V. ENVIRONMENTAL ISSUES ASSESSMENT

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

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
AESTHETICS Would the project				
1. Scenic Resources a) Have a substantial effect upon a scenic highway corridor within which it is located?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings and unique or landmark features; obstruct any prominent scenic vista or view open to the public; or result in the creation of an aesthetically offensive site open to public view?	☐	☐	☐	☒

Source: *Riverside County General Plan; Project Application Materials*

Findings of Fact:

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

EIR No. 374 Finding: EIR No. 374 determined that the project site was not located adjacent to any designated or eligible county or state scenic highway nor was the project site visible from any designated or eligible county or state scenic highway. Therefore, EIR No. 374 did not identify any impacts associated with science highways. (Riv. County, 1997, p.V-122)

No Substantial Change from Previous Analysis: According to Figure 9 of the SWAP, the nearest highway facility that is designated for or eligible as a scenic highway corridor is Interstate 215 (I-215), which is identified as a "County Eligible" facility (Riv. County, 2014b, Figure 9). The Project site is located 4.65 miles east of the I-215 freeway (Google Earth, 2013). Views of the site from I-215 are not possible due to distance, existing development, and intervening topography. Accordingly, the proposed Project has no potential to have a substantial effect upon any scenic highway corridor and no impact would occur. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis

b) Would the Project 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?

EIR No. 374 Finding: EIR No. 374 determined that the project would result in the removal of agricultural fields, riversidian woodland, freshwater marsh, and eucalyptus trees from the project site. The EIR did not identify any impacts to scenic vistas for views, nor did the EIR identify any impacts associated with aesthetically offensive site open to public view. (Riv. County, 1997, pp.V-109, V-114)

No Substantial Change from Previous Analysis: There are no designated scenic vistas on-site or in the surrounding area as identified in the Riverside County General Plan or the SWAP. Distant views of existing topographic landforms are available from the Project vicinity; however, proposed residential development would be restricted to a maximum height of 40 feet and would not obstruct views of distant landforms from public viewing areas. Therefore, implementation of the Project would not obstruct a prominent scenic vista or view open to the public, and a less-than-significant impact would occur.

Implementation of the Project would establish a planned residential community consisting of up to 231 additional single-family homes and open space areas within proposed Planning Areas 1, 2A, 3, 6, 7, 52A and 52B. Proposed Planning Area 5A has already been developed with 118 single family homes, and no new development would result from the Project within this Planning Area. Implementation of residential and open space land uses within proposed Planning Areas 1, 2A, 3, 6, 7, 52A, and 52B would not be considered aesthetically offensive. Implementing grading and building permit applications would be required to demonstrate compliance with the SP 286 Development Standards and Design Guidelines, which together provide for the orderly development of SP 286 in a manner that is not aesthetically offensive or incompatible with surrounding developments. Consistent with the conclusion reached in EIR No. 374, compliance with the Specific Plan Development Standards and Design Guidelines would ensure that future homes within the Specific Plan area are visually compatible existing and planned surrounding development. Landscaping within the proposed development also would be maintained by a County of Riverside Landscape Maintenance District and the Homeowners' Association to ensure that landscaping does not present adverse visual conditions. Furthermore, changes to the boundaries and densities of the Planning Areas within the Project area (refer to Table 2-1 above) would not substantially affect the planned visual character of the site, as the site is designated primarily for residential use. Accordingly, implementation of the proposed Project would not substantially degrade the existing visual character or quality of the site and its surroundings.

Based on the foregoing analysis, and consistent with the findings of EIR No. 374, Project-related impacts to scenic resources, scenic vistas, and public views would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

Mitigation: No mitigation is required

Monitoring: No monitoring is required.

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
2. Mt. Palomar Observatory a) Interfere with the nighttime use of the Mt. Palomar Observatory, as protected through Riverside County Ordinance No. 655?	☐	☐	☐	☒

Source: *Google Earth; Riverside County General Plan; Riverside County Ord. No 655*

Findings of Fact:

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

EIR No. 374 Finding: EIR No. 374 concluded that project development would result in the placement and installation of street lights as required by Riverside County. Entry monuments and signage on the project site also would require illumination. Mitigation Measures 109 through 112 (renumbered herein as MM 26.1 through MM 26.4) were identified to ensure that the project would not interfere with the nighttime use of the Mt. Palomar Observatory. EIR No. 374 concluded that these impacts would be less than significant with implementation of the required mitigation. (Riv. County, 1997, pp. V-191, II-44)

a) **No Substantial Change from Previous Analysis:** The Project site is located approximately 22 miles northwest of the Mt. Palomar Observatory and has the potential to create lighting levels that could adversely affect the operation of this facility (Google Earth, 2013). The proposed Project would be required to comply with the County Light Pollution Standard (Ord. No. 655), which is designed to prevent significant lighting impacts that could affect the nighttime use of the Mt. Palomar Observatory. Compliance with Ordinance No. 655 is mandatory and would be assured through future County review of building permit applications. In addition, mitigation measures identified in EIR No. 374 (renumbered herein as MM 26.1 through MM 26.4) would continue to apply to the proposed Project. Accordingly, Project impacts to the Mt. Palomar Observatory would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact analyzed in EIR No. 374.

