

RIVERSIDE COUNTY PLANNING DEPARTMENT

Carolyn Syms Luna
Director

Handwritten initials: KI

613 B

Handwritten date: 09.24.2013

DATE: August 12, 2013

TO: Clerk of the Board of Supervisors

FROM: Planning Department - Riverside Office *nm*

SUBJECT: SPECIFIC PLAN NO. 325, AMENDMENT NO. 1 (CITRUS HEIGHTS), CHANGE OF ZONE NO. 7779 and TENTATIVE TRACT MAP NO. 36390 (FAST TRACK NO. 2013-05)
(Charge your time to these case numbers)

The attached item(s) require the following action(s) by the Board of Supervisors:

- | | |
|---|--|
| <input type="checkbox"/> Place on Administrative Action (Receive & File; EOT) | <input checked="" type="checkbox"/> Set for Hearing (Legislative Action Required; CZ, GPA, SP, SPA) |
| <input type="checkbox"/> Labels provided If Set For Hearing | <input checked="" type="checkbox"/> Publish in Newspaper: |
| <input type="checkbox"/> 10 Day <input type="checkbox"/> 20 Day <input type="checkbox"/> 30 day | (1st Dist) Press Enterprise |
| <input type="checkbox"/> Place on Consent Calendar | <input checked="" type="checkbox"/> Addendum to earlier Environmental Document |
| <input type="checkbox"/> Place on Policy Calendar (Resolutions; Ordinances; PNC) | <input checked="" type="checkbox"/> 10 Day <input type="checkbox"/> 20 Day <input type="checkbox"/> 30 day |
| <input type="checkbox"/> Place on Section Initiation Proceeding (GPIP) | <input checked="" type="checkbox"/> Notify Property Owners (app/agencies/property owner labels provided) |
| | Controversial: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |

Designate Newspaper used by Planning Department for Notice of Hearing:
(1st Dist) Press Enterprise

Documents to be sent to County Clerk's Office for Posting:

Notice of Determination
Fish & Game Receipt (CFG05886)

Do not send these documents to the County Clerk for posting until the Board has taken final action on the subject cases.

This item is the "hearing" for the project, but the "adoption" (Policy Calendar) for the same project is going on the same day and must be moved AFTER the hearing item.

Riverside Office • 4080 Lemon Street, 12th Floor
P.O. Box 1409, Riverside, California 92502-1409
(951) 955-3200 • Fax (951) 955-1811

Desert Office • 38686 El Cerrito Road
Palm Desert, California 92211
(760) 863-8277 • Fax (760) 863-7555

"Planning Our Future... Preserving Our Past"

Agenda Item No.:
Area Plan: Lake Mathews / Woodcrest
Zoning District: Lake Mathews
Supervisory District: First/First
Project Planner: Matt Straite
Board of Supervisors

SPECIFIC PLAN NO. 325, AMENDMENT NO.1
CHANGE OF ZONE NO. 7779
TENTATIVE TRACT MAP No. 36390
ADDENDUM NO. 1 to EIR No. 433
(FAST TRACK NO. 2013-05)
Applicant: CV Communities
Engineer/Representative: T&B Planning

COUNTY OF RIVERSIDE PLANNING DEPARTMENT STAFF REPORT

PROJECT DESCRIPTION AND LOCATION:

Specific Plan No. 325 Amendment No. 1 (formerly the Lake Mathews Golf and Country Club, now the Citrus Heights Specific Plan) proposes to increase residential acreage from 98.4 acres to 135.5 acres, increase the total number of residential units from 295 to 345 (about 50 unit increase), increase the average residential lot size from approximately 10,237 square feet to approximately 12,976 square feet, increase the development intensity from 0.9 to 1.0 dwelling units per acres (du/ac), eliminate the 119.1-acre golf course and 3.5-acre golf course clubhouse land uses from the Land Use Plan, increase the area reserved for open space from 85.2 acres to 162.4 acres, increase the acreage designated for public parks from three parks on 2.5 acres to eight parks on 7.0 acres, provide approximately 6.6 miles of pedestrian trails and modify the internal circulation system to accommodate the modified land use plan.

Change of Zone No. 7779 proposes to modify the adopted Specific Plan Zoning Ordinance for SP325 and formalize all of the planning area boundaries within the Specific Plan.

Tentative Tract Map No. 36390 is a Schedule A subdivision that would subdivide the 333.7 acre property into a 343 single-family residential lots, 8 park lots, 3 water quality detention basin lots, and 43 open space lots.

The project site has a previously approved Tentative Map on the site, which has not yet been recorded (TR30153), surrounding a golf course. The map has not expired. No development has occurred on the site. The project is located in the Lake Mathews/ Woodcrest Area Plan, more specifically it is southerly of Van Buren Boulevard and easterly of McAllister Street.

ISSUES OF POTENTIAL CONCERN:

El Sobrante Policy Area consistency

The Lake Mathews/Woodcrest Area Plan contains the El Sobrante Policy Area, which limits the total number of units that can be approved within the area to 1,500 dwelling units. The project is located within the Policy Area. The first version of the Specific Plan was approved within the limits, and now requests an additional 50 units from the allocation. At the request of Planning, the applicant has commissioned a study to analyze the projects consistency with the policy area (study included in this Form 11). The study was closely scrutinized by staff as it is the first of its kind. In short, the study found that the proposed project, including the additional units, is consistent with the policy.

"A" Street

To provide access to the community upon its development and improve traffic circulation in the vicinity, SP No. 325 and EIR No. 433 planned for and evaluated the construction and operation of an off-site

road called "Street A," which is designed to connect McAllister Street to Van Buren Boulevard, with a short segment passing through the Lake Mathews Golf and Country Club property. Approximately 40 percent of the planned roadway alignment is located within the jurisdictional boundaries of the County of Riverside and approximately 60 percent of the planned roadway alignment is located within the jurisdictional boundaries of the City of Riverside. The previous EIR studied the impacts of this offsite connector, as did the addendum to the EIR.

Connection with the residential community to the west

There are a number of existing smaller lots to the east of the Specific Plan. Most have easement access only, there are few public streets. The proposed map does not provide any connection to this community for several reasons. There are no public streets to connect with. Because they are easements, they are usually granted to provide access to a specific lot. Use by any others, such as the residents of the Specific Plan would not be permitted access. Additionally, the easements that make up the access are substandard in size, thus making connections potentially unsafe.

Park locations

Offsite Fuel Modification Areas

The map shows offsite fuel modification areas that will require cooperation with neighboring property owners. These areas will also require limitations on certain kinds of building construction. A condition of approval has been added to the project (50.Planning.34) requiring recordation of any required easements prior to the processing of a final map.

Emergency Access to Neighboring Properties

There are several properties contiguous to the project on the west that are smaller lots with private access paths in place of streets. Because they are not public streets, the access to these existing homes is limited and could potentially represent a hazard to the existing properties. The proposed Project has an opportunity to provide additional access points to these properties; however, because they are private easements and not streets, the general public is not permitted to use them. As such, connecting streets from the Project to these existing drive paths (easements) is not a viable option. A condition of approval (50.Planning.35) has been added to the Project to require the addition of emergency access between proposed Street B as shown on the tentative Map at the far westerly edge of the project site and Meadow Lands Drive, and Moonridge Drive (two private access easements) such that the access can only be used for emergency access.

SUMMARY OF FINDINGS:

1. Existing General Plan Land Use: Residential Low Density, Residential Medium Density, Golf Course Clubhouse, Golf Course, Open Space, and Park as reflected on the Land Use Plan.
2. Surrounding General Plan Land Use (Ex. #5): City of Riverside to the north, Community Development- Low Density Residential (CD:LDR) and Open Space (OS) to the west, Rural Community- Low Density Residential (RC-LDR)

- and Rural Community- Very Low Density Residential (RC-VLDR) to the south, Rural- Rural Mountainous (R:RM), Very Low Density Residential (RC-VLDR) and Rural Residential (RR) to the east.
3. Proposed Zoning (Ex. #2): Specific Plan (SP)
4. Surrounding Zoning (Ex. #2): Residential Agricultural (R-A), Residential Agricultural- 1 Acre Minimum (R-A-1), Residential Agricultural- 20,000 Square Foot Minimum (R-A-20,000) to the west, City of Riverside to the north, Residential Agricultural (R-A), to the east and Light Agricultural- 10 Acre Minimum (A-1-10) to the south.
5. Existing Land Use (Ex. #1): Vacant land
6. Surrounding Land Use (Ex. #1): Single family to the west, single family and vacant lands to the south, east and north.
7. Project Data:
Total Acreage: 337.7
Total Single Family Proposed Lots: 343
Proposed Min. Lot Size: 8,000
Schedule: A
8. Environmental Concerns: See attached environmental assessment

RECOMMENDATIONS:

CONSIDERATION of **ADDENDUM NO.1** to **ENVIRONMENTAL IMPACT REPORT NO. 433**, based on the findings incorporated in the initial study and Addendum No. 3 concluding that the project will not trigger any aspect of CEQA Guidelines Section 15164 will not have a significant effect on the environment; and,

APPROVAL of **SPECIFIC PLAN NO. 325, AMENDMENT NO. 1**, subject to the attached conditions of approval, and based upon the findings and conclusions incorporated in the staff report, pending final adoption of the resolution by the Board of Supervisors; and,

APPROVAL of **CHANGE OF ZONE NO. 7779**, formalizing the Planning Area Boundaries for all the Planning Areas of Specific Plan No. 325, the Citrus Heights Specific Plan in accordance with attached exhibit, and based upon the findings and conclusions incorporated in the staff report, and pending final adoption of the zoning ordinance by the Board of Supervisors; and,

APPROVAL of **TENTATIVE TRACT NO. 36390**, subject to the attached conditions of approval, and based upon the findings and conclusions incorporated in the staff report.

FINDINGS: The following findings are in addition to those incorporated in the summary of findings and in the attached environmental assessment, which is incorporated herein by reference.

1. The project site is designated Community Development on the Residential Low Density, Residential Medium Density, Open Space, and Park as reflected on the Specific Plan Land Use Plan.

2. Pursuant to a cooperative agreement dated April 18, 2012, between Riverside County and the City of Riverside, the city has authorized the county to act as the lead agency for the Street "A" project (County of Riverside Capital Project C1-0641). Because Street "A" would be constructed on land which neither the Project Applicant, Riverside County, nor City of Riverside hold sufficient title or interest, land acquisition and/or eminent domain proceedings are required to facilitate construction of the roadway. As such, the County of Riverside is the lead agent for Capital Project C1-0641, not the Project Applicant. Regardless, because Street "A" was evaluated by EIR 433 and the plans and specifications of Capital Project C1-0641 require discretionary approval by the County of Riverside Board of Supervisors, the CEQA environmental review requirements for the construction and operation of Street "A" are included in this EIR Addendum. Both the Project and this offsite road project were considered in the CEQA document.
3. The project site is surrounded by properties which are designated City of Riverside to the north, Community Development- Low Density Residential (CD:LDR) and Open Space (OS) to the west, Rural Community- Low Density Residential (RC-LDR) and Rural Community - Very Low Density Residential (RC-VLDR) to the south, Rural- Rural Mountainous (R:RM), Very Low Density Residential (RC-VLDR) and Rural Residential (RR) to the east.
4. The zoning for the subject site is Specific Plan (SP).
5. The proposed use, residential single family lots, is consistent with the development standards set forth in the Specific Plan (SP) zone.
6. The project site is surrounded by properties which are zoned Residential Agricultural (R-A), Residential Agricultural - 1 Acre Minimum (R-A-1), Residential Agricultural - 20,000 Square Foot Minimum (R-A-20,000) to the west, City of Riverside to the north, Residential Agricultural (R-A) to the east and Light Agricultural- 10 Acre Minimum (A-1-10) to the south.
7. Similar uses have been constructed and are operating in the project vicinity.
8. This project is not located within a Criteria Area of the Multi-Species Habitat Conservation Plan.
9. This project is within the City Sphere of Influence of Riverside. As such, it is required to conform to the County's Memorandum of Understanding (MOU) with that city. This project does conform to the MOU.
10. This land division is located within a very high fire hazard severity zone.
11. This land division has been designed so that each lot, and the subdivision as a whole, is in compliance sections 4290 and 4291 of the Public Resources Code by providing a defensible space within each lot of 100 feet from each side, front and rear of a pad site, requiring that the site have fuel modification standards acceptable to the Riverside County Fire Department, requiring a minimum 10-foot clearance of all chimneys or stovetop exhaust pipes, no buildings shall covered or have dead brush overhang the roof line and requiring that the roof structure shall be maintained free of leaves, needles, or other vegetation.
12. Fire protection and suppression services will be available for the subdivision through Riverside County Fire Department.

13. The project meets the regulations regarding road standards for fire equipment access adopted pursuant to **Section 4290 of the Public Resources Code** and Riverside County Ordinance No. 787 by assuring road standards for fire equipment access are adequate, standards for signs identifying streets, roads and buildings are required, minimum private water supply reserves for emergency fire use are provided, fuel brakes and green belts are also included in the open space areas and offsite.
14. Environmental Assessment No. 42510 identified no potentially significant impacts outside those previously identified in EIR 433 which included the following areas as significant and unavoidable:

- a. Air Quality

These listed impacts will be fully mitigated by the measures indicated in the environmental assessment, conditions of approval, EIR and attached letters. No other significant impacts were identified.

CONCLUSIONS:

1. The proposed project is in conformance with the Community Development on the Residential Low Density, Residential Medium Density, Golf Course Clubhouse, Golf Course, Open Space, and Park as reflected on the Specific Plan Land Use Plan and with all other elements of the Riverside County General Plan.
2. The proposed project is consistent with the Specific Plan (SP) zoning classification of Ordinance No. 348, and with all other applicable provisions of Ordinance No. 348.
3. The proposed project is consistent with the Schedule A map requirements of Ordinance No. 460, and with other applicable provisions of Ordinance No. 460.
4. The public's health, safety, and general welfare are protected through project design.
5. The proposed project is conditionally compatible with the present and future logical development of the area.
6. The proposed project will have a significant effect on the environment as identified in the Addendum to EIR No. 433.
7. The proposed project will not preclude reserve design for the Western Riverside County Multiple Species Habitat Conservation Plan (WRCMSHCP).

INFORMATIONAL ITEMS:

1. As of this writing, no letters, in support or opposition have been received.
2. The project site is not located within:
 - a. A 100-year flood plain, an area drainage plan, or dam inundation area;
 - b. A Community service Area;

- c. A Parks District;
 - d. An area of mapped liquefaction;
 - e. The Stephens Kangaroo Rat Fee Area or Core Reserve Area; or,
 - f. California Gnatcatcher, Quino Checkerspot Butterfly habitat.
3. The project site is located within:
- a. The city of Riverside sphere of influence;
 - b. The El Sobrante Policy General Plan Policy Area.
4. The subject site is currently designated as Assessor's Parcel Numbers :269-060-004, -005, -006; 269-100-009-, -011, -012, -014.

MS

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Date Prepared: 01/01/01

Date Revised: 08/26/13



FAST TRACK AUTHORIZATION

Supervisory District: 1	Supervisor: Kevin Jeffries	FTA No. 2013-05
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Company/Developer: CV Communities Contact Name: Mike White

Address: 1900 Quail Street, Newport Beach, CA 92660

Office Phone: 949.258.7556 Mobile Phone: 951.232.9641 Email: mike@cityventures.com

Consulting Firm: T&B Planning Contact Name: Joel Morse

Firm Address: 17542 East 17th Street, Suite 100, Tustin, CA 92780

Office Phone: 714.505.6380 Mobile Phone: 714.614.5401 Email: jmorsew@TBplanning.com

Project Type: Industrial Commercial Childcare Workforce Housing
 Renewable Energy Other Roadway Improvement

Project Description: In conjunction with SPA 325, the County will construct Road A between McAllister Street and Van Buren Blvd. as a County Project. SPA 325 entitles & provides permits to construct the roadway.

Fast Track status granted by the Board of Supervisors on October 16, 2012, Item 3.55

Economic Impact (estimated) Capital Investment: \$6 million Full-Time Jobs: 108

Taxable Sales: N/A Full-Time Wages per Hour: \$15 to \$45 Construction Jobs: 108

Land Use Application(s): Plot Plan Conditional Use Permit Change of Zone
 Parcel Map General Plan Amendment Other: SPA325A1

Site Information Assessor's Parcel Number(s): 269-100-009, 011, 014, 015; 269-060-004, 005, 006
239-270-002; 270-070-004

Cross Streets/Address: McAllister between Dufferin and El Sobrante Rd. Site Acreage: 333

Land Use Designation: Med. Density Res. Zoning: SP 325 Building Size: N/A

The Economic Development Agency acknowledges that the above referenced project merits special consideration of its land use and permit processing by the County of Riverside. County agencies are encouraged to immediately institute "Fast Track" procedures in accordance with Board Fast Track Policy A-32. This authorization contains preliminary project information and serves as a basis for determining "Fast Track" eligibility. During the County's development review process, the proposed project size and configuration may be altered.

Felicia Flournoy 8/13/13 Rob Moran 8/8/13
 Felicia Flournoy, Assistant Director Date Rob Moran, EDA Development Manager Date



MEMORANDUM

To: Matt Straite
Riverside County Planning Department

From: Joel Morse, Principal

Re: CITRUS HEIGHTS SPECIFIC PLAN AMENDMENT (SP325A1) - RELATIONSHIP TO LMWAP 1.1

Date: July 12, 2013

Overview

Pursuant to your request, T&B Planning conducted research on the existing and planned development conditions in the El Sobrante Policy Area to determine if the proposed Citrus Heights Specific Plan Amendment project (SP325A1) complies with the development restriction placed on the El Sobrante Policy Area by the second sentence of General Plan Policy LMWAP 1.1, which is underlined below.

LMWAP Policy 1.1: Require the provision of adequate and available infrastructure to support development. To sustain the rural lifestyle found within the area, while still providing an acceptable level of service on local roadways, the total number of dwelling units within the Policy Area shall not exceed an additional 1,500 dwelling units. The circulation system, which would support the development of these additional dwelling units and which would, in part, be funded by their development, includes the following roadway improvements: the McAllister Street/ Dufferin Avenue Loop and the construction of a new connection ("A" Street) between McAllister Street/Dufferin Avenue Loop and Van Buren Boulevard, south of Dufferin Avenue. In addition to these improvements, other circulation connections between the Policy Area and the adjacent City of Riverside would be closed. These closures would direct high traffic volumes away from rural residential and green belt streets and toward more appropriate thoroughfares. Limiting the number of dwelling units within the Policy Area will help to maintain acceptable levels of service on local roadways both within the County and adjacent green belt areas of the City of Riverside. Limiting the number of dwelling units will also contribute to the continuation of the rural lifestyle enjoyed by area residents.

Proposed SP325A1 seeks to amend SP325 to allow a maximum of 345 dwelling units within the boundaries of the Citrus Heights Specific Plan. Based on the research and analysis provided below, we conclude that the proposed SP325A1 complies with LMWAP Policy 1.1 and would not preclude the development of other vacant properties in the Policy Area at the densities that are likely to occur.

The following table provides the calculations that you requested. Following the table are explanations about how the figures were calculated and the rationale for concluding that SP325A1 complies with LMWAP Policy 1.1.



Number of Units Existing in 2003	91
Number of Units Constructed Since 2003	55
Total Units in the Policy Area Today	146 (91 + 55)
Units Specified by Policy 1.1	1,591 (1,500 + 91)
Number of New Units Remaining	1,445 (1,591 - 146)
Number of Units Proposed by SP325A1	345
Number of New Units Remaining After SP325A1	1,100
Maximum General Plan Build Out of Entire Policy Area	1,991
Difference between Max GP Build Out and Policy 1.1	(-400) (1,591 - 1,991)*
*As described in the text below, build out at maximum General Plan densities for all properties is unrealistic to assume. A more realistic assumption is to use mid-point densities.	
Mid-Point General Plan Build Out (excluding SPA325A1 property and existing developed property in the Policy Area)	810
Number of Units Over Mid-Range Available to Other Parcels in the Policy Area in Compliance with Policy 1.1	290 (1,100-810)

1,444 Units Remain Available For Development

As interpreted by County Staff, LMWAP Policy 1.1 limits development within the El Sobrante Policy Area to no more than 1,500 dwelling units in addition to the homes that existed within the Policy Area at the time the General Plan was adopted on October 7, 2003.

As you have confirmed for us, there are no accurate County records available to verify the exact number of homes that existed in the Policy Area in October 2003. Therefore, we used a *Google Earth* aerial photograph dated October 17, 2003, and assumed that every structure appearing on the aerial that was not obviously an accessory structure or agricultural structure was a residential dwelling unit (refer to attached Exhibit titled *Historical Aerial Photograph (2003)*). Based on the aerial photo, 91 homes were located within the El Sobrante Policy Area in October 2003. Therefore, pursuant to the second sentence of LMWAP Policy 1.1 as interpreted by County Staff, a maximum of 1,591 dwelling units are allowed within the El Sobrante Policy Area (91 + 1,500 = 1,591).

Using the most recent aerial photograph available to us, an *ESRI* aerial photograph dated 2012, and again assuming that every structure appearing on the aerial that is not obviously an accessory structure or agricultural structure is a residential dwelling unit, 146 dwelling units exist in the El Sobrante Policy Area today (refer to attached Exhibit titled *Current Aerial Photograph (2012)*). This represents an increase of only 55 homes in the El Sobrante Policy Area in 10 years. Accordingly, of the 1,591 dwelling units allotted to the El Sobrante Policy Area by LMWAP Policy 1.1, 1,445 dwelling units remain available for development (1,591 - 146 = 1,445).



The 2003 General Plan Assumed up to 324 Dwelling Units for the Citrus Heights Property, but Only 295 Units Were Captured by the Specific Plan

When the General Plan was adopted in October 2003, the Citrus Heights Specific Plan was not yet approved. At that time, the General Plan designated approximately 324.2 acres of the Citrus Heights property for Very Low Density Residential (1 du/ac) and 9.4 acres for Conservation (refer to Exhibit titled *2003 General Plan Land Use – Citrus Heights*). Therefore, the General Plan assumed that the Citrus Heights property would have accounted for as many as 324 dwelling units (324.2 acres x 1 du/ac) of the 1,500 additional units in LMWAP Policy 1.1. When SP325 was approved in 2004, it utilized only 295 of the 324 units anticipated for the site (29 fewer units) in part because the property owner and the County desired the development of a golf course on the site. As such, 29 dwelling units originally anticipated by the General Plan remained unused within the property.

SP325A1 Proposes Only 21 More Dwelling Units than the General Plan Policy Assumed

Proposed SP325A1 would recapture those 29 dwelling units that were not captured by SP325 plus an additional 21 dwelling units in exchange for loss of the golf course that will not be built. In total, SP325A1 proposes the construction of 345 dwelling units and no golf course.

SP325A1 Would Generate Fewer Vehicular Trips Than Would Occur Under SP325

With removal of the golf course, traffic associated with SP325A1 will be reduced by 212 average daily trips as compared to the amount of traffic that would have been generated by SP325, which meets the purpose of LMWAP Policy 1.1. Additionally, SP325A1 is enabling the County to advance Capital Project C1-0641, which consists of the construction “Street “A,”” between McAllister Street and Van Buren Boulevard. This road will be a major infrastructure improvement for the benefit of all residents in the Policy Area and surrounding vicinity, the construction of which is specifically called for by Policy LMWAP 1.1.

Growth in the Policy Area Has Been Slow and is Projected to be Slow

Since adoption of the General Plan in 2003, no large scale residential developments have been approved in the El Sobrante Policy Area with the exception of SP325. No other large scale developments are pending approval and as previously stated, only 56 homes have been built in the policy area in the last 10 years. This confirms a very slow rate of growth and high probability that the 1,591 dwelling units suggested by LMWAP 1.1 will not be achieved in the foreseeable future.

Build Out of the Policy Area at Mid-Point Rather than Maximum Development Intensities is Realistic

Theoretically, considering existing entitlements, lots already built out, and the amount of available vacant land, if the entire El Sobrante Policy Area built out to maximum General Plan development intensities, a maximum of 1,991 dwelling units could be achieved (refer to Exhibit titled *General Plan Land Use*). Based on our research and knowledge of physical development constraints in the area, this theoretical maximum will never be realized for the following reasons:

1. Using the Riverside County Transportation Land Management Agency’s Parcel Database (updated 2013), 458 parcels exist in the El Sobrante Policy Area. Over 225 of these are small, undeveloped, rural parcels



that do not meet minimum lot size standards prescribed by the General Plan or the parcel's zoning designation (i.e., 227 lots). Given that so many small parcels are present, it would be very difficult for a master developer to acquire enough contiguous land to propose a large-scale master-planned community and cluster units. Additionally, some of these parcels are not served by domestic water and sewer lines or other public utilities which makes their development at maximum General Plan densities on a lot-by-lot basis highly improbable. As such, up to 227 dwelling units that could theoretically be achieved by build out of the General Plan will likely not occur due to parcel sizes and configurations.

2. The El Sobrante Policy Area has many physical and geographical constraints, including but not limited to steep slopes/rugged terrain, natural drainage courses, sensitive biological habitats, and dam inundation areas. When combined with the large number of small vacant parcels as described above and the need to work around a variety of physical constraints, it is reasonable to assume that the Policy Area will most likely achieve build out at General Plan mid-point densities rather than maximum densities.

Taking into account the slow pace of development that has occurred and is projected to occur in the Policy Area, combined with the 227 small, undeveloped parcels that do not meet minimum lot standards for development, and recognizing the Policy Area's physically constrained geography, build out at maximum General Plan intensities is not plausible. Further, Appendix E to the General Plan states that an assumption that any area in the County would develop at the maximum allowed intensity reflects a "theoretical" condition, rather than what is likely to be developed. Achieving an average build out at mid-point densities is much more realistic. Using mid-point densities for properties that have not already been developed, and excluding the Citrus Heights property, 810 dwelling units would be achieved (refer to Exhibit titled *Mid-Point Growth Forecast*)¹. Taking into account proposed SP325A1 (345 units) and existing development (146 units), a reasonable build out for the Policy Area is 1,301 units ($810 + 146 + 345 = 1,301$). This is 290 fewer dwelling units than the maximum of 1,591 units specified in LMWAP Policy 1.1.

Proposed SP325A1 is Consistent with LMWAP Policy 1.1

SP325A1 proposes the construction of 345 dwelling units. Due to parcel configurations and physical development constraints elsewhere in the Policy Area combined with large number of small, undeveloped parcels not served by public utilities, Citrus Heights is one of only a few properties in the Policy Area where large-scale residential development is likely to occur and where development can occur at maximum as opposed to at or below mid-point densities. The 345 units proposed by SP325A1 represent a 21-unit increase as compared to the 324 dwelling unit maximum allotted to the property by the 2003 General Plan and a 50-unit increase as compared to the 295 dwelling units subsequently entitled under SP325.

When the previously 295 entitled dwelling units of SP325 are deducted from the theoretical pool of 1,591 dwelling specified in LMWAP Policy 1.1, a total of 1,296 dwelling units remain available. Of these, 146 are already constructed, leaving 1,150 remaining ($1,296 - 146 = 1,150$). The 50 additional units proposed by SP325A1 represent only 4.3% of the available units. This would leave 1,100 available to other undeveloped parcels ($1,150 - 50 = 1,100$).

¹ A mid-point development factor of 3.0 du/ac was utilized for "Medium Density Residential (MDR)" areas. This development factor is equal to the maximum density permitted in MDR areas within the El Sobrante Policy Area pursuant to LMWAP Policy 1.2, but is less than the mid-point development factor utilized in the General Plan and General Plan EIR.



Additionally, when considering that the remainder of the Policy Area will likely be built out at mid-point densities on average (810 units), there would be still be 290 units remaining units available ($1,100 - 810 = 290$) for allocation to other properties before hitting the 1,591 dwelling unit cap as interpreted by County staff per the second sentence of LMWAP Policy 1.1).

In conclusion, proposed SP 325A1 is consistent with LMWAP Policy 1.1 for the following reasons:

1. SP325A1 is requesting only 21 units more than assumed for the site by the General Plan when LMWAP Policy 1.1 was adopted;
2. SP325A1 is requesting only 4.3% more of the "1,500 additional units" allowed by LMWAP Policy 1.1;
3. The intent of LMWAP Policy 1.1's dwelling unit restriction is to reduce traffic. SP325A1 will generate 212 fewer average daily trips as compared to the amount of traffic that would have been generated by SP325;
4. SP325A1 will advance the construction of Street "A" between McAllister Street and Van Buren Boulevard as specifically called for by Policy LMWAP 1.1, which will be a major infrastructure improvement for the benefit of all residents in the Policy Area and surrounding vicinity;
5. General Plan Appendix E states that the General Plan does not anticipate full buildout of all land use designations; given the physical constraints that exist in the Policy area, it is reasonable to conclude that mid-point densities rather than maximum densities would be achieved on average;
6. Given the large number of small vacant parcels in the Policy Area and the need to work around a variety of physical constraints that will prevent effective clustering of units, it is reasonable to assume that the Policy Area will most likely achieve build out at General Plan mid-point densities rather than maximum densities;
7. Only 55 dwelling units have been constructed in the Policy Area since 2003, which represents a very slow growth rate; and
8. Even with the additional dwelling units requested by SP325A1, 290 dwelling units above mid-point densities will be available to other parcels in the Policy Area.

It is important to note that for purposes of the analysis presented herein, T&B Planning made general assumptions regarding the development potential of the Policy area based on conditions that existed as of the writing of this memorandum. T&B Planning did not conduct a lot-by-lot evaluation of the feasibility of future development on specific parcels, including underdeveloped parcels or parcels that do not meet the minimum development standards of the General Plan and/or Zoning Ordinance. T&B Planning acknowledges that conditions within the Policy Area will continue to evolve as the Area is built out and anticipates that the County of Riverside will review subsequent development proposals to track actual buildout for consistency with LMWAP 1.1.

Please do not hesitate to contact me at (714) 505-6360, ext. 105, if you would like to discuss this topic in more detail.



