, approximately 17,800 cubic yards of cut and fill would be balanced on site to accommodate the construction of a water well, domestic water pipeline, and sewer system.

However, as stated above, since the proposed disturbed area would be less than one acre in size, the modified project would not be subject to the requirements of the Construction General Permit under the NPDES program. Short-term construction impacts would be minimal and result in less than significant impacts to existing drainage patterns on-site. Construction activities would result in less than significant impacts regarding erosion and siltation.

In addition, the modified project would be required to implement stormwater quality BMPs, including source control, site design, and structural treatment BMPs, as well as comply with all applicable local and regional water quality and stormwater plans, which would reduce the potential for operational sediment-laden runoff discharging from the site. Therefore, modified project implementation would not substantially alter the existing drainage pattern of the site during operational activities such that substantial erosion or siltation would occur. Impacts would be less than significant.

e-g) **Less Than Significant Impact.**

Original Project

Based on the 2021 IS/MND, the original project included landscaped areas and pervious surfaces that would allow for water to percolate into the subsurface soils. The proposed grading associated with the development of the original project was anticipated to alter the drainage patterns within the project site, however the general drainage patterns of both on-site and offsite flows were maintained.

While the original project site is located in a FEMA-designated flood hazard zone, Zone AO, which is a regulatory floodway area, the original project did not propose any new buildings which would alter the flood flow (FEMA 2018).

Based on County General Plan Figure S-10, Dam Failure Inundation Zones, the original project site is located outside of a dam inundation area (County of Riverside 2019a).

Therefore, the 2021 IS/MND concluded that the original project would not increase the rate or amount of surface runoff which would result in flooding, exceed the capacity of existing or planned stormwater drainage system, or impede flood flows. This impact was determined to be less than significant.

Modified Project

As an existing golf course, the project site already includes landscaped areas and pervious surfaces that allow for water to percolate into the subsurface soils. Mass grading of the project site was completed during development of the original project and no further significant grading of the site would occur with the modified project. The project site was elevated 5’-30’ from the previously existing elevations with the golf course generally draining to a central barranca and the proposed improvements generally draining overland from the southwest to the northeast. The site has been split into four distinct drainage areas, which in turn drain to three basins and one dry well.

Basin #1 borders the southern edge of the maintenance access road along the northern property line and follows the grade of the street. It detains water via 20 intermediate check dams spaced every 1.5’ of vertical grade change. The lowest sub-basin of this basin group was analyzed individually to confirm the maintenance access road would not be flooded. The secondary overflow for Basin #1 is an overland route towards the property entrance and the CVWD Avenue 68 Channel.

Basin #2 and the drywell is an overland flow path offsite towards the east and to the future CVWD channel east of the project.

Basin #3 is located adjacent to the proposed maintenance facility and the secondary overflow is an overland flow path through Basin #1 to the CVWD Avenue 68 Channel.

The modified project's storm drain system has been designed to retain the 100-year storm runoff within the site boundaries, as well as maintain at least 1 foot of freeboard between 100-year water surface elevation and building pads. The 100-year storm water runoff volume will be contained within retention basins constructed in support of the project's Interim Improvements Precise Grading Plan. The storm drain system in the interior streets will convey the 100-year storm. As such, similar to the original project, the modified project would not increase the rate or amount of surface runoff which would result in flooding, exceed the capacity of existing or planned stormwater drainage system, or impede flood flows. Impacts would be less than significant.

h) **Less Than Significant Impact.**

Original Project

Based on the 2021 IS/MND, the original project site is currently mapped by the Federal Emergency Management Agency (FEMA) as a designated Special Flood Hazard Area with an AO-1 zone (1-foot flood depth) designation. In addition, the original project site is located approximately 73 miles inland from the Pacific Ocean and would not be susceptible to a tsunami. The original project site contains a 2-acre reservoir/lake which is below surface elevation with a perimeter berm; and while highly unlikely to occur, in the event of a seiche, any wave movement would be contained within the depressed reservoir site and not significantly impact the site. Additionally, the original project site is located approximately 7.2 miles west of Salton Sea and due to the distance is not likely to be susceptible to a seiche. Therefore, the 2021 IS/MND concluded that the original project would not risk the release of pollutants due to project inundation in a flood hazard zone and that impacts would be less than significant.

Modified Project

Existing conditions relative to flood hazard, tsunami, or seiche zones on the project site continue to be similar to those analyzed for the original project in the 2021 IS/MND. It should be noted that, based on letter correspondence between the project applicant and CVWD dated July 7, 2022, the project applicant intends to develop the Conditional Letter of Map Revision/Letter of Map Revision (CLOMR/LOMR) to FEMA due to the site's location within a designated Special Flood Hazard Area, as described above. In the interim, and in order to comply with FEMA requirements, the proposed facilities must be designated as accessory structures, or built to comply with FEMA regulations for structures within a flood zone. Specifically, as designed, the project includes two (2) tent structures which would be constructed on raised concrete foundations a minimum of one foot above the Highest Adjacent Grade (HAG) which would comply with FEMA regulations for commercial buildings. In order to comply with FEMA, the proposed interim facilities must be designated accessary structures and easily moved or built to comply with FEMA regulation for structures in a flood zone. In addition, the project includes (3) office trailers, three (3) Porta Potty restrooms, and staff-only parking area that can accommodate up to 58 vehicles. One office trailer would be used as a lunchroom for staff, and the second office would house the administration/maintenance staff offices. The restroom, Airstream bar, kitchen, and office trailers would be on wheels that can be moved from the site prior to a flood event.

The modified project's storm drain system has been designed to retain the 100-year storm runoff within the site boundaries, as well as maintain at least 1 foot of freeboard between 100-year water surface

elevation and building pads. The 100-year storm water runoff volume will be contained within retention basins constructed in support of the project's Interim Improvements Precise Grading Plan. The storm drain system in the interior streets will convey the 100-year storm. As a result of this on-site storm drain system, this project will not increase downstream flow or impact existing storm drain facilities. As such, the modified project would not risk the release of pollutants due to project inundation in a flood hazard zone. Impacts would be less than significant.

i) **Less Than Significant Impact.**

Original Project

According to the 2021 IS/MND, the original project site is located within the Coachella Valley Groundwater Basin. However, as discussed in the 2021 IS/MND, the original project was required to comply with regional and local regulations related to water quality control plans and therefore, would not obstruct existing plans. Therefore, the 2021 IS/MND concluded that the original project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan and impacts were determined to be less than significant.

Modified Project

Similar to the original project, the modified project is required to comply with regional and local regulations related to water quality control plans and therefore, would not obstruct existing plans. The project will be required to retain urban runoff onsite in conformance with local ordinances.

Drinking water for the golf club facilities and restrooms would be provided by a non-transient non-community water system, which would be permitted by the State of California, Division of Drinking Water. The water system would be located near the project entrance with the storage tanks and pump station on the west side of the maintenance area. The on-site potable water system would include two (2), 20,000-gallon tanks: one tank would store well water and one tank would store water after it has been treated by a reverse osmosis system. Sanitation water would be temporarily held within septic tanks. A 6,000-gallon septic tank with an Advanced Treatment System and a 5,000-square-foot leach field would be installed for wastewater generated at the club house.

Specific actions the modified project is required to make with regard to the project-specific Water Quality Management Plan include ensuring that adequate cover is kept to limit erosion from stormwater runoff, checking for any leaks in the irrigation systems, removal of dead plant matter and disposal of in proper waste receptacles, and removing debris and performing street cleaning in dry conditions in a timely manner. With these covenants, the modified project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan and impacts would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
LAND USE AND PLANNING. Would the project:				
24. Land Use a) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐
b) Physically divide an established community?	☐	☐	☐	☒

Source(s):
County of Riverside. 2021. Riverside County General Plan – Healthy Communities Element.

County of Riverside. 2022. Riverside County Municipal Code. Updated through July 27, 2022. Accessed March 20, 2023. https://library.municode.com/ca/riverside_county/codes/code_of_ordinances

Findings of Fact:

a) **Less Than Significant.**

Original Project

The original project site is currently zoned W-2 (Controlled Development). Per Chapter 17.144, W-2 Controlled Development Areas Zone, of the Riverside County Municipal Code, golf courses with standard length fairways are permitted provided a plot plan is approved (County of Riverside 2021). Based on the 2021 IS/MND, the original project would not require a zone change and the project would largely be open space which is consistent with Policy OS 20.1 of the General Plan, whereas the project would maintain open space that protects County environmental and other nonrenewable resources (County of Riverside 2015). Additionally, the IS/MND concluded the original project is consistent with the environmental justice policies included in the Draft Land Use Element of the General Plan and that the original project would not cause a significant environmental impact due to a conflict with a land use plan or policy. A less than significant impact would occur.

Modified Project

The modified project site is located in an area identified as an Environmental Justice Community on Figure LU-4.1, "Riverside County Environmental Justice Communities," of the General Plan Land Use Element. As such, the environmental justice policies outlined in the Healthy Communities Element of the General Plan would apply to the project area. Table Land Use-1, *Environmental Justice Policies Consistency Summary*, demonstrates the project's consistency with the relevant environmental justice policies. As such, the modified project is consistent with policies identified in the County's General Plan and impacts would be less than significant.

Table Land Use-1
Environmental Justice Policies Consistency Summary

Environmental Justice Policies	Modified Project Consistency Analysis
Health Risk Reduction Policies	
Policy HC 16.13: Provide buffer spaces and vegetative barriers between high-	Consistent. The modified project site provides landscaping buffer along the northern and eastern perimeters consisting of citrus groves. The site is

volume roadways/transportation and train track corridors and sensitive land uses.	located in a rural area of unincorporated Riverside County and surrounded by undeveloped desert scrub land and farmland. The nearest sensitive receptor to the site is a single-family residence located approximately 4,000 feet north. The modified project is consistent with Policy HC 16.13
Policy HC 16.14: Assure that sensitive receptors are separated and protected from polluting point sources, as feasible, including agricultural businesses that produce or use pesticides and chemical fertilizers.	Consistent. The modified project site (existing golf course) would remain a largely open space and is surrounded by undeveloped desert scrub land and farmland. The nearest sensitive receptor to the site is a single-family residence located approximately 4,000 feet north . The northern and eastern perimeters of the site contain lemon trees, and to the south and west of the site are desert scrub and hills. The modified project is consistent with Policy HC 16.14
Policy HC 16.16: Apply pollution control measures such as landscaping, vegetation, and green zones (in cooperation with the SCAQMD) and other materials, which trap particulate matter or control air pollution.	Consistent. See responses to Policy HC 16.13 and HC 16.14. The modified project is required to comply with SCAQMD Rule 403.1 to control dust emissions generated during any dust-generating activities. Therefore, the modified project is consistent with Policy HC 16.16.
Policy HC 16.17: Landscape by planting of trees on a community basis that removes pollutants from the air, provides shade and decreases the negative impacts of extreme heat on the community.	Consistent. See response to Policy HC 16.13. The modified project would be consistent with Policy HC 16.17.
Policy HC 16.23: Discourage industrial and agricultural uses which produce significant quantities of toxic emissions into the air, soil, and groundwater to prevent the contamination of these physical environments.	Consistent. Historically, the modified project site supported agriculture uses. Today, the site is developed as a golf course. The modified project facilities would not be industrial in nature and would therefore not produce significant quantities of toxins. The lemon trees bordering the property are a much smaller quantity than the site's previous agricultural use, and therefore would not be introducing additional toxic emissions to the environment. The modified project would be consistent with Policy HC 16.23.
Policy HC 19.2: Develop high-quality parks, green space, hiking trails, recreational facilities and natural environments in areas where such facilities are lacking.	Consistent. The modified project site is located in a rural area of unincorporated Riverside County. The site is surrounded by undeveloped desert scrub land and farmland. The modified project would add recreational facilities to the development of the approved golf course. The nearest golf course to the site is Coral Mountain Golf Club, located approximately 5.48-miles north of the site. Additionally, the nearest park, Key Key Tum Park, is located approximately 3.4-miles north of the site. While there are various types of recreational facilities further surrounding the site, the immediate area is predominantly barren of parks and other recreational facilities. As such, the modified project is consistent with Policy HC 19.2.
Public Facilities Policies	
Policy HC 20.6: With the availability of funding and pursuant to health and safety considerations, ensure that surface drainage is properly captured and disposed and does not mix or otherwise interface with septic systems.	Consistent. As discussed in the "Hydrology and Water Quality" section, since the proposed disturbed area would be less than one acre in size, the modified project would not be subject to the requirements of the Construction General Permit under the NPDES program. However, short-term construction impacts would be minimal, since mass grading of the project site has already been conducted and the only additional grading that would occur for the modified project would be for installation of the onsite water well and septic system. In addition, the modified project's operational activities would be required to comply with the Riverside County Ordinance No. 754, (as amended through 754.2), *an Ordinance of the County of Riverside Amending Ordinance No. 754, Establishing Stormwater/Urban Runoff Management and Discharge Control*. This ordinance includes conditions and requirements established by the County related to the control of urban pollutants due to stormwater runoff, including a requirement for project applicants to prepare a stormwater management plan in conformance with standard urban stormwater mitigation plan requirements and implement stormwater quality BMPs. The modified project would be required to implement stormwater quality BMPs, including source control, site design, and structural treatment BMPs. Further, the