Mitigation: No additional mitigation is required

Monitoring: No additional 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?	☐	☐	☐	☒
b) Expose residential property to unacceptable light levels?	☐	☐	☐	☒

Source: *Project Application Materials; Riverside County Ordinance Nos. 461 and 915*

Findings of Fact:

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis

a) Would the Project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

b) Would the Project expose residential property to unacceptable light levels?

EIR No. 374 Finding: EIR No. 374 concluded that project development would result in the placement and installation of street lights as required by Riverside County. Entry monuments and signage on the project site also would require illumination. Mitigation Measures 109 through 112 (renumbered herein as MM 26.1 through MM 26.4) were identified to ensure that the property is not a new source of substantial light and glare and to minimize the exposure of residential property to unacceptable light levels. EIR No. 374 concluded that impacts associated with light and glare would be less than significant with implementation of the required mitigation. (Riv. County, 1997, pp. V-191, II-44)

No Substantial Change from Previous Analysis: As part of the proposed Project, Planning Areas 1, 3, 5A, 6, and 7 would allow for residential development while Planning Areas 2A, 52A and 52B would be designated as open space areas. Revisions to Planning Area 5A would involve a boundary and acreage change, but would not affect the maximum number of units (118) that are allocated to this Planning Area. 146 residential dwelling units are proposed by the Project within proposed Planning Areas 1, 3, and 6. An additional 85 dwelling units may be constructed in the future within Planning Area 7. Thus, implementation of the Project would result in the future construction of up to 231 new single family homes on-site.

As a proposed residential community, lighting elements that would be installed on the Project site would be of low intensity and residential in character, primarily consisting of lights installed on individual residential lots, lights installed in on-site parks, and street lights. All lighting proposed by the Project would be required to comply with Riverside County Outdoor Lighting Standards (Ordinance No. 915). Compliance with Ordinance No. 915 would be assured through future County review of grading and/or building permit applications. All proposed street lighting on- and off-site would be required to comply with provisions of the County's Public Road Standards, which implement the provisions of Ordinance No. 461. The County's Public Road Standards require that all street lights installed within the public right-of-way must comply with the following requirement: "Luminaries shall be cut off, high pressure sodium type..." The requirement to provide fully cut off high pressure sodium street lights would ensure that street lights constructed on- and off-site would not create a new source of substantial light or glare which would affect day or nighttime views, and further would ensure that street lights constructed on- and off-site do not expose residential properties to unacceptable light levels. Accordingly, with mandatory compliance with Ordinance Nos. 461 and 915, the proposed Project would not create a new source of light or glare which would adversely affect daytime or nighttime views in the area, nor would the Project expose residential property to unacceptable property to unacceptable light levels. In addition, mitigation measures identified in EIR No. 374 (renumbered herein as MM 26.1 through MM 26.4) would continue to apply to the proposed Project. Project lighting elements would not result in the exposure of on- or off-site residential property to unacceptable levels and impacts would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact analyzed in EIR No. 374.

Mitigation: No additional mitigation is required

Monitoring: No additional monitoring is required.

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
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: *California Department of Conservation; Riverside County GIS database (RCLIS); Project Application Materials*

Findings of Fact:

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

EIR No. 374 Finding: EIR No. 374 concluded that implementation of SP 286 would result in urban development on "Prime Farmlands." Impacts to on-site "Prime Farmlands" were disclosed by EIR No. 374 as a significant and unavoidable impact resulting from buildout of SP 286. (Riv. County, 1997, p. V-107)

No Substantial Change from Previous Analysis: A majority of the Project site is classified as containing "Locally Important Farmland," while a small portion of the Project site in the northwest corner contains "Unique Farmland." (CDC, 2012a) Implementation of the proposed Project would result in the elimination of "Unique Farmland" on-site, which represents a potentially significant impact. Impacts to Farmland were fully evaluated and disclosed in EIR No. 374, which concluded that mitigation measures were not available to reduce impacts to Farmland to a level below significant. Thus, although the Project would result in the conversion of Farmland to urban land uses, the Project would not result in any new or more severe impacts to Farmland beyond what was evaluated and disclosed by EIR No. 374. .

b) Would the Project conflict with existing agricultural zoning, agricultural use or with land subject to a Williamson Act contract or land within a Riverside County Agricultural Preserve