EL SOBRANTE POLICY AREA

HISTORICAL AERIAL PHOTOGRAPH (2003)

CITRUS HEIGHTS

03/18/2004 2:07
ELB PLANNING, INC.
1000 N. GARDEN AVENUE, SUITE 100
GARDEN GROVE, CA 92640
TEL: 714.942.1111
WWW.ELBPLANNING.COM



CITRUS HEIGHTS

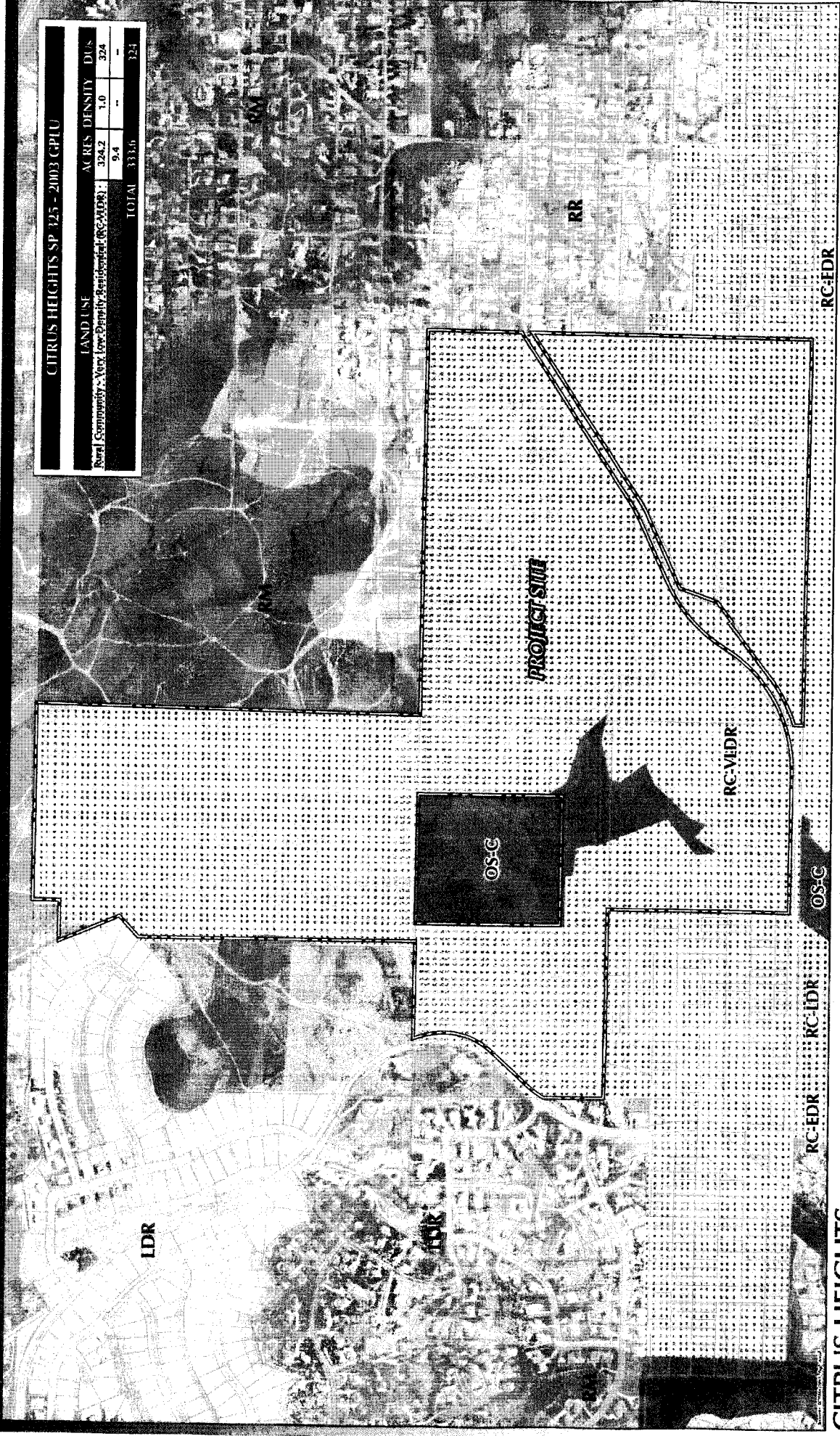
EL SOBRANTE POLICY AREA

CURRENT AERIAL PHOTOGRAPH (2012)

DATE: 11/15/12
EL PLANNING, INC.
1111 14TH AVENUE, SUITE 100
DENVER, CO 80202
TEL: 303.733.1111
WWW.ELPLANNING.COM

CITRUS HEIGHTS SP 325 - 2003 CPLU

LAND USE	ACRES	DENSITY	DUS
Urban Community - Very Low Density Residential (RC-MIDR)	324.2	1.0	324
	9.4	--	--
TOTAL	333.6		324



CITRUS HEIGHTS

EL SOBRANTE POLICY AREA

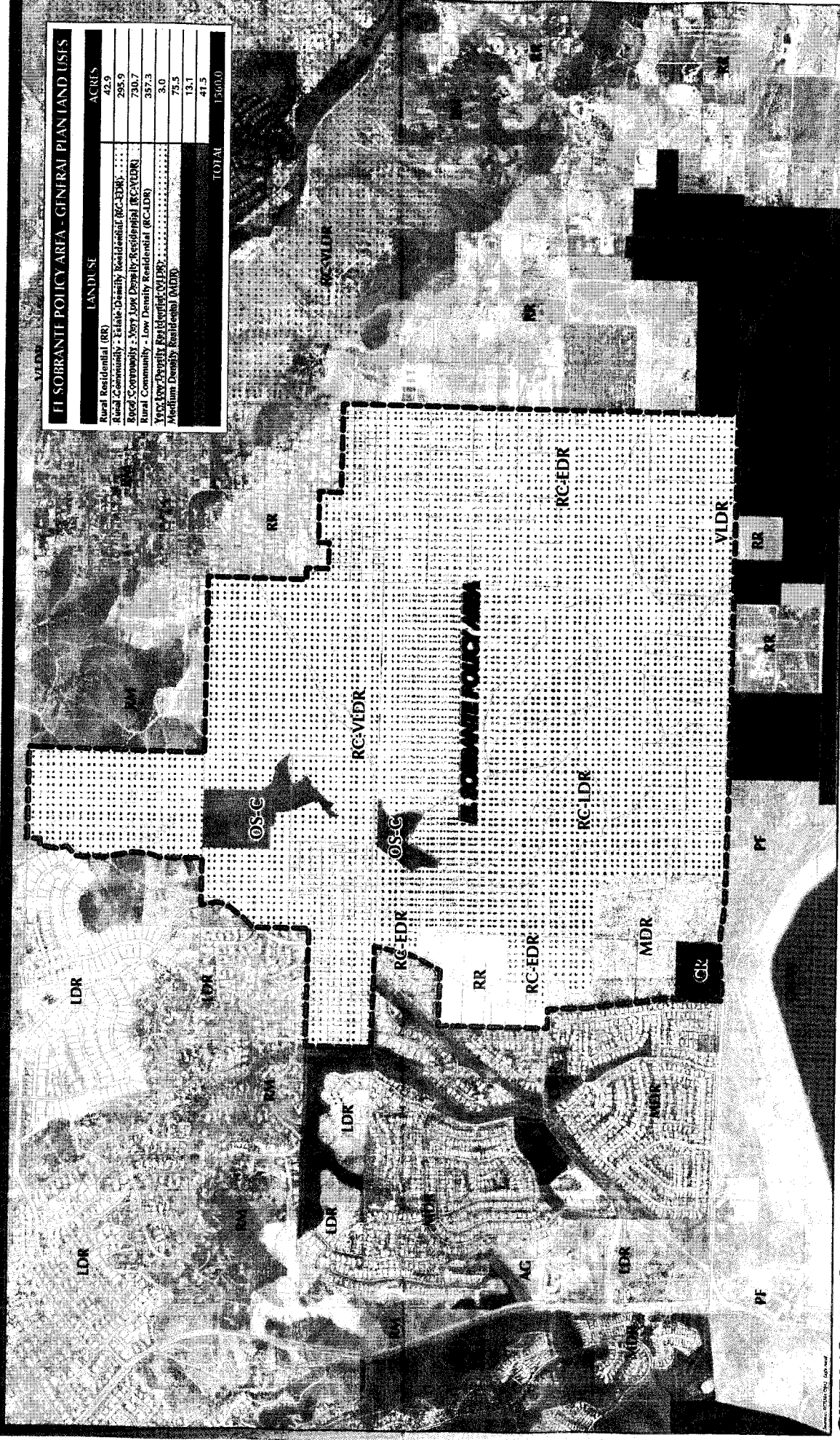
2003 GENERAL PLAN LAND USE - CITRUS HEIGHTS

DATE: 10/20/2011

LAB PLANNING, INC.
 11111 ...
 ...

EL SOBRANTE POLICY AREA - GENERAL PLAN LAND USES

LAND USE	ACRIS
Rural Residential (RR)	42.9
Rural Community - Estate-Density Residential (RC-EDR)	295.9
Rural Community - Very Low Density Residential (RC-VLDR)	730.7
Rural Community - Low Density Residential (RC-LDR)	357.3
Very Low Density Residential (VLDLDR)	3.0
Medium Density Residential (MDR)	75.5
	13.1
TOTAL	1569.0



EL SOBRANTE POLICY AREA

GENERAL PLAN LAND USE

CITRUS HEIGHTS

DATE: 10/20/2011

ES&P INC.

EL SOBRANTE POLICY AREA - GENERAL PLAN LAND USES

LANDUSE	ACRES	MID-POINT DENSITY	MID-POINT DUs
Rural Residential (RR)	15.9	0.15	2
Rural Community - Estate Density Residential (RC-EDR)	225.6	0.35	78
Rural Community - Very Low Density Residential (RC-VLDR)	305.9	0.5	152
Rural Community - Low Density Residential (RC-LDR)	308.8	1.2	366
Very Low Density Residential (RC-VLDR)	3.0	0.5	1
Very Low Density Residential (RC-VLDR)	70.6	3.0*	211
	13.1	-	-
	32.1	-	-
<i>Undeveloped Property Subtotals</i>	970.6	0.8	310
Citrus Heights Property	333.6	-	-
Existing Developed Property	256.4	-	-
TOTAL	1500.0	-	610

*Note: This mid-point development factor is equal to the maximum density permitted in MDR areas within the El Sobrante Policy Area pursuant to DMWAP Policy 1.2, but less than the mid-point development factor utilized in the General Plan.



EL SOBRANTE POLICY AREA

MID-POINT GROWTH FORECAST

CITRUS HEIGHTS

DATE: 10/19/2011
 IEE PLANNING, INC.
 11111 IEE PLANNING, INC.
 11111 IEE PLANNING, INC.

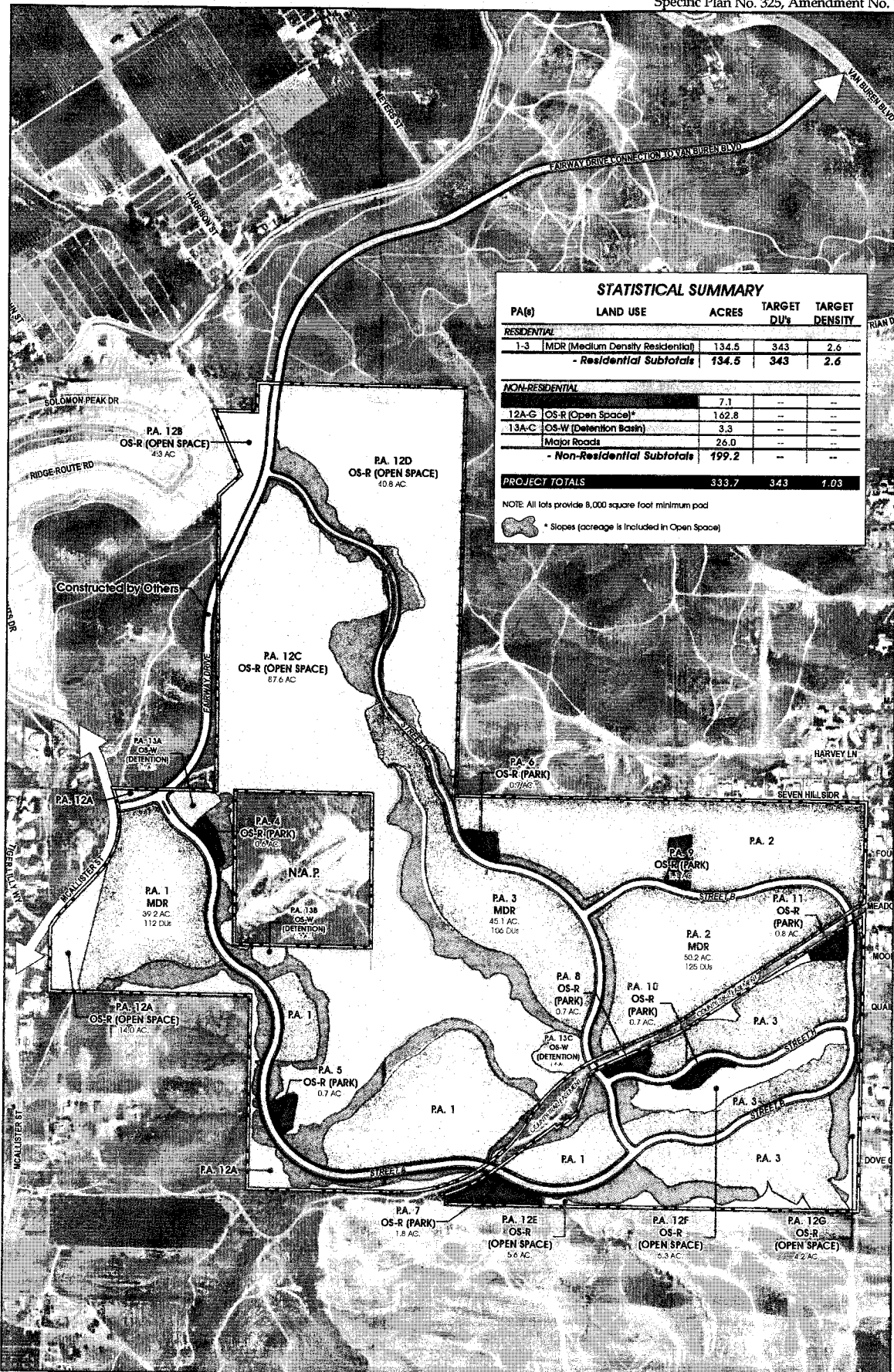


Figure II-1
 SPECIFIC PLAN LAND USE PLAN

Legend

	ACRES	DU/AC	DUA
RESIDENTIAL LOW DENSITY 2000 SF	116	17	22
RESIDENTIAL MEDIUM DENSITY 4500 SF - 15000 SF	84.8	22	20
RESIDENTIAL SUB TOTAL	198.4	3.0	205
GOLF COURSE CLUBHOUSE	15		
GOLF COURSE	118		
OPEN SPACE	852		
PARK ²	17		
INTERNAL PROJECT CIRCULATION	409		
	1318 ¹	0.9	295

1. INCLUDES PARKS, MAINTENANCE FACILITY AND MANUFACTURED HOUSING
2. REFLECTS 2-ACRE MULTI-PURPOSE TRAIL
3. LAKES AND INCLUDE HALL WITH IMPROVEMENTS TO MAINTAIN 1800 GROSS SQUARE FEET PER ACRE. GOLF COURSE ENCLOSURE AND THE 11.8 PARK IS 1.8 ACRES, AND 11.8 PARK IS 1.8 ACRES.

TO BE SUPERCEDED

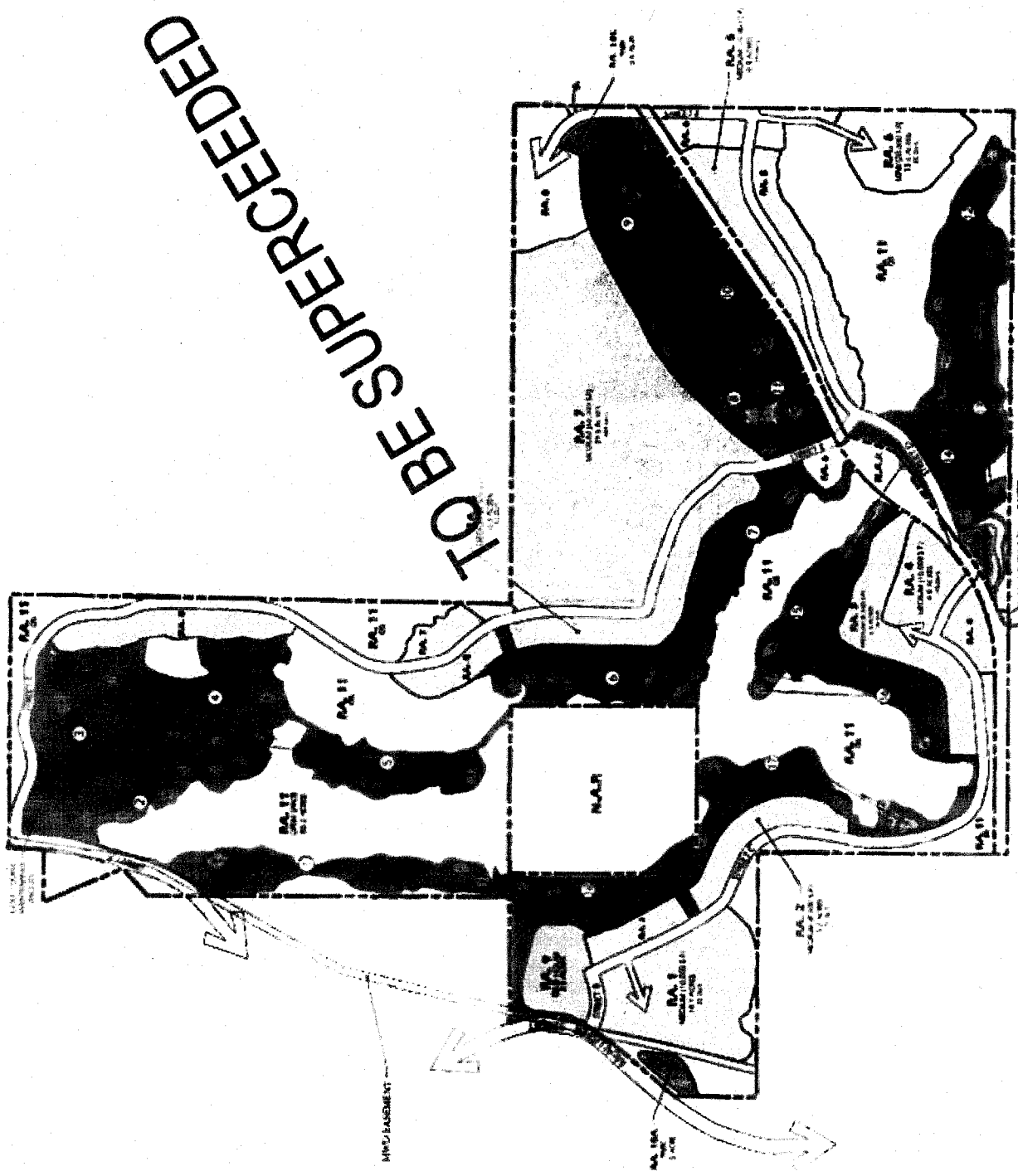


Figure No. 4A.2
Specific Plan Land Use Plan

CITY OF LAKE MATHews
 1000 LAKE MATHews BLVD
 LAKE MATHews, CA 92546
 www.lakemathews.org

LAKE MATHews GOLF & COUNTRY CLUB SPECIFIC PLAN/DIR

1 twenty (20) feet. The minimum front yard setback to the garage shall be twenty (20)
2 feet for a street facing garage and fifteen (15) feet for a side facing garage. The
3 minimum front yard setback to front porch or portico shall be fifteen (15) feet.

4 C. The minimum side yard setback for interior lots shall be five (5) feet.
5 The minimum side yard setback for corner lots (facing street) shall be a minimum of
6 ten (10) feet.

7 D. The minimum rear yard setback to single-story living space shall be
8 fifteen (15) feet. The minimum rear yard setback to two-story living space shall be
9 twenty (20) feet. The minimum rear yard setback to an integrated deck (house roof
10 extends over the deck) shall be fifteen (15) feet. The minimum rear yard setback to
11 an attached structure, detached structure, detached accessory building or guest quarter
12 shall be ten (10) feet.

13 E. Maximum lot coverage shall be sixty (60) percent for single-story
14 dwellings and fifty (50) percent for two-story dwellings.

15 (3) Except as provided above, all other zoning requirements shall be the same as
16 those requirements identified in Article VI, respectively of Ordinance No. 348.

17 b. Planning Area 2.

18 (1) The uses permitted in Planning Area 2 of Specific Plan No. 325 shall be the
19 same as those uses permitted in Article VI, Section 6.1 of Ordinance No. 348, except that the
20 uses permitted pursuant to Section 6.1.a. (2), (3), (5), (7), (8) and (9), Section 6.1.b.(1), (3),
21 (4), and (5), Section 6.1.c., and Section 6.1.e shall not be permitted.

22 (2) The development standards for Planning Area 2 of Specific Plan No. 325
23 shall be the same as those standards identified in Article VI, Section 6.2 of Ordinance No.
24 348, except that the development standards set forth in Article VI, Section 6.2.b., e.(1), e.(2),
25 e.(3), and g. shall be deleted and replaced by the following:

1 A. Lot area shall be not less than ten thousand (10,000) square feet. The
2 minimum lot area shall be determined by excluding that portion of a lot that is used
3 solely for access to the portion of a lot used as a building site.

4 B. The minimum front yard setback to single-story living space shall be
5 fifteen (15) feet. The minimum front yard setback to two-story living space shall be
6 twenty (20) feet. The minimum front yard setback to the garage shall be twenty (20)
7 feet for a street facing garage and fifteen (15) feet for a side facing garage. The
8 minimum front yard setback to front porch or portico shall be fifteen (15) feet.

9 C. The minimum side yard setback for interior lots shall be five (5) feet.
10 The minimum side yard setback for corner lots (facing street) shall be a minimum of
11 ten (10) feet.

12 D. The minimum rear yard setback to single-story living space shall be
13 fifteen (15) feet. The minimum rear yard setback to two-story living space shall be
14 twenty (20) feet. The minimum rear yard setback to an integrated deck (house roof
15 extends over the deck) shall be fifteen (15) feet. The minimum rear yard setback to
16 an attached structure, detached structure, detached accessory building or guest quarter
17 shall be ten (10) feet.

18 E. Maximum lot coverage shall be sixty (60) percent for single-story
19 dwellings and fifty (50) percent for two-story dwellings.

20 (3) Except as provided above, all other zoning requirements shall be the same as
21 those requirements identified in Article VI, respectively of Ordinance No. 348.

22 c. Planning Area 3.

23 (1) The uses permitted in Planning Area 3 of Specific Plan No. 325 shall be the
24 same as those uses permitted in Article VI, Section 6.1 of Ordinance No. 348, except that the
25 uses permitted pursuant to Section 6.1.a. (2), (3), (5), (7), (8) and (9), Section 6.1.b.(1), (3),
26 (4), and (5), Section 6.1.c. and Section 6.1.e shall not be permitted.

1 (2) The development standards for Planning Area 3 of Specific Plan No. 325
2 shall be the same as those standards identified in Article VI, Section 6.2 of Ordinance No.
3 348, except that the development standards set forth in Article VI, Section 6.2.b., e.(1), e.(2),
4 e.(3), and g. shall be deleted and replaced by the following:

5 A. Lot area shall be not less than twelve thousand (12,000) square feet.
6 The minimum lot area shall be determined by excluding that portion of a lot that is
7 used solely for access to the portion of a lot used as a building site.

8 B. The minimum front yard setback to single-story living space shall be
9 fifteen (15) feet. The minimum front yard setback to two-story living space shall be
10 twenty (20) feet. The minimum front yard setback to the garage shall be twenty (20)
11 feet for a street facing garage and fifteen (15) feet for a side facing garage. The
12 minimum front yard setback to front porch or portico shall be fifteen (15) feet.

13 C. The minimum side yard setback for interior lots shall be five (5) feet.
14 The minimum side yard setback for corner lots (facing street) shall be a minimum of
15 ten (10) feet.

16 D. The minimum rear yard setback to single-story living space shall be
17 fifteen (15) feet. The minimum rear yard setback to two-story living space shall be
18 twenty (20) feet. The minimum rear yard setback to an integrated deck (house roof
19 extends over the deck) shall be fifteen (15) feet. The minimum rear yard setback to
20 an attached structure, detached structure, detached accessory building or guest quarter
21 shall be ten (10) feet.

22 E. Maximum lot coverage shall be sixty (60) percent for single-story
23 dwellings and fifty (50) percent for two-story dwellings.

24 (3) Except as provided above, all other zoning requirements shall be the same as
25 those requirements identified in Article VI of Ordinance No. 348.

26 d. Planning Areas 4, 5, 6, 7, 8, 9, 10, and 11.

1 (1) The uses permitted in Planning Areas 4, 5, 6, 7, 8, 9, 10, and 11 of Specific
2 Plan No. 325 shall be the same as those uses permitted in Article VIIIe, Section 8.100 of
3 Ordinance No. 348, except that the uses permitted pursuant to Section 8.100.a. (1), (2), (3),
4 (6), (8) and (9); b.(1); and c.(1) shall not be permitted. In addition, the permitted uses
5 identified under Section 8.100.a. shall also include public parks, private parks, and trails.

6 (2) The development standards for Planning Areas 4, 5, 6, 7, 8, 9, 10, and 11 of
7 Specific Plan No. 325 shall be the same as those standards identified in Article VIIIe, Section
8 8.101 of Ordinance No. 348.

9 (3) Except as provided above, all other zoning requirements shall be the same as
10 those requirements identified in Article VIIIe of Ordinance No. 348.

11 e. Planning Areas 12A, 12B, 12C, 12D, 12E, 12F, and 12G.

12 (1) The uses permitted in Planning Areas 12A, 12B, 12C, 12D, 12E, 12F, and
13 12G of Specific Plan No. 325 shall be the same as those permitted in Article VIIIe, Section
14 8.100 of Ordinance No. 348, except that the uses permitted pursuant to Section 8.100.a.(1),
15 (2), (3), (4), (5), (6), (8), and (9); b.(1); and c.(1) shall not be permitted. In addition, the
16 permitted uses identified under Section 8.100.a. shall also include undeveloped open space
17 and trails.

18 (2) The development standards for Planning Areas 12A, 12B, 12C, 12D, 12E,
19 12F, and 12G of Specific Plan No. 325 shall be the same as those standards identified in
20 Article VIIIe., Section 8.101 of Ordinance No. 348.

21 (3) Except as provided above, all other zoning requirements shall be the same as
22 those requirements identified in Article VIIIe. of Ordinance No. 348.

23 f. Planning Area 13A, 13B, and 13C.

24 (1) The uses permitted in Planning Area 13A, 13B, and 13C of Specific Plan No.
25 325 shall be the same as those uses permitted in Article VIIIe, Section 8.100 of Ordinance
26 No. 348, except that the uses permitted pursuant to Section 8.100.a. (1), (2), (3), (4), (5), (6),

1 (8) and (9); b.(1); and c.(1) shall not be permitted. In addition, the permitted uses identified
2 under Section 8.100.a. shall also include detention basins.

3 (2) The development standards for Planning Area 13A, 13B, and 13C of Specific
4 Plan No. 325 shall the same as those standards identified in Article VIIIe, Section 8.101 of
5 Ordinance No. 348.

6 (3) Except as provided above, all other zoning requirements shall be the same as
7 those requirements identified in Article VIIIe of Ordinance No. 348.

8 Section 3. This ordinance shall take effect 30 days after its adoption.

9
10 BOARD OF SUPERVISORS OF THE COUNTY
11 OF RIVERSIDE, STATE OF CALIFORNIA
12

13
14 By _____
15 Chairman, Board of Supervisors
16

17
18 ATTEST:

19 Name

20 Clerk of the Board
21

22 By _____

23 Deputy
24

25 (SEAL)
26

27 APPROVED AS TO FORM AND CONTENT:

1 | Month Day, Year

2

3 | By _____

4 | NAME

5 | Deputy County Counsel

6

7

8

9

10

11

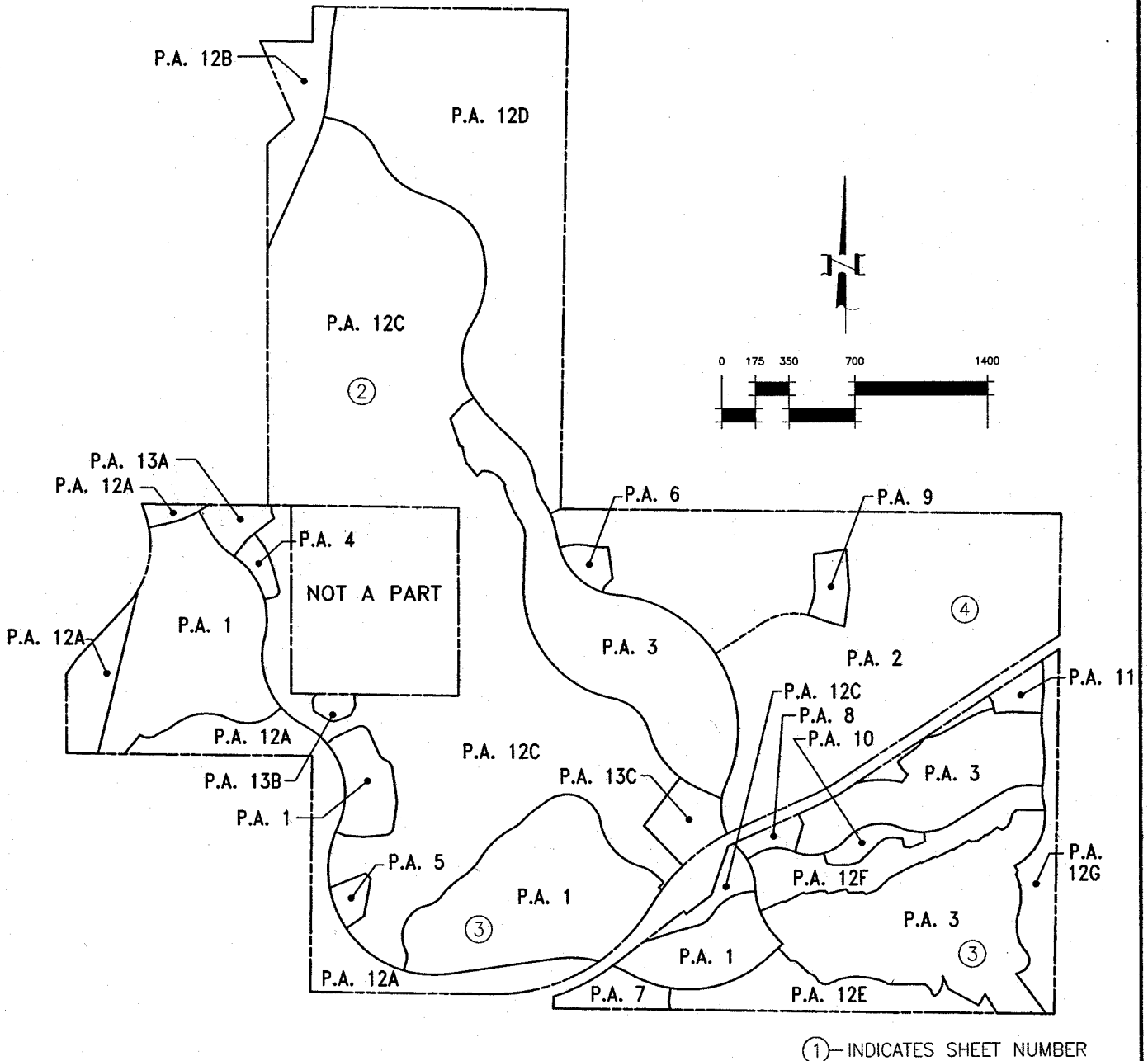
12

13

14

15

SECTION 29 T. 3 S. R. 5 W. S.B.B. & M.



①—INDICATES SHEET NUMBER

LEGEND

SP ZONE

SPECIFIC PLAN (SP 325 A1)
MAP NO. 36.057

**CHANGE OF OFFICIAL ZONING PLAN
LAKE MATTHEWS**

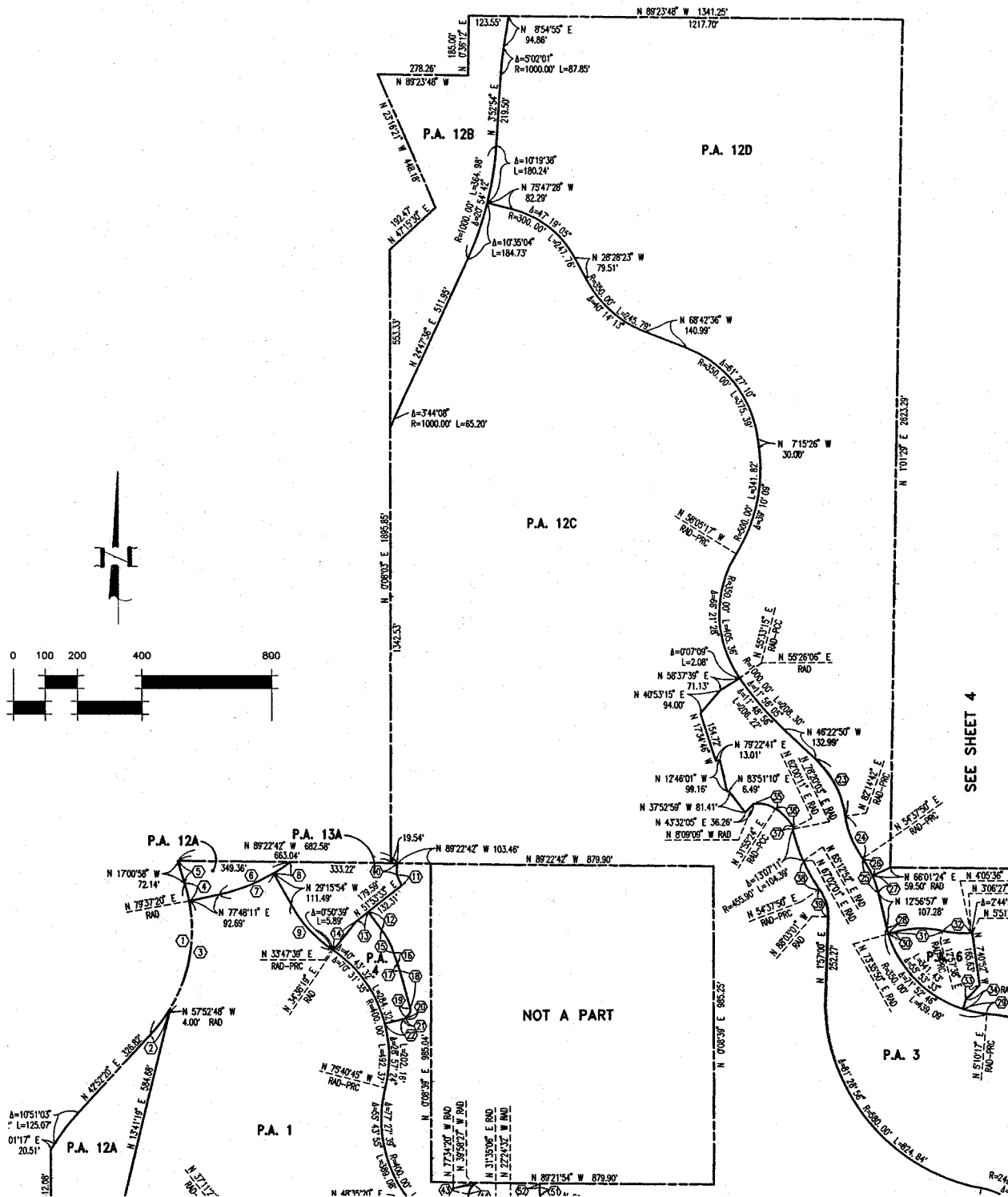
CHANGE OF ZONE CASE NO. 07779
AMENDING ORDINANCE NO. 348
ADOPTED BY ORDINANCE NO. 348.4764
SEPTEMBER 24, 2013

RIVERSIDE COUNTY BOARD OF SUPERVISORS

APN

- 269-060-004
- 269-060-005
- 269-060-006
- 269-100-009
- 269-100-011
- 269-100-012
- 269-100-014
- 269-100-015

SECTION 29 T. 3 S. R. 5 W. S.B.B. & M.