	modified project would be required to comply with all applicable local and regional water quality and stormwater plans. The on-site potable water system would include two (2) 20,000-gallon tanks: one tank would store well water and one tank would store water after it has been treated by a Reverse Osmosis (RO) system. The tanks' dimensions would be 12 feet high and 28 feet long and they would be either mounted on concrete slabs or partially or completely undergrounded. A 100-linear-foot 6-inch water pipe would be installed from the well to the booster as well as a 2,700-linear-foot 4-inch water pipe booster to the interim clubhouse. Sanitation water would be temporarily held within the self-contained, mobile restroom trailers (septic tanks). Food and drink facilities would require self-containing holding tanks for the Airstream trailers and a dry well for the bar within the Club Dining Tent for disposal of sink water. A 6,000-gallon septic tank with an Advanced Treatment System (ATS) and a 5,000-square-foot leach field would be installed for wastewater generated at the club house. As an existing golf course, the modified project site already includes landscaped areas and pervious surfaces that allow for water to percolate into the subsurface soils. The general drainage patterns of both on-site and offsite flows have been maintained. The modified project is consistent with Policy HC 20.6.
Policy HC 20.7: Ensure that health and safety facilities such as fire stations and sheriff substations are adequately sited, improved and staffed to serve affected communities. Identify which communities need services to be built in close proximity to reduce the amount of time it takes to respond to an emergency.	Consistent. The modified project would not directly induce substantial population growth in the area. Although the modified project would require fire protection and/or paramedic services in the event of an emergency, given the relatively low number of visitors that would use the project site and given that fire and emergency services already serve the project area, the modified project is not expected to result in the need for new or physically altered fire facilities, or to result in the station's inability to maintain acceptable service ratios, response times, or other performance objectives. Similarly, while the modified project could require police services, given the relatively low number of visitors that would use the project site and given that police services already serve the project area, the modified project is not anticipated to add a new strain on the existing police functions. The modified project is consistent with Policy HC 20.7.
Policy HC 20.8: Review the location and extent of community recreational facilities to ensure maximum use by children and adults and use that information to develop new recreational facilities and opportunities for the community, including indoor and outdoor facilities.	Consistent. The County offers a range of parks and recreational opportunities. However, parks and recreational facilities in the community of Thermal are limited and the closest golf course is the Coral Mountain Golf Club located in the City of La Quinta. The modified project involves the addition of supporting facilities to the existing golf course site. Conditions of Approval for the development of the site required the Applicant/Owner to provide funding for an off-site recreational facility. Therefore, the modified project would be consistent with Policy HC 20.8.

b) **No Impact.**

Original Project

The physical division of an established community is typically associated with the construction of a linear feature, such as a major highway or railroad tracks, or removal of means of access, such as a local road or bridge, which would impair mobility within an existing community or between a community and an outlying area. The 2021 IS/MND concluded that the project would not create a physical divide of an existing community, and that connectivity in the surrounding area is facilitates via local roadways.

Modified Project

The project is limited to the expansion of services and capacity to an existing golf course and would increase employment from 12 staff to 70 seasonal staff. The project is expected to be staffed by local/regional residents. Due to the nature of the project [improvements to an existing golf course facility], the project would not physically divide an established community. No impact would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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

Source(s):
Riverside County General Plan. 2015. Multipurpose Open Space Element. Accessed March 20, 2023. https://planning.rctlma.org/General-Plan-Zoning/General-Plan.

United States Geological Survey (USGS). Mineral Resources Online Spatial Data. Accessed March 20, 2023. https://mrdata.usgs.gov/general/map-us.html#home.

Findings of Fact:

a-c) **No Impact.**

Original Project

According to the United States Geological Survey (USGS) Mineral Online Spatial Data map, there are no known mineral resources located on or near the original project site. Additionally, the project site is not currently being used for mineral extraction, nor was it used for mineral extraction in the past. Therefore, no mining operations would be impacted by this development and the site would likely never be used for mining operations in the future. Given these factors, and based on the 2021 IS/MND, the original project would not result in the loss of availability of a known mineral resource that would be of future value to the region and the residents of the state. No impact would occur.

Riverside County's General Plan does not identify a mineral resource recovery site within the project area. Figure OS-6, Mineral Resource Zones, of the Riverside County Multipurpose Open Space Element, shows that the project site is designated MRZ-1 (Unstudied). Although unstudied for mineral resources, it is known that the project site is not currently being used for mineral extraction. No mining operations would be impacted by this development and the site would likely never be used for mining operations in the future. As such, the 2021 IS/MND concluded that the original project would not result

in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. No impact would occur.

According to the USGS Mineral Resources Online Spatial Data map, the original project site is not located near any abandoned quarries or mines. The nearest mine is located approximately 2.4 miles south of the site. As such, because the site does not contain any abandoned quarries or mines and is located over two miles away from the nearest mine, the 2021 IS/MND determined that the original project would not expose people or property to hazards from proposed, existing, or abandoned quarries or mines. No impact would occur.

Modified Project

The modified project is consistent with the findings of the 2021 IS/MND. The modified project site is the same as the original project site and mining is not proposed as part of the modified project. No impact would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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

Source(s):
Riverside County General Plan Figure S-20 “Airport Locations,” County of Riverside Airport Facilities Map.

RCALUCP (Riverside County Airport Land Use Compatibility Plan). 2006. Jacqueline Cochran Regional Airport Land Use Compatibility Plan. Accessed March 20, 2023. http://www.rcaluc.org/Plans/New-Compatibility-Plan.

Findings of Fact:

a-b) **No Impact.**

Original Project

According to the 2021 IS/MND, the original project site is located outside of any airport impact zones, and as such, the original project would not result in a safety hazard for people residing in the project

area. The 2021 IS/MND concluded that no impacts associated with exposing people residing or working in the project area to excessive noise levels would occur.

Modified Project

The closest public airport to the modified project site is Jacqueline Cochran Regional Airport, which is located approximately 4.8 miles northeast of the site. According to the Land Use Plan for the Jacqueline Cochran Regional Airport, the modified project is not located within an impact zone and is outside the airport planning area (RCALUCP 2006). Additionally, the closest private airstrip is Desert Air Sky Ranch-63CA, located approximately 18.4 miles east of the site. The site is located outside of any airport impact zones, and as such, the modified project would not result in a safety hazard for people residing in the project area. Therefore, no impacts associated with exposing people residing or working in the project area to excessive noise levels would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
27. Noise Effects by the Project a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan, noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Generation of excessive ground-borne vibration or ground-borne noise levels?	☐	☐	☒	☐

Source(s):
Riverside County General Plan. 2015. Table N-1 ("Land Use Compatibility for Community Noise Exposure")

REGULATORY FRAMEWORK

State Level

The State Office of Planning and Research (OPR) Noise Element Guidelines include recommended exterior and interior noise level standards for local jurisdictions to identify and prevent the creation of incompatible land uses due to noise. The OPR Noise Element Guidelines contain a land use compatibility table that describes the compatibility of various land uses with a range of environmental noise levels in terms of the CNEL. Table Noise-1, *Land Use Compatibility for Community Noise Environments*, presents guidelines for determining acceptable and unacceptable community noise exposure limits for various land use categories. The guidelines also present adjustment factors that may be used to arrive at noise acceptability standards that reflect the noise control goals of the community, the particular community's sensitivity to noise, and the community's assessment of the relative importance of noise pollution.

Table Noise-1
Land Use Compatibility for Community Noise Environments

Land Use Category	Community Noise Exposure (L_{dn} or CNEL, dBA)			
	Normally Acceptable	Conditionally Acceptable	Normally Unacceptable	Clearly Unacceptable
Residential – Low Density, Single-Family, Duplex, Mobile Homes	50 – 60	55 – 70	70 – 75	75 – 85
Residential – Multiple Family	50 – 65	60 – 70	70 – 75	70 – 85
Transient Lodging – Motel, Hotels	50 – 65	60 – 70	70 – 80	80 – 85
Schools, Libraries, Churches, Hospitals, Nursing Homes	50 – 70	60 – 70	70 – 80	80 – 85
Auditoriums, Concert Halls, Amphitheaters	NA	50 – 70	NA	65 – 85
Sports Arenas, Outdoor Spectator Sports	NA	50 – 75	NA	70 – 85
Playgrounds, Neighborhood Parks	50 – 70	NA	67.5 – 75	72.5 – 85
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50 – 70	NA	70 – 80	80 – 85
Office Buildings, Business Commercial, Professional	50 – 70	67.5 – 77.5	75 – 85	NA
Industrial, Manufacturing, Utilities, Agriculture	50 – 75	70 – 80	75 – 85	NA

Notes: NA = Not Applicable; L_{dn} = Day/Night Average; CNEL = community noise equivalent level; dBA = A-weighted decibels
Normally Acceptable - Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.
Conditionally Acceptable - New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.
Normally Unacceptable - New Construction or development should be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.
Clearly Unacceptable – New construction or development should generally not be undertaken.

Source: State of California Governor's Office of Planning and Research, *General Plan Guidelines*, July 2017.

Riverside County General Plan

The County of Riverside adopted its General Plan on December 8, 2015. The Noise Element of the General Plan is closely related to the Land Use Element because of the effects that noise has on sensitive land uses. The following applicable policies protect noise-sensitive land uses from noise emitted by outside sources and prevent new projects from generating adverse noise levels on adjacent properties. The following policies are applicable to the project:

- **Policy N 1.4**: Determine if existing land uses will present noise compatibility issues with proposed projects by undertaking site surveys.
- **Policy N 1.6**: Minimize noise spillover or encroachment from commercial and industrial land uses into adjoining residential neighborhoods or noise-sensitive uses.
- **Policy N 2.3**: Mitigate exterior and interior noises to the levels listed in Table N-2 below (Table Noise-2, *Stationary Source Land Use Noise Standards*) to the extent feasible, for stationary sources.

Table Noise-2
Stationary Source Land Use Noise Standards

Land Use	Interior Standards	Exterior Standards
Residential		
10:00 p.m. to 7:00 a.m.	40 dBA L_{eq} (10 minute)	45 dBA L_{eq} (10 minute)
7:00 a.m. to 10:00 p.m.	55 dBA L_{eq} (10 minute)	65 dBA L_{eq} (10 minute)

Source: County of Riverside, *Riverside County General Plan,* December 8, 2015.

- **Policy N 4.1**: Prohibit facility-related noise received by any sensitive use from exceeding the following worst-case noise levels:

- a. 45 dBA-10-minute L_{eq} between 10:00 p.m. and 7:00 a.m.
- b. 65 dBA-10-minute L_{eq} between 7:00 a.m. and 10:00 p.m.

- **Policy N 4.2**: Develop measures to control non-transportation noise impacts.
- **Policy 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.
- **Policy N 4.8**: Require that the parking structures, terminals, and loading docks of commercial or industrial land uses be designed to minimize the potential noise impacts of vehicles on the site as well as on adjacent land uses.
- **Policy N 6.3**: Require commercial or industrial truck delivery hours be limited when adjacent to noise-sensitive land uses unless there is no feasible alternative or there are overriding transportation benefits.
- **Policy N 13.1**: Minimize the impacts of construction noise on adjacent uses within acceptable practices.
- **Policy N 13.2**: Ensure that construction activities are regulated to establish hours of operation in order to prevent and/or mitigate the generation of excessive or adverse noise impacts on surrounding areas.
- **Policy N 13.3**: Condition subdivision approval adjacent to developed/occupied noise-sensitive land uses by requiring the developer to submit a construction-related noise mitigation plan to the County for review and approval prior to issuance of a grading permit. The plan must depict the location of construction equipment and how the noise from this equipment will be mitigated during construction of this project, through the use of such methods as:
  a. Temporary noise attenuation fences;
  b. Preferential location of equipment; and
  c. Use of current noise suppression technology and equipment.
- **Policy N 13.4**: Require that all construction equipment utilizes noise reduction features (e.g., mufflers and engine shrouds) that are no less effective than those originally installed by the manufacturer.