EIR No. 374 Finding: EIR No. 374 found that in order to accommodate the project, Williamson Act Contracts would need to be canceled on approximately 454 acres within Winchester Agricultural Preserve No. 5, Map 66. However, the EIR stated that a Notice of Nonrenewal was filed in September

of 1990 for the parcels within the project site within the Agricultural Preserve. Therefore, EIR No. 374 did not identify any conflicts with existing agricultural zoning, agricultural use or with land subject to a Williamson Act contract. (Riv. County, 1997, pp. V-99, II-20)

No Substantial Change from Previous Analysis: The entire Project site is located within the Winchester 1800 Specific Plan and is zoned for specific plan land uses ("Specific Plan Zone"). In addition, no portion of the Project site is designated for agricultural land uses (Riv. County, 2014a). Therefore, the Project would not conflict with existing agricultural zoning or land use. In addition, and subsequent to certification of EIR No. 374, the Project is no longer subject to an active Williamson Act contract. Land within the Project site is designated as "non-enrolled land" or "urban and built up land" according to the California Department of Conservation (CDC, 2012b). Furthermore, according to Riverside County GIS, no active agricultural preserves exist on the Project site (Riv. County, 2014a). As such, the Project would not conflict with existing agricultural zoning or agricultural use and would not conflict with land subject to a Williamson Act contract or Riverside County Agricultural Preserve and no impact would occur. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

c) Would the Project Cause development of non-agricultural uses within 300 feet of agriculturally zoned property (Ordinance No. 625 "Right-to-Farm")?

EIR No. 374 Finding: At the time EIR No. 374 was certified, agricultural land uses were located north of Keller Road, south of Auld Road, and east of Washington Street. However, the EIR concluded that these existing agricultural uses were protected by the Riverside County Right-to-Farm Ordinance (Ordinance No. 625), compliance with which is required pursuant to Mitigation Measure 50 (renumbered herein as MM 10.1). As such, EIR No. 374 concluded that impacts would be less than significant assuming mandatory compliance with Riverside County Ordinance No. 625. (Riv. County, 1997, pp. V-107, II-20)

No Substantial Change from Previous Analysis: Under existing conditions, the Project site is located within 300 feet of agriculturally zoned properties. Specifically, land to the north of the Project site is zoned "Light Agriculture (A-1-5)" (Riv. County, 2014a). The Project would be required to comply with Ordinance No. 625 ("Right-to-Farm Ordinance") pursuant to Mitigation Measure MM 10.1, which protects agricultural operations from nuisance complaints and encourages the development, improvement, and long-term viability of agricultural land where the landowner desires to continue agricultural operations in spite of urbanization that may occur in the surrounding areas (Riv. County, 1994). Mandatory compliance with Ordinance No. 625 would ensure that the Project does not indirectly cause or contribute to the conversion of off-site farmland to non-agricultural use. Accordingly, and consistent with the findings of EIR No. 374, impacts to agriculturally zoned properties would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374

d) Would the Project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?

EIR No. 374 Finding: EIR No. 374 concluded that the project would remove from production approximately 1,335 acres of dryland farming which would contribute to the decline of such uses in Riverside County. In addition, EIR No. 374 found that the project would result in the loss of "Locally Important Farmland" and could potentially hasten the conversion of surrounding agricultural areas to

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis

urban uses. Indirect impacts to Farmland were concluded by EIR No. 374 to be less than significant with adherence to (proposed) Mitigation Measure MM 10.1. (Riv. County, 1997, pp. V-107, V-219, II-20)

No Substantial Change from Previous Analysis: "Farmland" is defined in Section II (a) of Appendix G of the State CEQA Guidelines to mean Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. As described under Issue 4.a), above, there are no Prime Farmland or Farmland of Statewide Importance resources on the Project site, although a small portion of the site is identified as containing "Unique Farmland." Impacts to Unique Farmland would be considered significant unavoidable impacts, and were fully disclosed in EIR No. 374. Therefore, although implementation of the Project would not directly result in the conversion of Farmland resources to non-agricultural use, the Project would be required to comply with Ordinance No. 625 ("Right-to-Farm Ordinance"), which protects agricultural operations from nuisance complaints and encourages the development, improvement, and long-term viability of agricultural land (refer to Issue 4(c), above). Mandatory compliance with Ordinance No. 625 would ensure that Project-related construction and operational activities would not indirectly cause or contribute to the conversion of off-site Farmland resources to non-agricultural use. Accordingly, impacts would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

Mitigation: No additional mitigation is required

Monitoring: No additional 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?	☐	☐	☐	☒

Source: *Riverside County General Plan, Riverside County GIS database (RCLIS); Project Application Materials.*

Findings of Fact:

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis

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

b) Would the Project result in the loss of forest land or conversion of forest land to non-forest use?

c) Would the Project involve other changes in the existing environment which, due to their location or nature, could result in conversion of forest land to non-forest use?