SEE SHEET 4

SEE SHEET 3

LEGEND

SP ZONE
 SPECIFIC PLAN (SP 325 A1)
 MAP NO. 36.057

CHANGE OF OFFICIAL ZONING PLAN
LAKE MATTHEWS

APN

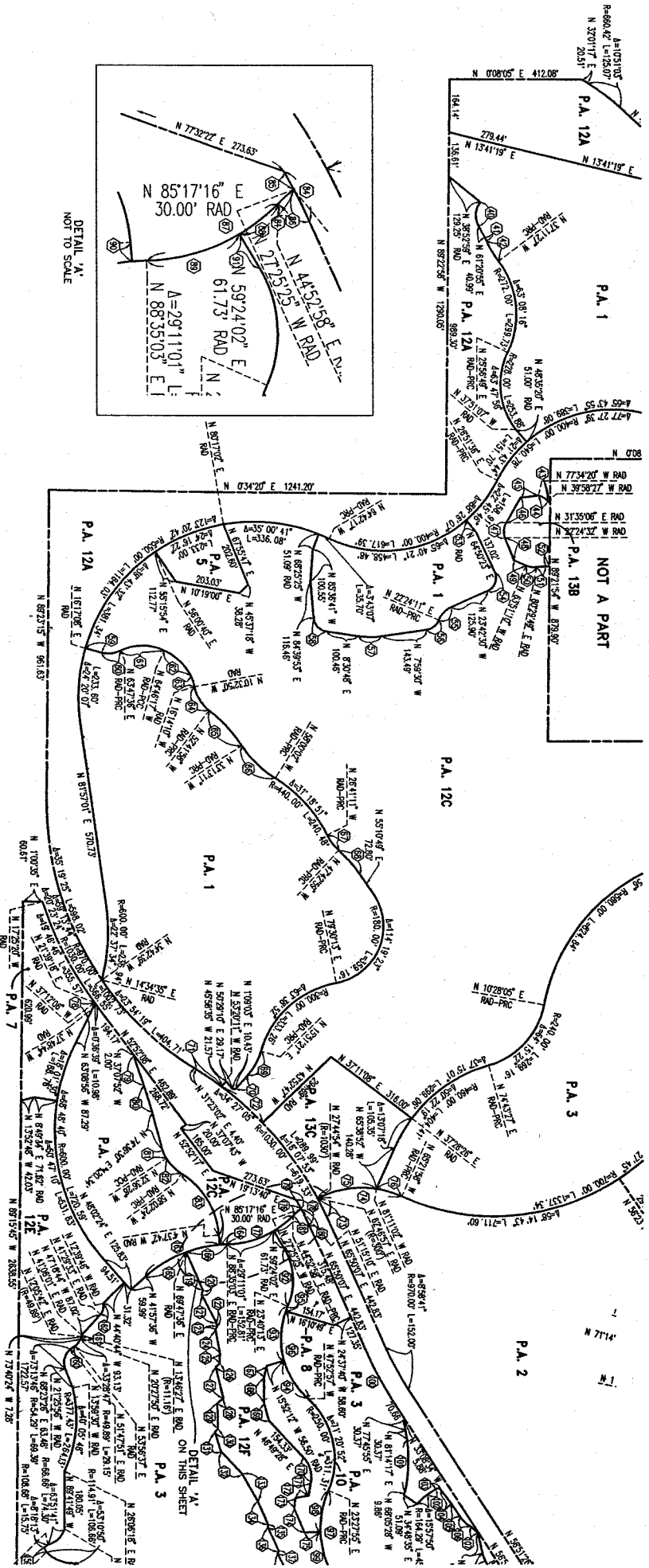
- 269-060-004
- 269-060-005
- 269-060-006
- 269-100-009
- 269-100-011
- 269-100-012
- 269-100-014
- 269-100-015

CHANGE OF ZONE CASE NO. 07779
 AMENDING ORDINANCE NO. 348
 ADOPTED BY ORDINANCE NO. 348.4764
 SEPTEMBER 24, 2013
 RIVERSIDE COUNTY BOARD OF SUPERVISORS

SEE SHEET 2

SECTION 29 T. 3 S. R. 5 W. S.B.B. & M.

SEE SHEET 4



LEGEND

SP ZONE

SPECIFIC PLAN (SP 325 A1)

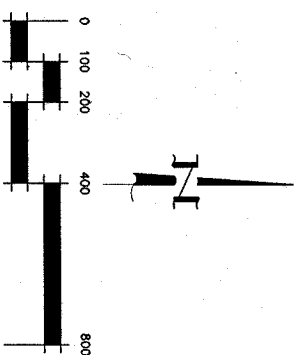
MAP NO. 36.057

CHANGE OF OFFICIAL ZONING PLAN

LAKE MATTHEWS

- APN
- 269-060-004
 - 269-060-005
 - 269-060-006
 - 269-100-009
 - 269-100-011
 - 269-100-012
 - 269-100-014
 - 269-100-015

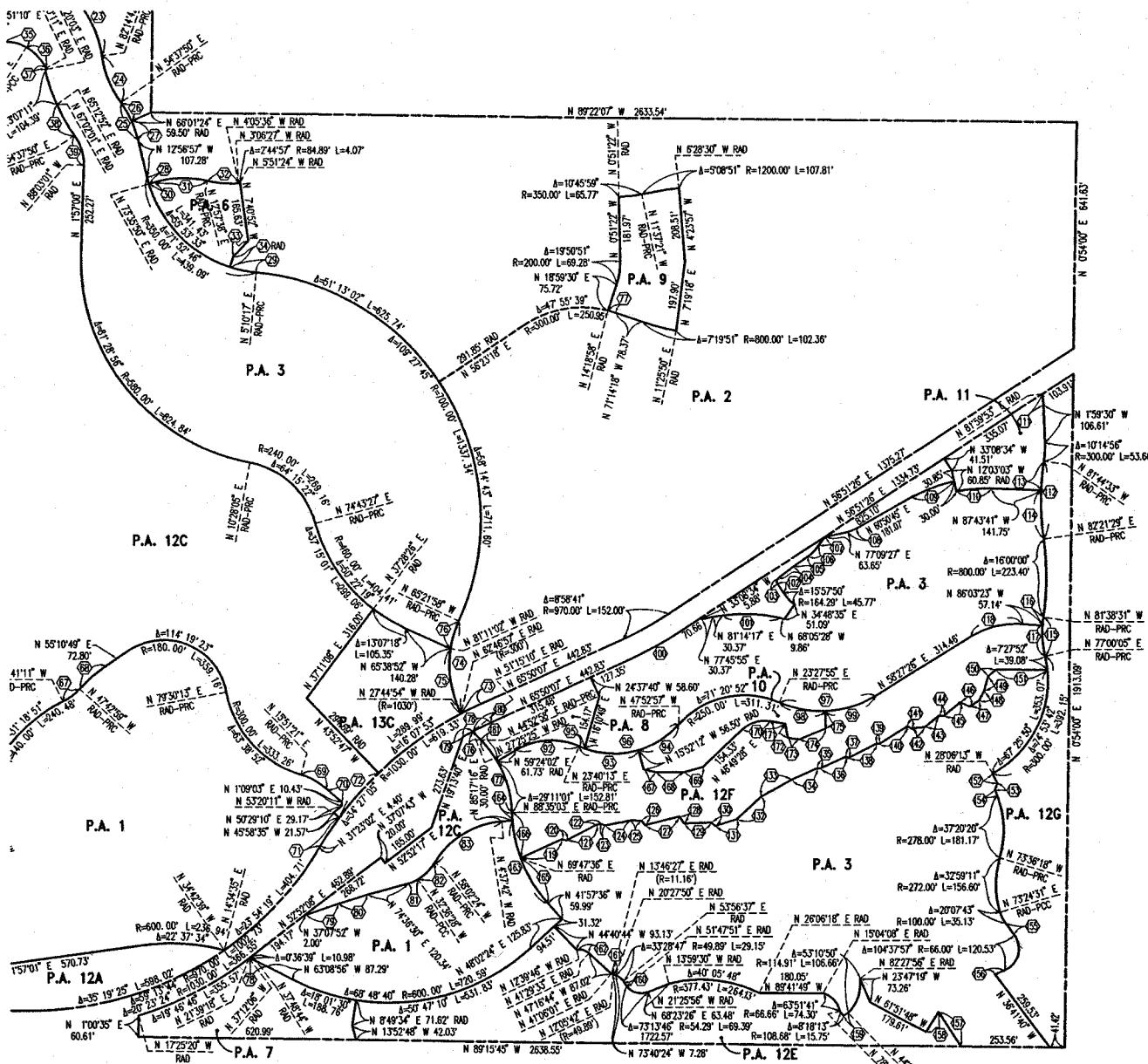
CHANGE OF CASE NO. 07779
 AMENDING ORDINANCE NO. 348
 ADOPTED BY ORDINANCE NO. 348,4764
 SEPTEMBER 24, 2013
 RIVERSIDE COUNTY BOARD OF SUPERVISORS



SECTION 29 T. 3 S. R. 5 W. S.B.B. & M.

SEE SHEET 2

SEE SHEET 3



LEGEND

SP ZONE

SPECIFIC PLAN (SP 325 A1)
MAP NO. 36.057

**CHANGE OF OFFICIAL ZONING PLAN
LAKE MATTHEWS**

APN.

- 269-060-004
- 269-060-005
- 269-060-006
- 269-100-009
- 269-100-011
- 269-100-012
- 269-100-014
- 269-100-015

CHANGE OF ZONE CASE NO. 07779
 AMENDING ORDINANCE NO. 348
 ADOPTED BY ORDINANCE NO. 348.4764
 SEPTEMBER 24, 2013

RIVERSIDE COUNTY BOARD OF SUPERVISORS

SECTION 29 T. 3 S. R. 5 W. S.B.B. & M.

CURVE TABLE			
BEARING/Delta	R	L	T
59°53'18"	483.00'	504.86'	278.23'
10°45'09"	483.00'	90.64'	45.45'
42°29'51"	483.00'	358.25'	187.82'
6°38'18"	483.00'	55.96'	28.01'
N17°00'58"E	-----	72.14'	-----
23°37'28"	600.00'	247.39'	125.48'
17°38'41"	600.00'	184.77'	93.12'
5°58'47"	600.00'	62.62'	31.34'
26°56'26"	400.00'	188.08'	95.81'
N0°37'18"E	-----	35.79'	-----
N22°41'21"W	-----	35.06'	-----
N37°32'59"W	-----	67.74'	-----
N51°53'33"E	-----	47.28'	-----
N38°57'01"E	-----	114.19'	-----
19°45'10"	238.20'	82.12'	41.47'
N19°56'20"W	-----	33.92'	-----
3°53'41"	368.36'	25.04'	12.52'
N15°02'14"W	-----	119.12'	-----
81°21'58"	24.00'	34.08'	20.63'
N23°08'51"W	-----	4.37'	-----
9°31'57"	52.50'	8.73'	4.38'
N76°22'13"E	-----	60.36'	-----
38°37'32"	300.00'	202.24'	105.13'
27°36'52"	300.00'	144.59'	73.73'
22°25'13"	300.00'	117.39'	58.48'
11°01'39"	300.00'	57.74'	28.96'
1°23'33"	300.00'	58.65'	29.92'
3°27'13"	350.00'	21.10'	10.55'
12°32'00"	350.00'	76.56'	38.43'
N73°35'30"E	-----	15.22'	-----
29°21'48"	300.00'	153.75'	78.60'
17°03'14"	300.00'	89.29'	44.98'
N44°16'22"E	-----	61.69'	-----
N17°42'17"E	-----	30.00'	-----
40°04'33"	101.18'	70.77'	36.90'
30°04'47"	156.33'	82.07'	42.01'
N29°30'46"E	-----	5.01'	-----
12°24'10"	460.00'	99.58'	49.98'
37°19'08"	140.00'	91.19'	47.28'
67°32'04"	66.00'	77.79'	44.13'
5°04'25"	100.00'	8.88'	4.43'
13°36'47"	328.00'	77.83'	39.19'
N49°01'02"E	-----	9.96'	-----
37°35'53"	52.02'	34.14'	17.71'
N62°29'41"W	-----	56.48'	-----
N60°23'09"W	-----	90.37'	-----
53°59'38"	50.48'	47.57'	25.72'
N68°55'03"E	-----	76.40'	-----
N23°18'17"E	-----	40.84'	-----
35°39'00"	55.74'	34.68'	17.92'
10°49'41"	145.00'	27.40'	13.74'
N1°19'31"E	-----	11.41'	-----
N49°37'22"E	-----	47.91'	-----
9°27'07"	45.00'	71.83'	46.16'
43°53'19"	75.00'	57.45'	30.22'
59°36'19"	50.00'	52.02'	28.64'
16°30'18"	250.00'	72.02'	36.28'
76°09'05"	45.00'	59.81'	35.25'
N14°58'33"E	-----	52.27'	-----
41°08'58"	85.00'	61.05'	31.91'
51°26'07"	160.00'	143.83'	77.06'
37°06'01"	180.00'	116.55'	60.40'
17°07'26"	120.00'	35.86'	18.07'
42°09'08"	120.00'	88.28'	46.25'
19°28'47"	440.00'	149.59'	75.53'
24°46'52"	340.00'	147.05'	74.69'
21°01'48"	160.00'	58.73'	29.70'
12°53'49"	440.00'	99.04'	49.73'
25°57'36"	190.00'	86.09'	43.79'
N48°11'03"W	-----	56.49'	-----
5°16'48"	1030.00'	94.92'	47.49'
9°27'24"	1030.00'	170.00'	85.19'
3°35'01"	1030.00'	64.42'	32.22'
51°51'05"	300.00'	271.49'	145.84'
36°02'01"	300.00'	188.67'	97.57'
15°49'04"	300.00'	82.82'	41.68'
4°26'44"	300.00'	23.28'	11.64'
5°11'46"	600.00'	54.41'	27.22'
N70°55'59"E	-----	97.21'	-----
N72°35'00"E	-----	87.68'	-----
17°12'58"	100.00'	30.05'	15.14'
25°25'56"	150.00'	66.58'	33.85'
53°24'42"	250.00'	233.05'	125.77'
5°11'06"	970.00'	87.78'	43.92'
1°55'35"	970.00'	32.61'	16.31'
3°15'31"	970.00'	55.17'	27.59'
43°42'05"	300.00'	228.82'	120.30'
14°31'04"	300.00'	76.01'	38.21'
29°11'01"	300.00'	152.81'	78.10'

CURVE TABLE			
BEARING/Delta	R	L	T
N85°17'16"E	-----	30.00'	-----
N59°24'02"E	-----	61.73'	-----
54°16'11"	200.00'	189.44'	102.50'
39°32'24"	250.00'	172.53'	89.86'
32°00'45"	250.00'	139.68'	71.72'
3°41'06"	250.00'	16.08'	8.04'
67°52'04"	250.00'	296.13'	168.21'
55°00'29"	300.00'	288.02'	156.20'
25°18'36"	300.00'	132.52'	67.36'
29°41'53"	300.00'	155.50'	79.54'
8°58'41"	1030.00'	161.40'	80.86'
20°16'12"	462.88'	163.76'	82.74'
N33°41'09"W	-----	30.25'	-----
84°12'07"	12.08'	17.75'	10.92'
N52°29'56"E	-----	52.81'	-----
N55°05'09"E	-----	52.81'	-----
24°31'48"	102.94'	44.07'	22.38'
10°59'31"	159.31'	30.56'	15.33'
13°00'25"	122.75'	27.86'	13.99'
15°42'52"	467.74'	128.29'	64.55'
14°19'22"	400.00'	99.99'	50.26'
6°00'38"	300.00'	31.47'	15.73'
15°53'56"	800.00'	222.00'	111.72'
5°59'07"	800.00'	83.57'	41.82'
9°54'51"	800.00'	138.43'	69.39'
21°21'24"	300.00'	111.82'	56.57'
4°24'52"	300.00'	23.11'	11.56'
16°56'32"	300.00'	88.71'	44.68'
35°29'11"	250.00'	154.84'	79.99'
N66°17'01"E	-----	52.81'	-----
N77°55'35"W	-----	13.77'	-----
N62°49'16"E	-----	97.73'	-----
N81°08'54"E	-----	13.06'	-----
N66°27'16"W	-----	10.82'	-----
N78°32'13"E	-----	73.64'	-----
N87°42'34"W	-----	32.58'	-----
N39°20'27"W	-----	15.24'	-----
N76°12'53"E	-----	100.94'	-----
N36°35'32"W	-----	24.30'	-----
N89°34'48"E	-----	77.74'	-----
N50°51'07"W	-----	15.10'	-----
N72°10'59"E	-----	63.19'	-----
N47°05'55"E	-----	93.95'	-----
N68°46'47"E	-----	99.63'	-----
N66°19'07"E	-----	80.35'	-----
N76°13'06"W	-----	6.11'	-----
N65°44'21"E	-----	82.49'	-----
N58°24'31"W	-----	7.54'	-----
N63°38'22"E	-----	90.99'	-----
N80°31'58"W	-----	6.82'	-----
N58°41'15"E	-----	96.17'	-----
N58°51'36"W	-----	11.74'	-----
N8°41'48"E	-----	38.23'	-----
N5°11'10"E	-----	49.74'	-----
N86°45'15"E	-----	13.61'	-----
N50°55'34"E	-----	61.94'	-----
N6°41'12"W	-----	30.12'	-----
N65°36'56"E	-----	32.64'	-----
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N16°13'32"E	-----	43.05'	-----
N49°18'59"E	-----	29.41'	-----
N89°26'52"W	-----	146.13'	-----
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N20°56'38"W	-----	17.11'	-----
N36°43'12"W	-----	40.99'	-----
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N32°33'34"W	-----	117.02'	-----
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N60°11'18"E	-----	15.83'	-----
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3°17'47"	400.00'	23.01'	11.51'
21°45'12"	400.00'	151.87'	76.86'
18°47'26"	400.00'	131.18'	66.19'
N76°06'56"W	-----	35.61'	-----
N89°47'46"E	-----	81.03'	-----
N74°45'11"E	-----	56.29'	-----
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N80°39'45"W	-----	44.51'	-----
N10°41'19"W	-----	41.19'	-----
N82°44'43"W	-----	31.69'	-----
N67°43'05"E	-----	81.80'	-----
N1°50'41"W	-----	49.55'	-----
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43°42'05"	300.00'	228.82'	120.30'
5°11'06"	970.00'	87.78'	43.92'
1°55'35"	970.00'	32.61'	16.31'
3°15'31"	970.00'	55.17'	27.59'
14°31'04"	300.00'	76.01'	38.21'

LEGEND

SP ZONE

SPECIFIC PLAN (SP 325 A1)
MAP NO. 36.057

**CHANGE OF OFFICIAL ZONING PLAN
LAKE MATTHEWS**

CHANGE OF ZONE CASE NO. 07779
AMENDING ORDINANCE NO. 348
ADOPTED BY ORDINANCE NO. 348.4764
SEPTEMBER 24, 2013

RIVERSIDE COUNTY BOARD OF SUPERVISORS

APN

- 269-060-004
- 269-060-005
- 269-060-006
- 269-100-009
- 269-100-011
- 269-100-012
- 269-100-014
- 269-100-015

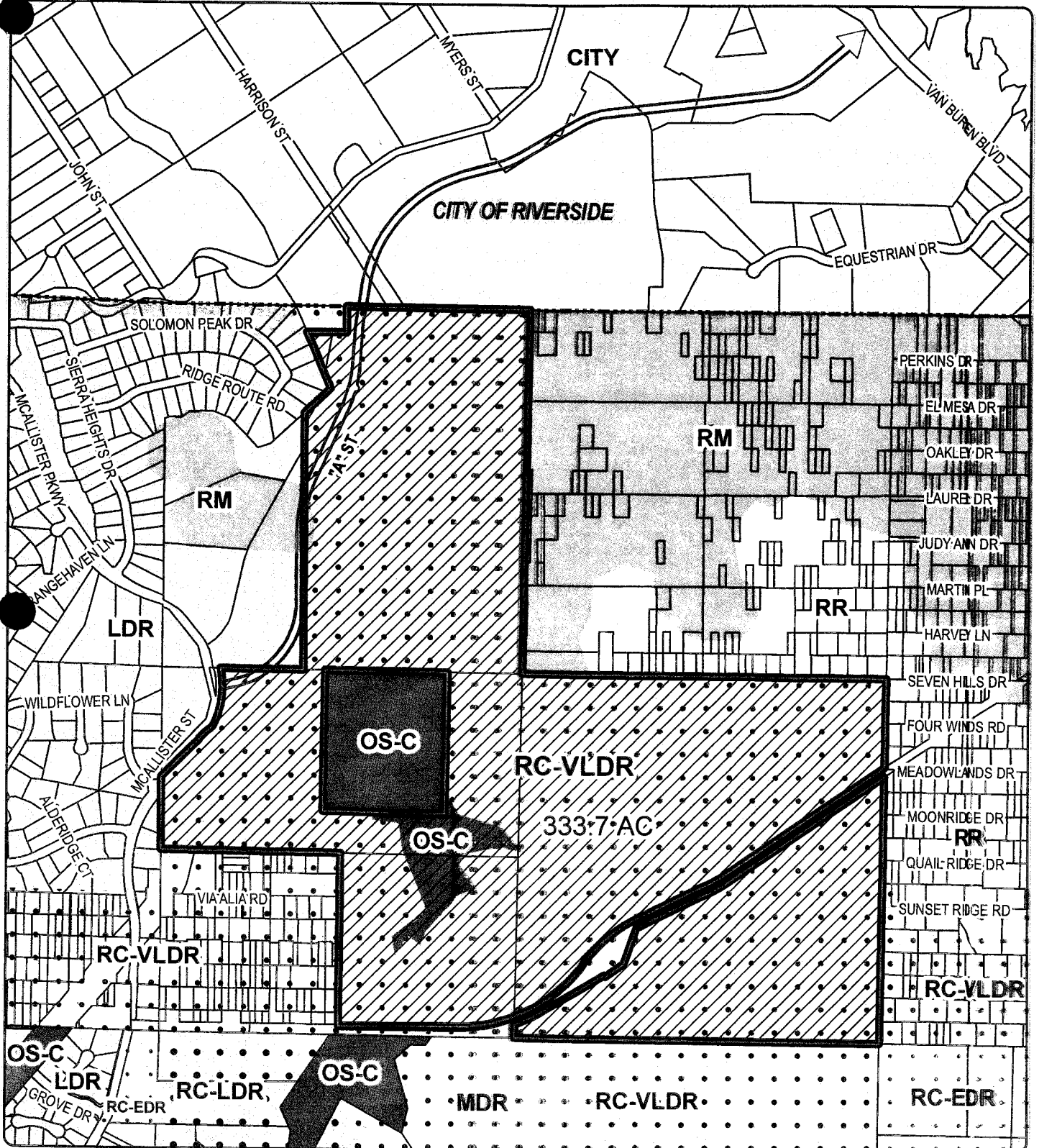
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SP00325A1 / CZ07779 / TR36390

EXISTING GENERAL PLAN

Supervisor Jeffries
District 1

Date Drawn: 7/08/13
Exhibit 5



Zoning District: Lake Mathews
Township/Range: T3SR5W
Section: 29

Assessors Bk. Pg. 239-06, 10, 24, 27
Thomas Bros. Pg. 745 4B
Edition 2009



DISCLAIMER: On October 7, 2003, the County of Riverside adopted a new General Plan providing new land use designations for unincorporated Riverside County parcels. The new General Plan may contain different types of land use than is provided for under existing zoning. For further information, please contact the Riverside County Planning Department offices in Riverside at (951) 955-3200 (Western County), or in Indio at (760) 863-8277 (Eastern County) or website at <http://www.tlma.co.riverside.ca.us/index.html>

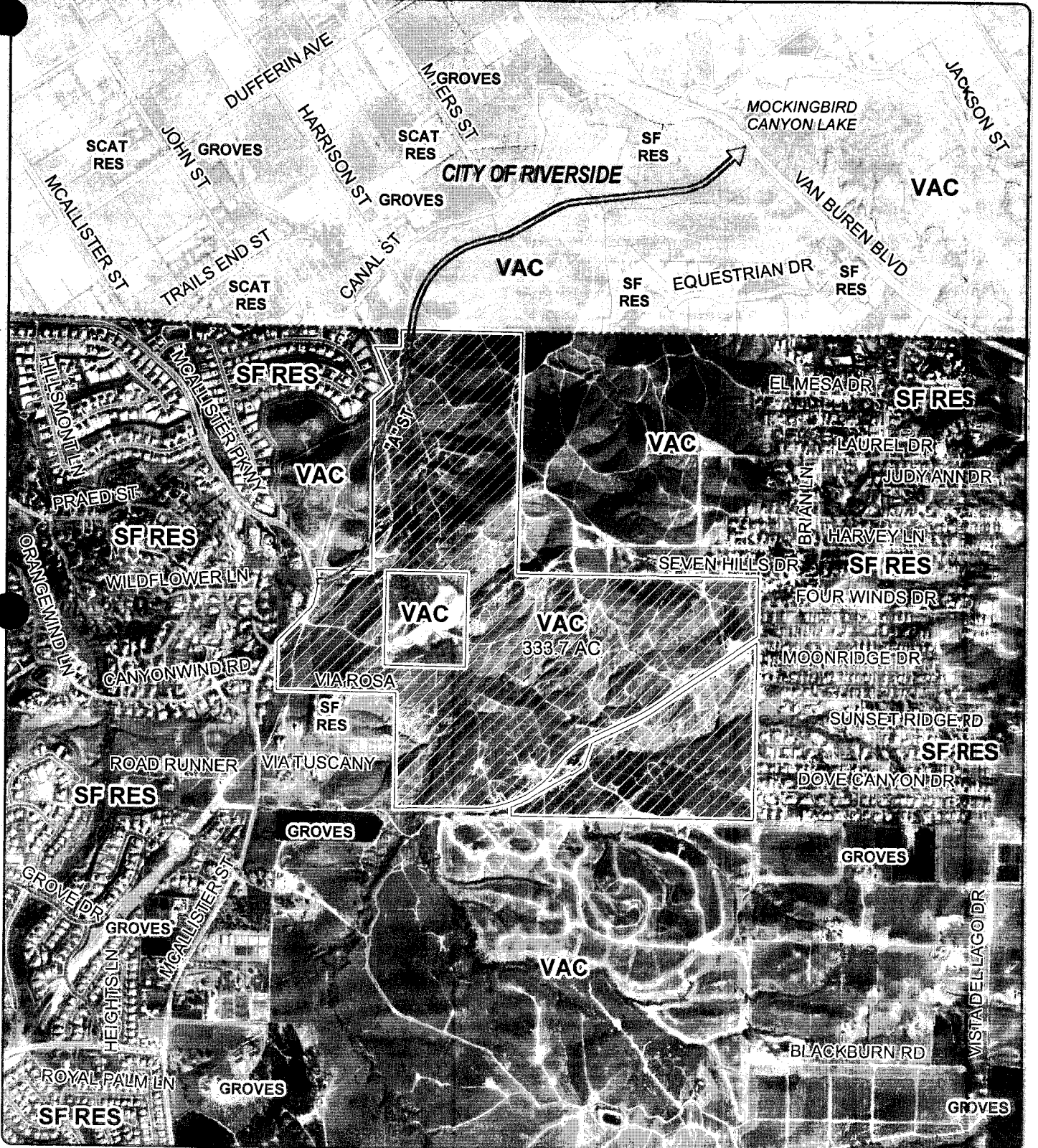
RIVERSIDE COUNTY PLANNING DEPARTMENT

SP00325A1 / CZ07779 / TR36390

LAND USE

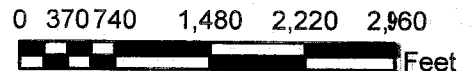
Supervisor Jeffries
District 1

Date Drawn: 7/08/13
Exhibit 1



Zoning District: Lake Mathews
Township/Range: T3SR5W
Section: 29

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RIVERSIDE COUNTY PLANNING DEPARTMENT