Riverside County

Ordinance No. 847 Regulating Noise exempts the noise emanating from the following sources from the Municipal Code Noise Regulation provided:

- Private construction projects located within one-quarter of a mile from an inhabited dwelling, provided that:
  1. Construction does not occur between the hours of 6:00 p.m. and 6:00 a.m. during the months of June through September;
  2. Construction does not occur between the hours of 6:00 p.m. and 7:00 a.m. during the months of October through May.

Ordinance 847 further states that an application for a construction-related exception shall be made to and considered by the director of building and safety on forms provided by the building and safety department and shall be accompanied by the appropriate filing fee.

Ordinance 847 also regulates the noise generated from the operation of power tools and equipment and states:

- Property maintenance, including, but not limited to, the operation of lawnmowers, leaf blowers, etc., provided such maintenance occurs between the hours of 7 a.m. and 8 p.m.

Noise Sensitive Receptors

Sensitive populations are more susceptible to the effects of noise than are the general population. Land uses considered sensitive by the State of California include schools, playgrounds, athletic facilities, hospitals, rest homes, rehabilitation centers, long-term care and mental care facilities. Generally, a sensitive receptor is identified as a location where human populations (especially children, senior citizens, and sick persons) are present.

Land uses less sensitive to noise are business, commercial, and professional developments. Noise receptors categorized as being least sensitive to noise include industrial, manufacturing, utilities, agriculture, natural open space, undeveloped land, parking lots, warehousing, and transit terminals. These types of land use often generate high noise levels. Moderately sensitive land uses typically include multi-family dwellings, hotels, motels, dormitories, and outpatient clinics. Existing land uses surrounding the project site include agricultural uses. The closest sensitive receptor to the modified project site is a single-family residence located approximately 4,000 feet to the north.

a) **Less Than Significant Impact.**

Original Project

According to the 2021 IS/MND, the original project would conduct construction activities between the allowable hours established by Riverside County Municipal Code. In addition, as the original project would not generate a significant number of trips, operational noise as a result of the original project would be minimal. The 2021 IS/MND concluded that noise impacts associated with construction and operation of the original project would be less than significant.

Modified Project

CONSTRUCTION

The modified project involves minimal construction activities for the concrete pads required for the placement of the two tent structures. Construction of the modified project would occur over approximately three months and would include grading, building construction, and paving. Typical noise levels generated by construction equipment are shown in Table Noise-3, *Maximum Noise Levels Generated by Construction Equipment*. It should be noted that the noise levels identified in Table Noise-3 are maximum sound levels (L_{max}), which are the highest individual sound occurring at an individual time period. Operating cycles for these types of construction equipment may involve one or two minutes of full power operation followed by three to four minutes at lower power settings. Other primary sources of acoustical disturbance would be due to random incidents, which would last less than one minute (such as dropping large pieces of equipment or the hydraulic movement of machinery lifts).

Table Noise-3
Maximum Noise Levels Generated by Construction Equipment

Type of Equipment	Acoustical Use Factor[1]	L_{max} at 50 Feet (dBA)	L_{max} at 4,000 Feet (dBA)
Crane	16	79	41
Generator	50	81	43
Loader	40	79	41
Dozer	40	82	44
Excavator	40	81	43
Forklift	40	78	40
Grader	40	85	47
Paver	50	77	39
Roller	20	80	42

Scrapers	40	85	47
Tractor	40	84	46
Water Truck	40	84	42
Grader	40	80	47
General Industrial Equipment	50	85	47

Note: L_{max} = maximum sound levels, dBA= A-weighted decibel's

1. Acoustical use factor (percent): Estimates the fraction of time each piece of construction equipment is operating at full power (i.e., its loudest condition) during a construction operation.

Source: Federal Highway Administration, *Roadway Construction Noise Model (FHWA-HEP-05-054),* January 2006.

The potential for construction-related noise to affect nearby sensitive receptors would depend on the location and proximity of construction activities to these receptors. Currently, there are no noise sensitive receptors surrounding the modified project site within one-quarter of a mile. The closest sensitive receptor to the modified project site is a single-family residence located approximately 4,000 feet to the north. At this distance, construction noise levels would range from approximately 39 dBA to 47 dBA L_{max}; refer to Table Noise-3. Furthermore, according to Ordinance 847, construction activities occurring between the hours of 6:00 a.m. to 6:00 p.m. during the months of June through September and between the hours of 7:00 a.m. to 6:00 p.m. during the months of October through May would be exempt from such regulations. The modified project would comply with the construction hours requirements. As a result, short-term construction noise impacts are considered less than significant.

OPERATIONS

Mobile Noise

Future development generated by the modified project would result in increase of traffic on adjacent roadways, thereby increasing vehicular noise in the vicinity of existing and proposed land uses. As determined by the California Department of Transportation (Caltrans) in the Technical Noise Supplement to the Traffic Noise Analysis Protocol (September 2013), a doubling in roadway traffic volumes is required to generate any noticeable increase in roadway noise levels. Based on *Jeule Ranch Golf Club Expansion – Transportation Screening Analysis* (Transportation Analysis) prepared by Michael Baker International (dated September 28, 2022), the modified project is projected to generate a net increase of 843 average daily trips (ADT), which includes 48 a.m. peak hour trips and 80 p.m. peak hour trips. Since there are no sensitive receptors near the project vicinity and due to the project's minimal trip generation (approximately 843 ADT), the modified project would not double existing traffic volumes along nearby roadways and an increase in traffic noise along local roadways would be imperceptible. Project-related traffic noise impacts would be less than significant.

Stationary Noise Impacts

Mechanical Equipment

Mechanical equipment noise would include noise from the operation of on-site generators, heating ventilation and air conditioning (HVAC) units. Typically, mechanical equipment noise is 55 dBA at 50 feet from the source. Based upon the Inverse Square Law, sound levels decrease by 6 dBA for each doubling of distance from the source. The proposed building would be located on the northeast corner of the modified project site, which is approximately 4,000 feet from the nearest sensitive receptor (i.e., single-family residence to the north of the modified project site). As such, noise levels from the HVAC units could reach approximately 17 dBA at this distance. Therefore, the County's exterior daytime (65 dBA L_{eq}) and nighttime (45 dBA L_{eq}) noise standards established by the Municipal Code would not be exceeded as a result of HVAC units at the modified project site. Thus, a less than significant impact would occur in this regard.

Parking Areas

Traffic associated with parking lots is typically not of sufficient volume to exceed community noise standards, which are based on a time-averaged scale such as the CNEL scale. However, the instantaneous maximum sound levels generated by a car door slamming, engine starting up, and car pass-bys may be an annoyance to adjacent noise-sensitive receptors. Estimates of the maximum noise levels associated with some parking lot activities are presented in Table Noise-4, *Typical Noise Levels Generated by Parking Lots*.

Table Noise-4
Typical Noise Levels Generated by Parking Lots

Noise Source	Maximum Noise Levels at 50 Feet from Source
Car door slamming	61 dBA L_{eq}
Car starting	60 dBA L_{eq}
Car idling	53 dBA L_{eq}
Source: Kariel, H. G., *Noise in Rural Recreational Environments*, Canadian Acoustics 19(5), 3-10, 1991.	

As shown in Table Noise-4, parking lot activities can result in noise levels up to 61 dBA at a distance of 50 feet. It is noted that parking lot noise are instantaneous noise levels compared to noise standards in the CNEL scale, which are averaged over time. As a result, actual noise levels over time resulting from parking lot activities would be far lower than what is identified in Table Noise-4. The closest sensitive receptors are located approximately 4,000 feet north of the project site. At a distance of 4,000 feet, parking lot noise levels could range from 15 to 23 dBA. As a result, the noise levels associated with parking lot activities and car idling would not exceed the County's exterior daytime (65 dBA L_{eq}) and nighttime (45 dBA L_{eq}) stationary noise standards.

It should be noted that the proposed hours of operation would be Monday through Sunday from 7:00 a.m. to 11:00 p.m. As a result, parking lot activities may occur during sensitive nighttime hours (i.e. 10:00 p.m. to 11:00 p.m.). However, parking lot activities are anticipated to be minimal during this time as the project would not generate significant trips during the last hour of operation. Further, there are no sensitive receptors in the near vicinity of the project site. As such, impacts would be less than significant in this regard.

Trucks Deliveries

The modified project includes a mobile kitchen and dining facilities that would necessitate occasional truck deliveries and waste hauling operations. The California Motor Vehicle Code establishes maximum sound levels for trucks operating at speeds less than 35 miles per hour (Section 23130). The maximum sound level established by the code is 86 dBA at 50 feet. However, maximum noise levels associated with medium delivery trucks are generally around 55 dBA at a distance of 100 feet, depending on whether or not the driver is accelerating.

As previously noted, there are no sensitive receptors in the near vicinity of the project site and the delivery and waste hauling truck operations would occur at a minimum of 4,000 feet from the nearest sensitive receptor to the north. As such, the maximum sound level at the nearest sensitive receptor from delivery trucks would be approximately 37 dBA, which would not exceed the County's exterior daytime noise standards (65 dBA L_{eq}) and nighttime noise standards (45 dBA L_{eq}). In addition, occasional truck activities would not generate excessive noise levels over an extended period of time. Therefore, operational noise impacts resulting from delivery and waste hauling vehicles would be less than significant.

Outdoor Patio Areas

The modified project proposes two outdoor patio seating areas with shade covers, BBQ, and fire pit features surrounding the clubhouse area. The proposed outdoor patio area has the potential to be accessed by groups of people intermittently. Noise generated by groups of people (i.e., crowds) is dependent on several factors including vocal effort, impulsiveness, and the random orientation of the crowd members. Crowd noise is estimated at 60 dBA at one meter (3.28 feet) away for raised normal speaking.[25] This noise level would have a +5 dBA adjustment for the impulsiveness of the noise source, and a -3 dBA adjustment for the random orientation of the crowd members.[26] Therefore, crowd noise would be approximately 62 dBA at one meter (3.28 feet) from the source. As the nearest sensitive receptor is approximately 4,000 feet from the outdoor patio area, crowd noise would be very nominal (3.2 dBA) and would not exceed the County's exterior noise standards. As such, impacts would be less than significant in this regard.

b) **Less Than Significant Impact.**

Original Project

According to the 2021 IS/MND, construction vibration as a result of the original project would not result in structural building damage, and excessive groundborne vibration would not be generated during construction. In addition, operation of the original project would not result in any sources of vibration. The 2021 IS/MND concluded that vibration impacts associated with construction and operation of the original project would be less than significant.

Modified Project

CONSTRUCTION

Project construction can generate varying degrees of groundborne vibration, depending on the construction procedure and the construction equipment used. Operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings located in the vicinity of the construction site often varies depending on soil type, ground strata, and construction characteristics of the receiver building(s). The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage at the highest levels. Groundborne vibrations from construction activities rarely reach levels that damage structures.

The California Department of Transportation (Caltrans) *Transportation and Construction Vibration Manual* identifies various vibration damage criteria for different building classes. Human annoyance occurs when construction vibration rises significantly above the threshold of human perception for extended periods of time. For most commercial and industrial structures that are engineered concrete and masonry buildings, the FTA architectural damage criterion for continuous vibrations is 0.3 in/sec. For most residential structures that are non-engineered timber and masonry buildings, the FTA architectural damage criterion for continuous vibrations is 0.2 in/sec. The modified project site is currently surrounded by agricultural use and the nearest structure is an agricultural pump house building located approximately 50 feet to the north of project construction activities. As a conservative analysis, the FTA architectural damage criterion for continuous vibrations of 0.2 in/sec is utilized. Typical vibration produced by construction equipment is illustrated in Table Noise-5, *Typical Vibration Levels for Construction Equipment*.