EIR No. 374 Finding: EIR No. 374 did not identify any conflicts to existing zoning for forest land, timberland, or timberland zoned as "Timberland Production nor did the EIR determine that the project would result in the loss of forest land or conversion of forest land to non-forest use (Riv. County, 1997, Figure V-8 and V-9)

No Substantial Change from Previous Analysis: No lands within the Project vicinity are zoned for forest land, timberland, or Timberland Production, nor are any lands within the Project vicinity used for timber production (Riv. County, 2014a). The Project therefore would have no potential to conflict with timberland or forest land zoning designations, nor would the Project result in the loss of forest land or conversion of forest land to non-forest use. There are no components of the proposed Project that would result in changes to the existing environment which could result in the conversion of forest land to non-forest use. Therefore, no impact to forest resources would occur. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

Mitigation: No mitigation is required

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?	☐	☐	☐	☒
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☐	☒
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)?	☐	☐	☐	☒
d) Expose sensitive receptors which are located within 1 mile of the project site to project substantial point source emissions?	☐	☐	☐	☒
e) Involve the construction of a sensitive receptor located within one mile of an existing substantial point source emitter?	☐	☐	☐	☒
f) Create objectionable odors affecting a substantial number of people?	☐	☐	☐	☒

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis

Source: SCAQMD Final 2012 Air Quality Management Plan; Google Earth; Project Application Materials; *Air Quality Impact Report*, Mestre Greve Associates, December 18, 2014.

Findings of Fact:
The Project proposes changes to the boundaries, acreage, and/or unit allocations of proposed Planning Areas 1, 2A, 3, 5A, 6, 7, 52A, and 52B. Planning Area 5A is currently developed with 118 single-family homes; thus, existing development within Planning Area 5A has no potential to result in new or more severe impacts to air quality. Although Planning Area 7 ultimately would be developed with up to 85 dwelling units, development within Planning Area 7 would require subsequent discretionary approvals that would be subject to CEQA. Other than the reduced unit allocation and diminishment of the size of Planning Area 7, no development would occur in Planning Area 7 as a result of the Project; thus, impacts associated with future development of Planning Area 7 are not evaluated herein because such impacts were fully evaluated as part of EIR No. 374. Although impacts to proposed Planning Areas 1, 2A, 3, 6, 52A, and 52B (within TTM 36722) were previously evaluated within EIR No. 374, a new air quality impact analysis has been prepared for this portion of the Project site. Findings from the air quality assessment are summarized below within Thresholds 6.a) through 6.f).

a) Would the Project conflict with or obstruct implementation of the applicable air quality plan?

EIR No. 374 Finding: EIR No. 374 did not identify any impacts associated with a conflict with the 1989 Air Quality Management Plan (AQMP), although EIR No 374 did disclose that impacts to air quality would be significant and unavoidable on both a direct and cumulative basis. (Riv. County, 1997, p. V.61).

No Substantial Change from Previous Analysis: The proposed Project is located in the South Coast Air Basin (SCAB). The SCAB is composed of parts of Los Angeles, Riverside and San Bernardino counties and all of Orange County. The basin is bounded on the west by the Pacific Ocean and surrounded on the other sides by mountains. To the north lie the San Gabriel Mountains, to the north and east the San Bernardino Mountains, to the southeast the San Jacinto Mountains and to the south the Santa Ana Mountains. The basin forms a low plain and the mountains channel and confine airflow, which trap air pollutants. (MGA, 2014a, p. 1)

The SCAQMD is principally responsible for air pollution control in the SCAB and has adopted a series of Air Quality Management Plans (AQMPs) to reduce air emissions in the Basin. Most recently, the SCAQMD Governing Board adopted the Final 2012 AQMP for the SCAB, on December 7, 2012. The 2012 SCAQMD AQMP is based on motor vehicle projections provided by the California Air Resources Board (CARB) in their EMFAC 2007 model and demographics information provided by the Southern California Association of Governments (SCAG).