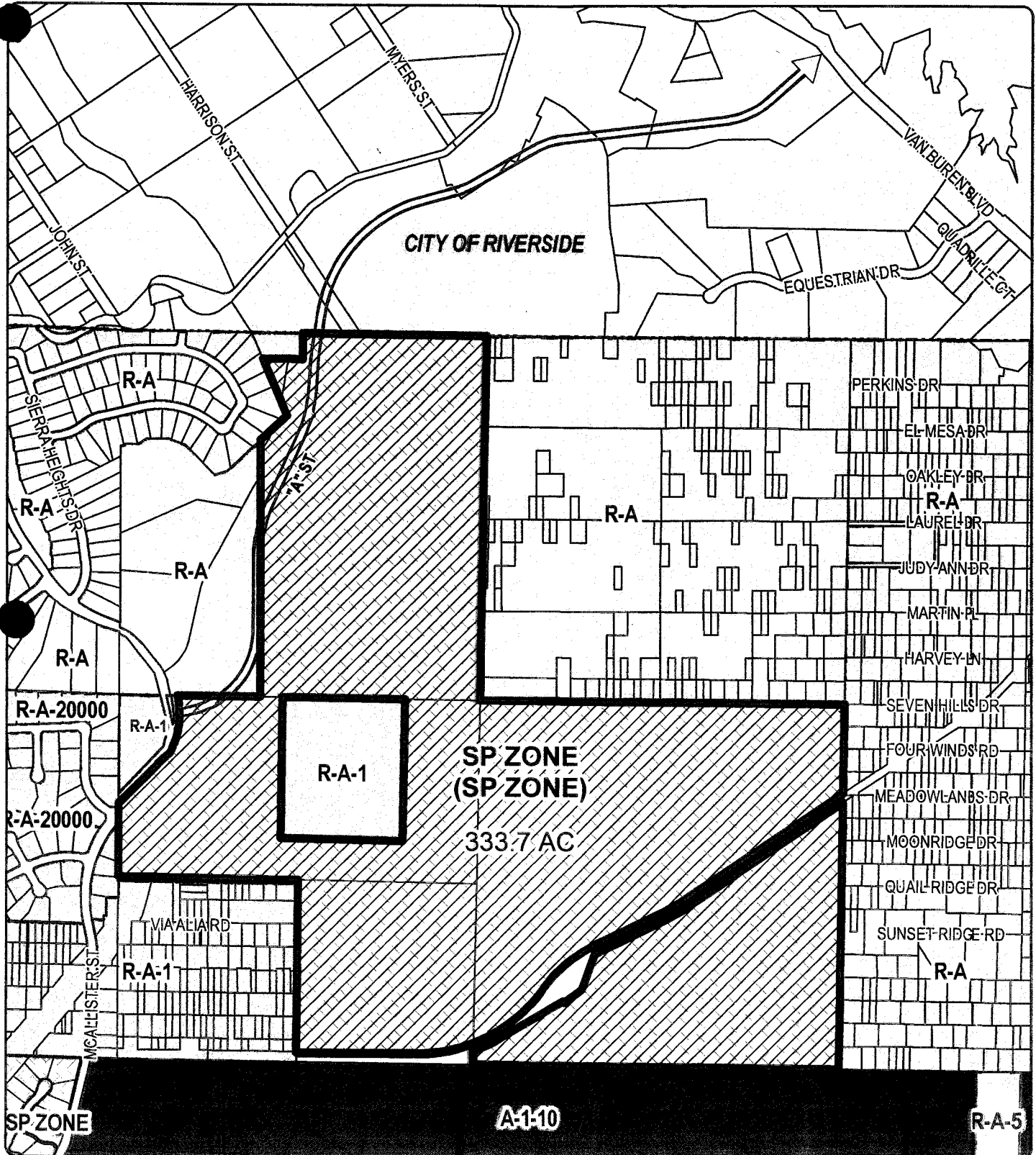
SP00325A1 / CZ07779 / TR36390

PROPOSED ZONING

Supervisor Jeffries
District 1

Date Drawn: 7/08/13

Exhibit 3



Zoning District: Lake Mathews
Township/Range: T3SR5W
Section: 29

Assessors Bk. Pg. 239-06, 10, 24, 27
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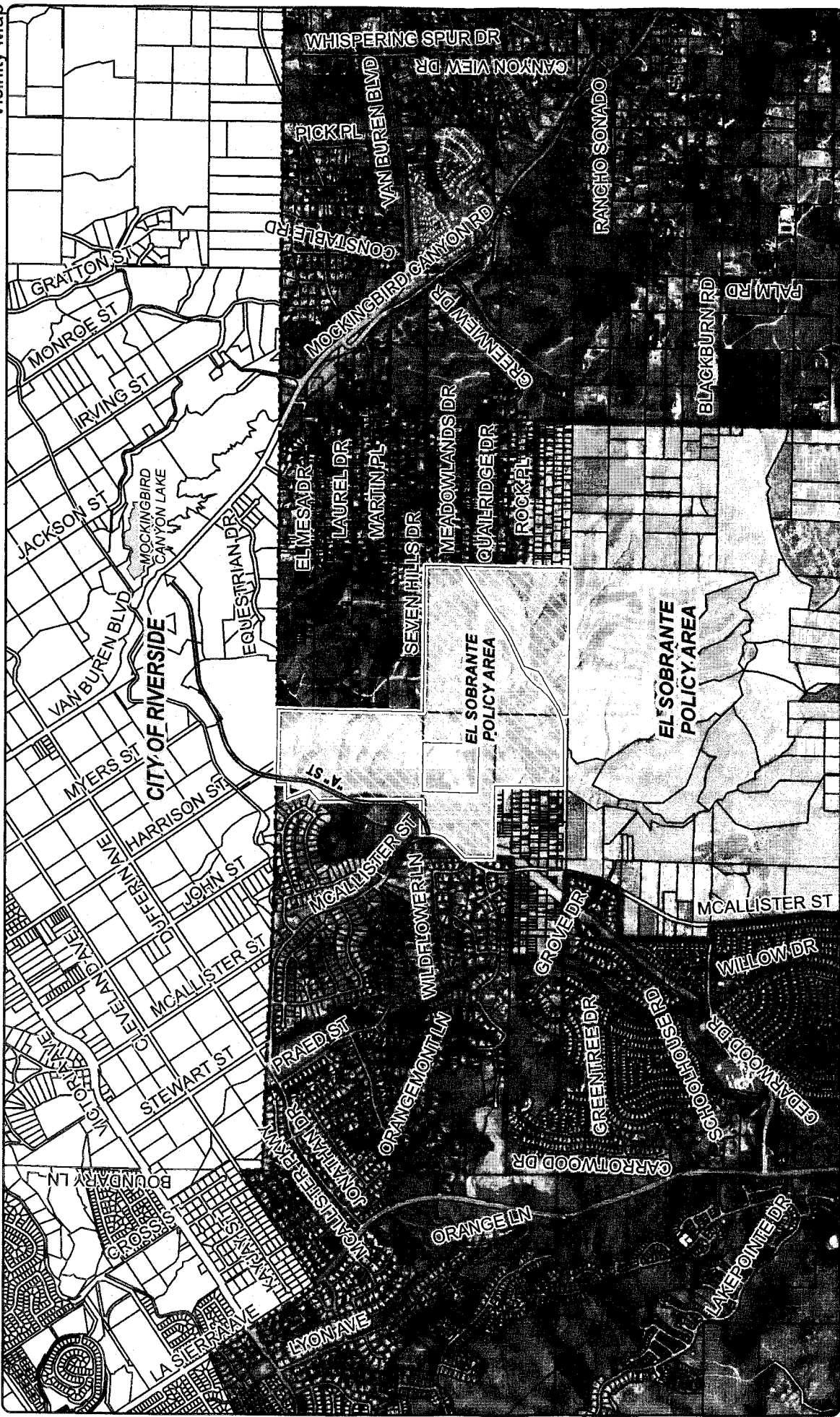
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RIVERSIDE COUNTY PLANNING DEPARTMENT
SP00325A1 / C07779 / TR36390
VICINITY/POLICY AREAS

Supervisor Jeffries
 District 1

Date Drawn: 7/08/13
 Vicinity Map



Zoning District: Lake Mathews
 Township/Range: T3SR5W
 Section: 29

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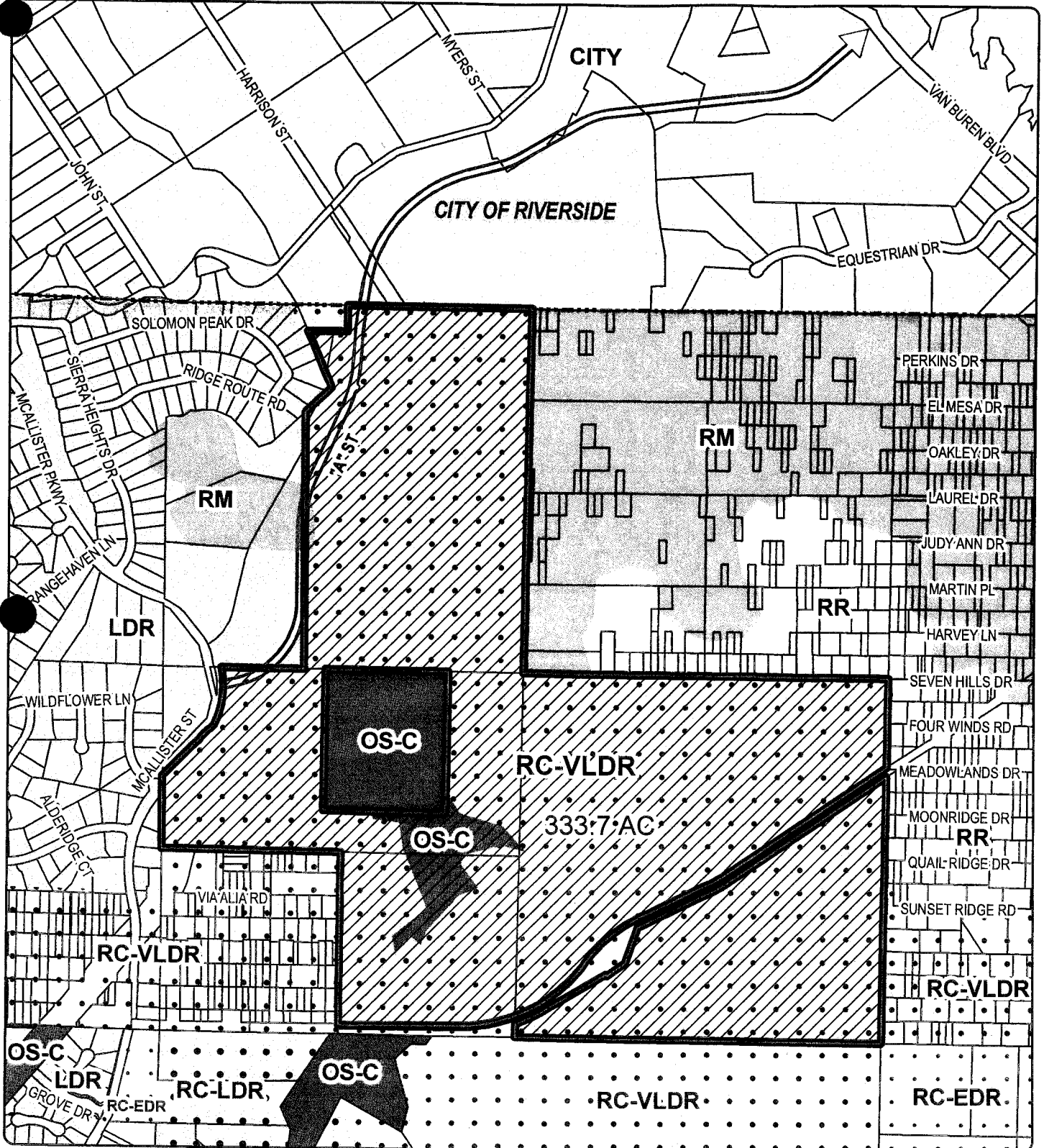
RIVERSIDE COUNTY PLANNING DEPARTMENT

SP00325A1 / CZ07779 / TR36390

EXISTING GENERAL PLAN

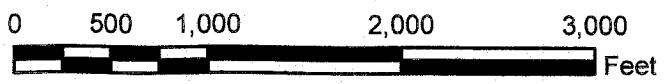
Supervisor Jeffries
District 1

Date Drawn: 7/08/13
Exhibit 5



Zoning District: Lake Mathews
Township/Range: T3SR5W
Section: 29

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Addendum No. 1 to
Environmental Impact Report No. 433

for:

Specific Plan No. 325, Amendment No. 1
Change of Zone No. 7779
Tentative Tract Map No. 36390
Capital Project Work Order No. C1-0641

Prepared by:

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August 19, 2013

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- H. Preliminary Hydrology Report
- I. Traffic Report
- J. Blasting Analysis
- K. Fire Behavior and Protection Plan

I. Introduction

I. INTRODUCTION

A. Purpose of this Document

This document is an Addendum to Environmental Impact Report (EIR) No. 433 (SCH No. 2001061096), prepared in accordance with the California Environmental Quality Act (CEQA). This EIR Addendum was compiled by the Planning Department of the Riverside County Transportation & Land Management Agency, serving as the Lead Agency for the proposed Project. See CEQA Guidelines §15050.

The following information is provided in this Introduction: 1) the principal requirements of CEQA; 2) the history of Specific Plan No. 325 (SP 325) and Final Environmental Impact Report No. 433 (EIR 433); 3) a summary of the proposed Project; 4) the purpose of an EIR Addendum; 5) the standards for adequacy of an EIR Addendum pursuant to the State CEQA Guidelines; 6) a description of the format and content of this EIR Addendum; and 7) Riverside County's processing requirements to consider the proposed Project for approval. Following this introductory information is Riverside County's Environmental Assessment Form, which serves as the CEQA Initial Study for the proposed Project, which provides conclusive evidence that all potentially significant environmental effects of the proposed Project were previously and adequately analyzed in Final EIR No. 433.

B. The California Environmental Quality Act

CEQA, a statewide environmental law contained in Public Resources Code §§21000-21177, applies to most public agency decisions to carry out, authorize, or approve actions that have the potential to adversely affect the environment. The overarching goal of CEQA is to protect the physical environment. To achieve that goal, CEQA requires that public agencies inform themselves of the environmental consequences of their discretionary actions and consider alternatives and mitigation measures that could avoid or reduce significant adverse effects when avoidance or reduction is feasible. It also gives other public agencies and the general public an opportunity to comment on the information. If significant adverse effects cannot be avoided, reduced, or mitigated to below a level of significance, the public agency is required to prepare an EIR and balance the project's environmental concerns with other goals and benefits in a statement of overriding considerations.

C. Specific Plan No. 325, Final Environmental Impact Report No. 433, and Associated Approvals

On December 21, 2004, the Riverside County Board of Supervisors approved the "Lake Mathews Golf and Country Club" project and certified its associated Final EIR 433. Actions taken by the County associated with the project included approval of General Plan Amendment No. 572, approval of Change of Zone No. 6598, adoption of SP 325, and certification of Final EIR 433 (SCH No. 2001061096).

The project consisted of approvals to develop a 333.8-acre property as a master-planned residential community with amenities including a golf course, golf clubhouse, parks, and trails. The property is

SP00325A1, CZ07779, TR36390, C1-0641

located in the Lake Mathews/Woodcrest area of unincorporated Riverside County, approximately 1.2 miles north of Lake Matthews and 1.8 miles south of State Route 91 (SR-91). Specifically, the approved project calls for development of the property with 295 single-family residential homes, an 18-hole golf course on 119.1 acres, a golf course clubhouse complex on 3.5 acres, parks on 2.5 acres, and trails on 1.2 acres, with 85.2 acres set aside as open space. To provide access to the community upon its development and improve traffic circulation in the vicinity, SP 325 and EIR 433 planned for and evaluated the construction and operation of an off-site road called "Street A," which is designed to connect McAllister Street to Van Buren Boulevard, with a short segment passing through the Lake Mathews Golf and Country Club property. Approximately 40 percent of the planned roadway alignment is located within the jurisdictional boundaries of the County of Riverside and approximately 60 percent of the planned roadway alignment is located within the jurisdictional boundaries of the City of Riverside.

To implement the approved project, the Riverside County Planning Commission approved a subdivision map, Tentative Tract Map No. 30153 (TR 30153), on January 18, 2006. In accordance with CEQA, the Planning Department of the Riverside County Transportation & Land Management Agency prepared an Initial Study (EA 38579) to evaluate the physical environmental effects of TR 30153. The Initial Study determined that TR 30153 would implement SP 325 as approved and that the environmental effects associated with TR 30153 had been adequately covered by Final EIR 433; therefore, no additional CEQA documentation was required at that time.

Shortly after the approval of TR 30153, the property owner received necessary permits and approvals required by state and federal resource agencies to implement the approved project. The U.S. Fish and Wildlife Service issued a favorable Biological Opinion for the project in accordance with the Western Riverside County Multiple Species Conservation Program (MSHCP) on May 16, 2006; the California Department of Fish and Game (CDFG) approved Streambed Alteration Agreement Number 1600-2005-0076-R6 on June 21, 2006; and, the U.S. Army Corps of Engineers approved Clean Water Act Section 404 Permit No. 20050112-SJH on February 20, 2007. These permits and approvals are herein incorporated by reference and are available for public review at the Riverside County Planning Department, 4080 Lemon Street, 12th Floor, Riverside, CA 92501.

At the present time, all of the necessary permits and approvals are in place to develop the property as described in approved SP 325. However, no development has occurred on the property to-date. The subject property was listed for sale and purchased by a new owner who desires to make changes to the approved project, as described below in Section I.D.

D. Project Summary

The current owner of the subject property (hereafter "Project Applicant") seeks to amend SP 325 and replace approved TR 30153 with proposed TR 36390. The proposed modifications include eliminating the planned golf course and clubhouse, increasing the amount of open space, park acreage, and the maximum number of permitted single-family homes, and adding storm water quality/detention facility improvements. Actions requested of Riverside County include the adoption of Amendment No. 1 to SP 325 (SP 325A1), adoption of an associated Change of Zone No. 7779 (CZ 7779), and approval of Tentative Tract Map No. 36390 (TR 36390) (collectively hereafter called "the Citrus Heights Project").

SP00325A1, CZ07779, TR36390, C1-0641

Specifically, the Citrus Heights Project would involve the following:

- Reduce the approved grading footprint for SP 325 (exclusive of grading required for Street "A") from approximately 254.7 acres to approximately 207.6 acres, a reduction of 47.1 acres.
- Eliminate the approved 119.1-acre golf course and 3.5-acre golf course clubhouse from the Specific Plan.
- Increase areas planned for open space from 85.2 acres to 162.8 acres.
- Increase the area planned for parks from 2.5 acres to 7.1 acres.
- Develop a portion of the property with 343 single-family residential homes at a maximum gross density of 1.03 dwelling units per acre. In comparison, approved SP 325 provides for a maximum of 295 homes at a maximum gross density of 0.9 dwelling units per acre.
- Introduce 3.3 acres of storm water drainage/water quality detention facilities on the subject property while retaining existing drainage characteristics.

Because the proposed Citrus Heights Project would involve the discretionary approval of Riverside County associated with SP 325A1, CZ 7779, and TTM 36390, environmental review is required pursuant to CEQA.

Additionally, SP 325 and EIR 433 planned for and evaluated the construction and operation of an off-site road called "Street 'A'." Concurrent with the Project Applicant's proposals, the Riverside County Transportation Department is concurrently processing Capital Project Work Order No. C1-0641 to construct Street "A" between McAllister Street and Van Buren Boulevard (approximately 7,600 linear feet), with a short segment traversing and providing access to the Citrus Heights property. In addition to providing access to SP 325, Street "A" is intended to improve operational efficiency of the surrounding roadway network. Street "A" is classified as a "Collector" Road by the General Plan Circulation Elements of both the County of Riverside and the City of Riverside, with approximately 40 percent of the planned roadway alignment being located within the jurisdictional boundaries of the County of Riverside and approximately 60 percent of the planned roadway alignment being located within the jurisdictional boundaries of the City of Riverside.

Improvement plans for Street "A" provide for its construction as a modified Collector Road, featuring two vehicular travel lanes and curb and gutter improvements within 66 feet of public right-of-way. A traffic signal would be constructed at the intersection of Street "A" with Van Buren Boulevard. Street "A" would include infrastructure improvements to capture and convey storm water drainage flows, and a water main and dry utilities would be constructed beneath Street "A" to provide service to the Citrus Heights property. A multi-use trail would be constructed on the eastern edge of Street "A" between the northern and southern access points of SP 325A1 (i.e., proposed Street "A" and Street "C"). The grading footprint for Street "A" would be reduced from approximately 33.5 acres (as provided by approved SP 325) to approximately 23.3 acres, a reduction of approximately 10.2 acres.

SP00325A1, CZ07779, TR36390, C1-0641

Pursuant to a cooperative agreement dated April 18, 2012, between Riverside County and the City of Riverside, the city has authorized the county to act as the lead agency for the Street "A" project (County of Riverside Capital Project C1-0641). Because Street "A" would be constructed on land which neither the Project Applicant, Riverside County, nor City of Riverside hold sufficient title or interest, land acquisition and/or eminent domain proceedings are required to facilitate construction of the roadway. As such, the County of Riverside is the lead agent for Capital Project C1-0641, not the Project Applicant. Regardless, because Street "A" was evaluated by EIR 433 and the plans and specifications of Capital Project C1-0641 require discretionary approval by the County of Riverside Board of Supervisors, the CEQA environmental review requirements for the construction and operation of Street "A" are included in this EIR Addendum.

Capital Project C1-0641 and the Citrus Heights Project are hereinafter considered collectively as "the Project" evaluated herein.

E. CEQA Requirements for an EIR Addendum

The CEQA Guidelines allow for the updating and use of a previously certified EIR for projects that have changed or are different from the previous project or conditions analyzed in the certified EIR. In cases where changes or additions occur with no new significant environmental impacts, an Addendum to a previously certified EIR may be prepared. *See* CEQA Guidelines § 15164.

The following describes the requirements of an Addendum, as defined by CEQA Guidelines § 15164:

- a. The lead agency or responsible agency shall prepare an Addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in § 15162 calling for preparation of a Subsequent EIR have occurred.
- b. An Addendum need not be circulated for public review but can be included in or attached to the Final EIR.
- c. The decision-making body shall consider the Addendum with the Final EIR prior to making a decision on the project.
- d. A brief explanation of the decision not to prepare a Subsequent EIR pursuant to § 15162 should be included in an Addendum to an EIR, the lead agency's findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

As noted above, CEQA Guidelines § 15164(a) allows for the preparation of an Addendum if none of the conditions described in § 15162 are met. CEQA Guidelines § 15162 describes the conditions under which a Subsequent EIR must be prepared, as follows:

- a. Substantial changes are proposed in the project which will require major revisions of the previous EIR due to the involvement of environmental effects or a substantial increase in the severity of previously identified significant effects;

SP00325A1, CZ07779, TR36390, C1-0641

- b. Substantial changes occur with respect to the circumstances under which the project is undertaken, which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- c. 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, shows any of the following:
 - 1. The project will have one or more significant effects not discussed in the previous EIR;
 - 2. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - 3. 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 alternatives; or
 - 4. 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.

If none of these circumstances are present, and only minor technical changes or additions are necessary to update the previously certified EIR, an Addendum may be prepared. *See* CEQA Guidelines § 15164. As described in detail herein, none of the above circumstances that warrant the preparation of a Subsequent EIR are present.

F. Type of CEQA Compliance Document and Level of Analysis

This document is Addendum No. 1 to previously-certified EIR 433. As such, this EIR Addendum compares the differences between the environmental impacts previously disclosed in EIR 433 and those that would be associated with the proposed Project described above in Section I.D.

This EIR Addendum provides the environmental information necessary for Riverside County to make an informed decision about the environmental effects of the proposed Project, which consists of the actions summarized above in Section I.D and more fully described in the associated Project application materials on file with the Riverside County Planning Department. Serving as the CEQA Lead Agency (*see* CEQA Guidelines §15050), the Planning Department determined that an Addendum to the previously-certified Final EIR 433 should be prepared, rather than a Supplemental or Subsequent EIR, based on the following facts:

- a. As demonstrated in the accompanying Environmental Assessment No. 42510 (EA 42510) and its associated analyses, the proposed Project would not require major revisions to certified Final EIR 433 because the Project would not result any new significant impacts to

the physical environment nor would it create substantial increases in the severity of the environmental impacts previously disclosed in the Final EIR. In summary, the proposed Project consists of reducing the approved physical impact footprint of SP 325 by approximately 47 acres by eliminating the planned golf course and clubhouse while also increasing the amount of open space, park acreage, and adding storm water quality/detention facility improvements. Although the maximum number of single-family homes within SP 325 would increase from 295 units to 343 units, the physical and operational impacts associated with the residential intensity increase would be more than offset by elimination of the physical and operational impacts associated with the planned golf course and clubhouse. As proposed, the Project would involve the following:

- The Project would increase the amount of open space conserved on the Citrus Heights property from 85.2 acres as approved under SP 325, to 162.8 acres as proposed by the Project. As such, the Project would decrease the grading footprint of SP 325 by 47.1 acres, from approximately 254.7 acres of impact under SP 325 to approximately 207.6 acres of impact associated with the proposed Project. As a result, all short-term environmental effects associated with grading operations on the Citrus Heights property would be no greater than the effects previously disclosed in the Final EIR.

Additionally, permanent impacts associated with SP 325 to all natural land resources would be reduced, including 44.4 acres of reduced impact to biological resources as compared to the level of impact previously disclosed in EIR 433.

- The Project would eliminate the approved 119.1-acre golf course and 3.5-acre golf course clubhouse from SP 325. Elimination of the golf course would substantially reduce the projected demand for non-potable water resources and the need for chemical fertilizer application disclosed in the Final EIR that would have been required to irrigate and maintain the golf course.
- The Project proposes to develop the Citrus Heights property with 343 single-family dwelling units at a maximum gross density of 1.03 dwelling units per acre. In comparison, approved SP 325 allows a maximum of 295 single-family dwelling units at a maximum gross density of 0.9 dwelling units per acre. Although the proposed Project would increase the residential intensity on the Citrus Heights property by 48 single-family units, operational impacts associated with air quality, noise, and traffic would be below levels disclosed in EIR 433 due to the elimination of air quality, noise, and traffic effects associated with operation of the golf course and clubhouse. A traffic trip comparison analysis was conducted for the Project (see Appendix I to this EIR Addendum) and shows that traffic associated with the proposed Project would represent a reduction of 212 average daily trips, including 6 fewer AM peak hour trips and 4 fewer PM peak hour trips, compared to the trip generation evaluated by EIR 433.¹ Operational noise and air quality emissions would be reduced concomitantly.

¹ Appendix I studied traffic generated by 345 single-family homes, which is two (2) more homes than actually proposed by the Project.

- Although the proposed Project would increase residential intensity on the Citrus Heights property by 48 single-family units, the Project would not result in a substantial increase in the severity of impacts associated with public services and utilities/service systems as compared to that disclosed in EIR 433. The proposed Project would not necessitate the construction of any new or expanded governmental facilities nor require the construction or expansion of utility infrastructure beyond what was disclosed in EIR 433.
- The Project would provide more park land on the Citrus Heights property, increasing park acreage from 2.5 acres as planned by approved SP 325, to 7.1 acres as proposed by the Project. The provision of additional active park acreage on the subject property would meet Quimby Act requirements for the proposed 343 single-family residential homes and eliminate the significant recreational resource impact identified in EIR 433.
- The proposed Project would provide 3.3 acres of storm water drainage/water quality detention facilities on the Citrus Heights property. The Citrus Heights property's existing drainage characteristics would be retained to a greater extent than disclosed in EIR 433 because more open space would be conserved. In addition, the Project is required to comply with a site-specific Water Quality Management Plan (WQMP) prepared for the Citrus Heights property and local and state water quality regulations to ensure that Project implementation does not result in substantial new sources of polluted runoff. As a result, the Project would not result in any new impacts to hydrology or water quality beyond levels disclosed in EIR 433.
- The operational characteristics of Street "A" are consistent with the characteristics evaluated in EIR 433. Street "A" would be developed as a Collector Road with a 66-foot wide public right-of-way between McAllister Street and Van Buren Boulevard, similar to what was disclosed in EIR 433. Although the alignment of Street "A" would be slightly altered compared to the alignment disclosed in EIR 433, the modified alignment would not result in substantial increases in the severity of environmental impacts beyond levels disclosed in the Final EIR. Furthermore, modifications to Street "A" proposed by the Project would reduce the grading footprint for Street "A" by approximately 10.2 acres, thereby reducing permanent impacts to biological and other physical resources as compared to the level of permanent impact previously disclosed in EIR 433. In addition, short-term air quality emissions and noise effects associated with the construction of Street "A" would be reduced concomitantly.

As demonstrated in more detail in accompanying Environmental Assessment Form (EA 42510), changes proposed as part of the Project would not substantially increase the severity of impacts to the environment as compared to impacts that were evaluated and disclosed as part of EIR 433.

- b. The proposed Project does not involve the introduction of any land uses or construction or operational characteristics which were not previously evaluated in EIR 433.

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- c. Subsequent to the certification of EIR 433, no new information of substantial importance has become available which was not known or could not have been known with the exercise of reasonable diligence at the time EIR 433 was prepared.
- d. Subsequent to the certification of EIR 433, no substantial changes in the circumstances under which the Project is undertaken have occurred.
- e. Technical reports that evaluate the proposed Project were prepared for the subject areas of air quality, biological resources (including focused surveys for the western burrowing owl and least Bell's vireo), cultural resources (archaeology and paleontology), fire protection, geotechnical and rock blasting, greenhouse gasses, hydrology, traffic, and water quality. Copies of these reports are contained within the appendix of this document. These technical reports did not identify any new impacts or substantial increases in impacts to the environment beyond that which was disclosed in EIR 433. Specifically, these updated technical reports concluded as follows:
- The *Air Quality Impact Analysis* (Technical Appendix A), prepared by Urban Crossroads, Inc., concludes that the proposed Project would not result in any new impacts or more severe impacts associated with air quality than previously disclosed in EIR 433.
 - The *Biological Technical Report* (Technical Appendix B1), prepared by Glenn Lukos Associates, determines that the proposed Project would result in an overall reduction in impacts to biological resources, as compared to impacts previously disclosed in EIR 433. No new impacts or more severe impacts would occur from implementation of the Project.
 - The *Addendum to Determination of Biologically Equivalent or Superior Preservation Report* (Technical Appendix B2), prepared by Glenn Lukos Associates, determines that the proposed Project would result in an overall reduction in impacts to riparian/riverine biological habitats, as compared to impacts that would have occurred with implementation of the previously approved project. No new impacts or more severe impacts would occur from implementation of the Project.
 - The *Cultural Resources Report and Paleontological Resource Update Letter* (Technical Appendices C and D), prepared by Brian F. Smith & Associates, affirmed the findings from EIR 433, and found that no new impacts would occur from implementation of the Project.
 - The *Preliminary Geotechnical Report* (Technical Appendix E), prepared by Alta California Geotechnical, Inc., affirmed the geology and soils findings from EIR 433 and found that no new impacts would occur from implementation of the Project.
 - The *Greenhouse Gas Analysis* (Technical Appendix F), prepared by Urban Crossroads, Inc., concludes that the proposed Project would not generate substantial amounts of greenhouse gases that could result in a new impact or more severe

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significant impact on the environment than would otherwise occur with implementation of the previously approved project, nor would the Project conflict with any plans, policies, or regulations adopted for the purpose of reducing greenhouse gas emissions.

- The *Preliminary Hydrology Report* (Technical Appendix H), prepared by MDS Consulting and the *Preliminary Water Quality Management Plan* (Technical Appendix G), prepared by MDS Consulting analyzed the proposed Project and did not identify any new environmental impacts or an increase to the severity of impacts disclosed in EIR 433.
 - The *Traffic Analysis* (Technical Appendix I), prepared by Urban Crossroads determined that the proposed Project would result in a reduction in overall average daily traffic, as well as a reduction in peak hour traffic (both AM and PM peak hours), as compared to impacts previously disclosed in EIR 433. No new impacts or more severe impacts would occur from implementation of the Project.
 - The *Blasting Analysis* (Technical Appendix J), prepared by Revey Associates, Inc. evaluated potential rock blasting activities associated with the Project and did not identify any new environmental impacts or an increase to the severity of impacts disclosed in EIR 433.
 - The *Fire Behavior and Protection Plan* (Technical Appendix K), prepared by Firesafe Planning Solutions affirmed the findings from EIR 433, and found that no new impacts would occur from implementation of the Project.
- f. Mitigation measures identified in EIR 433, other than those that have been changed as a result of this EIR Addendum to reflect currently applicable County ordinances, building codes, and proposed SP 325A1, remain appropriate and feasible for the proposed Project.

Based on these facts, the Riverside County Planning Department determined that an Addendum to previously certified EIR 433 is the appropriate type of CEQA document to prepare for the proposed Project. The purpose of this EIR Addendum is to evaluate the proposed Project's level of impact on the environment in comparison to the approved Project its accompanying certified EIR 433.

G. Format and Content of this EIR Addendum

The following components comprise the EIR Addendum in its totality:

- A. This Introduction (Section 1.0).
- B. The completed Environmental Assessment form EA 42510 and its associated analyses which concludes that the proposed Project would not result in any new significant environmental impacts or substantially increase the severity environmental impacts beyond the levels disclosed in EIR 433.

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- C. The Mitigation Monitoring and Reporting Program that accompanies EA 42510, which indicates all mitigation measures contained in EIR 433 and those that have been changed as a result of EA 42510 to reflect currently applicable County ordinances, building codes, and proposed SP 325A1.
- D. Twelve (12) technical reports that evaluate the proposed Project, which are attached as EIR Addendum Technical Appendices A – K.
 - A. Air Quality Report
 - B1. Biological Technical Report
 - B2. Addendum to Determination of Biologically Equivalent or Superior Preservation Report
 - C. Cultural Resources Update Letter
 - D. Preliminary Paleontological Resource Impact Assessment
 - E. Preliminary Geotechnical Investigation
 - F. Greenhouse Gas Analysis
 - G. Preliminary Water Quality Management Plan
 - H. Preliminary Hydrology Report
 - I. Traffic Study
 - J. Blasting Analysis
 - K. Fire Behavior and Protection Plan
- E. SP 325 and Final EIR 433, accompanying Mitigation Monitoring and Reporting Program (MMRP), Technical Appendices to EIR 433, Findings and Statement of Facts, Statement of Overriding Considerations, and County Resolution No. 2004-539, which are all herein incorporated by reference pursuant to CEQA Guidelines § 15150 and are available for review at the Riverside County Planning Department, 4080 Lemon Street, 12th Floor, Riverside, CA 92501.
- F. State and federal resource agency permits and approvals associated with SP 325 and EIR 433, including the USFWS Biological Opinion dated May 16, 2006, the CDFG approved Streambed Alteration Agreement Number 1600-2005-0076-R6 dated June 21, 2006, and the U.S. Army Corps of Engineers approved Clean Water Act Section 404 Permit No. 20050112-SJH dated February 20, 2007. These permits and approvals are herein incorporated by reference and are available for public review at the Riverside County Planning Department, 4080 Lemon Street, 12th Floor, Riverside, CA 92501.