25 M.J. Hayne, et al, *Prediction of Crowd Noise, Acoustics*, November 2006.

26 Ibid.

Table Noise-5
Typical Vibration Levels for Construction Equipment

Equipment	Approximate peak particle velocity at 25 feet (inch/sec)	Approximate peak particle velocity at 50 feet (inch/sec)[1]
Loaded trucks	0.076	0.0269
Small bulldozer	0.003	0.0011

Notes:
1. Calculated using the following formula:
$PPV_{equip} = PPV_{ref} \times (25/D)^{1.5}$
where: PPV_{equip} = the peak particle velocity in in/sec of the equipment adjusted for the distance
PPV_{ref} = the reference vibration level in in/sec from Table 7-4 of the FTA *Transit Noise and Vibration Impact Assessment Guidelines*
D = the distance from the equipment to the receiver

Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual, Table 7-4 Vibration Source Levels for Construction Equipment*, September 2018.

As indicated in Table Noise-5, vibration velocities from typical heavy construction equipment used during project construction would range from 0.0011 in/sec PPV to 0.0269 in/sec PPV at 50 feet from the source of activity, which would not exceed the FTA's 0.2 in/sec PPV threshold. Additionally, the modified project would not utilize heavy-duty construction equipment with noticeable vibration levels (e.g., vibratory rollers, pile drivers, etc.) near off-site uses or nearby structures. As such, the impacts would be less than significant.

OPERATIONS

The modified project proposes to build service facilities to support the golf club site and would not generate groundborne vibration that could be felt at surrounding uses. The modified project would not involve railroads or substantial heavy truck operations, and therefore would not result in vibration impacts at surrounding uses. No impact would occur in this regard.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
PALEONTOLOGICAL RESOURCES:				
28. Paleontological Resources a) Directly or indirectly destroy a unique paleontological resource, site, or unique geologic feature?	☐	☒	☐	☐

Source(s):
Riverside County General Plan. 2015. Figure OS-8 "Paleontological Sensitivity," Paleontological Resource Impact Mitigation Program ("PRIMP") Report

Findings of Fact:

a) **Less Than Significant Impact.**

Original Project

The Riverside County General Plan Multipurpose Open Space Element Figure OS-8 designates the project site as having an undetermined paleontological sensitivity (County of Riverside 2015). Because mass grading was required for the development of the original project, MM-PAL-1 (protocol for inadvertent discovery of paleontological resources) was required and implemented during construction of the original project. Therefore, the 2021 IS/MND determined this impact to be less than significant with mitigation.

Modified Project

Mass grading and contouring of the project site was conducted as part of the original project. The modified project includes grading and earthwork for the installation of foundations required for the tent structures, and installation of the water well and septic system. Consistent with the original project, the modified project would implement MM-PAL-1. The modified project involves additional grading for installation of the onsite water well and septic system. Therefore, with implementation of the 2021 IS/MND mitigation program, impacts relative to paleontological resources would be reduced to less than significant.

Mitigation:

MM-PAL-1 In the event that paleontological resources (fossil remains) are exposed during construction activities for the proposed project, all construction work occurring within 50 feet of the find shall immediately stop until a qualified paleontologist, as defined by the Society of Vertebrate Paleontology's 2010 guidelines, can assess the nature and importance of the find. Depending on the significance of the find, the paleontologist may record the find and allow work to continue or recommend salvage and recovery of the resource. All recommendations will be made in accordance with the Society of Vertebrate Paleontology's 2010 guidelines and shall be subject to review and approval by the County of Riverside. Work in the area of the find may only resume upon approval of a qualified paleontologist.

Monitoring: No monitoring is required.

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

Source(s): N/A

Findings of Fact:

a-c) **Less Than Significant Impact.**

Original Project

The original project proposed to develop a new golf course presumed to be utilized by residents in the local area. The 2021 IS/MND concluded that the original project would not introduce residential uses nor businesses to the project area and would not directly or indirectly lead to unplanned population growth. Additionally, the original project would not displace existing housing or require the construction of replacement housing. Therefore, the 2021 IS/MND determined that no impact would occur.

Modified Project

A significant impact would occur if the project would induce substantial population growth that would not have otherwise occurred as rapidly or in as great a magnitude, or if the project would displace substantial numbers of existing people or housing. Because the modified project is limited to the expansion of services and capacity to an existing golf course, the modified project would not induce substantial unplanned population growth in the area, either directly or indirectly. Due to the nature of the modified project [improvements to an existing golf course facility], the project would not displace people or housing, nor would the project require construction of replacement housing.

The modified project would increase employment from 12 staff to 70 seasonal staff. The project is expected to be staffed by local/regional residents. The increase of employment opportunities to the area is not expected to result in a substantial increase to unplanned population growth. A less than significant impact would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:				
30. Fire Services	☐	☐	☒	☐

Source(s):

County of Riverside. County of Riverside General Plan – Safety Element. Revised September 28, 2021. https://planning.rctlma.org/Portals/14/genplan/2021/elements/Ch06_Safety_092821.pdf

RCFD (Riverside County Fire Department). 2021. Our Department. Accessed March 23, 2023. https://www.rvcfire.org/resources/fire-stations.

Findings of Fact:

Less Than Significant Impact.

Original Project

According to the 2021 IS/MND, the original project would not directly induce substantial population growth in the area and would not result in the need for new or physically altered fire facilities to maintain acceptable service. The original project site is located approximately 13 miles west of Fire Station 40, which would serve the project site. Therefore, the 2021 IS/MND concluded that impacts would be less than significant.

Modified Project

The County of Riverside Fire Department (County Fire Department) provides fire services to the unincorporated areas of the County, including the project site, as well as to partner cities within the County. The department operates 101 fire stations in 10 divisions composed of 15-line battalions, providing fire suppression, emergency medical, technical rescue, fire prevention and related services. The equipment used by the department has the versatility to respond to both urban and wildland emergencies (RCFD 2021). Fire Station 40, located at 91350 66th Avenue, would serve the project site. Fire Station 40 is located approximately 13-miles east of the site.

The modified project would not directly induce substantial population growth in the area. Although the project would require fire protection and/or paramedic services in the event of an emergency, given the relatively low number of visitors that would use the project site and given that fire and emergency services already serve the project area, the project is not expected to result in the need for new or physically altered fire facilities, or to result in the station's inability to maintain acceptable service ratios, response times, or other performance objectives. The increase in demand for fire protection services due to the modified project would result in a less than significant impact.

As such, the modified project would not change local fire protection response times or affect demand for fire protection services in the project area. Therefore, impacts associated with fire protection services would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
31. Sheriff 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 in regard to sheriff services?	☐	☐	☒	☐

Source(s):
County of Riverside. (2021). County of Riverside General Plan – Safety Element. Revised September 28, 2021. https://planning.rctlma.org/Portals/14/genplan/2021/elements/Ch06_Safety_092821.pdf

Findings of Fact:

Less Than Significant Impact.

Original Project

According to the 2021 IS/MND, the original project would not directly induce substantial population growth in the area and would not add a new strain on sheriff functions. The project site is located approximately 6.6 miles south of the Thermal Sheriff Station. Therefore, the 2021 IS/MND concluded that impacts would be less than significant.

Modified Project

The project site is served by the Riverside County Sheriff's Department (County Sheriff's Department) (County of Riverside 2021). In the event of an emergency, the Thermal Sheriff Station, located at 86625 Airport Boulevard, would respond to the site. The Thermal Sheriff Station is located approximately 6.6-miles north of the project site.

The modified project would not directly induce substantial population growth in the area. Although the project could require sheriff services, given the relatively low number of visitors that would use the project site and given that sheriff services already serve the project area, the modified project is not anticipated to add a new strain on the existing sheriff functions. The increase in demand for sheriff protection services due to the modified project would result in a less than significant impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
32. Schools 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 in regard to school services?	☐	☐	☐	☒

Source(s):
Coachella Valley Unified School District. Our Schools. Accessed March 23, 2023. https://www.cvusd.us/our-schools

Findings of Fact:

No Impact.

Original Project

According to the 2021 IS/MND, the original project would not involve a housing component that would result in population growth and increased demands on schools within the area. Therefore, the 2021 IS/MND concluded that no impact to schools would occur.

Modified Project

The closest schools are Desert Mirage High School (86150 Avenue 66), Toro Canyon Middle School (86150 Avenue 66), and Las Palmitas Elementary School (86150 Avenue 66), which are located about 3.2 miles northeast from the project site. The modified project does not involve a housing component that would result in a significant population growth and increased demands on existing schools within the area. Therefore, no impact would occur in this regard.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
33. Libraries 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 in regard to library services?	☐	☐	☐	☒

Source(s):
Riverside County Library System. Mecca. Accessed March 23, 2023. https://www.rivlib.net/branch/mecca

Findings of Fact:

No Impact.

Original Project

According to the 2021 IS/MND, the original project would not involve a housing component or increase employment opportunities that would result in population growth within the area. The 2021 IS/MND determined that additional demands on libraries would not occur and that there would be no impact in this regard.

Modified Project

The closest library is the Mecca Library (91260 Avenue 66), which is part of the Riverside County Library system and is located 8.8 miles from the project site. The modified project would increase employment from 12 staff to 70, full-time, seasonal staff and is expected to be staffed by local/regional residents. The modified project does not involve a housing component that would result in significant population growth within the area requiring additional demands on other public facilities, such as libraries. Therefore, no impact would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
34. Health 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 in regard to health services?	☐	☐	☐	☒

Source(s): N/A

Findings of Fact:

No Impact.

Original Project

According to the 2021 IS/MND, the original project would not involve a housing component or increase employment opportunities that would result in population growth within the area. Therefore, the 2021 IS/MND determined that additional demands on health care services would not result from the original project and that no impact would occur.

Modified Project

The nearest hospital is the John F. Kennedy memorial Hospital (47111 Monroe Street, Indio), which is located approximately 15 miles from the project site. The modified project would increase employment from 12 staff to 70, full-time, seasonal staff and is expected to be staffed by local/regional residents. The modified project would not involve a housing component or increase employment opportunities that would result in significant population growth within the area. Therefore, additional demands on other public facilities, such as health care services would not occur as a result of modified project implementation.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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

Source(s):
County of Riverside Ordinance No. 460, Section 10.35 (Regulating the Division of Land – Park and Recreation Fees and Dedications) and Ordinance No. 659 (Establishing Development Impact Fees),

Findings of Fact:

a-c) **No Impact.**

Original Project

A significant impact would occur if the project increased the use of existing parkland and recreational facilities so as to accelerate or induce their physical deterioration. The County offers a range of parks and recreational opportunities. However, parks and recreational facilities in the community of Thermal are limited and the closest golf course is the Coral Mountain Golf Club located in the City of La Quinta, approximately 4.5 miles northwest of the original project site. According to the 2021 IS/MND, the original project would not increase the use of existing parkland or result in their accelerated deterioration; therefore, the 2021 IS/MND determined that no impact would occur.

Modified Project

The modified project would provide the expansion of existing golf course facility services and operations. The project site is not located within a recreation or park district with a Community Parks and Recreation Plan. Therefore, no impact would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
36. Recreational Trails a) Include the construction or expansion of a trail system?	☐	☐	☐	☒

Source(s):
Riverside County General Plan Figure C-6 Trails and Bikeway System

Findings of Fact:

a) **No Impact.**

Original Project

According to the 2021 IS/MND, the original project would develop a new golf course and would not include the construction or expansion of a trail. Therefore, the 2021 IS/MND determined that no impact would occur.

Modified Project

The modified project is the expansion of existing golf course facility services and operations at the project site. The modified project would not include the construction or expansion of a trail. No impact would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

TRANSPORTATION. Would the project:				
37. Transportation a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☒	☐
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?	☐	☐	☒	☐
d) Cause an effect upon, or a need for new or altered maintenance of roads?	☐	☐	☐	☒
e) Cause an effect upon circulation during the project's construction?	☐	☐	☒	☐
f) Result in inadequate emergency access or access to nearby uses?	☐	☐	☒	☐

Source(s):
Michael Baker International. *Jeule Ranch Golf Club Expansion – Transportation Screening Analysis*. October 3, 2022.