Criteria for determining consistency with the AQMP are defined in Chapter 12, Section 12.2 and Section 12.3 of the SCAQMD's CEQA Air Quality Handbook (1993). These indicators are discussed below:

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

Consistency Criterion No. 1 refers to violations of the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). Based on the air quality modeling analysis contained in the Project-specific air quality assessment (Technical Appendix C), and as described more fully in Thresholds 6.b) and 6.c), the proposed Project would increase regional emissions during both construction and long-term operation, but Project-related emissions would not exceed the SCAQMD's Regional Thresholds. An LST analysis also was performed by the Project's air quality analyst (Mestre Greve Associates) to determine if local air impacts would occur (refer to Section 2.2.4 of the air quality assessment, Technical Appendix C). No local impacts are anticipated during either construction or long-term operation. Because the Project is not projected to significantly impact local or regional air quality, the Project is found to be consistent with the AQMP for the first criterion. (MGA, 2014a, pp. 16-17)

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

Consistency with the AQMP assumptions is determined by comparing the Project to the land use assumptions in the AQMP. Thus, the emphasis of this criterion is to insure that the analyses conducted for projects are based on the same forecasts as the AQMP. Since the SCAG forecasts are not detailed, the test for consistency of this project is not specific. The traffic modeling methodologies are based on the County's General Plan and the ITE Trip Generation 8th Edition. The AQMP assumptions are based upon projections from local general plans. Projects that are consistent with the local general plan are consistent with the AQMP assumptions. The Project, as proposed, would result in a net decrease of 150 dwelling units and the elimination of an elementary school site. As such, the Project is within the Southern California Association of Governments (SCAG) growth forecasts. Therefore, the second criterion is met for consistency with the AQMP. (MGA, 2014a, p. 17)

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. Furthermore, the Project would not substantially exceed the growth assumptions in the AQMP. As such, and consistent with the conclusion of EIR No. 374, the Project would be consistent with the AQMP and impacts would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

b) Would the Project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

c) Would the Project Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

EIR No. 374 Finding: EIR No. 374 concluded that the project would result in short-term particulate emissions during grading as well as vehicular emissions that would exceed the threshold of "significant" as defined by the South Coast Air Quality Management District. In addition, the EIR determined that cumulative emissions from the project would exceed the threshold of significance established by the South Coast Air Quality Management District. Mitigation Measures 29 through 45 (renumbered herein as MM 6.1 through MM 6.17) were identified to reduce air quality impacts; however, with incorporation

of mitigation, EIR No. 374 nonetheless determined that air quality impacts would be significant and unavoidable. (Riv. County, 1997, pp. V-219, II-13 - II-17)

No Substantial Change from Previous Analysis: Since certification of EIR No. 374 in 1997, the federal and state air quality standards which were used to evaluate air quality impacts in EIR No. 374 have become more stringent. As with any new development project, the proposed Project has the potential to generate substantial pollutant concentrations during both construction activities and long-term operation. The following provides an analysis based on the applicable significance thresholds established by the SCAQMD and Federal and State air quality standards. This analysis assumes that the proposed Project would comply with applicable, mandatory regional air quality standards, including: SCAQMD Rule 403, "Fugitive Dust;" SCAQMD Rule 431.2, "Sulfur Content of Liquid Fuels;" SCAQMD Rule 1113, "Architectural Coatings;" SCAQMD Rule 1186, "PM_{10} Emissions from Paved and Unpaved Roads, and Livestock Operations;" SCAQMD Rule 1186.1, "Less-Polluting Street Sweepers," and Title 13, Chapter 10, Section 2485, Division 3 of the California Code of Regulations "Airborne Toxic Control Measure."

Thresholds of Significance

In its "1993 CEQA Air Quality Handbook," the SCAQMD established regional significance thresholds to assess the impact of project related air pollutant emissions. Table EA-1, *SCAQMD Regional Pollutant Emission Thresholds of Significance,* presents these significance thresholds. A project with daily emission rates below these thresholds is considered to have a less than significant effect on air quality on both a direct and cumulative basis. (MGA, 2014a, p. 11)

Table EA-1 SCAQMD Regional Pollutant Emission Thresholds of Significance

	Pollutant Emissions (lbs./day)					
	CO	ROG	NOx	PM10	PM2.5	SOx
Construction	*550*	*75*	*100*	*150*	*55*	*150*
Operation	*550*	*55*	*55*	*150*	*55*	*150*

(MGA, 2014a, Table 4)

In addition, and in accordance with Governing Board direction, SCAQMD staff developed localized significance threshold (LST) methodology and mass rate look-up tables by Source Receptor Area (SRA) that can be used to determine whether or not a project may generate significant adverse localized air quality impacts. LSTs represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard, and are developed based on the ambient concentrations of that pollutant for each source receptor area. The LST methodology is described in "Final Localized Significance Threshold Methodology" updated in 2009 by the SCAQMD. The project is located in SRA 26. The nearest existing land uses are the residences approximately 80 feet south of the Project site. Table EA-2, *Localized Significance Thresholds at the Nearest Receptors,* summarizes the LSTs for construction and operation of the Project. (MGA, 2014a, p. 12)

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis

Table EA-2 Localized Significance Thresholds at the Nearest Receptors

Description	CO	NO_x	PM_{10}	$PM_{2.5}$
Construction Activities	1,965	371	13	8
Operation	1,965	371	4	2

All measurements are in lbs/day
(MGA, 2014a, Table 5)