H. Preparation and Processing of this EIR Addendum

The Riverside County Planning Department directed and supervised the preparation of this Addendum. Although prepared with assistance of the consulting firm T&B Planning, Inc., the content contained within and the conclusions drawn by this EIR Addendum reflect the sole independent judgment of Riverside County.

This EIR Addendum will be forwarded, along with EIR 433, to the Riverside County Board of Supervisors for review as part of their deliberations concerning the proposed Project. On October 16, 2012, the Riverside County Board of Supervisors approved a “Fast Track” authorization for the proposed Project. Under the provisions of the County of Riverside’s “Fast Track” procedures,

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Planning Commission review of a project is bypassed, and the Board of Supervisors has exclusive authority to hear, approve, conditionally approve, or disapprove a project. Accordingly, a public hearing will be held before the Riverside County Board of Supervisors to consider the proposed Project and the adequacy of this EIR Addendum. Public comments will be heard and considered at the hearings. At the conclusion of the public hearing process, the Board of Supervisors will take action to approve, conditionally approval, or deny the proposed Project. If approved, the Board of Supervisors will adopt findings relative to the Project's environmental effects.

**II. Environmental Assessment Form/
Initial Study Checklist**

COUNTY OF RIVERSIDE

ENVIRONMENTAL ASSESSMENT FORM: INITIAL STUDY

Environmental Assessment (E.A.) Number: EA42510
Project Case Type (s) and Number(s): SP 325A1, CZ 7779, TR 36390, Capital Project C1-0641
Lead Agency Name: County of Riverside Planning Department
Address: P.O. Box 1409, Riverside, CA 92502-1409
Contact Person: Matt Straite
Telephone Number: (951) 955-8631
Applicant's Name: CV Communities, LLC
Applicant's Address: 1900 Quail Street, Newport Beach, CA 92660

I. PROJECT INFORMATION

A. Project Description:

Actions requested of County of Riverside involve the following (collectively hereafter called "the Project"):

Specific Plan No. 325, Amendment No. 1 (Citrus Heights, SP 325A1) proposes to amend Specific Plan No. 325 (SP 325, Lake Mathews Golf and Country Club). SP 325 was approved by the Riverside County Board of Supervisors on June 29, 2004, and then officially adopted along with the certification of Final EIR No. 433 (EIR 433, SCH No. 2001061096) on December 21, 2004.

As compared to adopted SP 325, proposed SP 325A1 would revise the Specific Plan land use plan to reconfigure planning area boundaries; eliminate the planned golf course and clubhouse; increase the amount of open space, park acreage, and the maximum number of permitted single-family homes; adjust the range of residential lot sizes; add storm water quality/detention facility improvements; and modify the Specific Plan's internal circulation network. The land use acreage modifications proposed by SPA No. 1 are summarized in Table 1, *Summary of Changes Proposed by Specific Plan No. 325, Amendment No. 1*. The land use plan for proposed SP 325A1 is depicted on Figure 1, *Specific Plan No. 325, Amendment No. 1 Land Use Plan*.

Specifically, with approval of SP 325A1 the following changes would occur:

- The grading footprint for SP 325 (exclusive of grading required for Street "A") would decrease from approximately 254.7 acres to approximately 207.6 acres (a reduction of 47.1 acres);
- The 119.1-acre golf course and 3.5-acre golf course clubhouse land uses would be eliminated from the plan;
- Areas planned for open space would increase from 85.2 acres to 162.8 acres;
- Areas planned for parks would increase from 2.5 acres to 7.1 acres;
- Areas planned for drainage facilities and detention basins would increase from zero (0) acres to 3.3 acres;
- Areas planned for single-family residential development would increase from 98.4 acres to 134.5 acres, and the total number of homes permitted by the Specific Plan would increase from 295 to 343, resulting in an increase in gross project density from 0.9 dwelling units per acres (du/ac) to 1.03 du/ac;

Table 1 Summary of Changes Proposed by Specific Plan No. 325, Amendment No. 1

Planning Area	Adopted Specific Plan No. 325				Proposed Amendment No. 1 (SP 325A1)			
	Land Use	Acres	Density	Units	Land Use	Acres	Density	Units
1	Medium Density Residential 10,000 s.f. minimum lots	10.1	2.2	22	Medium Density Residential 8,000 s.f. minimum lots	39.2	2.9	112
2	Medium Density Residential 8,500 s.f. minimum lots	5.2	4.8	25	Medium Density Residential 10,000 s.f. minimum lots	50.2	2.5	125
3	Medium Density Residential 8,500 s.f. minimum lots	6.5	3.7	24	Medium Density Residential 12,000 s.f. minimum lots	45.1	2.4	106
4	Medium Density Residential 10,000 s.f. minimum lots	4.8	3.1	15	Open Space-Recreation Park	0.6	--	--
5	Medium Density Residential 10,000 s.f. minimum lots	8.5	3.4	29	Open Space-Recreation Park	0.7	--	--
6	Low Density Residential 20,000 s.f. minimum lots	13.6	1.6	22	Open Space-Recreation Park	0.7	--	--
7	Medium Density Residential 10,000 s.f. minimum lots	39.5	2.7	107	Open Space-Recreation Park	1.8	--	--
8	Medium Density Residential 8,500 s.f. minimum lots	10.2	5.0	51	Open Space-Recreation Park	0.7	--	--
9	Golf Course & Clubhouse	122.6	--	--	Open Space-Recreation Park	1.1	--	--
10	Park	3.7	--	--	Open Space-Recreation Park	0.7	--	--
11	Open Space	85.2	--	--	Open Space-Recreation Park	0.8	--	--
12A-G	N/A	--	--	--	Open Space-Recreation Open Space	162.8	--	--
13A-C	N/A	--	--	--	Open Space-Water Detention Basin	3.3	--	--
--	Roadways	23.9	--	--	Roadways	26.0	--	--
Total - Specific Plan No. 325:		333.8	0.9	295	Total - Proposed SP 325A1:	333.7	1.03	103

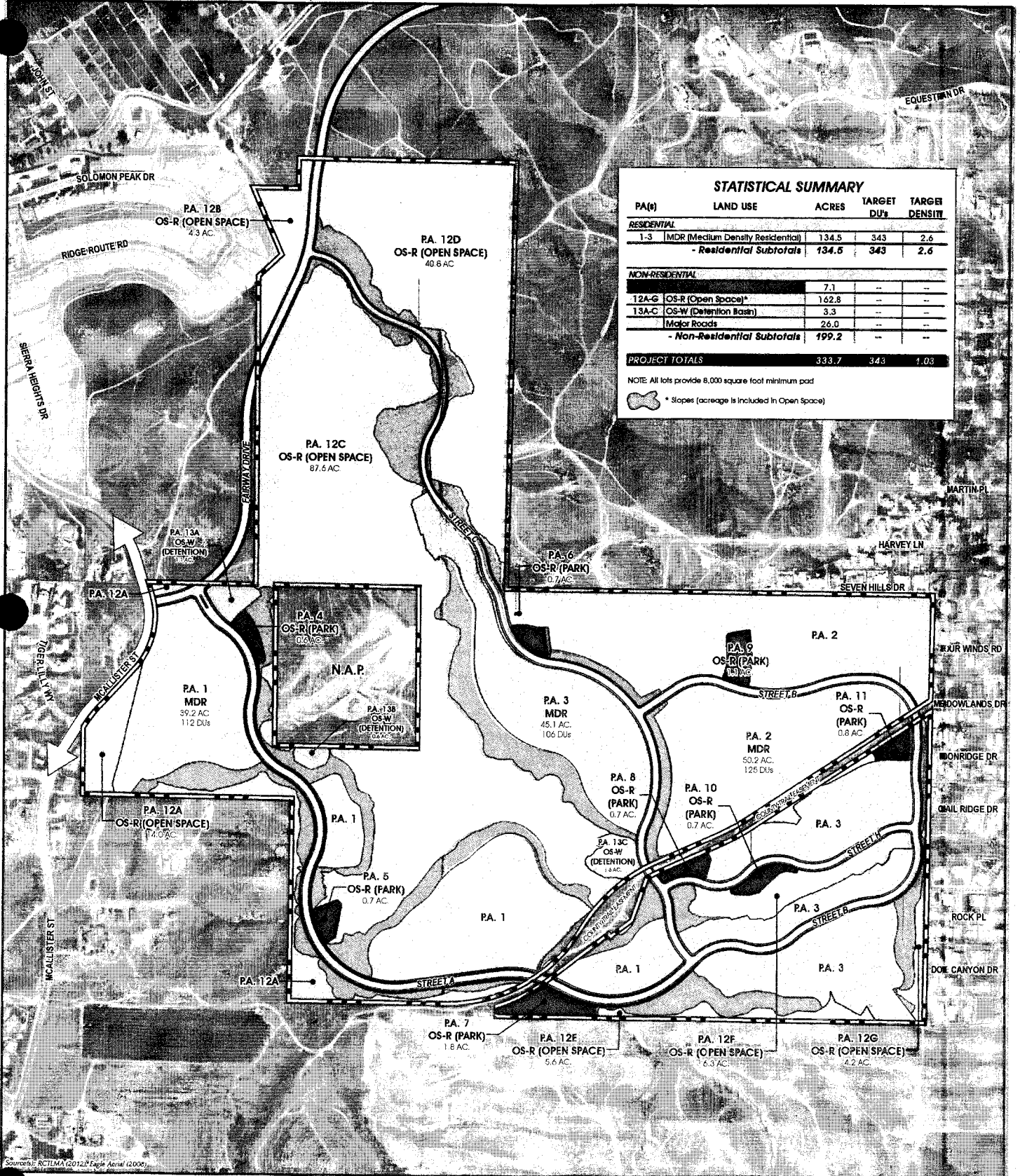
Source: Proposed Citrus Heights Specific Plan Amendment No. 1, August 2013

- Areas reserved for major roadways would increase from 23.9 acres to 26.0 acres;
- Land use designation labels for all Specific Plan Planning Areas would be modified to be consistent with the nomenclature of the currently adopted Riverside County General Plan (2005); and
- The name of the Specific Plan would be changed from "Lake Matthews Golf and Country Club" to "Citrus Heights."

Change of Zone No. 7779 (CZ 7779) would amend the approved Specific Plan Zoning Ordinance for SP 325 (Ordinance No. 348.4260) to provide amended land use and development standards for the subject property and formalize planning area boundaries that reflect the revisions proposed as part of SP 325A1.

Tentative Tract Map No. 36390 (TR 36390) is a Schedule "A" map that proposes to implement the changes proposed by SP 325A1. TR 36390 would subdivide the SP 325 site into 343 single-family residential development lots ranging in size from 8,000 square feet (s.f.) to 33,098 s.f., eight (8) park lots, three (3) water quality/detention basin lots, and 43 open space lots, as depicted on Figure 2, *Tentative Tract Map No. 36390*. TR 36390 also identifies on-site rights-of-way and the location of necessary on-site infrastructure improvements, such as water, sewer, and storm drain lines. TR 36390 also identifies the location of necessary off-site improvements, including a water line within the proposed right-of-way of Street "A" and a sewer line within the existing right-of-way of McAllister Street. The Preliminary Landscape Plan for TR 36390 identifies landscape improvements for the site, including the location of on- and off-site areas requiring vegetation thinning for fire fuel modification purposes. Implementation of TR 36390 would require approximately 2,500,000 cubic yards (c.y.) of cut and 2,500,000 c.y. of fill; grading activities would balance on-site and no import or export would be required.

SP00325A1, CZ 07779, TR36390, C1-0641



STATISTICAL SUMMARY

PA(n)	LAND USE	ACRES	TARGET DU's	TARGET DENSITY
RESIDENTIAL				
1-3	MDR (Medium Density Residential)	134.5	343	2.6
- Residential Subtotals		134.5	343	2.6
NON-RESIDENTIAL				
12A-G	OS-R (Open Space)*	7.1	--	--
12A-G	OS-R (Open Space)*	162.8	--	--
13A-C	OS-W (Detention Basin)	3.3	--	--
- Non-Residential Subtotals		199.2	--	--
PROJECT TOTALS		333.7	343	1.03

NOTE: All lots provide 8,000 square foot minimum pad
 * Slopes (acreage is included in Open Space)

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Figure 1
**SPECIFIC PLAN 325
 AMENDMENT NO. 1 LAND USE PLAN**

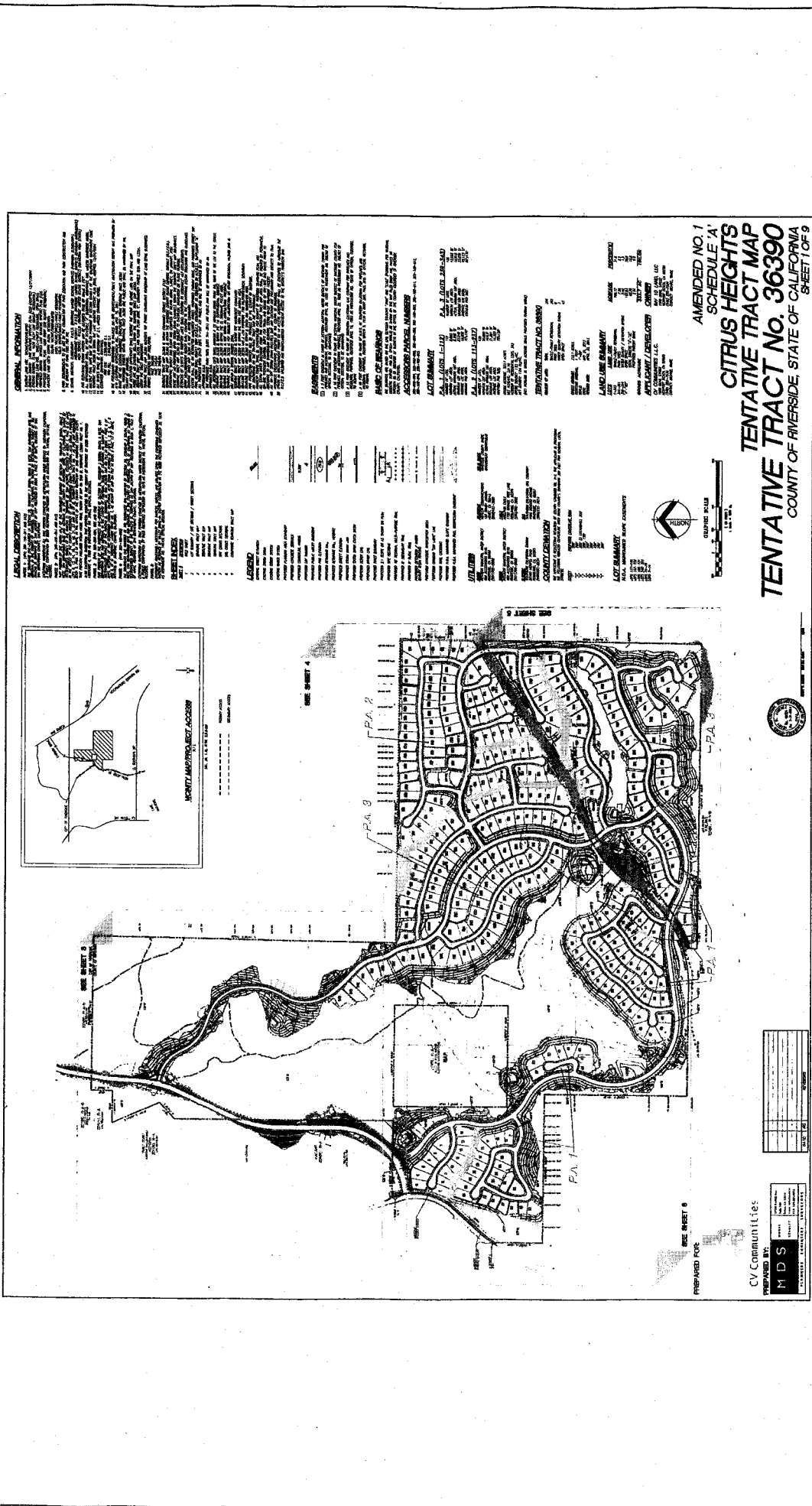


Figure 2

TENTATIVE TRACT MAP NO. 36390

Capital Project Work Order No. C1-0641 (Capital Project C1-0641) addresses the construction of a roadway called "Street "A," between McAllister Street and Van Buren Boulevard, which is classified by both the County and City of Riverside General Plan Circulation Elements as a "Collector" road. Proposed Street "A" would be constructed as a modified Collector Road, featuring two vehicular travel lanes and curb and gutter improvements within 66 feet of public right-of-way. Street "A" would include improvements to capture and convey storm water drainage flows; a traffic signal would be constructed at the intersection of Street "A" with Van Buren Boulevard. A water main and dry utilities would be constructed beneath Street "A" to provide service to the Citrus Heights property. A multi-use trail would be constructed on the eastern edge of Street "A" between the northern and southern access points of SP 325A1 (i.e., proposed Street "A" and Street "C"). The grading footprint for Street "A" would be reduced from approximately 33.5 acres (as provided by approved SP 325) to approximately 23.3 acres, a reduction of approximately 10.2 acres. Approximately 40 percent of the roadway alignment is located within the jurisdictional boundaries of the County of Riverside and approximately 60 percent of the roadway alignment is located within the jurisdictional boundaries of the City of Riverside. Pursuant to a cooperative agreement dated April 18, 2012 between Riverside County and the City of Riverside, the city has authorized the county to act as the lead agency for the Street "A" project. Approved SP 325 included this roadway as an associated off-site improvement connecting McAllister Street to Van Buren Boulevard, with a short segment passing through the Citrus Heights property. The environmental effects associated with the implementation of Street "A" along its planned alignment from McAllister Street to Van Buren Boulevard were evaluated by EIR 433 and as such, the implementing improvement plans are evaluated herein.

B. Type of Project: Site Specific ; Countywide ; Community ; Policy .

C. Total Project Area: 333.7 acres (Citrus Heights property); 23.3 acres ("Street A," including 5.5 acres on the Citrus Heights property)

Residential Acres: 134.5	Lots: 394	Units: 343	Projected No. of Residents: 888
Commercial Acres: N/A	Lots: N/A	Sq. Ft. of Bldg. Area: N/A	Est. No. of Employees: N/A
Industrial Acres: N/A	Lots: N/A	Sq. Ft. of Bldg. Area: N/A	Est. No. of Employees: N/A

Other: Parks: 7.1 acres; Open Space: 162.8 acres; Drainage/Detention: 3.3 acres; Circulation: 26.0 acres (Citrus Heights)
Circulation: 23.3 acres (Street "A," including 5.5 acres on the Citrus Heights property)

D. Assessor's Parcel No(s):

SP 325A1, CZ 7779, TR 36390: 269-060-004, -005, -006; 269-100-009, -011, -012, -014; -015

Capital Project C1-0641: 239-240-001, -004; 239-270-001, -002, -004; 269-060-004, -005, -006, -012; 269-100-014

E. Street References: Northerly of El Sobrante Road, southwesterly of Van Buren Boulevard, and easterly of McAllister Street. Refer to Figure 3, *Vicinity Map*.

F. Section, Township & Range Description or reference/attach a Legal Description:

SP 325A1, CZ 7779, TR 36390: Section 29, Township 3 South, Range 5 West, San Bernardino Baseline and Meridian.

Capital Project C1-0641: Sections 20 & 29, Township 3 South, Range 5 West, San Bernardino Baseline and Meridian

SP00325A1, CZ 07779, TR36390, C1-0641

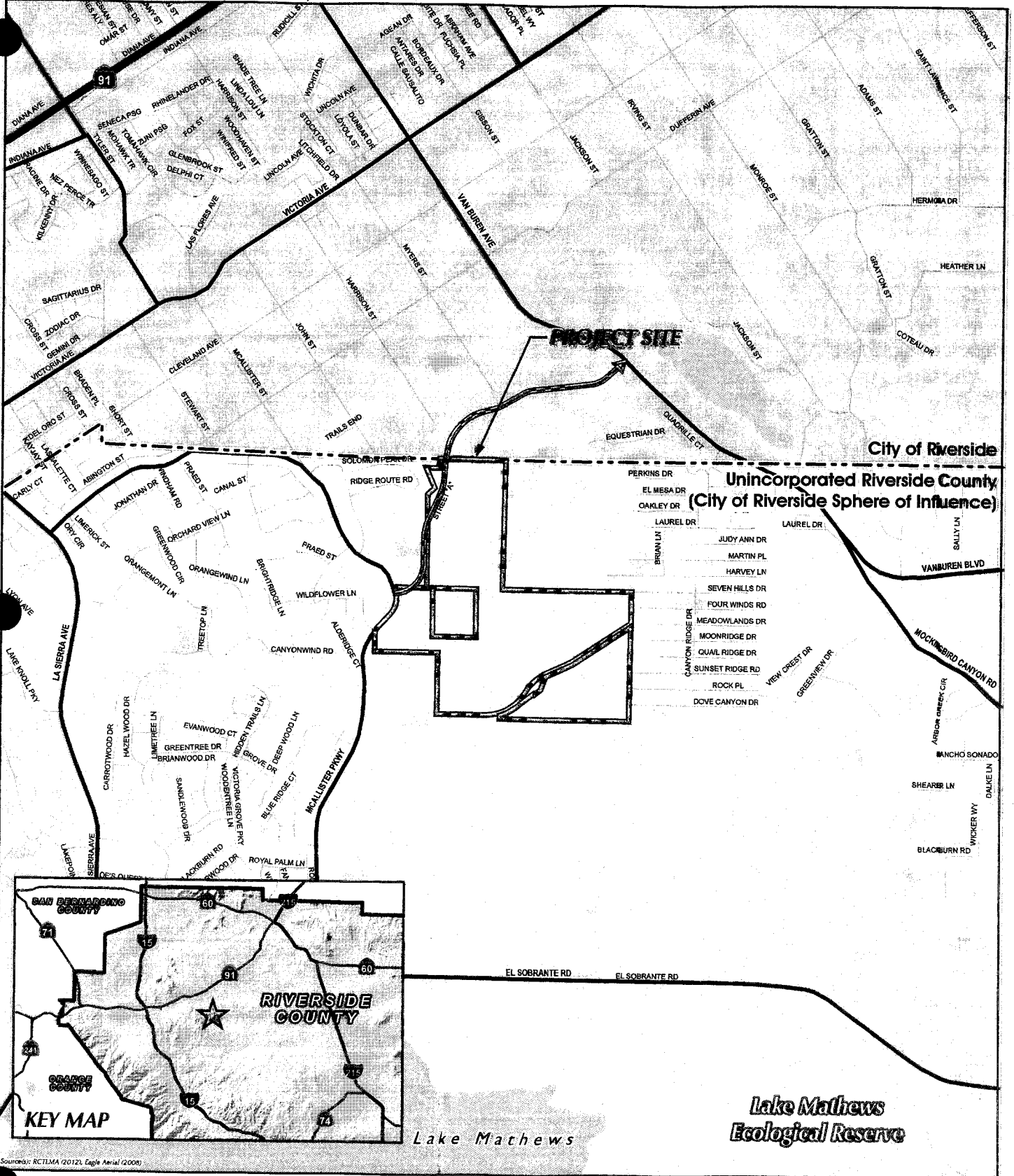
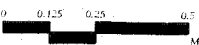


Figure 3

VICINITY MAP

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G. Brief description of the existing environmental setting of the project site and its surroundings: The SP 325 site (hereafter referred to as "the Citrus Heights property") consists of an irregularly shaped collection of contiguous parcels in the El Sobrante area of unincorporated Riverside County. The property is vacant and undeveloped, and is characterized by generally rugged terrain and drainage features. The entire property has been heavily used by off-road vehicle use, which resulted in the formation of dirt access roads, motorcycle and bicycle trails, and tire ruts across the entire site. Refer to Figure 4, *Aerial Photograph*.

The proposed alignment of Street "A" consists of vacant and undeveloped property that is characterized by generally rugged terrain. Portions of the alignment of Street "A" have been utilized by off-road vehicle use, which resulted in the formation of dirt access roads, motorcycle and bicycle trails, and tire ruts across portions of the proposed alignment for Street "A." Refer to Figure 4.

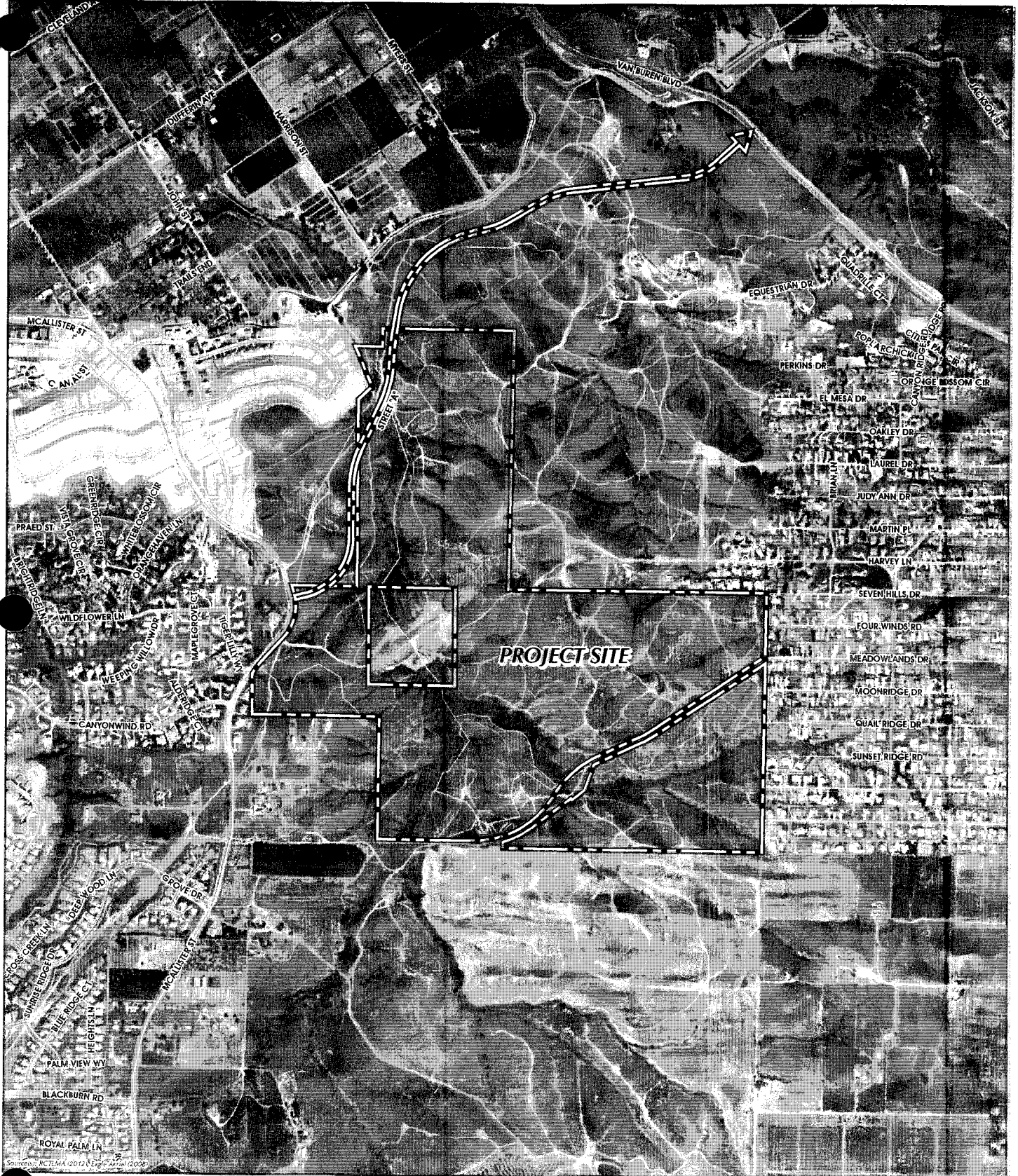
The surrounding area is occupied by rural and low-density residential land uses to the east and west, agricultural properties to the north, and vacant land to the north and south. In addition, the Harrison Dam, an earthen fill dam owned and operated by the Riverside County Flood Control and Water Conservation District, occupies a parcel that is completely surrounded by approved SP 325 but that is not a part of approved SP 325 nor the proposed Project.

II. APPLICABLE GENERAL PLAN AND ZONING REGULATIONS

A. General Plan Elements/Policies:

- 1. Land Use:** Pursuant to Riverside County General Plan Land Use Element Policy LU 1.10, with approval of SP 325A1, the proposed land uses on the Citrus Heights property would be consistent with the General Plan Land Use Map. The proposed Project meets all other applicable land use policies of the Riverside County General Plan and the Lake Mathews/Woodcrest Area Plan, including the El Sobrante Policy Area. Street "A" passes through areas within the City of Riverside designated for Agriculture/Rural Residential land uses by the City of Riverside General Plan. Street "A" is designated as a Circulation Element road by the City of Riverside General Plan and would be compatible with surrounding land uses within the City. Street "A" is consistent with all applicable policies of the City of Riverside General Plan Land Use and Urban Design Element.
- 2. Circulation:** The proposed Project was reviewed by the Riverside County Transportation Department and was found to be in conformance with County Ordinance No. 461 (Road Improvement Standards and Specifications). Street "A," which is classified as a "Collector" road by the Circulation Elements of both the County and City of Riverside would be constructed by the County of Riverside as part of this Project. Approximately 40 percent of the proposed alignment of Street "A" is located within the jurisdictional boundaries of the County of Riverside and approximately 60 percent of the proposed alignment of this roadway is located within the jurisdictional boundaries of the City of Riverside. Other adequate circulation facilities exist or are planned to serve the proposed development associated with SP 325A1. The proposed Project adheres to all applicable circulation policies of the Riverside County and City of Riverside General Plans.
- 3. Multipurpose Open Space:** Neither the Citrus Heights property nor the proposed alignment of Street "A" is designated for open space conservation by the Western Riverside County Multiple Species Conservation Plan. Additionally, the Citrus Heights property is not designated by the Riverside County General Plan as important farmland or

SP00325A1, CZ 07779, TR36390, C1-0641



PROJECT SITE

Figure 4

AERIAL PHOTOGRAPH

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mineral resource land. The proposed Project adheres to all applicable Multipurpose Open Space Element policies of the Riverside County General Plan. The proposed alignment of Street "A" does not pass through areas designated by the City of Riverside General Plan as important farmland, mineral resource land, nor is the proposed alignment of Street "A" designated for parks or recreation facilities. Street "A" adheres to all applicable policies of the Open Space and Conservation Element and Parks and Recreation Element of the City of Riverside General Plan.