Findings of Fact:

a) **Less Than Significant Impact.**

Original Project

Based on the 2021 IS/MND, the original project would generate 32 AM peak-hour trips and 52 PM peak-hour trips and as such, did not require an LOS analysis. The original project was determined to be consistent with applicable policies within the General Plan Circulation element that focus on the circulation system (County of Riverside 2020b). Additionally, the 2021 IS/MND determined that the original project would not severely delay, impact, or reduce the service level of transit in the area, and that bicyclist and pedestrian safety would be maintained at existing levels in the area, as there would be no changes to the existing pedestrian or bicycle circulation system. All pedestrian areas within the original project site would meet Americans with Disabilities Act requirements and adhere to County design guidelines. Therefore, the 2021 IS/MND concluded that the original project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and that a less than significant impact would occur.

Modified Project

A *Transportation Screening* Analysis was prepared for the modified project, which evaluated trip generation and Vehicles Miles Traveled (VMT); refer to Appendix B, *Transportation Screening Analysis* Table Traffic-1, *Project Trip Generation***,** provides a summary of trip generation estimates for the modified project based on the Institute of Transportation Engineer's (ITE) Trip Generation, 11th Edition, for Golf Course use (ITE Code 430) (ITE 2017). Table 1 demonstrates the trips associated with the modified project including the maximum number of members and guest at the facility at given time as well as the 70 employees. For purposes of this analysis, each member group consists of four players (one member and 3 guests) since most playing groups on a golf course consist of 4 players. With anticipated 250 members and guests on site at a given time, this translates to 62.5 member groups (250 players/4 players per group) that would be on site. At the peak time, these member groups would be spread over the total 32 available holes, those groups waiting to get on the course, and groups that have finished the course and are using the locker room and beverage and food service facilities.

Throughout the day, it is conservatively estimated that a total of approximately 125 member groups (62.5 member groups times 2 rounds per day) could attend the golf club through the day. Based on these assumptions, the modified project is expected to generate 1,390 daily trips with 80 AM and 132 PM peak hour trips. According to the Transportation Screening Analysis prepared for the original project (Dudek 2021), the 18-hole course with four employees and a crew of 12 members of a third-party company for periodic maintenance is estimated to generate 547 daily trips with 32 AM and 52 PM peak hour trips. After taking credit for the approved 18-hole golf course, the trips generated by the modified project would be 843 net new daily trips with 48 AM and 80 PM peak hour trips.

According to the *County of Riverside's Transportation Analysis Guidelines for Level of Service and Vehicle Miles Traveled* (VMT) dated December 2020, projects that generate less than 100 vehicle trips during the AM or PM peak hour are exempt from the traffic analysis requirements. Since the modified project is expected to generate less than 100 AM or PM peak hour trips, a traffic analysis is not provided in this assessment. Additionally, the modified project would be consistent with the following policies within the General Plan Circulation element focus on the circulation system (County of Riverside 2020b):

- **Policy C 1.7**: Encourage and support the development of projects that facilitate and enhance

the use of alternative modes of transportation, including pedestrian-oriented retail and activity centers, dedicated bicycle lanes and paths, and mixed-use community centers.

- **Policy C 3.1**: Design, construct, and maintain Riverside County roadways as specified in the Riverside County Road Improvement Standards and Specifications. The standards shown in Figure C-4 may be modified by Specific Plans, Community Guidelines, or as approved by the Director of Transportation if alternative roadway standards are desirable to improve sustainability for the area.
- **Policy C 3.2**: Maintain the existing transportation network, while providing for future expansion and improvement based on travel demand, and the development of alternative travel modes.
- **Policy C 3.10**: Require private and public land developments to provide all onsite 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.
- **Policy C 3.15**: Provide adequate sight distances for safe vehicular movement at a road's design speed and at all intersections.
- **Policy C 3.24**: Provide a street network with quick and efficient routes for emergency vehicles, meeting necessary street widths, turn-around radius, secondary access, and other factors as determined by the Transportation Department in consultation with the Fire Department and other emergency service providers.
- **Policy C 3.25**: Restrict on-street parking to reduce traffic congestion and improve safety in appropriate locations such as General Plan roadways.
- **Policy C 4.1**: Provide facilities for the safe movement of pedestrians within developments, as specified in the Riverside County Ordinances Regulating the Division of Land of the County of Riverside.
- **Policy C 17.1**: Develop Class I Bike Paths, Class II Bike Lanes and Class I Bike Paths/Regional Trails (Combination Trails) as shown in the Trails Plan (Figure C-7), to the design standards as outlined in the California Department of Transportation Highway Design Manual, adopted Riverside County Design Guidelines (for communities that have them), the Riverside County Regional Park and Open Space Trails Standards Manual, and other Riverside County Guidelines.

As such, the modified project is not expected to severely delay, impact, or reduce the service level of transit in the area. Bicyclist and pedestrian safety would be maintained at existing levels in the area, given that that modified project does not propose changes to the existing pedestrian or bicycle circulation system. Pedestrian areas within the modified project site would meet Americans with Disabilities Act requirements and adhere to County design guidelines. Therefore, impacts would less than significant.

Table Transportation-1
Project Trip Generation

Land Use	Intensity	Daily Trips	AM Peak Hour Trips			PM Peak Hour Trips		
			Total	In	Out	Total	In	Out
Modified Project								
Golf Course Membership[1]	125 Member Groups	1,250	72	57	15	119	63	56
Golf Course Employees	70 Employees	140	8	6	2	13	7	6
Total Trip Generation		1,390	80	63	17	132	70	62
Approved Golf Course (Previous Transportation Screening Analysis)								
Project Trip Generation Summary[2]		547	32	25	7	52	27	25
Net New Total Trip Generation								
NET NEW TOTAL TRIP GENERATION (Modified Project Plus Approved Golf Course)		**843**	**48**	**38**	**10**	**80**	**43**	**37**

Source: Jeule Ranch Golf Club Expansion – Transportation Screening Analysis. October 3, 2022.

1 = Anticipated players on site is 250 players (members and guests). Assuming four players per Member Group (1 member + 3 guests), 62.5 Member Groups (250 people/4 players per group) could be on site at any given time. This trip generation assumes approximately 125 total Member Groups (62.5 groups x 2-rounds per day) use the golf course facilities throughout the day.

2 = Trip Generation Summary assumed an 18-hole golf course with four full-time employees for operations and a crew of 12 members from a third-party company for periodic maintenance according to the Transportation Screening Analysis dated October 21, 2021, prepared by Dudek.

b) **Less Than Significant Impact.**

Original Project

Based on the 2021 IS/MND, the original project would meet the Vehicle Miles Traveled (VMT) screening criteria of Small Project. In addition, the original project's GHG emissions are significantly lower than the 3,000 MT CO2e per year threshold used for screening by the County. As such, the 2021 IS/MND concluded that the original project would result in a less than significant VMT impact.

Modified Project

According to the County's *Transportation Analysis Guidelines (TAG) for LOS and VMT*, the CEQA analysis requires an evaluation of project impact related to Vehicle Miles Traveled (VMT). The screening criteria to determine if a project is anticipated to result in a less than significant transportation impact along with VMT metrics and thresholds of significance are included in the County's TAG. Projects that meet the VMT screening criteria identified below are assumed to result in a less than significant transportation impact under CEQA and do not require a detailed quantitative VMT assessment.

The County uses the following criteria for development projects that can be presumed to cause a less than significant impact:

- **Small Projects:** Project that meets one of the following criteria:
  - Single Family Housing projects less than or equal to 110 Dwelling Units; or
  - Multi Family (low rise) Housing projects less than or equal to 147 Dwelling Units; or
  - Multi Family (mid-rise) Housing projects less than or equal to 194 Dwelling Units; or
  - General Office Building with area less than or equal to 165,000 SF; or
  - Retail buildings with area less than or equal to 60,000 SF; or
  - Warehouse (unrefrigerated) buildings with area less than or equal to 208,000 SF; or
  - General Light Industrial buildings with area less than or equal to 179,000 SF

    - Project GHG emissions less than 3,000 Metric Tons of Carbon Dioxide Equivalent (MTCO2e) as determined by a methodology acceptable to the Transportation Department; or
    - Unless specified above, project trip generation is less than 110 trips per day per the ITE Manual or other acceptable source determined by Riverside County.
- **Transit Priority Area:** Project that meet both of the following criteria:
    - Within a ½ mile of an existing major transit stop; and
    - Maintains a service interval frequency of 15 minutes or less during the morning and afternoon peak commute periods.
- **Local-serving Retail:** Project that meet both of the following criteria:
    - No single store on-site exceeds 50,000 square feet; and
    - Project is local serving as determined by the Transportation Department
- **Affordable Housing**: Project that includes:
    - A high percentage of affordable housing is provided as determined by the Riverside County Planning and Transportation Departments
- **Local Essential Service**:
    - Project is local serving as determined by the Transportation Department; and
    - Local-serving and Day care center; or
    - Police or Fire facility; or
    - Medical/Dental office building under 50,000 square feet; or
    - Government offices (in-person services such as post office, library, and utilities); or
    - Local or Community Parks
- **Map-based Screening**: Project's area of development is under threshold as shown on screening map as allowed by the Transportation Department
- Redevelopment Project: Project replaces an existing VMT-generating land use and does not result in a net overall increase in VMT.

As discussed in the *Transportation Screening Analysis*, the VMT screening criteria was evaluated and concluded that the modified project meets one of the Screening Criteria (Small Projects). Therefore, a project-specific VMT assessment is not required. Based on the air quality analysis conducted for the modified project, the modified project's greenhouse gas emissions would be approximately 1,113.78 MT CO2e per year, which is significantly lower than the 3,000 MT CO2e per year threshold used for screening by Riverside County. Therefore, similar to the original project, the modified project meets the screening criteria of "Small Project" and the modified project would result in a less than significant VMT impact.

c) **Less Than Significant Impact.**

Original Project

Based on the 2021 IS/MND, the project original does not include construction of new roadways, modifications to any existing roadway or intersection geometry. Any and all improvements required within the public right-of-way would be required to comply with design standards set forth by the County to ensure that the original project does not introduce an incompatible design feature that would impede operations on project-adjacent roadway facilities. Therefore, the original project would not increase hazards due to a geometric design feature or incompatible use. The 2021 IS/MND concluded that impacts would be less than significant.

Modified Project

Similar to the original project, the modified project does not propose construction of new roadways, modifications to any existing roadway or intersection geometry. Therefore, the modified project would not increase hazards due to a geometric design feature or incompatible use. Impacts would be less than significant in this regard.

d) **No Impact.**

Original Project

Based on the 2021 IS/MND, access to the original project site is provided via an entrance driveway along Lemon Blossom Lane. The original project would not construct a new or altered maintenance of a nearby road. Therefore, the 2021 IS/MND concluded that no impact would occur.

Modified Project

Similar to the original project, the modified project has the same access point via an entrance driveway along Lemon Blossom Lane and the modified project does not propose construction of a new or altered maintenance of a nearby road. No impact would occur in this regard.

e) **Less Than Significant Impact.**

Original Project

Based on the 2021 IS/MND, construction of the original project would occur completely within the project site boundaries. As such, the original project would not require temporary road closures during construction. The 2021 IS/MND concluded that impacts related to circulation during construction of the original project would be less than significant.

Modified Project

Similar to the original project, construction of the modified project would occur completely within the project site boundaries and no temporary road closures would be required. As such, a less than significant impact would occur in this regard.

f) **Less Than Significant Impact.**

Original Project

Based on the 2021 IS/MND, the original project would comply with all local, regional, state, and federal guidelines related to emergency access. Emergency vehicles would be able to access the single entrance/exit or maintenance/security gate within the original project site. The original project site is accessible to emergency responders during construction and operation of the original project. Therefore, the 2021 IS/MND determined that the original project would not result in inadequate emergency access and that impacts would be less than significant.

Modified Project

Similar to the original project, the modified project site is accessible to emergency responders during construction and operation and the modified project would comply with all local, regional, state, and federal guidelines related to emergency access. Therefore, a less than significant impact would occur in this regard.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
38. Bike Trails a) Include the construction or expansion of a bike system or bike lanes?	☐	☐	☐	☒

Source(s): N.A

Findings of Fact:

No Impact.

Original Project

Based on the 2021 IS/MND, the original project would not include construction or expansion of a bike system or bike lanes. Therefore, the 2021 IS/MND concluded that no impact would occur in this regard.

Modified Project

Similar to the original project, the modified project would not include construction or expansion of a bike system or bike lanes. No impact would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
TRIBAL CULTURAL RESOURCES. Would the project cause a substantial adverse change in the significance of a Tribal Cultural Resource, defined in Public Resources Code section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:				
39. Tribal Cultural Resources a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?	☐	☐	☐	☒
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be	☐	☐	☐	☒

significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? (In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.)	