Impact Analysis for Construction Emissions

Emissions during the phases of construction were calculated using the California Emissions Estimator Model (CalEEMod). CalEEMod considers the following phases in its calculation of construction emissions: demolition, site preparation, grading, building construction, paving, and painting. The activities for this Project associated with demolition would be minimal. The appropriate number of acres, duration of each construction phase, and other key elements of the Project were input into the CalEEMod to generate the estimate of emissions. It was also assumed that the overlap between construction phases would be minimal. Key assumptions in the modeling include compliance with SCAQMD Rules 403 and 1113. Rule 403 requires water during site preparation and grading three times per day. Rule 1113 restricts paint emissions. For paints starting in 2015 the volatile organic content (VOC) cannot exceed 50 grams per liter (g/l). (MGA, 2014a, pp. 12-13)

Table EA-3, *Regional Construction Emissions*, presents the results of the total emissions calculations for the construction activities discussed above. The highest construction emissions are presented in Table EA-3 and represent a "worst case" scenario. As shown, the projected construction emissions are all below the significance thresholds established by the SCAQMD. Therefore, impacts associated with construction-related emissions would be less than significant and mitigation is not required. (MGA, 2014a, p. 13)

Table EA-3 Regional Construction Emissions

	Pollutant Emissions (Pounds Per Day)					
Activity	ROG	NOx	CO	SOx	PM10	PM2.5
Demolition	4.6	48.4	37.2	0.0	2.6	2.3
Site Preparation	5.3	57.0	43.9	0.0	10.3	6.8
Grading	6.9	79.2	52.3	0.1	8.7	5.1
Building Const.	4.1	31.9	24.3	0.0	2.8	2.2
Paving	2.4	25.3	16.1	0.0	1.6	1.3
Architectural Coating	11.2	2.6	2.7	0.0	0.3	0.3
SCAQMD Thresholds	*75*	*100*	*550*	*150*	*150*	*55*
Exceed Threshold?	*No*	*No*	*No*	*No*	*No*	*No*

(MGA, 2014a, Table 6)

In addition, the on-site localized emissions were calculated utilizing CalEEMod. The emissions presented in Table EA-4, *Localized Significance Summary- Construction*, are those that would be emitted during construction activities within the Project site. The total on-site construction emissions are compared to the Localized Significance Thresholds (LSTs) listed in Table EA-2 above. None of the emissions would exceed the LST significance thresholds during Project construction. Consistent with Rule 403, the model assumes that watering would occur three times per day during site preparation

and grading. Therefore, no local air impacts are anticipated during Project construction. (MGA, 2014a, pp. 13-14)

Table EA-4 Localized Significance Summary- Construction

Activity	Daily Emissions (lbs./day) NOx	CO	PM10	PM2.5
Demolition	48.4	36.1	2.5	2.3
Site Preparation	56.9	42.6	10.1	6.7
Grading	79.0	50.8	8.4	5.0
Building Construction	30.0	18.7	2.1	2.0
Paving	25.2	15.0	1.4	1.3
Architectural Coating	2.6	1.9	0.2	0.2
LST Thresholds	*371*	*1,965*	*13*	*8*
Exceed Threshold?	*No*	*No*	*No*	*No*

(MGA, 2014a, Table 7)

Finally, the Project's diesel particulate matter (DPM) emissions during construction were evaluated by the Project's air quality analyst (Mestre Greve Associates). It is assumed that the majority of the heavy construction equipment utilized during construction would be diesel fueled and would emit DPM. Grading for the Project, when the peak diesel exhaust emissions would occur, is expected to take less than 6 months with all construction expected to be completed over a five year period. Because of the relatively short duration of construction compared to a 70-year lifespan, diesel emissions resulting from the construction of the Project, including truck traffic associated with the Project, would result in less than significant impacts. (MGA, 2014a, p. 14)

Impact Analysis for Operational Emissions

Air pollutant emissions due to the Project were calculated using the CalEEMod program. Primary sources of emissions generated by the proposed Project would be from motor vehicle use. Natural gas combustion and re-current painting of the facilities also would contribute to the emissions. The traffic data indicates that there would be 1,390 trips in and out of the site per day. CalEEMod calculates maximum daily emissions for the summertime and wintertime periods. The results from the CalEEMod analysis are presented in Table EA-5, *Regional Project Emissions.* The data within Table EA-5 depicts the season with higher emissions. Table EA-5 presents the results of the CalEEMod model showing the maximum daily air pollutant emissions projected for buildout year. Table EA-5 shows that the total Project emissions would be below the SCAQMD thresholds for all criterion pollutants. Therefore, the Project would result in less-than-significant regional air impacts and mitigation is not necessary to reduce operational emissions. (MGA, 2014a, p. 15)