4. **Safety:** The Citrus Heights property is located within an area that is subject to seismic ground shaking, but the site is not located within an Alquist-Priolo Fault Zone or a County-designated Fault Hazard Zone. Construction as required by the California Building Standards Code (CBCS) would satisfactorily address seismic safety. The Citrus Heights property and the proposed alignment of Street "A" are located in a high fire hazard area and portions of the Citrus Heights property and the alignment of Street "A" are located in an area with moderate dam inundation risk. Neither the Citrus Heights property nor the proposed alignment of Street "A" are located in a flood hazard area or an area subject to blowsand (erosion). The Project is designed to minimize hazards associated with wildfires and dam inundation. In addition, the Project is designed to accommodate the sufficient provision of emergency response services and was reviewed by the Riverside County Fire Department for compliance with all applicable fire protection requirements. The proposed Project adheres to all other applicable policies of the Riverside County General Plan Safety Element and the City of Riverside General Plan Public Safety Element.
5. **Noise:** The proposed Project adheres to all applicable policies within the Riverside County General Plan Noise Element and the City of Riverside General Plan Noise Element.
6. **Housing:** The Riverside County General Plan Housing Element does not contain any policies applicable to the proposed Project, but rather identifies programs and actions to achieve the County's goals with respect to housing. The proposed Project does, however, relate to the County General Plan Housing Element through the Project's proposed land uses on the Citrus Heights property. The land uses proposed by the Project on the Citrus Heights property would not adversely impact the implementation of the County General Plan Housing Element's goals or policies. The City of Riverside General Plan Housing Element does not contain any policies applicable to the construction or operation of Street "A."
7. **Air Quality:** The proposed Project is conditioned to control fugitive dust emissions during grading and construction activities and to reduce air pollutant emissions to the greatest feasible extent. The proposed Project is consistent with all other applicable Riverside County General Plan Air Quality Element and City of Riverside General Plan Air Quality Element policies.

The following elements from the City of Riverside General Plan are applicable only to the Street "A" component of the proposed Project.

8. **Arts and Culture:** The City of Riverside General Plan Arts and Culture Element does not contain any policies applicable to the proposed Project.
9. **Education:** The City of Riverside General Plan Education Element does not contain any policies applicable to the proposed Project.

10. Public Facilities and Infrastructure: The proposed Project adheres to all applicable policies within the City of Riverside General Plan Public Facilities and Infrastructure Element.

11. Historic Preservation: The City of Riverside General Plan Historic Preservation Element does not contain any policies applicable to the proposed Project.

B. General Plan Area Plan(s)/Neighborhood Plan(s):

County of Riverside (applicable to Citrus Heights and portion of Street "A" alignment): Lake Mathews/Woodcrest

City of Riverside (applicable to portion of Street "A" alignment): Arlington Heights

C. Foundation Component(s):

County of Riverside (applicable to Citrus Heights and portion of Street "A" alignment): Community Development, Open Space

City of Riverside (applicable to portion of Street "A" alignment): N/A

D. Land Use Designation(s):

County of Riverside (applicable to Citrus Heights): Specific Plan No. 325 (LDR, MDR, OS-R, OS-C)

County of Riverside (applicable to portion of Street "A" alignment): Low Density Residential

City of Riverside (applicable to portion of Street "A" alignment): Agricultural/Rural Residential

E. Overlay(s), if any:

County of Riverside (applicable to Citrus Heights and portion of Street "A" alignment): None

City of Riverside (applicable to portion of Street "A" alignment): None

F. Policy Area(s), if any:

County of Riverside (applicable to Citrus Heights and portion of Street "A" alignment): El Sobrante Policy Area

City of Riverside (applicable to portion of Street "A" alignment): N/A

G. Adjacent and Surrounding Area Plan(s)/Neighborhood(s), Foundation Component(s), Land Use Designation(s), and Overlay(s) and Policy Area(s), if any:

1. Area Plan(s)/Neighborhood(s):

County of Riverside: Elsinore Area Plan to the south; Mead Valley Area Plan to the east
Temescal Canyon Area Plan to the west

City of Riverside (applicable to portion of Street "A" alignment): Arlington Heights neighborhood to the north

2. Foundation Component(s):

County of Riverside: Rural Foundation Component to east and south; Rural Foundation Component and Community Development Foundation Component to the west

City of Riverside (applicable to portion of Street "A" alignment): N/A

3. Land Use Designation(s):

County of Riverside: Rural Mountainous, Rural Community-Very Low Density Residential, Rural Community-Estate Density Residential to the east; Rural Community-Very Low Density Residential, Rural Community-Low Density Residential to the south; Low Density Residential, Rural Community-Very Low Density Residential, Rural Mountainous to west

City of Riverside (applicable to portion of Street "A" alignment): Agricultural/Rural Residential to the north (within City of Riverside)

4. Overlay(s):

County of Riverside: None

City of Riverside (applicable to portion of Street "A" alignment): None

5. Policy Area(s):

County of Riverside: El Sobrante Policy Area to the east, south, and west

City of Riverside (applicable to portion of Street "A" alignment): N/A

H. Adopted Specific Plan Information

1. Name and Number of Specific Plan, if any:

County of Riverside (applicable to Citrus Heights and portion of Street "A" alignment): Specific Plan No. 325 (Lake Mathews Golf and Country Club)

City of Riverside (applicable to portion of Street "A" alignment): N/A

2. Specific Plan Planning Area, and Policies, if any:

County of Riverside: The proposed Project would affect the entire area of Specific Plan No. 325

City of Riverside (applicable to portion of Street "A" alignment): N/A

I. Existing Zoning:

County of Riverside:

Citrus Heights Property: Specific Plan (SP)

Portion of Street "A" Alignment: Specific Plan (SP), Residential Agriculture (R-A)

City of Riverside:

Citrus Heights Property: N/A

Portion of Street "A" Alignment: Residential Agriculture (RA-5)

J. Proposed Zoning, if any: Same as existing

K. Adjacent and Surrounding Zoning:

County of Riverside (applicable to Citrus Heights and portion of Street "A" alignment): Residential Agriculture (R-A) to the east; Light Agriculture (A-1-10) to the south; One Family Dwellings (R-1-15000) and Residential Agriculture (R-A-1) to the west

City of Riverside (applicable to portion of Street "A" alignment): Residential Agriculture (RA-5) to the north

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.

- | | | |
|---|--|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Agriculture & Forest Resources | <input type="checkbox"/> Hydrology / Water Quality | <input type="checkbox"/> Transportation / Traffic |
| <input type="checkbox"/> Air Quality | <input type="checkbox"/> Land Use / Planning | <input type="checkbox"/> Utilities / Service Systems |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Other: |
| <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Noise | <input type="checkbox"/> Other: |
| <input type="checkbox"/> Geology / Soils | <input type="checkbox"/> Population / Housing | <input type="checkbox"/> Mandatory Findings of Significance |
| <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> 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 EIR or Negative Declaration has been prepared and will be considered by the approving body or bodies.

I find that at least one of the conditions described in California Code of Regulations, Section 15162 exist, but I further find that only minor additions or changes are necessary to make the previous EIR adequately apply to the project in the changed situation; therefore a **SUPPLEMENT TO THE ENVIRONMENTAL IMPACT REPORT** is required that need only contain the information necessary to make the previous EIR adequate for the project as revised.

I find that at least one of the following conditions described in California Code of Regulations, Section 15162, exist and a **SUBSEQUENT ENVIRONMENTAL IMPACT REPORT** is required: (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; (2) Substantial changes have occurred with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any the following: (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration; (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR or negative declaration; (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measures or alternatives; or, (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR or negative declaration would substantially reduce one or more significant effects of the project on the environment, but the project proponents decline to adopt the mitigation measures or alternatives.



Signature



Date

Matt Straite
Printed Name

For Frank Coyle, Deputy Director

V. ENVIRONMENTAL ISSUES ASSESSMENT

In accordance with the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000-21178.1), this Initial Study has been prepared to analyze the proposed project to determine any potential new or more severe significant impacts upon the environment that were not previously disclosed in Final EIR No. 433 (EIR 433) that would result from construction and implementation of the Project as amended. In accordance with California Code of Regulations, Section 15063, this Initial Study is a preliminary analysis prepared by the Lead Agency, the County of Riverside, in consultation with other jurisdictional agencies, to determine whether a Negative Declaration, Mitigated Negative Declaration, or an Environmental Impact Report is required for the proposed project. The purpose of this Initial Study is to inform the decision-makers, affected agencies, and the public of potential new or more severe significant environmental impacts that were not previously disclosed in EIR 433 associated with the implementation of the proposed Project.

	Potentially Significant New Impact	Less than Significant New Impact with Mitigation Incorporated	Less Than Significant New Impact	Impact Fully Analyzed in EIR 433
AESTHETICS Would the project				
1. Scenic Resources				
a) Have a substantial effect upon a scenic highway corridor within which it is located?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source: EIR 433, Section V.C.13 "Aesthetics, Visual Analysis, Light and Glare;" Lake Mathews/Woodcrest Area Plan Figure 9, "Scenic Highways;" Google Earth (accessed July 2, 2012); Project Application Materials

Findings of Fact:

a) The Citrus Heights property is located approximately 1.0 mile north of El Sobrante Road, approximately 1.4 miles east of La Sierra Avenue, and approximately 2.4 miles west of Mockingbird Canyon Road; each of which are designated as County Eligible Scenic Highways by the Riverside County General Plan. Due to its one mile or further distance from these eligible scenic highway corridors, the rolling terrain of the surrounding area, and existing intervening development, neither the Citrus Heights property nor the proposed alignment of Street "A" is visible from these roadways. Because the Citrus Heights property and the proposed alignment of Street "A" is not visible from any scenic highway corridor, development on the Citrus Heights property either as previously approved by SP 325, or as proposed by the Project, and development of Street "A" has no potential to substantially affect the aesthetic quality of a scenic highway corridor.

b) Impacts to scenic resources resulting from buildout of the Specific Plan were previously evaluated in EIR 433, Section V.C.13 "Aesthetics, Visual Analysis, Light and Glare," which found that impacts would be less than significant because development planned by SP 325, including the construction of Street "A," would not substantially damage scenic resources, obstruct any prominent scenic vista, or result in the creation of aesthetically offensive views. Development proposed by the Citrus Heights Project would disturb approximately 44 less acres of land on the Citrus Heights property than previously approved (including required fuel modification), thereby preserving more of

Potentially Significant New Impact	Less than Significant New Impact with Mitigation Incorporated	Less Than Significant New Impact	Impact Fully Analyzed in EIR 433
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the property as natural open space. Proposed off-site impacts required to implement the Citrus Heights Project (e.g., grading, fuel modification) would be consistent with what was disclosed in EIR 433. The additional 44 acres of preserved open space would conserve more of the Citrus Heights property's natural characteristics in the northern portion of the site, including steep slopes and some rock outcroppings. Areas proposed for development on the Citrus Heights property by the Project would be similar in aesthetic character to that approved by SP 325. Although some of the development areas interior to the southern portion of the Citrus Heights property previously planned for golf course and open space would be developed instead with single-family residential homes, parks, and water quality/detention facilities, this change in land use would have the same level of effect on scenic resources as the previously approved Specific Plan and as disclosed in EIR 433. Proposed grading activities on the Citrus Heights property associated with the Project as described in SP 325A1 and as shown on TR 36390 would not substantially damage scenic resources and proposed manufactured slopes would be engineered and vegetated to provide a natural appearance and minimize the need for retaining walls. In addition, the proposed Project would be developed in accordance with the Development Standards and Design Guidelines (Architecture and Landscaping) set forth in SP 325A1, which are designed to ensure that the Project is developed in a manner that is visually attractive and not offensive. Grading and construction activities associated with Street "A" would disturb approximately 10.2 fewer acres, would be similar in character to what was evaluated in EIR 433 and would not substantially damage scenic resources. Accordingly, implementation of the Project would preserve 44 more acres of the Citrus Heights property in its natural condition, disturb less off-site acreage associated with the Street "A" alignment, and would not result in any new or more severe impacts to aesthetics or scenic resources than was previously disclosed in EIR 433.

Mitigation: No mitigation measures are required for the proposed Project and no mitigation measures were required by EIR 433.

Monitoring: No monitoring is required.

2. Mt. Palomar Observatory

a) Interfere with the nighttime use of the Mt. Palomar Observatory, as protected through Riverside County Ordinance No. 655?

Source: EIR 433, Section V.C.13 "Aesthetics, Visual Analysis, Light and Glare;" Ord. No. 655 (Regulating Light Pollution); Lake Mathews/Woodcrest Area Plan Figure 6, "Mount Palomar Nighttime Lighting Policy"

Findings of Fact:

a) The Citrus Heights property and the proposed alignment of Street "A" (hereafter collectively referred to as "the Project site") is not located within the Mt. Palomar Nighttime Lighting Policy Area. Therefore, development of the Project site, either as approved by SP 325 or as proposed by the Project, will have no impact on operations at the Mt. Palomar Observatory. This conclusion is consistent with the information disclosed in EIR 433.

Mitigation: No mitigation measures are required for the proposed Project and no mitigation measures were required by EIR 433.

Potentially Significant New Impact	Less than Significant New Impact with Mitigation Incorporated	Less Than Significant New Impact	Impact Fully Analyzed in EIR 433
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Monitoring: No monitoring is required.

3. Other Lighting Issues

a) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Expose residential property to unacceptable light levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source: EIR 433, Section V.C.13 "Aesthetics, Visual Analysis, Light and Glare;" Project Application Materials

Findings of Fact:

a & b) The Project site is vacant under existing conditions, and is adjacent to residential properties on the north, south, east and west. Although the proposed Project would introduce new sources of artificial light on the Citrus Heights property and along the proposed alignment of Street "A", the lighting would be no more intense than would have occurred under approved SP 325. All lighting sources on the Citrus Heights property associated with the approved golf course, club house, and residential development previously approved in the northern portion of the property would be eliminated. Lighting of roads, parks, and the residential development areas on the Citrus Heights property proposed by the Project would be of similar character as the lighting of existing residential development in the area and would not create unacceptable sources of light or more intense lighting levels than previously evaluated by EIR 433. Furthermore, artificial lighting standards are included in SP 325A1 that would require all artificial lighting elements to be designed, focused, directed, arranged, and shielded. See proposed SP 325A1, Section IV.7.j., "Outdoor Lighting." These standards would ensure that the Project would not create any unacceptable sources of light on the Citrus Heights property, would prevent substantial light or glare from falling on public streets or property adjoining the Citrus Heights property, and would prevent "spillover" effects from the Citrus Heights property that could interfere with day or nighttime views in the area. Furthermore, street lighting proposed along Street "A" would be designed and constructed in accordance with County and City standards to ensure that substantial adverse nighttime lighting effects would not occur. As such, Project-related lighting impacts would be less than significant and would not be increased above the level evaluated in EIR 433.

Mitigation: No mitigation measures are required for the proposed Project and no mitigation measures were required by EIR 433.

Monitoring: No monitoring is required.

Potentially Significant New Impact	Less than Significant New Impact with Mitigation Incorporated	Less Than Significant New Impact	Impact Fully Analyzed in EIR 433
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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: EIR 433, Section V.C. 9 "Agriculture;" County General Plan Figure OS-2 "Agricultural Resources;" Riverside County Land Information System (RCLIS); Farmland Mapping and Monitoring Program; Riverside County General Plan EIR; Riverside County General Plan EIR Findings of Fact and Statement of Overriding Considerations; City of Riverside General Plan EIR; Ord. No. 625; Google Earth (accessed July 2, 2012); Project Application Materials.

Findings of Fact:

a) According to EIR 433, Section V.C.9 "Agriculture," and as confirmed by the California Department of Conservation Farmland Mapping and Monitoring Program (FMMP) map for Riverside County, approximately 14.8 acres of the 333.8-acre Citrus Heights property is designated as "Farmland of Local Importance" and the remainder of the property is designated as "Other Lands," as classified by the FMMP. As disclosed in EIR 433 and confirmed by the FMMP map for Riverside County, the entire proposed alignment of Street "A" is classified as "Other Lands" by the FMMP. The Project site does not include any soils classified by the FMMP as important farmland, which are categorized by the FMMP as "Prime Farmland," "Unique Farmland," or "Farmland of Statewide Importance." As such, no impact to important farmlands would occur with development of the Project site either as approved by SP 325 or as proposed by the Project. This conclusion is consistent with the information disclosed in EIR 433.

b) As disclosed in EIR 433 Section V.C. 9, "Agriculture," the Citrus Heights property is not zoned for agricultural use and is not under active agricultural production. These circumstances have not changed since EIR 433 was certified in 2004. The proposed alignment of Street "A" passes through properties in the City of Riverside zoned for agricultural use; however, this property is not under active agricultural production and construction and operation of Street "A" would not conflict with or preclude potential agricultural operations on these properties, other than within the roadway alignment itself. Also as disclosed in EIR 433, the Project site is not subject to a Williamson Act contract, nor is the Citrus Heights property located within a Riverside County Agricultural Preserve. As such, no direct

Potentially Significant New Impact	Less than Significant New Impact with Mitigation Incorporated	Less Than Significant New Impact	Impact Fully Analyzed in EIR 433
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impact to agricultural zoning, agricultural use, or Williamson Act contract status would occur with development of the property either as approved by SP 325 or as proposed by the Project.

An existing agricultural preserve, El Sobrante 1, occurs off-site and adjacent to (on the south) of the Citrus Heights property. EIR 433 acknowledges the location of the agricultural preserve and discloses that development pressure on this off-site property and other agricultural properties in Riverside County exists with or without development of the Citrus Heights property. Based on a review of aerial photography, a majority of the El Sobrante 1 Agricultural Preserve is not under active agricultural production, including the areas immediately adjacent to the Project site. In addition, the entire area of the El Sobrante 1 Agricultural Preserve is designated by the Riverside County General Plan for non-agricultural land uses (i.e., "Rural Community-Estate Density Residential," "Rural Community-Low Density Residential," "Rural Residential," "Very Low Density Residential," "Medium Density Residential," "Commercial Retail," "Public Facility," "Open Space-Conservation," and "Open Space-Conservation Habitat"). Therefore, it is reasonably foreseeable that the El Sobrante 1 Agricultural Preserve will eventually convert to non-agricultural land uses, with or without development of the Project as proposed. The conversion of this off-site property as well as other agricultural properties in Riverside County from agricultural to non-agricultural uses as planned for by the County's General Plan was addressed by Riverside County's General Plan Program EIR (SCH No. 2002051143), which found that the conversion of such properties represent a significant and unavoidable impact Countywide. There are no components of the proposed Project that would result in an increase in indirect or cumulative impacts to existing agricultural uses or zoning beyond the levels that were previously evaluated and disclosed as part of EIR 433 and the County's General Plan EIR.

As documented in EIR 433 and as a mandatory requirement of Riverside County's Municipal Code, the proposed Project would be conditioned to comply with Riverside County Ordinance No. 625 ("Right to Farm Ordinance"), which requires future homeowners on the Citrus Heights property to be notified that existing agricultural operations may operate in the area, and that such existing operations shall not be deemed a nuisance as a result of residential land uses being placed in the area. Mandatory compliance with Ordinance No. 625 would ensure that future development of residential land uses on the Citrus Heights property, either as approved by SP 325 or as proposed by the Project, would not conflict with any existing off-site agricultural lands or preserves. Accordingly, and as concluded by EIR 433, impacts would be less than significant.

c) The Citrus Heights property is located within 300 feet of agriculturally-zoned properties to the north, east, and south. Lands to the north of the Citrus Heights property are zoned "Residential Agriculture (RA-5)" by the City of Riverside. Lands to the east and south of the Citrus Heights property are zoned "Residential-Agriculture (R-A)" and "Light Agriculture - 10 acre minimum (A-1-10)," respectively, by Riverside County. The proposed alignment of Street "A" would pass through agriculturally-zoned properties in the City of Riverside (RA-5). The City of Riverside and the County of Riverside consider the RA-5 and A-1-10 zones to be for "primarily agricultural purposes." These surrounding zoning designations were in effect at the time EIR 433 was certified, so there has been no change in circumstance. Development proposed by the Citrus Heights Project would disturb approximately 44 less acres of land on the Citrus Heights property than previously approved, thereby preserving more of the Citrus Heights property as natural open space adjacent to agriculturally zoned lands to the north. Although some of the development areas interior to the southern portion of the Citrus Heights property previously planned for golf course and open space would be developed instead with single-family residential homes, parks, and water quality/detention facilities, this change in land use would not affect off-site agricultural properties any differently than as previously disclosed in EIR 433. Proposed off-site impacts required to implement the Citrus Heights Project (e.g., grading,

Potentially Significant New Impact	Less than Significant New Impact with Mitigation Incorporated	Less Than Significant New Impact	Impact Fully Analyzed in EIR 433
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fuel modification) would be consistent with what was disclosed in EIR 433. As concluded in EIR 433, development on the Citrus Heights property would place non-agricultural land uses within 300 feet of agriculturally zoned property but indirect impacts would be less than significant because the Project would be conditioned to comply with Riverside County Ordinance No. 625, as described above under Response 4.b). Mandatory compliance with Ordinance No. 625 would ensure that existing agricultural operations are not deemed a nuisance as a result of residential land uses being located in the area, either as approved by SP 325 or as proposed by the Project. This conclusion is consistent with the information provided in EIR 433.

d) Neither the Citrus Heights property nor the proposed alignment of Street "A" are located immediately adjacent to any active agricultural operations. Only one active agricultural operation, an orchard, occurs in proximity to the Citrus Heights property, located approximately 250 feet southwest of the Citrus Heights property. At the time EIR 433 was certified, over 100 acres of land adjacent to and south of the Citrus Heights property was under active cultivation as orchard; these properties are fallow under existing conditions. Although circumstances have changed since EIR 433 was certified, the change in circumstances has reduced the likelihood that development of the Project would result in the conversion of an active agricultural use to non-agricultural use. Therefore, pursuant to Section 15162(a)(2) of the CEQA Guidelines, a subsequent EIR is not required because the change in circumstances would not result in a new significant environmental effect or a substantial increase in the severity of a previously identified significant effect. Furthermore, as described above under Response 4.b), areas to the south of the Citrus Heights property are designated by the Riverside County General Plan for future development with non-agricultural uses. The effects associated with converting agricultural properties to non-agricultural uses as called for by the General Plan were previously evaluated as part of the Riverside County's General Plan EIR (SCH No. 2002051143), which found that the conversion of such properties represent a significant and unavoidable impact Countywide. There are no components of the proposed Project that would result in an increase in impacts associated with farmland conversion beyond levels previously evaluated and disclosed as part of EIR 433 and the County General Plan EIR. Accordingly, and as concluded by EIR 433, development on the subject property would result in less than significant impacts associated with farmland conversion.

Mitigation: No mitigation measures are required for the proposed Project and no mitigation measures were required by EIR 433.

Monitoring: No monitoring is required.

5. Forest

a) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Govt. Code section 51104(g))?

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?

Potentially Significant New Impact	Less than Significant New Impact with Mitigation Incorporated	Less Than Significant New Impact	Impact Fully Analyzed in EIR 433
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Source: Riverside County General Plan Figure OS-3 "Parks, Forests and Recreation Areas;" City of Riverside General Plan Open Space and Conservation Element; Project Application Materials

Findings of Fact:

a) through c) Neither the Citrus Heights property nor the proposed alignment of Street "A" contains any forest lands, is not zoned for forest resources, nor is it identified as containing forest resources by the Riverside County General Plan or the City of Riverside General Plan. There are no components of either approved SP 325 or the proposed Project that could result in the conversion of forestland resources to non-forest use, either directly or indirectly. No impact would occur. Although the specific topic of Forest was not evaluated in EIR 433, the EIR disclosed extensive information about the property's existing conditions and surrounding environment, including vegetation types, to reasonably conclude that the property and immediately surrounding area do not contain forest lands and that development of the Project would have no adverse effects on forests.

Mitigation: No mitigation measures are required for the proposed Project and no mitigation measures were required by EIR 433.

Monitoring: No monitoring is required.

AIR QUALITY Would the project

6. Air Quality Impacts

a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose sensitive receptors which are located within 1 mile of the project site to project substantial point source emissions?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve the construction of a sensitive receptor located within one mile of an existing substantial point source emitter?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source: EIR 433, Section V.C.5, "Air Quality;" Technical Appendix E to EIR 433 "Air Quality Assessment" (Giroux and Associates, 2002); SCAQMD Air Quality Management Plan; 1997 SCAQMD Air Quality Management Plan; SCAQMD CEQA Air Quality Handbook; SCAQMD Rule 1113; 1996 SCAG Regional Comprehensive Plan; Traffic Report (Urban Crossroads, September

Potentially Significant New Impact	Less than Significant New Impact with Mitigation Incorporated	Less Than Significant New Impact	Impact Fully Analyzed in ER 433
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2012); Air Quality Report (Urban Crossroads, October 2012); California Building Standards Code; Google Earth (accessed July 2, 2012)

Findings of Fact:

a) The Project site is located within the South Coast Air Basin (SCAB or "Basin"). The SCAB encompasses approximately 6,745 square miles and includes Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. The SCAB is bound by the Pacific Ocean to the west; the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east, respectively; and the San Diego County line to the south. The South Coast Air Quality Management District (SCAQMD) is principally responsible for air pollution control in the SCAB. The SCAQMD works directly with the Southern California Association of Governments (SCAG), county transportation commissions, local governments, and state and federal agencies to reduce emissions from stationary, mobile, and indirect sources to meet state and federal ambient air quality standards.

The SCAQMD has adopted a series of Air Quality Management Plans (AQMPs) to reduce air emissions in the Basin. When EIR 433 was certified in 2004, the SCAQMD's 1997 AQMP was applicable. Subsequently, the SCAQMD Governing Board adopted the Draft Final 2007 AQMP for the SCAB, on June 1, 2007, which was in effect with the environmental analysis for the proposed Project commenced and is the applicable AQMP for consistency evaluation. Since that time, the SCAQMD adopted a 2012 AQMP on December 7, 2012. The 2012 AQMP incorporates the latest scientific and technological information and planning assumptions, including the 2012 Regional Transportation Plan/Sustainable Communities Strategy and updated emission inventory methodologies for various source categories. Similar to the 2007 AQMP, the 2012 AQMP is based on assumptions provided by both CARB and SCAG in the latest available EMFAC model for the most recent motor vehicle and demographics information, respectively. Similar to the 2007 AQMP, the 2012 AQMP assumes that development associated with general plans, specific plans, residential projects, and wastewater facilities will be constructed in accordance with population growth projections identified by SCAG. The 2012 AQMP relies on SCAG's 2012 RTP, which assumes the same land uses for the Project site as assumed in 2007. For purposes of evaluation and to determine whether the proposed Project would result in any new or more severe air quality impacts than disclosed in EIR 433, consistency with both the 1997 AQMP, which was applicable at the time EIR 433 was certified, and the 2007 AQMP are discussed below.

Regarding the 1997 AQMP, EIR 433 concluded that because approved SP 325 was consistent with the regional growth projections documented by Riverside County and SCAG, the approved project was consistent with the AQMP. This rationale was applied because the 1997 AQMP used the County's General Plan and SCAG's Regional Comprehensive Plan (RCP) as the basis for its growth assumptions. Applying this same rationale, the proposed Project would not create a new or more severe impact associated with 1997 AQMP compliance. The land use modifications proposed by the Project include reducing the grading footprint of approved SP 325 by approximately 47 acres, eliminating the planned golf course and clubhouse, increasing the amount of open space and park acreage, adding storm water quality/detention facility improvements, and adding 48 more single-family homes. The net difference in air emissions associated with these land use changes is nominal as documented in an air quality impact analysis prepared by Urban Crossroads for the Citrus Heights Project (refer to Appendix A of this EIR Addendum). Developing 48 additional single-family homes and more park acreage and drainage facilities on the Citrus Heights property instead of a golf course and clubhouse uses would have been consistent with the County's General Plan and SCAG's RCP growth assumptions when EIR 433 was certified in 2004. The RCP projected an increase of 495,000

Potentially Significant New Impact	Less than Significant New Impact with Mitigation Incorporated	Less Than Significant New Impact	Impact Fully Analyzed in EIR 433
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people in the western Riverside County region between years 2000 and 2010 (SCAG RCP, adopted June 1996, Growth Management Chapter, Table 3-2). Based on census data, the population of western Riverside County grew by 264,694 persons between 2000 and 2010, which was much less than the 495,000 increase projected by SCAG and assumed in the AQMP. Therefore, the addition of 48 single-family homes and the other land use changes proposed by the Project would have been well within the regional growth projections and not in conflict with the 1997 AQMP. This conclusion is consistent with the AQMP consistency information presented in EIR 433.

SCAQMD prepared the 2007 AQMP based on the assumptions provided by both the California Air Resources Board (CARB) and SCAG in the Emission FACTors 2007 (EMFAC 2007) model for motor vehicle and demographics information, respectively.

The proposed Project's consistency with the 2007 AQMP is discussed below. Criteria for determining consistency with the 2007 AQMP and the 2012 AQMP are defined in Chapter 12, Section 12.2 and Section 12.3 of the SCAQMD's CEQA Air Quality Handbook (1993).

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

According to the SCAQMD's CEQA Air Quality Handbook, the proposed Project would be consistent with the 2007 AQMP if the Project would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.

The violations that Consistency Criterion No. 1 refers to are the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). EIR 433 included an analysis of impacts to air quality and found that short-term construction and long-term mobile source emissions associated with SP 325 would result in direct and cumulative impacts to regional air quality that would remain significant and unavoidable even following the incorporation of identified mitigation measures. The proposed Project would have similar earthwork quantities on the Citrus Heights property as approved SP 325, and would reduce the grading footprint of Street "A" by approximately 30 percent (i.e., a reduction of 10.2 acres); therefore, the Project's construction-related emissions would be no greater than the construction-related air quality impacts disclosed in EIR 433. A trip generation analysis conducted by Urban Crossroads in accordance with the Institute of Transportation Engineers (ITE) Trip Generation Manual (2008, 8th Edition) concluded that the proposed Project would generate 212 fewer trip ends per day than approved SP 325. As such, long-term mobile source emissions would be reduced under the proposed Project as compared to what was disclosed in EIR 433, with the exception of airborne particulate matter (PM₁₀), refer to the analysis presented in Appendix A. Although long-term mobile source PM₁₀ emissions would increase slightly under the proposed Project to a maximum of 35.35 pounds per day (from 25.4 pounds per day as disclosed in EIR 433), long-term PM₁₀ emissions would remain well below the SCAQMD PM₁₀ emissions threshold of 150 pounds per day and would be less than significant. Furthermore, the increase in long-term mobile source PM₁₀ emissions attributed to the Project is solely the result of advancements and refinements to the air quality emissions models utilized by CARB and supported by the SCAQMD that have occurred since EIR 433

Potentially Significant New Impact	Less than Significant New Impact with Mitigation Incorporated	Less Than Significant New Impact	Impact Fully Analyzed in EIR 433
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was certified in 2004. Had the approved SP 325 been evaluated using the current EMFAC 2007 emissions model, long-term mobile source PM₁₀ emissions would have been greater than the long-term mobile source PM₁₀ emissions of the proposed Project. Accordingly, implementation of the proposed Project would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations beyond what was already identified and disclosed as part of EIR 433. On the basis of the preceding discussion, the proposed Project would be consistent with Consistency Criterion No. 1.

- **Consistency Criterion No. 2:** *The proposed project will not exceed the assumptions in the AQMP in 2011 or increments based on the years of project build-out phase.*

Assumptions used in the 2007 AQMP for projecting future emissions levels are based in part on land use data provided by lead agency general plan documentation. Projects that propose general plan amendments and changes of zone may increase the intensity of use and may result in increased stationary area source or mobile source emissions that exceed projections contained within the AQMP. The Project proposes a Specific Plan Amendment and a Change of Zone to modify the land uses on the Citrus Heights property, including the addition of 48 single-family units and the elimination of a golf course and clubhouse. However, as described under Consistency Criterion No. 1 above, Project-related short-term construction emissions would be no greater than what was disclosed in EIR 433 and long-term mobile source emissions would be less than what was disclosed in EIR 433, which concluded that SP 325 was consistent with the AQMP. As such, the Project would not substantially exceed assumptions in the AQMP and the Project would be consistent with Consistency Criterion No. 2.