Source(s): County of Riverside, Archaeologist

Findings of Fact:

a-b) **No Impact.**

Original Project

Based on the 2021 IS/MND, in compliance with Assembly Bill 52 (AB52), notices regarding the original project were mailed to all requesting tribes on September 21, 2021. Consultation was requested by the Torres Martinez Desert Cahuilla Indians and the Agua Caliente Band of Cahuilla Indians. Consultation was held with Agua Caliente on November 2, 2021. Torres Martinez requested consultation via email on October 22, 2021. Both Tribes expressed concerns that the original project has the potential for as yet unidentified subsurface tribal cultural resources. As a result, the original project was required to implement MM-TCR-1 (Native American monitoring) and MM-TCR-2 (native plant protocol), which were concurred upon by both Tribes. Therefore, the 2021 IS/MND concluded that the original project would have a less than significant impact to Tribal Cultural Resources with implementation of mitigation.

Modified Project

Per the County's Archaeologist, consultation under AB 52 is not required for the modified project.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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

Source(s):
UWMP (Urban Water Management Plan). 2021. Coachella Valley Water District 2020 Urban Water Management Plan. Accessed September 2022. http://www.cvrwmg.org/wp-content/uploads/2021/08/Final-Coachella-Valley-RUWMP.pdf.

Findings of Fact:

a) **Less Than Significant Impact.**

Original Project

The 2021 IS/MND concluded that the project would not require the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage systems. Under existing conditions (as a large-scale citrus farm), the site requires irrigation. The project would also require irrigation and would receive water for irrigation from two (2) on-groundwater wells. With implementation of the project, on-site water use would be reduced by approximately 40 percent as compared to water used on the site as a citrus farm.

Modified Project

Under existing conditions, the golf course project site receives irrigation (non-potable) water for the citrus groves, golf course turf, and landscape via the two-acre reservoir pond which is replenished via Canal water (Colorado River water), and the two (2) existing groundwater wells.

The modified project includes a non-transient non-community water system (NTNC WS). The water system would be located near the project entrance with the storage tanks and pump station on the west side of the maintenance area. The on-site potable water system would include two (2), 20,000-gallon tanks: one tank would store well water and one tank would store water after it has been treated by a Reverse Osmosis (RO) system. The tanks' dimensions would be approximately 12 feet high and 28 feet long and they would be either mounted on concrete slabs or partially underground. A 100-linear-foot of 6-inch water pipe would be installed from the well to the booster and 2,700 linear-foot 4-inch water pipe booster to the interim clubhouse.

In addition, the proposed mobile restrooms would have self-contained, portable septic tanks and the associated wastewater would be transported off-site daily to CVWD's Water Reclamation Plant No 4 in Thermal. Sanitation water would be temporarily held within the self-contained, mobile restroom trailers (septic tanks). Food and drink facilities would require self-containing holding tanks for the Airstream trailers and a dry well for the bar within the Club Dining Tent for disposal of sink water. A 6,000-gallon septic tank with an Advanced Treatment System (ATS) and a 5,000-square-foot leach field would be installed for wastewater generated at the club house.

Stormwater is captured on-site within various design features of the golf course and retention basins. The modified project's storm drain system has been designed to retain the 100-year storm runoff within the site boundaries, as well as maintain at least 1 foot of freeboard between 100-year water surface elevation and building pads. The 100-year storm water runoff volume will be contained within retention basins constructed in support of the project's Interim Improvements Precise Grading Plan. The storm drain system in the interior streets will convey the 100-year storm. As a result of this on-site storm drain system, this project will not increase downstream flow or impact existing storm drain facilities.

Therefore, as the project's proposed water facilities would be self-contained, and because the project would not impact existing storm drain facilities, a less than significant impact would occur.

b) **Less Than Significant Impact.**

Original Project

As an urban water supplier, CVWD is required to assess the reliability of its water supply service under the multiple-dry year scenario. As such the 2020 Urban Water Management Plan (UWMP) prepared for CVWD, contains projected water supply and demand for normal year, single dry year, and multiple-year dry year scenarios. According to the 2020 UWMP, a normal year, single dry year, and multiple dry year are shown to be fully reliable until 2045 (UWMP 2021). As such, the original project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. The 2021 IS/MND concluded that impacts would be less than significant.

Modified Project

The modified project proposes to increase staffing and membership and provide additional services to support the golf course. The project would deliver drinking water (via truck delivery) for use during this phase and would not rely on nor significantly impact water supplies. Therefore, a less than significant impact would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
41. Sewer a) Require or result in the construction of new wastewater treatment facilities, including septic systems, or expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects?	☐	☐	☒	☐
b) Result in a determination by the wastewater treatment provider that serves or may service the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐

Source(s):
UWMP (Urban Water Management Plan). 2021. Coachella Valley Water District 2020 Urban Water Management Plan. Accessed August 2021. http://www.cvrwmg.org/wp-content/uploads/2021/08/Final-Coachella-Valley-RUWMP.pdf.

Findings of Fact:

a) **Less Than Significant Impact.**

Original Project

Based on the 2021 IS/MND, the original project would not result in the construction of new wastewater treatment facilities, including septic tanks, nor would the project require or result in the expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects. The original project requires irrigation and receives water for irrigation from two wells owned by CVWD. Therefore, the 2021 IS/MND concluded that this impact is less than significant.

Modified Project

Similar to the original project, the modified project would not connect to the municipal sewer system. Sanitation water would be temporarily held within septic tanks. Food and drink facilities would require self-containing holding tanks for the Airstream trailers and a dry well for the bar within the Club Dining Tent for disposal of sink water. A 6,000-gallon septic tank with an Advanced Treatment System (ATS) and a 5,000-square-foot leach field would be installed for wastewater generated at the club house. The proposed mobile restroom would have a self-contained portable septic tank and the associated wastewater would be transported off-site daily to CVWD's Wastewater Reclamation Plant No. 4 located in Thermal. Impacts would be less than significant.

b) **Less Than Significant Impact.**

Original Project

The 2021 IS/MND concluded that, because the original project requires less water than under the previous existing conditions and water is anticipated to be met during normal year, single dry year, and multiple dry year scenarios, impacts would be less than significant.

Modified Project

The proposed mobile restrooms would have self-contained, portable septic tanks. As such, the modified project would generate wastewater; however, wastewater generated would be nominal. Wastewater would be transported from the septic tanks to the CVWD Sanitation System located at Wastewater Reclamation Plant (WRP) No. 4 is located in the community of Thermal and would treat wastewater produced by the project. WRP No. 4 has the capacity to treat 9.9 million gallons of wastewater per day. Per the 2020 UWMP, wastewater collected at WRP No. 4 is under the daily capacity (UWMP 2021). Thus, because the modified project would generate nominal wastewater and WRP No. 4 has capacity to treat wastewater produced from the modified project, impacts would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
42. Solid Waste a) Generate solid waste in excess of State or Local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
b) Comply with federal, state, and local management and reduction statutes and regulations related to solid wastes including the CIWMP (County Integrated Waste Management Plan)?	☐	☐	☒	☐

Source(s):
Cal Recycle (California Department of Resources, Recycling, and Recovery). 2021. Solid Waste Information System Facility/Site Search [Database search applying filters: 'County: Riverside';

'Regulatory Status: Permitted'; 'Operational Status: Active'; 'Facility Type: Disposal']. Accessed September 2022. https://www2.calrecycle.ca.gov/swfacilities/Directory/.

Findings of Fact:

a) **Less Than Significant Impact.**

Original Project

Riverside County's Waste Management Department manages the County's solid waste system through the provision of facilities and programs that meet or exceed all applicable local, state, federal, and land use regulations. The department manages several Riverside County Sanitary Landfills: Badlands, Blythe, Desert Center, El Sobrante, Lamb Canyon, and Oasis. Each of these landfills has sufficient capacity to accommodate the project's minimal solid waste disposal needs and are permitted to receive non-hazardous municipal solid waste (Cal Recycle 2021).

Based on the 2021 IS/MND, the original project would not provide connections to sewer lines or contain a septic system, and as such, the original project would not result in construction of new wastewater treatment facilities nor connect to wastewater utilities. Therefore, the 2021 IS/MND determined that no impact would occur in this regard.

Modified Project

Upon completion of the minimal construction activities associated with the modified project, the site would continue to be largely open space with golf course facility services and operations (including interim structures including tents and trailers with a water well and septic system). Based on the CalRecycle waste generation rate for golf courses of 0.5 pounds per golfer per day, the modified project would generate approximately 125 pounds of waste per day.[27] Therefore, impacts would be less than significant.

b) **Less Than Significant Impact.**

Original Project

Based on the 2021 IS/MND, the original project is required to comply with all applicable federal, state, and local agency regulations related to solid waste. Under AB 939, the Integrated Waste Management Act of 1989, local jurisdictions are required to develop source reduction, reuse, recycling, and composting programs to reduce the amount of solid waste entering landfills. In addition, the state has set an ambitious goal of 75 percent recycling, composting, and source reduction of solid waste by 2020. To help reach this goal, the state has adopted AB 341 and AB 1826. AB 341 is a mandatory commercial recycling bill, and AB 1826 is mandatory organic recycling. Waste generated by the project would enter the County's waste stream but would not adversely affect the County's ability to meet AB 939, AB 341, or AB 1826, since the original project's waste generation would represent a nominal percentage of the waste created within the County. Therefore, the 2021 IS/MND concluded that impacts would be less than significant in this regard.

Modified Project

Similar to the original project, the modified project would generate a nominal amount of construction waste and would comply with federal, state, and local management and reduction statutes and

[27] California Department of Resources Recycling and Recovery (CalRecycle) website, accessed 3-27-23, https://www2.calrecycle.ca.gov/wastecharacterization/general/rates

regulations related to solid wastes including the County Integrated Waste Management Plan. Impacts would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
43. Utilities Would the project impact the following facilities requiring or resulting in the construction of new facilities or the expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects?				
a) Electricity?	☐	☐	☒	☐
b) Natural gas?	☐	☐	☒	☐
c) Communications systems?	☐	☐	☒	☐
d) Street lighting?	☐	☐	☐	☒
e) Maintenance of public facilities, including roads?	☐	☐	☐	☒
f) Other governmental services?	☐	☐	☐	☒

Source(s): N/A

Findings of Fact:

a-c) **Less Than Significant Impact.**

Original Project

Electrical service is currently provided to the site by the Imperial Irrigation District (IID) with support of several generators. Based on the 2021 IS/MND, the original project consists of largely be open space and would not develop any buildings that would require electricity, natural gas, or communication services. Additionally, the original project would not include improvements outside the project site. As such, the original project would not require or result in the construction of new facilities or the expansion of existing facilities regarding electricity, natural gas, communications systems, street lighting, public facilities, or other governmental services. Therefore, the 2021 IS/MND concluded that no impact would occur.

Modified Project

As part of the modified project, fiber optic internet is proposed which would require the installation of an approximately 15-foot-tall tower at the facility. Electrical equipment would be installed and located along the entire perimeter of the site, including security cameras, antenna poles, Carson boxes, and power panels. Upon completion of construction, the site would continue to consist of largely open space and recreational uses on-site and would not include any features that would have the potential to require or result in the construction of new facilities or the expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects. Impacts would be less than significant.

d-f) **Less Than Significant Impact.**

Original Project

Based on the 2021 IS/MND, the original project is located on private property and does not propose any street lighting or public roadways. Since the original project would not include improvements outside the project site, the original project would not require or result in the construction of new facilities or the expansion of existing facilities regarding street lighting, public facilities, or other governmental services. As such, the 2021 IS/MND concluded that no impact would occur in this regard.