Table EA-5 Regional Project Emissions

	ROG	NOx	CO	SOx	PM10	PM2.5
Total Project Emissions	12.2	17.7	79.9	0.2	11.3	3.4
SCQAMD Thresholds	*55*	*55*	*550*	*150*	*150*	*55*
Exceed Thresholds	*No*	*No*	*No*	*No*	*No*	*No*

All measurements are in lbs/day
(MGA, 2014a, Table 8)

A project with daily emission rates below the SCAQMD thresholds during operation is considered to have a less than significant effect on local air quality. Because the proposed Project would not exceed any SCAQMD thresholds during operation, it would have a less-than-significant impact associated with Localized Significance Thresholds (LSTs) during Project operation. (MGA, 2014a, p. 15)

Conclusion

As indicated in the above analysis, the Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation during construction or operational activities. Additionally, the Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors). Therefore, impacts would be less than significant and no mitigation is required. Accordingly, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

d) Expose sensitive receptors which are located within 1 mile of the project site to project substantial point source emissions

EIR No. 374 Finding: EIR No. 374 did not identify any impacts associated with the exposure of sensitive receptors within 1 mile of the project site to substantial point source emissions.

No Substantial Change from Previous Analysis: The proposed Project has the potential to expose nearby sensitive receptors to substantial pollutant concentrations during Project construction and long-term operation. Sensitive receptors can include uses such as long term health care facilities, rehabilitation centers, and retirement homes. Residences, schools, playgrounds, child care centers, and athletic facilities can also be considered as sensitive receptors. Potential sensitive receptors in the Project vicinity include existing residences that may be located in close proximity to the Project site. Based on an aerial review, the nearest sensitive receptors include existing residential units located along Koon Street within Planning Area 5A immediately adjacent to the Project's southern boundary (Google Earth, 2013).

Construction and Operational LST Analysis

As indicated above under the discussion and analysis of Thresholds 6.b) and 6.c), near-term construction activities associated with the proposed Project would not expose nearby sensitive receptors to emissions that exceed the SCAQMD LSTs. In addition, because the Project's daily emission rates would be below the SCAQMD thresholds during operation, the proposed Project would

have a less-than-significant impact associated with Localized Significance Thresholds (LSTs) during Project operation.

CO "Hot Spot" Analysis

Carbon monoxide (CO) is a colorless and odorless gas, which in the urban environment, is associated primarily with the incomplete combustion of fossil fuels in motor vehicles. Carbon monoxide combines with hemoglobin in the bloodstream and reduces the amount of oxygen that can be circulated through the body. High carbon monoxide concentrations can lead to headaches, aggravation of cardiovascular disease, and impairment of central nervous system functions. Carbon monoxide concentrations can vary greatly over comparatively short distances. Relatively high concentrations are typically found near crowded intersections, along heavily used roadways carrying slow-moving traffic, and at or near ground level. Even under the most severe meteorological and traffic conditions, high concentrations of carbon monoxide are limited to locations within a relatively short distance (i.e., up to 600 feet or 185 meters) of heavily traveled roadways. (MGA, 2014a, p. 6)

Localized areas where ambient CO concentrations exceed CAAQS and/or NAAQS standards are termed CO "hot spots." Emissions of CO are produced in greatest quantities from motor vehicle combustion and are usually concentrated at or near ground level because they do not readily disperse into the atmosphere, particularly under cool, stable (i.e., low or no wind) atmospheric conditions. Consequently, the highest CO concentrations are generally found within close proximity to congested intersection locations.

The Project area is in attainment of the CO state and national standards. CO is a pollutant of primary concern near intersections, and exceedances of the state and national standards would result in a significant local air quality impact. Since the air basin has reached attainment of the CO air quality standards, CO analysis is no longer required by the SCAQMD. Therefore, no air quality impacts are anticipated near intersections or along roadways serving the Project. (MGA, 2014a, p. 14)

Conclusion

As indicated in the above analysis, the Project would not expose sensitive receptors to substantial localized emissions during construction or operation. Therefore, impacts would be less than significant and no mitigation is required. Accordingly, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

e) Would the Project involve the construction of a sensitive receptor located within one mile of an existing substantial point source emitter?

EIR No. 374 Finding: While EIR No. 374 noted that the Winchester 1800 Specific Plan would construct park sites (considered a "sensitive" land use) along Washington Street, Pourroy Road, and Benton Road, the EIR did not identify any impacts associated with the construction of a sensitive receptor located within one mile of an existing substantial point source emitter. (Riv. County, 1997, p. V-60)

No Substantial Change from Previous Analysis: Under existing conditions, land uses within one mile of the Project site largely consist of residential uses, agricultural uses, and undeveloped land/open space. There are no existing uses within one mile of the Project site that comprise a substantial point source emitter (e.g., refineries, industrial plants, etc.) or that would attract/generate diesel trucks that may spend long periods of time queuing or idling near the Project site (e.g., warehouses, transfer facilities, etc.). Accordingly, implementation of the proposed Project would not involve the construction

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis

of a sensitive receptor located within one mile of an existing substantial point source emitter, and no impact would occur. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact analyzed in EIR No. 374.

f) Would the Project create objectionable odors affecting a substantial number of people?