For the reasons stated above, the proposed Project would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP, or exceed the growth assumptions in the AQMP. Accordingly implementation of the proposed Project would not conflict with or obstruct implementation of the AQMP to a greater degree than the approved project, and would not result in new or substantially increased impacts that were not previously disclosed in EIR 433.

b) & c) EIR 433 concluded that impacts to regional air quality resulting from buildout of approved SP 325 would be significant and unavoidable even after the incorporation of mitigation measures on both a direct (short-term construction emissions) and cumulative (short-term construction and long-term mobile source emissions) basis. Mitigation measures identified in EIR 433 would continue to apply to the proposed Project, and would be enforced by Riverside County as part of the Project's conditions of approval. As indicated above under Response 6.a), the proposed Project would result in a net reduction of average daily traffic trips compared to the previously approved SP 325, resulting in a concomitant reduction of estimated long-term mobile source air pollutant emissions. The proposed Project also would be required to comply with the most recent version of the California Green Building Standards Code (California Code of Regulations Title 24) that went into effect on January 1, 2011 (CALGreen) and that will become even more stringent on January 1, 2014. CALGreen requires more stringent construction practices than evaluated by EIR 433. CALGreen requires lower water usage, lower fossil fuel usage, and landfill waste diversion, which directly and indirectly reduce adverse air emissions during building construction and operation. Accordingly, the proposed Project would slightly reduce the severity of short-term, long-term direct and cumulative air quality impacts previously identified in EIR 433 and would not create any additional air quality violations. Nonetheless,

Potentially Significant New Impact	Less than Significant New Impact with Mitigation incorporated	Less Than Significant New Impact	Impact Fully Analyzed in EIR 433
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direct and cumulative air quality impacts would remain significant and unavoidable as disclosed in EIR 433 and the Statement of Overriding Considerations that supported certification of EIR 433.

d) The proposed Project consists of a residential community and a roadway (Street "A") and would not include any uses that have the potential to generate substantial amounts of point source emissions during long-term operation. However, construction equipment that would be utilized by the Project has the potential to expose nearby residents to adverse localized pollutant concentrations during proposed short-term construction activities. As shown in the air quality impact analysis prepared by Urban Crossroads (see Appendix A to this EIR Addendum), with the implementation of mitigation measures identified in EIR 433, the proposed Project would not generate substantial air pollutant emissions during short-term construction activities. Accordingly, and consistent with the information disclosed in EIR 433, the proposed Project would not expose sensitive receptors located within one mile of the Project site to substantial point source emissions, and impacts would be less than significant.

e) EIR 433 did not disclose the existence of any sources of substantial point source emissions within one (1) mile of the Project site. No such emission sources have been introduced in the Project's one (1) mile vicinity since EIR 433 was certified; therefore, there has been no change in circumstance. Development on the Citrus Heights property either as approved by SP 325, or as proposed by the Project, has no potential to construct residential land uses within one (1) mile of substantial point-source emissions, because no such emission sources exist. No impact would occur.

f) The Project proposes to develop the Citrus Heights property with single-family residential land uses, parks, roads, and water quality/detention facilities. The Project would also develop a roadway connection between McAllister Street and Van Buren Boulevard. These land uses are not typically associated with the generation of objectionable odors and consistent with the information provided in EIR 433, there would be no long-term odor impacts. EIR 433 disclosed that although construction activities are a source of potential odor nuisance, odor emission impacts would be less than significant. As shown in the air quality impact analysis prepared by Urban Crossroads (see Appendix A to this EIR Addendum), the estimated emissions from construction activities on the Citrus Heights property would be less than disclosed in EIR 433. Although odor emissions would occur from construction equipment exhaust, application of asphalt, and the application of architectural coatings, such odors would be no greater than assumed by EIR 433, would not be substantially objectionable, would not affect a substantial number of people, and would be short-term and intermittent in nature ceasing upon completion of construction. As such, short-term odor impacts associated with Project construction would be less than significant and consistent with the information disclosed in EIR 433. Although no mitigation measures are required, mandatory compliance with applicable regulatory standards, including SCAQMD Rule 1113 (Architectural Coatings), would minimize odors associated with Project construction activities.

Mitigation: No new mitigation measures beyond those identified in EIR 433 are required. Mitigation Measures C.5-1 and C.5-2, as specified in EIR 433, have been revised to reflect the currently applicable SCAQMD regulatory requirements. All measures identified in EIR 433 to mitigate impacts to air quality, including Mitigation Measures C.5-1 and C.5-1 as revised below, continue to apply to the proposed Project.

C.5-1 Prior to final map recordation, the County shall verify the following notes are listed on the Environmental Constraint Sheet. The County also shall verify that the following notes are listed on the grading plan prior to grading permit issuance:

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"During grading and ground-disturbing construction activities, the construction contractor shall assure that water trucks or sprinkler systems apply water to unpaved roads and areas undergoing active ground disturbance within the Project site a minimum of three (3) times daily. At a minimum, watering shall occur in the mid-morning, afternoon, and after work has been completed for the day."

"If wind speed is 15 mph or greater, water shall be sprayed onto areas subject to blasting to wet the ground surface before blasting."

"The construction contractor shall assure that temporary signs indicating a maximum speed limit of 15 miles per hour (MPH) are placed along all unpaved roads and/or unpaved haul routes on the Project site, before construction activities commence. The construction contractor shall be responsible for assuring the enforcement of the 15 MPH speed limit throughout the duration of construction activities."

C.5-2 Prior to final map recordation, the County shall verify the following note is listed on the Environmental Constraint Sheet. The County also shall verify that the following note is listed on the grading and construction plans prior to the issuance of grading and building permits:

"The construction contractor shall assure that temporary signs indicating that all construction equipment on-site shall not idle for more than five (5) minutes are placed at all loading, unloading, and equipment staging areas, before construction activities commence. The construction contractor shall be responsible for assuring enforcement of the five (5) minute idling limit throughout the duration of construction activities."

Monitoring: Monitoring shall occur as specified in the revised Mitigation Monitoring & Reporting Program prepared for Addendum No. 1 to EIR 433.

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 Game or U. S. Wildlife Service?

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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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U. S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source: GIS database, WRC-MSHCP, Biological Opinion, Clean Water Act Section 404 Permit, Streambed Alteration Agreement, On-site Inspection, Biology Report, DBESP Addendum

Findings of Fact:

a) The Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) is the regional habitat conservation plan (HCP) that applies to all properties in Western Riverside County, including the proposed Project. The MSHCP identifies conservation criteria for portions of the County that are identified for conservation as part of the MSHCP. When EIR 433 was prepared, the MSHCP was approved, but the County's associated "take permit" from the U.S. Fish and Wildlife Service (USFWS) and California Department of Fish and Game (CDFG) was not yet issued; therefore, EIR 433 evaluated consistency with the MSHCP, but provided mitigation in the event that the take permit was never issued. Subsequently, Permit (10(a)(1)(B) Permit No. TE-088609) was executed between the County and USFWS and CDFG on June 22, 2004.

The proposed Project is not located within the MSHCP Criteria Area, and therefore is not subject to the Habitat Evaluation and Acquisition Negotiation Strategy (HANS) process, or the Joint Project Review (JPR) process. Although habitat conservation is not required on the Project site by the MSHCP, all projects must demonstrate compliance with applicable MSHCP requirements pursuant to the following sections of the MSHCP: Section 6.1.2, "Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools;" Section 6.1.3, "Protection of Narrow Endemic Plant Species;" Section 6.1.4, "Guidelines Pertaining to the Urban/Wildland Interface;" and Section 6.3.2, "Additional Survey Needs and Procedures."

Compliance with MSHCP Section 6.1.2

The proposed Project would result in a lesser extent of overall biological impact than disclosed in EIR 433. The Project would impact approximately 2.45 acres of MSHCP riparian/riverine areas, including 2.08 acres of riparian habitats and 0.37 acre of unvegetated riverine areas. Approximately 13.74 acres of riparian habitats located on the Citrus Heights property would be

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avoided by the Project. Of the impacts that would occur to MSHCP riparian/riverine areas, approximately 0.08-acre would occur within the proposed alignment of Street "A." The MSHCP requires that impacts to riparian/riverine area must be mitigated such that the resulting Project, with mitigation, is biologically equivalent or superior to the existing site conditions. A Determination of Biologically Equivalent or Superior Preservation (DBESP) was approved in 2006 for the previously approved project, which was to impact 4.04 acres of riparian/riverine habitat, with proposed mitigation consisting of 8.20 acres of on-site riparian restoration, along with the avoidance of the remaining riparian habitat. The proposed Project has reduced the impacts to riparian/riverine areas, and the Project Applicant would provide 8.20 acres of riparian restoration as originally proposed and approved by the 2006 DBESP. A DBESP Addendum was prepared in 2013 for the proposed Project and concluded that the proposed Project would be less impactful to habitat function and biologically superior as compared to the previously approved project. Furthermore, the DBESP Addendum concluded the proposed Project would be consistent with MSHCP Volume I, Section 6.1.2 of the MSHCP.

The proposed Project would result in the loss of 2.08 acres of habitat with long-term conservation value for the least Bell's vireo. The 2006 Biological Opinion for the previously approved Project acknowledged that the loss of vireo habitat (2.10 acres) was covered under the MSHCP, with measures that included the on-site restoration of 8.20 acres of riparian habitat. MSHCP Section 6.1.2 and the species-specific objectives for the least Bell's vireo require that at least 90 percent of habitat with long-term conservation value be avoided for the vireo. Otherwise, the loss of vireo habitat must be approved with mitigation subject to the DBESP process. The proposed Project would preserve less than 90 percent of on-site vireo habitat. As such, the unavoidable impacts require an approved DBESP. A DBESP was accepted for the previously approved project in 2006, based on the mitigation measures referenced in the Biological Opinion, and a DBESP Addendum was prepared in 2013 for the proposed Project which affirmed the findings of the 2006 DBESP. The proposed Project is required to implement all measures for the least Bell's vireo as identified in the 2006 Biological Opinion. As such, the proposed Project is consistent with the MSHCP as it pertains to the least Bell's vireo.

The Project site does not contain, and therefore would not impact, any MSHCP vernal pools or habitat suitable to support listed fairy shrimp. As such, the proposed Project is consistent with MSHCP Volume I, Section 6.1.2 as it pertains to vernal pools and listed fairy shrimp.

Compliance with MSHCP Section 6.1.3

The proposed Project site does not occur within an identified Narrow Endemic Plant Species Survey Area (NEPSSA). Therefore, focused surveys are not required by the MSHCP for NEPSSA species, and the proposed Project is consistent with Volume I, Section 6.1.3 of the MSHCP.

Compliance with MSHCP Section 6.1.4

The MSHCP Urban/Wildland Interface Guidelines are intended to address indirect effects associated with locating development in proximity to the MSHCP Conservation Area. The Project is not located adjacent to existing Conserved Lands, and is not within or adjacent to the MSHCP Criteria Area. Therefore, the Project is consistent with Volume I, Section 6.1.4 of the MSHCP.

Potentially Significant New Impact	Less than Significant New Impact with Mitigation Incorporated	Less Than Significant New Impact	Impact Fully Analyzed in EIR 433
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Consistency with MSHCP Section 6.3.2

The proposed Project site occurs within the MSHCP's burrowing owl survey area, but does not occur within the amphibian or mammal survey areas, or within the CAPSSA. Focused burrowing owl surveys were conducted for the proposed Project site in 2012, and no burrowing owls were detected. Pre-construction burrowing owl surveys would be required within 30 days of site disturbance as mandated by MSHCP requirements. As such, the proposed Project is consistent with MSHCP Volume I, Section 6.3.2.

In conclusion, because the MSHCP does not identify any portion of the Project site for conservation, because a DBESP has already been approved and its provisions will be complied with, and because the Project is required by Riverside County to adhere to all applicable MSHCP policies, the proposed Project would be consistent with the MSHCP. No new or more severe MSHCP-related impacts would occur beyond those disclosed in EIR 433, which concluded that impacts would be less than significant with mitigation.

b & c) One sensitive plant species, particulate tarplant (*Deinandra paniculata*), a CNPS List 4.2 species, is located on the Citrus Heights Project site and in the alignment of Street "A." This species is not federally or state listed as threatened or endangered nor was it considered for coverage under the MSHCP. The loss of these plants is considered less than significant because the species is found throughout Riverside County and the loss associated with the Project would not affect long-term survival of the species.

Impacts to sensitive wildlife species and their habitat would occur to a lesser extent than disclosed by EIR 433, because the Project's grading footprint would be reduced. The proposed Project would result in the loss of habitat for a number of special-status wildlife species, including listed and non-listed species. Two listed species (coastal California gnatcatcher and least Bell's vireo) have been documented on the site and were identified in EIR 433. In addition, Stephens' kangaroo rat (SKR) has the potential to occur on the site as disclosed in EIR 433. The loss of habitat for these species is potentially significant, both individually and cumulatively, but impacts would occur to a lesser degree than previously identified in EIR 433. The USFWS previously issued a Biological Opinion (dated May 16, 2006) on their formal consultation for the previously approved project, addressing impacts to the coastal California gnatcatcher and least Bell's vireo. The USFWS concluded that the previously approved project was generally consistent with the relevant MSHCP policies and procedures, and that the USFWS did not anticipate any adverse effects to the vireo and gnatcatcher that were not previously evaluated in the Biological Opinion for the MSHCP. Furthermore, the USFWS concluded that implementation of the previously approved project would not result in jeopardy to the vireo or gnatcatcher. Because the proposed Project consists of a reduced impact footprint compared with the previously approved project, it is assumed that the "no jeopardy" conclusion of the USFWS would apply to the currently proposed Project, provided that the Project implements the measures identified in the May 16, 2006 Biological Opinion. These measures are required to be implemented in order for the proposed Project to receive the Take Authorization established in the Biological Opinion. As such, the measures included in the Biological Opinion are repeated below as mitigation measures. These are not new measures but simply a repetition of the measures already required under the Biological Opinion issued in 2006.

Regarding applicable MSHCP policies, MSHCP Section 6.1.2 and the species-specific objectives for the least Bell's vireo discussed above under Item 7.a) require that at least 90 percent of habitat with

Potentially Significant New Impact	Less than Significant with Mitigation Incorporated	Less Than Significant New Impact	Impact Fully Analyzed in EIR 433
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long-term conservation value be avoided for the vireo. Otherwise, the loss of vireo habitat must be approved with mitigation subject to the DBESP process. The proposed Project would avoid and preserve less than 90 percent of on-site vireo habitat. This impact is the same as disclosed in EIR 433. The unavoidable impacts require an approved DBESP. As discussed above under Item 7.a), a DBESP was accepted for the previously approved project, based on the mitigation measures referenced in the Biological Opinion. A DBESP Addendum was prepared in 2013 for the proposed Project, which affirmed the conclusions of the 2006 DBESP. As discussed above, the proposed Project would implement the previously accepted measures, including the on-site restoration of 8.2-acres of riparian habitat. As such, the proposed Project is consistent with the MSHCP policies for the least Bell's vireo.

The proposed Project site occurs within the SKR Fee Assessment Area as established by the SKR Habitat Conservation Plan (SKR HCP). Coverage for impacts to SKR would be provided to the proposed Project through payment of the SKR fee, as disclosed in EIR 433. Impacts to SKR habitat would be less under the proposed Project than the previously approved project due to the impact in grading footprint and increase in the amount of on on-site open space preservation.

Consistent with the information disclosed in EIR 433, impacts to the following "Covered Species" under the MSHCP would be less than significant with mandatory payment of the MSHCP development impact fee: coast horned lizard, orange throat whiptail, red-diamond rattlesnake, Bell's sage sparrow, loggerhead shrike, northwestern San Diego pocket mouse, and San Diego desert woodrat.

Based on these findings, implementation of the proposed Project would not result in any new significant or more severe impacts to sensitive plant or wildlife species than previously discussed in EIR 433.

d) EIR 433 concluded that the previously-approved project would result in a significant impact to regional wildlife movement. However, this finding was made prior to approval of the MSHCP, and therefore did not account for the MSHCP analysis of important Linkages within the MSHCP. The proposed Project would remove live-in habitat for wildlife, and would restrict the local movement of wildlife within the site and through the site, but to a lesser degree than would have occurred under the previously approved project. Because the Project site does not occur within a designated MSHCP Linkage or Constrained Linkage, the Project site is not critical for regional wildlife movement as recognized by the MSHCP. As such, impacts to wildlife movement would be less than significant and less than disclosed in EIR 433.

e) and f) The proposed Project would permanently impact approximately 2.08 acres of MSHCP riparian areas, and 0.37 acre of unvegetated riverine areas, which is less than disclosed in EIR 433. Impacts to MSHCP riparian/riverine areas require the approval of a DBESP by the County of Riverside, subject to review by the CDFG and USFWS. A DBESP was approved for the previously approved project in 2006. A DBESP Addendum was prepared for the proposed Project in 2013, which affirmed the conclusions of the 2006 DBESP. The Project Applicant would implement the same mitigation for the current Project as was approved for the previously-approved project. Therefore, all impacts would be mitigated to below a level of significance, consistent with the finding of EIR 433.

The proposed Project would permanently impact 0.43 acre of U.S. Army Corps of Engineers (Corps) jurisdiction, of which 0.03 acre consist of jurisdictional wetlands. Of the impacts, approximately 0.03-acre (none of which consists of jurisdictional wetlands) is associated with Street "A". The Corps issued

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a 404 permit (SPL-2005-01112-SJH, dated February 20, 2007) for the previously approved project, authorizing impacts to 3.03 acres of Corps jurisdiction (including 0.46 acre of wetlands). The permit was extended on February 3, 2012. The impacts to Corps jurisdiction for the currently proposed Project would be substantially less than that authorized by the 404 permit and as disclosed in EIR 433.

The proposed Project would permanently impact 0.47 acre of Regional Water Quality Control Board jurisdiction, of which 0.03 acre consist of jurisdictional wetlands. Of this total, approximately 0.03 acre (none of which consists of jurisdictional wetlands) is associated with Street "A." The Regional Board issued a Section 401 Water Quality Certification (March 28, 2006) for the previously approved project, authorizing impacts to 3.28 acres of Regional Board jurisdiction, including 0.64 acre of wetlands. The 401 Certification, which has no expiration date, has the same lifespan as the 404 permit. The impacts to Regional Board jurisdiction for currently proposed Project are substantially less than that authorized by the 401 Certification and as disclosed in EIR 433.

The proposed Project would permanently impact 2.45 acres of CDFG jurisdiction, of which 2.08 acres consist of vegetated riparian habitat. Of this total, approximately 0.08 acre (none of which consists of vegetated riparian habitat) is associated with Street "A". CDFG issued a Streambed Alteration Agreement (1600-2005-0076-R6, dated June 21, 2006) authorizing impacts to 4.04 acres of CDFG jurisdiction. The CDFG Agreement has also been extended, and is in effect until December 31, 2015. The impacts to CDFG jurisdiction for the proposed Project are substantially less than that authorized by the Streambed Alteration Agreement and as disclosed in EIR 433.

No new or more severe impacts would occur. Mandatory compliance with the requirements of the previously approved DBESP, the 404 permit, the 401 certification and the 1602 streambed alteration agreement would reduce impacts to below a level of significance.

g) The proposed Project site does not contain any oak trees or any other tree species regulated by County ordinance or addressed by County policy. Accordingly, no impact would occur, which is consistent with the conclusion reached by EIR 433.

Mitigation: Mitigation Measures C.10-1 through C.10-12, as specified in EIR 433, have been replaced with the measures listed below to reference and reflect the mandatory requirements of the MSHCP and the provisions of the Project's previously approved DBESP, 404 permit, 401 Water Quality Certification and 1602 streambed alteration agreement.

C.10-1: In compliance with the Project's approved DBESP, Section 404 Permit (SPL-2005-01112 SJH,) Regional Board Section 401 Water Quality Certification, and CDFG Streambed Alteration Agreement (1600-2005-0076-R6), the following measures shall be implemented:

- a) The Project shall avoid and conserve 13.52 acres of onsite riparian habitats and 0.22 acre of unvegetated streambed (riverine areas).
 - 13.52 acres of onsite riparian habitats and 0.22 acre of unvegetated streambed shall be marked as preservation areas on the grading plan, prior to issuance of a grading permit.
 - Prior to and during grading operations, riparian habitats and riverine areas that will be conserved adjacent to areas approved for grading shall be marked in the field by orange construction fencing. The construction contractor shall be responsible for ensuring that ground disturbance does not encroach into these areas.

Potentially Significant New Impact	Less than Significant New Impact with Mitigation Incorporated	Less Than Significant New Impact	Impact Fully Analyzed in EIR 433
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- Prior to final map recordation, the conserved riparian habitats and riverine areas shall be marked on the Environmental Constraint Sheet.
- b) The Project Applicant shall create 8.2 acres of riparian habitat onsite, including willow woodland creation (0.40 acre), willow woodland enhancement (1.8 acres), mulefat/willow scrub restoration (0.9 acre), and saltbush/mule fat scrub restoration (5.1 acres); or The Project Applicant shall purchase 8.2 acres of mitigation credits from a Corps/CDFG approved mitigation bank; or the Project Applicant shall compensate for the loss of habitat through a combination of onsite mitigation and the purchase of credits from an offsite mitigation bank, in a total amount of no less than 8.2 acres.
- c) Approximately 11.7 acres of Riversidean sage scrub shall be restored along the onsite riparian drainages to enhance the buffer between the proposed development and the conserved riparian habitat.

C.10-2: In compliance with the Project's approved May 16, 2006 Biological Opinion, the following measures shall be implemented to mitigate impacts to the least Bell's vireo:

- a) The removal of vegetation within onsite riparian habitats, or within 100 meters of riparian habitats, shall occur outside of the vireo breeding season (March 1 – August 31). This restriction shall be noted on all grading plans.
- b) Development lighting shall be directed away from sensitive habitats. Lighting plans shall be reviewed and approved by Riverside County prior to the approval of building permits to ensure compliance with this requirement.
- c) A native vegetation buffer shall be established between vireo habitat and development areas. The buffer shall be in place prior to the first final building inspection in Planning Area 1 or 3.
- d) An Environmental Awareness Program shall be developed and administered by the Project's Homeowners' Association to educate property owners regarding the least Bell's vireo, and other sensitive habitat issues. This requirement shall be specified in the community's CC&Rs.
- e) Access to the conserved riparian corridor shall be restricted. The County shall review and approve all wall and fencing plans prior to the issuance of building permits to ensure compliance with this requirement. The access restrictions also shall be specified in the community's CC&Rs.
- f) Cat exclusion fencing shall be installed along areas adjacent to the conserved riparian corridor. The County shall review and approve fencing plans prior to the issuance of building permits to ensure compliance with this requirement. A requirement to maintain this fence at all times shall be specified in the community's CC&Rs.
- g) The Project Applicant shall provide funding assistance for cowbird trapping in coordination with the Santa Ana Watershed Association (SAWA). Proof of funding assistance (receipt or other acceptable verification) shall be provided to the Riverside County Planning Department prior to the issuance of the first building permit.

Potentially Significant New Impact	Less than Significant New Impact with Mitigation Incorporated	Less Than Significant New Impact	Impact Fully Analyzed in EIR 433
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C.10-3: In compliance with the MSHCP Objective 6 for burrowing owls, within 30 days prior to grading, a qualified biologist shall conduct a pre-construction survey of the property and make a determination regarding the presence or absence of the burrowing owl. In the event that the pre-construction survey identifies no burrowing owls on the property, a grading permit may be issued without restriction. In the event that the pre-construction survey identifies the presence of at least one individual but less than three (3) mating pairs of burrowing owl, then prior to the issuance of a grading permit and prior to the commencement of ground-disturbing activities on the property, the qualified biologist shall relocate the burrowing owls following accepted protocols. Relocation shall occur outside of the nesting season to avoid the take of active nests. In the event that the pre-construction survey identifies the presence of three (3) or more mating pairs of burrowing owl, the provisions of MSHCP Species-Specific Conservation Objective 5 shall be followed.

C.10-4: To avoid impacts to nesting birds, vegetation clearing shall be conducted outside of the nesting season (February 1st through September 15th). If avoidance of the nesting season is not feasible, then a qualified biologist shall conduct a nesting bird survey within 3 days prior any disturbance of the site. If active nests are identified, the biologist shall establish suitable buffers around the nests, and the buffers shall be avoided until the nests are no longer occupied and the juvenile birds can survive independently from the nests.

C.10-5: Prior to the issuance of clearing or grading permits, the Project Applicant shall pay Local Development Mitigation Fees (per County Ordinance No. 810.2) for implementation of the MSHCP.

C.10-6: Prior to the issuance of grading permits, the Project Applicant shall pay fees in accordance with Riverside County Ordinance No. 633 (Stephens' Kangaroo Rat Fee Assessment Area) for implementation of the Stephens' Kangaroo Rat Habitat Conservation Plan.

Monitoring: Monitoring shall occur as specified in the revised Mitigation Monitoring & Reporting Program prepared for Addendum No. 1 to EIR 433.

CULTURAL RESOURCES Would the project

8. Historic Resources

a) Alter or destroy an historic site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of a historical resource as defined in California Code of Regulations, Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source: EIR 433, Section V.C.12, "Historic and Prehistoric Resources;" EIR 433 Appendix J "A Cultural Resources Study for the Lake Mathews Golf and Country Club Specific Plan" (BFSA, 2001); EIR 433 Appendix J.1 "A Cultural Resource Survey of the Van Buren Boulevard Collector Project in Association with Lake Mathews Golf and Country Club" (BFSA, 2002); County General Plan Figure OS-7 "Historic Resources;" Cultural Resources Study (BFSA, 2013); On-Site Inspection; Project Application Materials

Potentially Significant New Impact	Less than Significant New Impact with Mitigation Incorporated	Less Than Significant New Impact	Impact Fully Analyzed in EIR 433
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Findings of Fact:

a) EIR 433 disclosed that subject property does not contain any historic sites. The Project site is vacant and no evidence of structures or buildings are located on the subject property of shown on local historic maps.

In 2012 and 2013, Brian F. Smith and Associates conducted a field survey of the Citrus Heights property and the proposed alignment of Street "A". Brian F. Smith and Associates also performed a records archive search of known historical sites in the vicinity of the Project site. During the field survey, two (2) previously unrecorded historical sites were discovered in the Project area; one (1) site was recorded on the Citrus Heights property and comprised a historic refuse scatter (CA-RIV-11,302), and one (1) site was recorded within the proposed alignment of Street "A" and comprised a historic refuse scatter (CA-RIV-11,303). CA-RIV-11,303 would be impacted during the construction of Street "A," however CA-RIV-11,302 is located outside of the Project's impact footprint. The examination of the historic sites (CA-RIV-11,302 & CA-RIV-11,303) did not reveal anything unique about the sites' functions or content. Both sites comprised trash deposits from between 1900 and the mid-1950s that was likely the result of episodic roadside dumping. Contents of the sites included common household waste products such as bottles, cans, light bulbs, ceramic shards, and food. Due to the nature of the trash deposits, the sites were determined to lack depth, integrity or uniqueness, and were determined to be non-significant pursuant to State of California protocol.

Although two historical sites were identified during the 2012 and 2013 field work that were not disclosed in EIR 433, the conclusions of EIR 433 remain accurate, because these additional sites are not significant resources. As concluded by EIR 433, implementation of the proposed Project would not result in impacts to any historical site designated as a significant resource. Accordingly, impacts would be less than significant and the proposed Project would not result in any new or more severe impacts to historical resources beyond what was previously disclosed in EIR 433.

b) As documented in EIR 433, no historic resources are located on the subject property; thus, development of the property either as approved by Specific Plan No. 325 or as proposed by the Project has no potential to cause an adverse change in the significance of a historic resource. This finding is consistent with the conclusion of EIR 433.

Mitigation: No mitigation measures are required for the proposed Project and no mitigation measures were required by EIR 433.

Monitoring: No monitoring is required.

9. Archaeological Resources

a) Alter or destroy an archaeological site.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to California Code of Regulations, Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Restrict existing religious or sacred uses within the potential impact area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Potentially Significant New Impact	Less than Significant New Impact with Mitigation Incorporated	Less Than Significant New Impact	Impact Fully Analyzed in EIR 433
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Source: EIR 433, Section V.C.12, "Historic and Prehistoric Resources;" EIR 433 Appendix J "A Cultural Resources Study for the Lake Mathews Golf and Country Club Specific Plan" (BFSA, 2001); EIR 433 Appendix J.1 "A Cultural Resource Survey of the Van Buren Boulevard Collector Project in Association with Lake Mathews Golf and Country Club" (BFSA, 2002); Cultural Resources Study (BFSA, 2013); County General Plan Program EIR Section 4.7 "Cultural Resources;" Conditions of Approval for SP 325A1 & TR36390; Project Application Materials; Pechanga Letter

Findings of Fact:

a) & b) As disclosed in EIR 433, the Citrus Heights property site contains nine (9) archaeological sites, while the proposed alignment of Street "A" does not contain any archaeological sites. All nine (9) archaeological sites on the Citrus Heights property are documented to contain bedrock milling sites in poor condition. No subsurface artifacts were recovered from any of the archaeological sites during field investigations conducted by a professional archaeologist, and only two (2) isolated surface artifacts were recovered. According to EIR 433, the archaeological sites located on the Citrus Heights property reveal nothing unique about the site's function or content, and exhibit no segregated special use areas beyond the bedrock milling function or unique elements. Due to the lack of unique artifacts recovered at the archaeological sites on the Citrus Heights property and the poor condition of the bedrock features, EIR 433 concluded that the archeological resources on the Citrus Heights property are not classified as significant pursuant to State of California protocol, and any physical impacts to these sites would be less than significant under CEQA. SP 325 was conditioned to provide archaeological monitoring during grading activities to ensure that any archaeological resources that may be unearthed during grading activities on the Project site would be properly identified and treated.

In 2012 and 2013, Brian F. Smith & Associates conducted field surveys of the Citrus Heights property and the proposed alignment of Street "A," and also performed a cultural records archive search (BFSA, 2013). During the field survey, two (2) previously unrecorded prehistoric archaeological sites were located in the Project area. Both sites were recorded on the Citrus Heights property, including CA-RIV-6650 (bedrock milling site) and CA-RIV-6651 (bedrock milling site). In addition, one isolated artifact (P-33-021732, quartzite adze) was recovered from the Citrus Heights property.

Information gathered during the testing of the prehistoric sites (CA-RIV-6650 & CA-RIV-6651) indicates that these sites were utilized as resource processing locations. No subsurface artifacts were discovered at either site; however, one quartz flake and one quartz biface fragment was recovered at the surface of CA-RIV-6651. Both sites exhibited a high degree of exfoliation of the boulders, which reduced the integrity of the sites. Because of the lack of subsurface artifacts, poor physical condition, and lack of uniqueness of the prehistoric sites, both CA-RIV-6650 & CA-RIV-6651 and the single isolated artifact, P-33-021732 were determined to be non-significant archaeological sites pursuant to State of California protocol. CA-RIV-6650 and CA-RIV-6651 are located outside of the proposed Project's impact footprint and would not be disturbed by the Project.

Although two additional archaeological sites were identified during the 2012 and 2013 field work that were not disclosed in EIR 433, the conclusions of EIR 433 remain accurate, because these additional sites are not significant resources. As concluded by EIR 433, implementation of the proposed Project would not result in impacts to any archaeological site designated as a significant cultural resource. Furthermore, the requirement to provide archaeological monitoring during grading activities to ensure that any archaeological resources that may be unearthed during grading activities on the Project site

Potentially Significant New Impact	Less than Significant New Impact with Mitigation Incorporated	Less Than Significant New Impact	Impact Fully Analyzed in EIR 433
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would be properly identified and treated would continue to apply to the proposed Project and would be incorporated as part of the County's conditions of approval for the Project.

Additionally, the Project would reduce the approved grading footprint of SP325 by approximately 47 acres and would reduce the approved grading footprint of Street "A" by approximately 10 acres, thereby lessening the potential that subsurface archaeological resources would be unearthed and increasing the potential that resources would be preserved in place in the open space areas. Three (3) of the recorded Sites that would have been disturbed by implementation of SP 325 would be preserved in open space under the Proposed Project. Accordingly, impacts would be less than significant and the proposed Project would not result in any new or more severe impacts to archaeological resources beyond what was previously disclosed in EIR 433.

c) EIR 433 does not disclose the presence of human remains on the Project site and no human remains have been identified on the Project site during past archaeological investigations and other field work. Nonetheless, in the event that human remains are uncovered during construction activities on the Citrus Heights property or during construction of proposed Street "A", the Project developer and/or County of Riverside would be required to comply with California Health and Safety Code Section 7050.5, which states that earthwork and other construction activities in the affected area shall cease immediately and cannot resume until the Riverside County Coroner is notified and has made the necessary findings as to origin. Further, pursuant to California Public Resources Code Section 5097.98(b), the remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made by the Coroner. If the Riverside County Coroner determines the remains to be Native American, the California Native American Heritage Commission must be contacted within 24 hours. The Native American Heritage Commission must then immediately notify the "most likely descendant(s)" of receiving notification of the discovery. The most likely descendant(s) shall then make recommendations within 48 hours, and engage in consultations concerning the treatment of the remains as provided in Public Resources Code Section 5097.98, "Native American Historical, Cultural, and Sacred Sites. With mandatory compliance with State law, any adverse impacts to human remains, if discovered, would be precluded.

d) The Project site does not contain any known existing religious or sacred uses; therefore, EIR 433 did not disclose any impacts associated with development activities, either on the Citrus Heights property or within the proposed alignment of Street "A." As discussed in Response 9.b, SP 325 was conditioned to provide archaeological monitoring during grading activities to ensure that any archaeological resources (including religious or sacred uses) that may be unearthed during grading activities on the Project site would be properly identified and treated. This requirement would continue to apply to the proposed Project and would be incorporated as part of the County's conditions of approval for the Project. Additionally, the Project would reduce the approved grading footprint of SP 325 by approximately 47 acres and would reduce the approved grading footprint of Street "A" by approximately 10 acres, thereby lessening the potential that subsurface archaeological resources would be unearthed and increasing the potential that resources would be preserved in place in the open space areas. Accordingly, impacts would be less than significant and the proposed Project would not result in any new or more severe impacts to archaeological resources beyond what was previously disclosed in EIR 433.