Modified Project

Similar to the original project, the modified project does not propose any improvements outside the site and would not require or result in the construction of new facilities or the expansion of existing facilities regarding street lighting, public facilities, or other governmental services. Therefore, a less than significant impact would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
WILDFIRE. If located in or near a State Responsibility Area ("SRA"), lands classified as very high fire hazard severity zone, or other hazardous fire areas that may be designated by the Fire Chief, would the project:				
44. Wildfire Impacts a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐
e) Expose people or structures either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☒	☐

Source(s):
Riverside County General Plan Figure S-11 "Wildfire Susceptibility", GIS database, Project Application Materials

Findings of Fact:

a) **Less Than Significant Impact.**

Original Project

Based on the 2021 IS/MND, the original project must comply with the County's EOP for both construction and operation. Construction activities would be required to implement adequate and appropriate measures to facilitate the passage of persons and vehicles through and around any required road closures in accordance with the County's EOP. Operation of the original project would not interfere with the County's EOP because the entrance to the project site would remain accessible for emergency vehicles. The site owner would be required to design, construct, and maintain the original project to comply with applicable local, regional, state, and federal requirements related to emergency access and evacuation plans. Therefore, the 2021 IS/MND concluded that adherence to these requirements would ensure that potential impacts related to this issue would be less than significant.

Modified Project

Similar to the original project, the modified project must comply with the County's EOP for both construction and operation as described above. Impacts in this regard would be less than significant.

b) **Less Than Significant Impact.**

Original Project

Based on the 2021 IS/MND, a review of CAL FIRE maps show that the original project site is located in an SRA and is within a moderate fire hazard severity zone (CAL FIRE 2021). Construction of the original project would comply with Section 8.32.040 of the County's Municipal Code, which adopts the 2019 California Fire Code (CFC). The site would continue to largely consist of open space upon completion of construction. In the event of a wildfire in the areas proximate to the project site, any persons at the project site would evacuate the area, as directed by local fire officials. Therefore, the 2021 IS/MND determined that impacts would be less than significant.

Modified Project

Under existing conditions, the site is an approved golf course under construction (as of March 20, 2023). Upon completion of construction of the original project and modified project, the site would continue to be largely open space with minimal improvements being implemented as part of the proposed expansion of golf course facility services and operations (including interim structures including tents and trailers with a water well and septic system). Construction of the modified project would comply with Section 8.32.040 of the County's Municipal Code, which adopts the 2019 CFC. Impacts in this regard would be less than significant.

c) **Less Than Significant Impact.**

Original Project

Based on the 2021 IS/MND, upon completion of construction, the original project site would continue to consist of largely open space and recreational uses on-site and would not include any infrastructure or features that would have the potential to exacerbate fire risk or result in temporary or ongoing impacts to the environment. Therefore, the 2021 IS/MND concluded that impacts would be less than significant.

Modified Project

Similar to the original project, the project site would continue to consist of largely open space and recreational uses and would not include any infrastructure or features that would have the potential to exacerbate fire risk or result in temporary or ongoing impacts to the environment. Impacts would be less than significant.

d) **Less Than Significant Impact.**

Original Project

Based on the Riverside County General Plan Figure S-10, Dam Failure Inundation Zones, the original project site is located outside of a dam inundation area. Additionally, the original project site is not located in an area susceptible to landslides (County of Riverside 2015). Therefore, the 2021 IS/MND determined that it is unlikely that the original project would expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire stability, or drainage change and that impacts would be less than significant.

Modified Project

The project involves the same project site as analyzed in the 2021 IS/MND. Similar to the original project, the modified project would not expose people or structures to significant risks, including

downslope or downstream flooding or landslides, as a result of runoff, post-fire stability, or drainage change and impacts would be less than significant.

e) **Less Than Significant Impact.**

Original Project

Construction of the original project would comply with Section 8.32.040 of the County's Municipal Code, which adopts the 2019 CFC. Upon completion of construction, the original project would continue to be largely open space. Therefore, the 2021 IS/MND concluded that the original project would not expose people or structures either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires and that a less than significant impact would occur.

Modified Project

Similar to the original project, construction of the modified project would comply with Section 8.32.040 of the County's Municipal Code, which adopts the 2019 CFC. Upon completion of construction of the original and modified project, the site would continue to be largely open space with minimal improvements being implemented as part of the proposed expansion of golf course facility services and operations (including interim structures including tents and trailers with a water well and septic system). In the event of a wildfire in the areas proximate to the modified project site, any visitors at the site would evacuate the area, as directed by local fire officials. Therefore, the project would not expose people or structures either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. A less than significant impact would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
MANDATORY FINDINGS OF SIGNIFICANCE. Does the project:				
45. Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self- sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐

Source(s): N/A

Findings of Fact:

Less Than Significant Impact

Original Project

The 2021 IS/MND analyzed environmental effects associated with the golf course development including direct, indirect, and cumulative impacts. The 2021 IS/MND disclosed the potential environmental impacts, the level of significance prior to mitigation, approved project requirements that were required by law, feasible mitigation measures, and the level of significance after the incorporation of mitigation measures. The Biological Resources section of the 2021 IS/MND addressed biological effects related to the reduction of fish or wildlife habitat, the reduction of fish or wildlife populations, and the reduction or restriction of the range of special-status species as a result of the original project's implementation. The Cultural Resources sections of the 2021 IS/MND addressed impacts related to California history and prehistory, historic resources, archaeological resources and paleontological resources. The 2021 IS/MND concluded that implementation of the project would not substantially degrade the environment with adherence to the mitigation program.

Modified Project

Implementation of the modified project would not substantially degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause fish or wildlife populations to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal. The approximate 292.16-acre site has already undergone massive grading and contouring as part of the original project. Final grading and shaping of the golf course site to construct the greens, tees, and bunkers is complete and turf has been planted.

The modified project would add facilities to support the golf course and would not result in significant alterations to fish or wildlife habitat. As discussed in the Biological Resources section of this Addendum, no listed or non-listed special-status wildlife species were observed during the biological surveys conducted in August and September 2021, and no federally or state-listed plant species have a potential to occur within the project site. There are also no riparian habitat or other sensitive natural community contained on the project site. As with all project sites adjacent to a conservation area, the modified project is required to adhere to the CVMSHCP Land Use Adjacency Guidelines, identified as MM BIO-2. With adherence to the Land Use Adjacency Guidelines, the modified project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state conservation plan.

As previously analyzed in the 2021 IS/MND, no historic sites were identified within the records search area of the project site or the 1-mile radius. No newly or previously recorded historic sites were identified within the project site as a result of the CHRIS records search, archival research, or the intensive-level pedestrian survey.

The modified project would not substantially degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife populations to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. Further, there are no known historical or pre-historical records associated with the site. Similar to the original project, impacts would be less than significant with adherence to the mitigation program.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No 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)?	☐	☐	☒	☐

Source(s): N/A

Findings of Fact:

Less Than Significant Impact.

Original Project

According to the 201 IS/MND, the approved project does not have impacts which are individually limited, but cumulatively considerable, with implementation of the mitigation measures identified in the 2021 IS/MND. The 2021 IS/MND concluded the project would result in either no impact, less than significant impact, or a less than significant impact with mitigation incorporated. The project's individual-level impacts would reduce the potential for these impacts to be considered part of a cumulative impact. The project would result in less than significant impact with mitigation incorporated.

Modified Project

A significant cumulative impact may occur if the project, in conjunction with related projects proposed for development in the County, would result in impacts that are less than significant when viewed separately but would be significant when viewed together. When considering the modified project in combination with other past, present, and reasonably foreseeable future projects in the vicinity of the revised project site, the modified project does not have the potential to cause impacts that are cumulatively considerable. As detailed in the above discussions, the modified project would not result in a significant and unmitigable impact in any environmental categories. In all cases, the impacts associated with the revised project are limited to the project site or are of such a negligible degree that they would not result in a significant contribution to a cumulative impact. Therefore, the modified project would not result in individually limited but cumulatively considerable impacts, when viewed in connection with the effects of past, current or probable future projects. Impacts would be less than significant with mitigation incorporated.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
47. Have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

Source(s): N/A

Findings of Fact:

Less Than Significant Impact.

Original Project

According to the 2021 IS/MND, the original project would not directly or indirectly cause substantial adverse effects on human beings. Impacts were determined to be less than significant with mitigation incorporated.

Modified Project

The modified project would not result in new potentially significant impacts compared to the original project. As evaluated throughout this document, the modified project would have no impact, a less than significant impact, or less than significant impact with mitigation with respect to the environmental resource topics. Therefore, the modified project would not directly or indirectly cause substantial adverse effects on human beings. Impacts would be less than significant with mitigation incorporated.

VI. EARLIER ANALYSES

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

This Addendum, Revision No. 1 to Plot Plan No. PPT210024 (PPT210024R1), relies upon and incorporates by reference the County of Riverside's CEQ/EA No. 210045 for PPT210024 for the project background and baseline conditions, including summary of potential environmental effects and related project materials.

Earlier Analyses Used, if any:

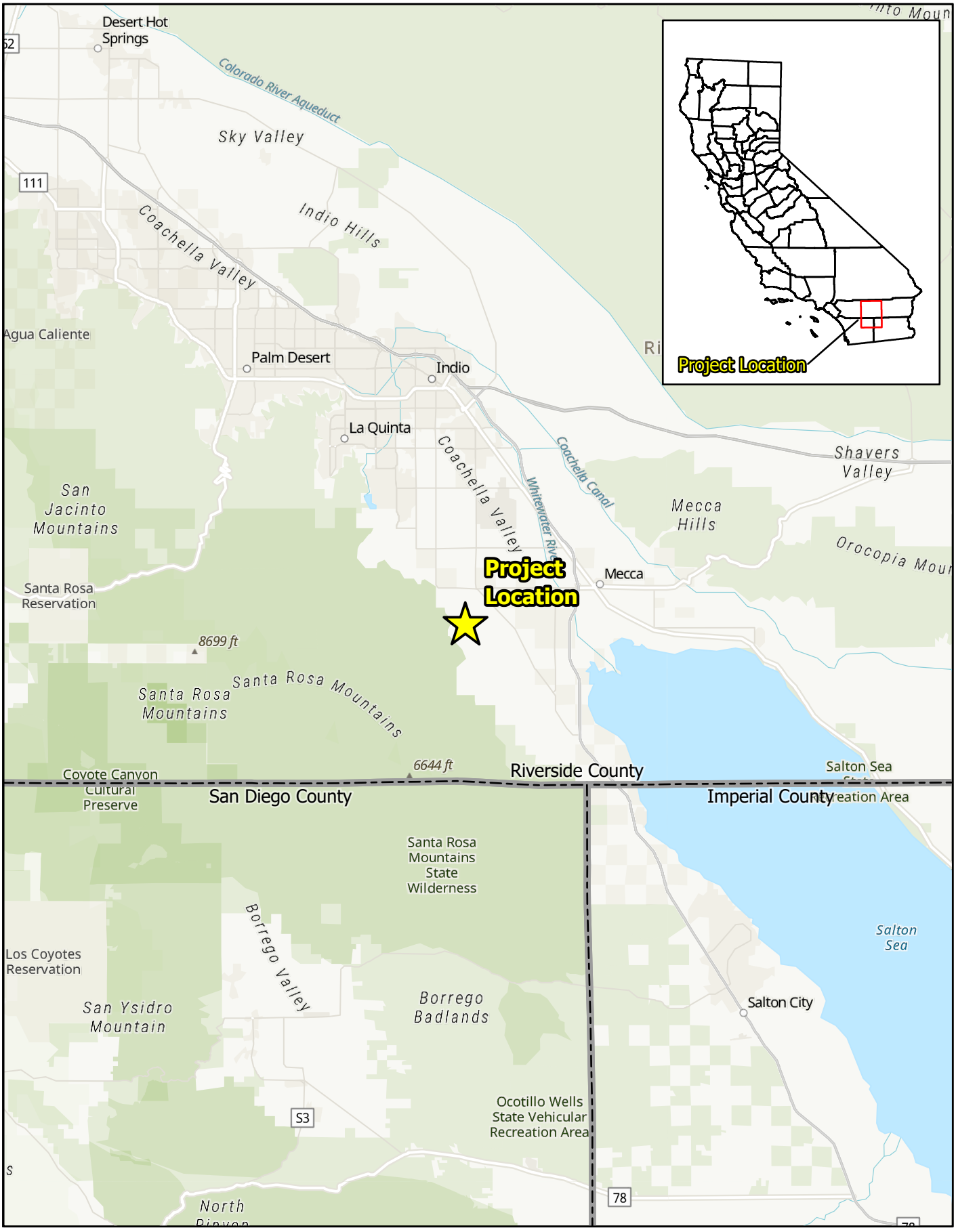
County of Riverside CEQ/EA No. 210045 for PPT210024 (Incorporated by reference pursuant to State CEQA Guideline Section 15150)