Mitigation: No mitigation measures are required for the proposed Project and no mitigation measures were required by EIR 433.

Monitoring: No monitoring is required.

Potentially Significant New Impact	Less than Significant New Impact with Mitigation Incorporated	Less Than Significant New Impact	Impact Fully Analyzed in EIR 433
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10. Paleontological Resources

a) Directly or indirectly destroy a unique paleontological resource, or site, or unique geologic feature?

Source: EIR 433, Section V.C.12, "Historic and Prehistoric Resources;" EIR 433 Appendix J "A Cultural Resources Study for the Lake Mathews Golf and Country Club Specific Plan" (BFSA, 2001); Preliminary Paleontological Resource Impact Assessment (BFSA, 2012); County General Plan Figure OS-8 "Paleontological Sensitivity;" RCLIS; Project Application Materials

Findings of Fact:

a) Potential impacts to paleontological resources were evaluated and disclosed in EIR 433, which determined that based on the Citrus Heights property's geological setting, the potential for uncovering such resources on the property would be extremely remote and that implementation of development activities would result in less than significant impacts to paleontological resources. There are no components of the proposed Project that could result in any new or more severe impacts to paleontological resources beyond what was disclosed in EIR 433. Additionally, the Project would reduce the approved grading footprint of SP 325 by approximately 47 acres and would reduce the approved grading footprint of Street "A" by approximately 10 acres, thereby lessening the remote potential that subsurface paleontological resources could be unearthed. Consistent with the conclusion of EIR 433, impacts to paleontological resources would be less than significant.

Mitigation: No mitigation measures are required for the proposed Project and no mitigation measures were required by EIR 433.

Monitoring: No monitoring is required.

GEOLOGY AND SOILS Would the project

11. Alquist-Priolo Earthquake Fault Zone or County Fault Hazard Zones

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death?

b) 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: EIR 433, Section V.C.1, "Seismic Safety;" EIR 433 Appendix B "Preliminary Geotechnical Investigation McAllister Hills Golf and Country Club" (Leighton, 2001); Preliminary Geotechnical Investigation (Alta, 2012); County General Plan Figure S-2 "Earthquake Fault Study Zones;" RCLIS

Potentially Significant New Impact	Less than Significant New Impact with Mitigation Incorporated	Less Than Significant New Impact	Impact Fully Analyzed in EIR 433
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Findings of Fact:

a) & b) As disclosed in EIR 433, neither the Citrus Heights property nor the alignment of Street "A" is located in an Alquist-Priolo Earthquake Fault Zone or a County Fault Hazard Zone. There are no active faults crossing the Citrus property or the alignment of Street "A". Therefore, there is no potential for the Project to expose people or structures to potential adverse effects resulting from a fault hazard zone, and there is no potential for fault rupture on the Citrus Heights property or along the alignment of Street "A." Consistent with the information disclosed in EIR 433, no impact would occur.

Mitigation: No mitigation measures are required for the proposed Project and no mitigation measures were required by EIR 433.

Monitoring: No monitoring is required.

12. Liquefaction Potential Zone

a) Be subject to seismic-related ground failure, including liquefaction?

Source: EIR 433, Section V.C.1, "Seismic Safety;" EIR 433 Appendix B "Preliminary Geotechnical Investigation McAllister Hills Golf and Country Club" (Leighton, 2001); Preliminary Geotechnical Investigation (Alta, 2012); County General Plan Figure S-3 "Generalized Liquefaction;" Lake Mathews/Woodcrest Area Plan Figure 12 "Seismic Hazards;" RCLIS

Findings of Fact:

a) EIR 433 evaluated the potential of liquefaction on the Citrus Heights property, and concluded that the likelihood of liquefaction on the site is low. The findings of EIR 433 are supported by an updated geotechnical report that was prepared by Alta in support of the proposed Project (Alta, 2012). The updated geotechnical report concluded that the Citrus Heights property has a very low potential for liquefaction due to the lack of shallow groundwater, the dense, consolidated nature of the older alluvium, and shallow bedrock on the subject property. In addition, the proposed alignment of Street "A" is not located within a liquefaction hazard area, as mapped by the County of Riverside. Accordingly, the proposed Project would be consistent with the findings of EIR 433 and would not be subject to seismic-related ground failure. No impact would occur.

Mitigation: No mitigation measures are required for the proposed Project and no mitigation measures were required by EIR 433.

Monitoring: No monitoring is required.

13. Ground-shaking Zone

a) Be subject to strong seismic ground shaking?

Source: EIR 433, Section V.C.1, "Seismic Safety;" EIR 433 Appendix B "Preliminary Geotechnical Investigation McAllister Hills Golf and Country Club" (Leighton, 2001); Preliminary Geotechnical

Potentially Significant New Impact	Less than Significant New Impact with Mitigation Incorporated	Less Than Significant New Impact	Impact Fully Analyzed in EIR 433
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Investigation (Alta, 2012); Conditions of Approval for SP 325A1 & TR36390, California Building Standards Code

Findings of Fact:

a) As disclosed in EIR 433, major earthquakes occurring on regional active faults located in the Southern California region, including the Chino-Central Avenue Fault located approximately 8.5 miles northwest of the Project area, could subject the Project area to ground shaking. Development proposed on the Citrus Heights property by the Project would be required to comply with the recommendations within the geotechnical report prepared for TR 36390 and with the California Building Standards Code, which would satisfactorily address seismic safety. This conclusion is consistent with the finding of EIR 433, as SP 325 was conditioned to construct on-site structures in accordance with the criteria set forth in the Uniform Building Code (which has since been superseded by the California Building Standards Code which is based on the International Building Code) and applicable County Ordinances to withstand ground shaking from the maximum credible earthquake that could be expected to occur. Furthermore, Street "A" would be required to comply with all applicable State and County standards related to road construction to ensure that adverse effects associated with seismic ground shaking would be minimized to the maximum feasible extent. As such, the Project would not result in any new or more severe impacts associated with strong seismic shaking that were not previously disclosed in EIR 433.

Mitigation: No mitigation measures are required for the proposed Project and no mitigation measures were required by EIR 433.

Monitoring: No monitoring is required.

14. Landslide Risk

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

Source: EIR 433, Section V.C.1, "Seismic Safety;" EIR 433 Appendix B "Preliminary Geotechnical Investigation McAllister Hills Golf and Country Club" (Leighton, 2001); Preliminary Geotechnical Investigation (Alta, 2012); Riverside County General Plan Figure S-5 "Regions Underlain by Steep Slope;" Lake Mathews/Woodcrest Area Plan Figure 14 "Slope Instability;" Conditions of Approval for SP 325A1 & TR36390; California Building Standards Code

Findings of Fact:

a) EIR 433 concluded that the Citrus Heights property does not contain unstable geologic units or soils and would not be subject to landslides, lateral spreading, collapse, or rockfall hazards. The findings of the geotechnical report update prepared for the proposed Citrus Heights project (Alta, 2012) are consistent with the conclusions disclosed in EIR 433. Additionally, the proposed alignment of Street "A" does not traverse soils mapped by the County General Plan as containing a high susceptibility for instability, including landslide and rockfall hazards. As such, there is no potential for landslide risk hazards to occur on the Project site. No impact would occur.

Potentially Significant New Impact	Less than Significant New Impact with Mitigation Incorporated	Less Than Significant New Impact	Impact Fully Analyzed in EIR 433
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Mitigation: No mitigation measures are required for the proposed Project and no mitigation measures were required by EIR 433.

Monitoring: No monitoring is required.

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: EIR 433, Section V.C.1, "Seismic Safety;" EIR 433, Section V.C.2, "Soils, Slopes, and Erosion;" EIR 433 Appendix B "Preliminary Geotechnical Investigation McAllister Hills Golf and Country Club" (Leighton, 2001); Preliminary Geotechnical Investigation (Alta, 2012); Riverside County General Plan Figure S-7 "Documented Subsidence Areas Map;" Conditions of Approval for SP 325A1 & TR36390

Findings of Fact:

a) EIR 433 reported that the likelihood of ground subsidence on the Citrus Heights property is low. Regardless, SP 325 was conditioned to comply with the recommendations of the geotechnical report prepared for SP 325, as well as applicable building codes and Riverside County ordinances to preclude any hazards related to ground subsidence. The proposed Project would not result in any more severe impacts or new impacts related to soil collapse on the Citrus Heights property than previously disclosed in EIR 433. Additionally, the Project would reduce the approved grading footprint for SP 325 by approximately 47 acres, thereby lessening the potential for ground subsidence. Conditions would be imposed on the proposed Project that would require construction activities on the Citrus Heights property to comply with the recommendations given in the geotechnical study update prepared for TR 36390 (Alta, 2012), consistent with the findings of EIR 433. Adherence to the County conditions of approval would further ensure that impacts on the Citrus Heights property would be less than significant. The proposed alignment of Street "A" is not located within an area susceptible to ground subsidence, as mapped by the County General Plan. Therefore, implementation of Street "A" would not cause or be affected by ground subsidence. Ground subsidence impacts associated with the proposed Project would be less than significant and consistent with the conclusion reached by EIR 433.

Mitigation: No mitigation measures are required for the proposed Project and no mitigation measures were required by EIR 433.

Monitoring: No monitoring is required.

16. Other Geologic Hazards

- a) Be subject to geologic hazards, such as seiche, mudflow, or volcanic hazard?

Potentially Significant New Impact	Less than Significant New Impact with Mitigation Incorporated	Less Than Significant New Impact	Impact Fully Analyzed in EIR 433
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Source: EIR 433, Section V.C.1, "Seismic Safety," EIR 433, Section V.C.2, "Soils, Slope, and Erosion;" EIR 433 Appendix B "Preliminary Geotechnical Investigation McAllister Hills Golf and Country Club" (Leighton, 2001); Preliminary Geotechnical Investigation (Alta, 2012)

Findings of Fact:

a) The Project site is not located in close proximity to any known active volcanoes. Additionally, as disclosed in EIR 433, there are no conditions in the vicinity of the Project site that could subject the site to hazards associated with seiches or mudflows. The Project site is adjacent to a flood control facility, the Harrison Dam. The Harrison Dam is dry for most of the year and only temporarily detains water during storm events. The physical conditions of the Harrison Dam are similar to what existed in 2004 when EIR 433 was certified; therefore, there is no change in circumstances. Although the proposed Project would develop homes in closer proximity to the Harrison Dam than approved SP 325; potential adverse effects associated with a seiche would not be increased beyond what was disclosed in in EIR 433 because no homes would be located within the dam inundation area and all homes would be developed at a higher elevation than the maximum water line. The Project site is located in the vicinity of Lake Mathews; however, due to distance and intervening topography there is no potential for a seiche generated at Lake Mathews to affect the Project site. Accordingly, significant impacts would not occur.

Mitigation: No mitigation measures are required for the proposed Project and no mitigation measures were required by EIR 433.

Monitoring: No monitoring is required.

17. Slopes

a) Change topography or ground surface relief features?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Create cut or fill slopes greater than 2:1 or higher than 10 feet?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Result in grading that affects or negates subsurface sewage disposal systems?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source: EIR 433, Section V.C.13 "Aesthetics, Visual Analysis, Light and Glare;" EIR 433, Section V.C.2, "Soils, Slope, and Erosion;" EIR 433 Appendix B "Preliminary Geotechnical Investigation McAllister Hills Golf and Country Club" (Leighton, 2001); Preliminary Geotechnical Investigation (Alta, 2012); Conditions of Approval for SP 325A1 & TR36390; Project Application Materials

Findings of Fact:

a) EIR 433 disclosed that grading activities associated with SP 325 would alter the Citrus Heights property's natural topography, but would preserve the overall topographic character of the site to the extent feasible by engineering manufactured slopes to blend with the natural topographic contours. The proposed Project would reduce the approved grading footprint for SP 325 by approximately 47 acres and would reduce the grading footprint for Street "A" by approximately 10 acres, thereby reducing the extent of topographic change. As shown in proposed SP 325A1, TR36390, and Capital Project C1-0641, manufactured slopes created by the Project would be similar in size and topographic

Potentially Significant New Impact	Less than Significant New Impact with Mitigation Incorporated	Less Than Significant New Impact	Impact Fully Analyzed in EIR 433
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character as the manufactured slopes provided on the grading plan that was analyzed in EIR 433. Combined with the Project's proposed grading footprint for SP 325 being approximately 18 percent smaller and the proposed grading footprint for Street "A" being approximately 30 percent smaller than the grading footprints analyzed in EIR 433, the proposed Project would have a reduced impact to the Project site's natural topography compared to that disclosed in EIR 433. Consistent with the conclusion drawn by EIR 433, impacts would be less than significant.

b) As evaluated in EIR 433, approved SP 325 planned to construct slopes with gradients greater than 2:1 or heights higher than 10 feet on the Citrus Heights property. SP 325 was conditioned to comply with the recommendations of the geotechnical report (Leighton, 2001), applicable building codes, and Riverside County ordinances during the engineering design and construction of slopes with gradients greater than 2:1 or heights higher than 10 feet. In addition, SP 325 was conditioned to provide Riverside County with a slope stability report prior to the issuance of grading permit that demonstrates that all manufactured slopes with gradients steeper than 2:1 or heights higher than 10 feet meet minimum safety regulations. As with the original SP 325, the Project proposes manufactured slopes with heights greater than 10 feet or gradients steeper than 2:1 on the Citrus Heights property. The proposed Project would not result in any more severe impacts or new impacts related to manufactured slopes than previously disclosed in EIR 433. The conditions of approval that applied to SP 325 would also be applied to the proposed Project, which would require the proposed Project to comply with the recommendations for the Citrus Heights property provided in the geotechnical study update (Alfa, 2012), which supersede the recommendations in the original geotechnical study (Leighton, 2001), and prepare a slope stability report prior to the issuance of grading permits for the Citrus Heights property to document the design measures incorporated into the Project design to ensure that manufactured slopes would meet minimum safety standards. In addition, the Project would construct slopes with gradients steeper than 2:1 to accommodate Street "A." However, with mandatory compliance with all applicable County grading standards and ordinances, Street "A" would comply with all minimum safety standards. Consistent with the conclusion drawn by EIR 433, adherence to the County conditions of approval and applicable grading standards and ordinances would ensure that impacts would be less than significant.

c) Neither the Citrus Heights property nor the proposed alignment for Street "A" contains any existing subsurface sewage disposal systems; therefore, EIR 433 did not disclose any impacts associated with such a system. Consistent with the information provided in EIR 433, no impacts would occur.

Mitigation: No mitigation measures are required for the proposed Project and no mitigation measures were required by EIR 433.

Monitoring: No monitoring is required.

18. Soils

a) Result in substantial soil erosion or the loss of topsoil?

b) Be located on expansive soil, as defined in Section 1802.3.2 of the California Building Code (2007), creating substantial risks to life or property?

Potentially Significant New Impact	Less than Significant New Impact with Mitigation Incorporated	Less Than Significant New Impact	Impact Fully Analyzed in EIR 433
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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: EIR 433, Section V.C.2, "Soils, Slope, and Erosion;" EIR 433 Appendix B "Preliminary Geotechnical Investigation McAllister Hills Golf and Country Club" (Leighton, 2001); Preliminary Geotechnical Investigation (Alta, 2012); Conditions of Approval for SP 325A1 & TR36390; Project Application Materials

Findings of Fact:

a) EIR 433 disclosed that temporary soil erosion would occur during development of the Project, but that impacts associated with soil erosion and/or the loss of top soil would be less than significant with the incorporation of required conditions of approval. The proposed Project would be similarly conditioned to minimize potential effects associated with soil erosion. In addition, development of the Project site would be subject to the National Pollutant Discharge Elimination System (NPDES) permit required by the Regional Water Quality Control Board, which would further reduce the potential for temporary soil erosion. Furthermore, the Project would reduce the approved grading footprint for SP 325 by approximately 47 acres and would reduce the grading footprint for Street "A" by approximately 10 acres, thereby lessening the potential for temporary erosion. As such, and consistent with the conclusion drawn by EIR 433, short-term impacts associated with soil erosion and the loss of topsoil are less than significant.

b) EIR 433 disclosed that soils on the Citrus Heights property vary in expansion potential from "very low" to "medium." SP 325 was conditioned to comply with the design recommendations of the geotechnical report (Leighton, 2001) to remediate potential effects associated with expansive soils. EIR 433 concluded that impacts would be less than significant with the incorporation of the required conditions of approval. The proposed Project would be similarly conditioned to comply with the design recommendations contained within the geotechnical study update (Alta, 2012), which supersedes the original geotechnical study (Leighton, 2001). Additionally, the Project would reduce the approved grading footprint for SP 325 by approximately 47 acres, thereby lessening the potential for encountering expansive soils. The County did not identify any expansion soils during preparation of the improvement plans for Street "A." With mandatory compliance with required conditions of approval, the Project would result in less than significant impacts associated with expansive soils. This conclusion is consistent with the finding of EIR 433.

c) Septic systems were not discussed in EIR 433 because SP 325 did not plan for the use of such systems. Similarly, the proposed Project would not involve the construction of septic systems, as the Project would connect to a sanitary sewer system for treatment of Project wastewater. As such, and consistent with the information disclosed in EIR 433, no impact would occur.

Mitigation: No mitigation measures are required for the proposed Project and no mitigation measures were required by EIR 433.

Monitoring: No monitoring is required.

	Potentially Significant New Impact	Less than Significant New Impact with Mitigation Incorporated	Less Than Significant New Impact	Impact Fully Analyzed in EIR 433
19. Erosion				
a) Change deposition, siltation, or erosion that may modify the channel of a river or stream or the bed of a lake?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in any increase in water erosion either on or off site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source: EIR 433, Section V.C.2, "Soils, Slope, and Erosion;" EIR 433 Appendix C "Hydrologic Analysis" (BAW Civil Engineering, 2002); Preliminary Water Quality Management Plan (MDS, 2012), Project Application Materials

Findings of Fact:

a) & b) All potential short- and long-term erosion impacts associated with developing the Project as planned by SP 325 were addressed in EIR 433. As concluded by EIR 433, erosion-related impacts on the Project site would be less than significant with the incorporation of mandatory conditions of approval requiring compliance with a site-specific Water Quality Management Plan (WQMP) and applicable Riverside County ordinances. The proposed Project would be similarly conditioned. In addition, a NPDES permit would be required for proposed construction activities on the Citrus Heights and Street "A" sites and conditions would be issued by the Regional Water Quality Control Board to further reduce the potential for substantial erosion from the sites. A Preliminary WQMP was prepared for the proposed TR 36390, which describes that first flush runoff from the developed portions of the Citrus Heights property would be captured by storm drains and conveyed via a subsurface storm drain system to one of three water quality/detention basins. The water quality/detention basins are designed to treat stormwater flows for water quality purposes to remove silt and sediment. The Preliminary WQMP also identifies other Best Management Practices (BMPs) for the Citrus Heights property that would minimize impacts associated with erosion. Compliance with the Preliminary WQMP for TR 36390 is required as a condition of Project approval. Therefore, through mandatory compliance with conditions of approval and compliance with the NPDES permit and conditions issued by the Regional Water Quality Control Board, the Project would result in less than significant impacts, consistent with the conclusion reached by EIR 433.

Mitigation: No mitigation measures are required for the proposed Project and no mitigation measures were required by EIR 433.

Monitoring: No monitoring is required.

20. Wind Erosion and Blowsand from project either on or off site.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a) Be impacted by or result in an increase in wind erosion and blowsand, either on or off site?				

Source: EIR 433, Section V.C.2, "Soils, Slope, and Erosion;" Riverside County General Plan Figure S-8 "Wind Erosion Susceptibility Map," Ord. No. 460, Ord. No. 484; Project Application Materials

Potentially Significant New Impact	Less than Significant New Impact with Mitigation Incorporated	Less Than Significant New Impact	Impact Fully Analyzed in EIR 433
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Findings of Fact:

a) EIR 433 concluded that wind-erosion impacts associated with development of the Project would be less than significant because the Project site is not located in a portion of the County subject to strong winds or blowsand-related hazards. Additionally, mandatory compliance with County and SCAQMD requirements would ensure that areas disturbed by grading on the Citrus Heights property would be re-vegetated to preclude wind erosion. The Project would be similarly conditioned to comply with applicable County and SCAQMD requirements to preclude wind erosion impacts on the Citrus Heights property and along the proposed alignment of Street "A." Implementation of the proposed Project would result in no new impacts beyond what was evaluated as part of EIR 433. In fact, the Project would reduce the approved grading footprint for SP 325 by approximately 47 acres and would reduce the grading footprint for Street "A" by approximately 10 acres, thereby lessening the potential for wind erosion of exposed soils. Consistent with the conclusion reached by EIR 433, wind erosion impacts would be less than significant.

Mitigation: No mitigation measures are required for the proposed Project and no mitigation measures were required by EIR 433.

Monitoring: No monitoring is required.

GREENHOUSE GAS EMISSIONS Would the project

21. 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: EIR 433, Section V.C.5, "Air Quality" and Section V.D.1 "Circulation and Traffic;" EIR 433, Technical Appendix K "Lake Mathews Golf and Country Club Specific Plan Traffic Impact Analysis" (Urban Crossroads, 2003); EIR 433 Technical Appendix E "Air Quality Assessment" (Giroux and Associates, 2002); Citrus Heights Greenhouse Gas Analysis (Urban Crossroads, September 2012); Traffic Report (Urban Crossroads, September 2012); Air Quality Report (Urban Crossroads, October 2012); *CREED v. City of San Diego* (2011)

Findings of Fact:

a) & b) Although climate change impacts due to greenhouse gas (GHG) emissions were not specifically evaluated in EIR 433, the EIR analyzed air quality impacts associated with buildout of the approved project, inclusive of carbon dioxide (CO2) and other GHG emissions. EIR 433 also addressed vehicle emissions (both construction and operational) and operational emissions from energy consumption, which are the most common sources of greenhouse gas emissions.

As such, GHG emissions and the issue of global climate change (GCC) do not represent new information of substantial importance which was not known and could not have been known at the time that the EIR 433 was certified. Information on the effect of GHG emissions on climate was

Potentially Significant New Impact	Less than Significant New Impact with Mitigation Incorporated	Less Than Significant New Impact	Impact Fully Analyzed in EIR 433
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known long before the Riverside County certified EIR 433. GCC and GHG emissions were identified as environmental issues since as early as 1978 when the U.S. Congress enacted the National Climate Program Act (Pub L 95-367, 92 Stat 601). In 1979, the National Research Council published "Carbon Dioxide and Climate: A Scientific Assessment," which concluded that climate change was an accelerating phenomenon partly due to human activity. Numerous studies conducted before and after the National Research Council report reached similar conclusions. Information also was widely published in a series of reports by the Intergovernmental Panel on Climate Change (IPCC) dating back to the 1990s, including IPCC's "2001 Third Assessment Report." California adopted legislation in 2002 requiring the California Air Resources Board to develop regulations limiting greenhouse gas emissions from automobiles. As such, information about GCC and GHG emissions was available with the exercise of reasonable diligence at the time EIR 433 was certified in 2004. During the public review period and public hearings associated with EIR 433, no objections or concerns were raised regarding the EIR's analysis of GHG emissions, and no legal challenge was filed within the statute of limitations period established by Public Resources Code §21167(c). Pursuant to CEQA case law and CEQA Guidelines Section 15162(a)(3), the issue of project-related GHG emissions does not provide new information of substantial importance or substantial evidence of a new impact to the environment that was not or could not have been known at the time EIR 433 was certified; thus, minor additions are needed to make the previous EIR adequate to cover the actions that are currently proposed, which are documented herein, below and serves as an Addendum to the EIR.

To evaluate whether the proposed Project would result in GHG impacts that were not examined in EIR 433, a GHG study was prepared for the proposed Project by Urban Crossroads, Inc. This study is provided as Appendix F to this EIR Addendum. Refer to Appendix F for a more detailed discussion of GHGs, the regulatory context for GHG emissions, and for a description of the methodology used to calculate the proposed Project's GHG emissions.

Currently (as of August 2013), the SCAQMD has not adopted significance thresholds for GHG emissions for residential development projects within the SCAQMD region. The Riverside County Planning Department relies on a draft Standard Operating Procedure (draft County SOP) for GHG analysis and CEQA compliance. According to the draft County SOP, for non-industrial projects and until such time as binding regulatory guidance or a more specific threshold is adopted by a relevant agency, a demonstration that the Project has reduced GHG emissions by 30 percent or more below a business-as-usual (BAU) standard suffices for demonstrating that the Project has a less than significant impact. The draft County SOP defines BAU as those emissions that would occur in year 2020 if the average baseline emissions during the 2002-2004 period were grown to 2020 levels without control. This is consistent with the methodology that CARB used to estimate the GHG reductions the State of California would need to achieve in 2020 to meet 1990 levels. For purposes of Project-related analysis, BAU refers to emissions that would occur based on the approved SP 325, which is described and analyzed in EIR 433 without taking credit for mandatory, regulatory emission controls that have been adopted since 2004.

Consistent with SOP guidance, the analysis contained in Appendix F to this EIR Addendum compares the emissions from the land uses as originally evaluated in EIR 433 (BAU) to the emissions from the currently proposed Project. In summary, the total amount of Project-related GHG emissions for BAU without accounting for any regulatory developments since 2004 that would reduce GHG emissions from direct and indirect sources combined, would total 8,132.55 MTCO_{2e} as shown on Table 2.

Potentially Significant New Impact	Less than Significant New Impact with Mitigation Incorporated	Less Than Significant New Impact	Impact Fully Analyzed in EIR 433
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Table 2 Business as Usual (BAU) GHG Emissions (annual in metric tons/year)

Emission Source	Emissions (metric tons per year)			
	CO ₂	CH ₄	N ₂ O	Total CO ₂ E
Annual construction-related emissions amortized over 30 years	73.38	0.007	--	73.53
Area Source Emissions	223.03	0.11	--	226.70
Energy	2,016.07	1.15	9.66	2,027.08
Mobile Sources	4,942.50	0.43	--	4,951.63
Waste	171.435	63.408	--	234.84
Water Usage	597.91	0.62	0.03	618.77
Total CO₂E (All Sources)		8,132.55		

Source: Urban Crossroads, 2013

In comparison, the total amount of Project-related GHG emissions when accounting for applicable regulatory developments, project design features specified in SP 325A1, and applicable mitigation measures from EIR 433 that would apply to the reduction of GHG emissions from direct and indirect sources combined would total 5,591.29 MTCO₂e as shown on Table 3. This results in an approximate 31.25% reduction from BAU; thus, with implementation of SP 325A1 and regulatory developments, the Project's GHG reduction would meet the reduction target of 30% (refer to Table 4) and impacts would be less than significant. Construction-related impacts associated with the construction of Street "A" amortized over 30 years would slightly increase the quantification of total Project-related GHG emissions presented in Tables 2 and 3; however, the Project would still meet the reduction target of 30% of BAU.

Table 3 Proposed Project GHG Emissions (annual in metric tons/year)

Emission Source	Emissions (metric tons per year)			
	CO ₂	CH ₄	N ₂ O	Total CO ₂ E
Annual construction-related emissions amortized over 30 years	73.38	0.007	--	73.53
Area Source Emissions	257.12	0.01	--	258.81
Energy	1,310.49	0.04	0.02	1,318.57
Mobile Sources	3,644.05	0.14	--	3,646.95
Waste	73.33	4.37	--	165.68
Water Usage	111.31	0.55	0.02	127.75
Total CO₂E (All Sources)		5,591.29		

Source: Urban Crossroads, 2013

Potentially Significant New Impact	Less than Significant New Impact with Mitigation Incorporated	Less Than Significant New Impact	Impact Fully Analyzed in EIR 433
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Table 4 Comparison: BAU v. Project GHG CO₂ Equivalent Emissions

ANNUAL	
Land Use	Total CO ₂ E
Business as Usual (BAU)	8,132.55
Proposed Land Use	5,591.29
DELTA (Proposed - BAU)	-2,541.26
% DELTA	-31.25%

Source: Urban Crossroads, 2013

Mitigation: No mitigation measures are required for the proposed Project and no mitigation measures were required by EIR 433.

Monitoring: No monitoring is required.

HAZARDS AND HAZARDOUS MATERIALS Would the project

22. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source: EIR 433, Section V.C.7, "Toxic Substances;" EIR 433 Appendix H "Phase I Environmental Site Assessment 275 Acre Property East of McAllister Street" (Gradient Engineers, 2001); EIR 433 Appendix H.1 "Limited Phase II Environmental Site Assessment, Northwestern Area of the 275 Acre McAllister Property" (Gradient Engineers, 2001); EIR 433 Appendix H.2 "Phase I Environmental Site Assessment Addendum" (Gradient Engineers, 2001); Google Earth (accessed July 6, 2012); EnviroStor Database (accessed July 6, 2012); Project Application Materials; Blasting Analysis (REVEY Associates, 2013)

Potentially Significant New Impact	Less than Significant New Impact with Mitigation Incorporated	Less Than Significant New Impact	Impact Fully Analyzed in EIR 433
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Findings of Fact:

a) & b) As concluded in EIR 433, SP 325 did not propose any land uses that would permit hazardous materials storage, with exception of the golf course (in former Planning Area 9). The proposed Project would eliminate the golf course from SP 325; therefore, there would be no land uses on the Citrus Heights property that would store, transport, or dispose of hazardous materials. Other changes proposed as part of the Project would not significantly alter allowable uses on the Citrus Heights property. As such, implementation of the Project would not increase the potential for transporting, using, or disposing hazardous materials beyond what was previously disclosed in EIR 433. In addition, the proposed Project would not increase the potential for reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. EIR 433 disclosed that blasting would occur on the property during construction activities, but did not specifically evaluate hazards associated with the storage of blasting materials. With adherence to the recommendations contained in the Project's blasting analysis (REVEY Associates, February 2013), hazards would be precluded. In conclusion, the Project would not result in any new or more severe impacts associated with hazards or hazardous materials beyond what was previously disclosed in EIR 433.

c) As disclosed in EIR 433, the proposed Project site is not identified as an emergency evacuation route in any emergency response plans or emergency evacuation plans. No new evacuation routes have been identified on or near the Project site since EIR 433 was certified in 2004; therefore, there has been no change in circumstance. Consistent with the information disclosed in EIR 433, no impact would occur.

d) As disclosed in EIR 433, the Project site is not located within one-quarter mile of an existing or proposed school. The nearest school site is located approximately 1.4 miles from the Citrus Heights property and approximately 1.2 miles from the proposed alignment of Street "A." No new schools have been built or have been planned to be built within one-quarter mile of the Project site since EIR 433 was certified in 2004, so there has been no change in circumstance. Therefore, there is no potential for either approved SP 325 or the proposed Project to emit or handle hazardous substances within 1/4-mile of an existing or planned school, because no such school sites exist. No impact would occur.

e) As originally disclosed in Technical Appendix H to EIR 433, and confirmed on the State's EnviroStor database, the proposed Project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Accordingly, no impact would occur associated with either approved SP 325 or the proposed Project, because no hazardous materials sites are located on the property.

Mitigation: No mitigation measures are required for the proposed Project and no mitigation measures were required by EIR 433.

Monitoring: No monitoring is required.

23. Airports

a) Result in an inconsistency with an Airport Master Plan?