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

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

FIGURES

Index:



LADERA GOLF CLUB PROJECT

Michael Baker INTERNATIONAL

0 5 10 Miles

Source: ESRI

Project Location

Figure 1

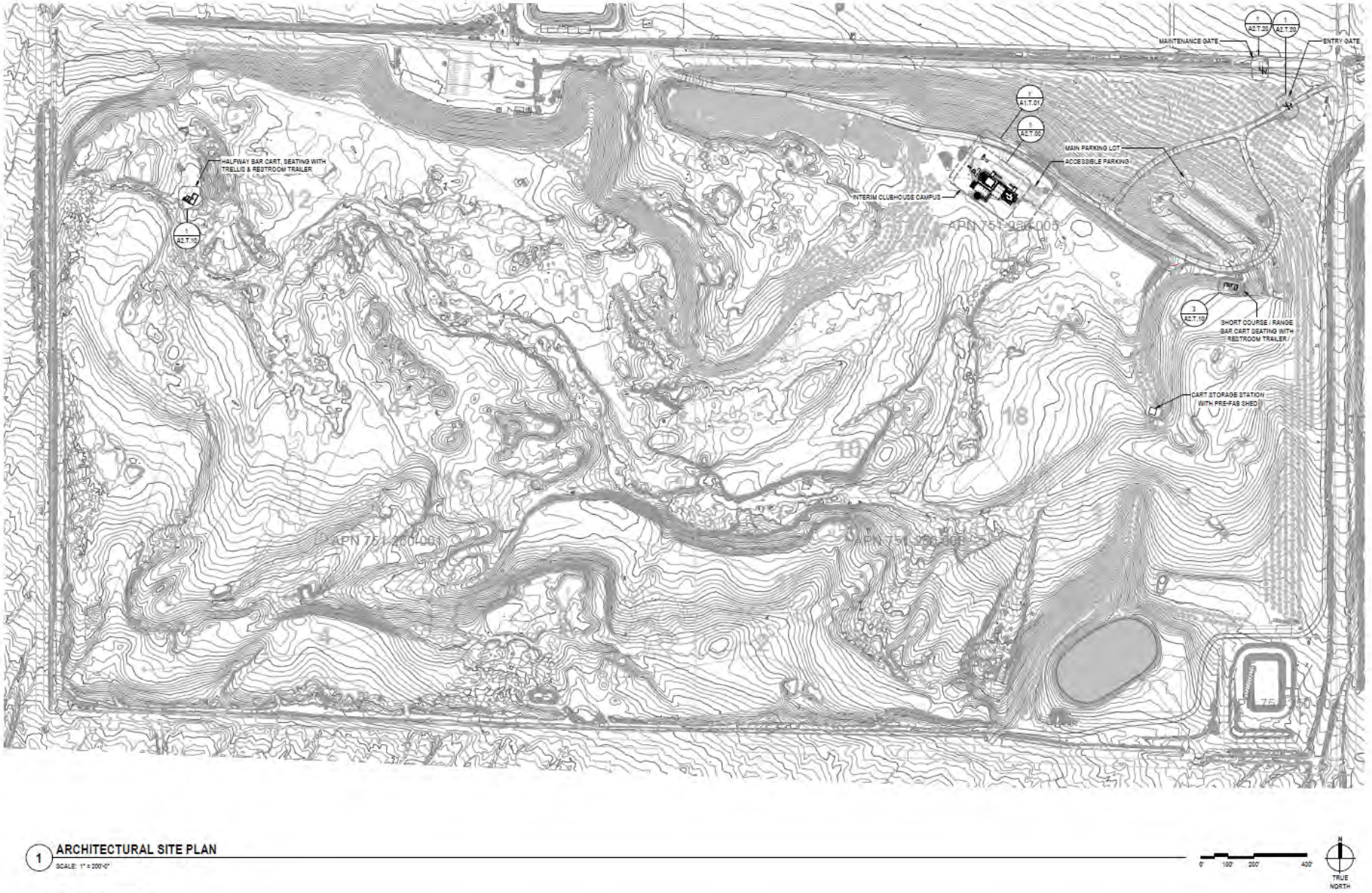
LADERA GOLF CLUB PROJECT

Michael Baker INTERNATIONAL

Source: ESRI, Nearmap

Aerial Photo, January 2023

Figure 2



LADERA GOLF CLUB PROJECT

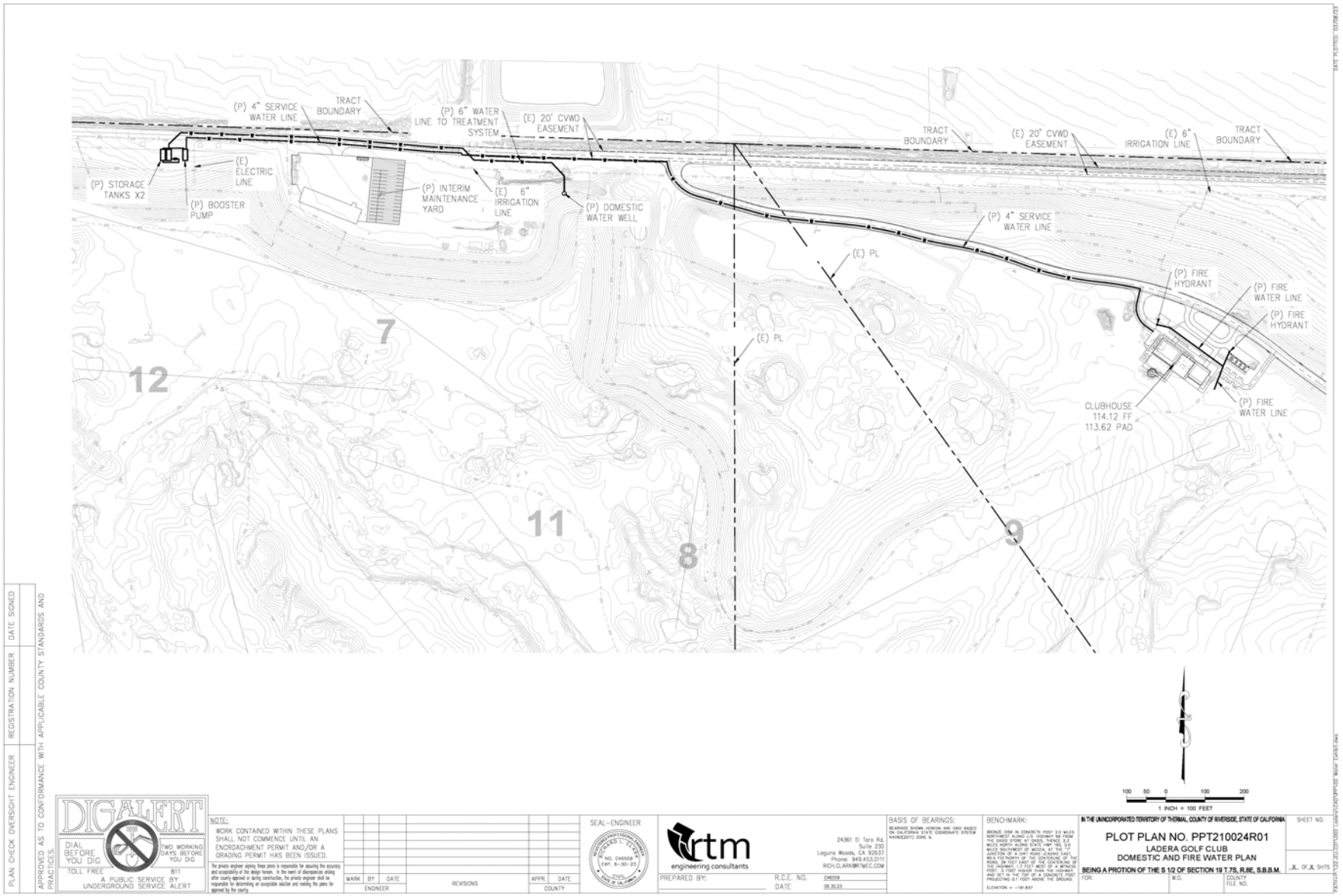
Michael Baker INTERNATIONAL

NOT TO SCALE

Source: Olson Kundig

Site Plan

Figure 3



LADERA GOLF CLUB PROJECT

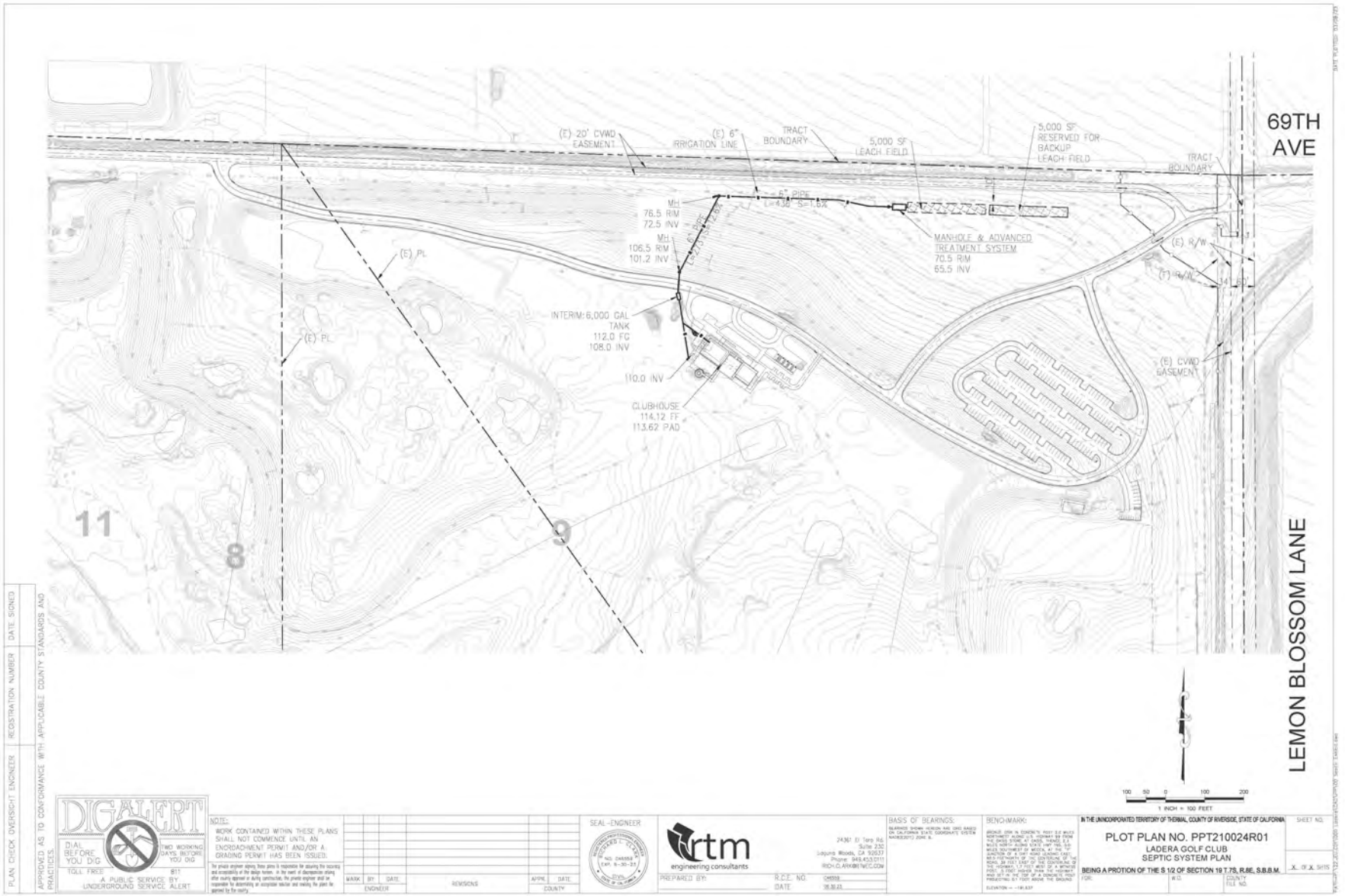
Michael Baker INTERNATIONAL

NOT TO SCALE

Source: Olson Kundig

Water Plan

Figure 4



LADERA GOLF CLUB PROJECT

Michael Baker INTERNATIONAL

NOT TO SCALE

Source: Olson Kundig

Septic Plan

Figure 5