EIR No. 374 Finding: EIR No. 374 did not identify any impacts associated with odors that could affect a substantial number of people.

No Substantial Change from Previous Analysis: Proposed construction activities at the Project site could produce odors from equipment exhaust, application of asphalt, and/or the application of architectural coatings. However, any odors emitted during construction would be temporary, short-term, and intermittent in nature, and would cease upon completion of construction activities. Furthermore, standard construction practices would minimize odor emissions and their associated impacts and construction activities would be required to comply with SCAQMD Rule 402, which prohibits the discharge of odorous emissions that would create a public nuisance. Accordingly, the Project is not anticipated to create objectionable odors during construction activities, and short-term impacts would be less than significant.

During long-term operation, the proposed Project would include residential and open space land uses, which are not typically associated with objectionable odors. The temporary storage of refuse and the placement of refuse containers on the streets for collection in the residential neighborhood could be a source of odor; however, Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the County's solid waste regulations, thereby precluding any potential impact. In addition, the proposed Project would be required to comply with SCAQMD Rule 402, which prohibits the discharge of odorous emissions that would create a public nuisance, during long-term operation. As such, long-term operation of the Project would not create objectionable odors and impacts would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact analyzed in EIR No. 374.

Mitigation: No mitigation is required

Monitoring: No monitoring is required.

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	☐	☐	☐	☒

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
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?				
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U. S. Fish and Wildlife Service?	☐	☐	☐	☒
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?	☐	☐	☐	☒
g) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒

Source: Project Application Materials; *General Biological Resources Assessment*, Helix Environmental Planning, March 4, 2015; *Least Bell's Vireo Survey*, Helix Environmental Planning, August 14, 2014; *Burrowing Owl Survey,* Helix Environmental Planning, September 19, 2014.; *Determination of Biologically Equivalent or Superior Preservation Analysis*, Helix Environmental Planning, March 11, 2015.

Findings of Fact:

The Project proposes changes to the boundaries, acreage, and unit allocations of proposed Planning Areas 1, 2A, 3, 5A, 6, 7, 52A, and 52B. Planning Area 5A is fully developed with 118 single-family homes. Additionally, the Project does not propose any development within Planning Areas 5A or 7, and impacts associated with buildout of these planning areas were fully evaluated in EIR No. 374. Although impacts to proposed Planning Areas 1, 2A, 3, 6, 52A, and 52B (within TTM 36722) were previously evaluated within EIR No. 374, a new biological resources analysis has been prepared for this portion of the Project site. Findings from the biological resources assessment, associated surveys, and Determination of Biologically Equivalent or Superior Preservation (DBESP) report are summarized below within Thresholds 7.a) through 7.g).

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis

a) Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state conservation plan?

EIR No. 374 Finding: EIR No. 374 did not identify any impacts due to a conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state conservation plan.

No Substantial Change from Previous Analysis: In 2003, and subsequent to certification of EIR No. 374, Riverside County adopted the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). The MSHCP is the only applicable habitat conservation/planning program for Western Riverside County. As indicted on Figure EA-1, *MSHCP Overlay Map*, the Project site is within MSHCP criteria cell 5279. In addition, the Project also encroaches slightly into cells 5275, 5173, and 5169. (Helix, 2015a, p. 1)

The Project site was previously approved for full development through the County's Habitat Acquisition Negotiation Strategy (HANS 607) and Joint Project Review (JPR) 04 10 22 16 on April 19, 2005, and a large majority of off-site impacts were approved for development through HANS 429 and JPR 05 03 29 03 on June 30, 2005. HANS 429 and JPR 05 03 29 03 also included the approval of the Determination of Biologically Equivalent or Superior Preservation (DBESP) analysis that included the grading of the off-site channel in a similar location as is proposed by the Project. (Helix, 2015a, p. 1; Helix, 2015b, p. 2)

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." The Project is subject to mandatory payment of the MSHCP per-acre local development mitigation fee pursuant to the Ordinance No. 810. An assessment of the Project's consistency with these requirements is provided below.

Project Compliance with MSHCP Section 6.1.2

Volume 1, Section 6.1.2 of the MSHCP describes the process to protect species associated with riparian/riverine areas and vernal pools. The MSHCP requires focused surveys for sensitive riparian bird species when suitable habitat would be affected and surveys for sensitive fairy shrimp species when vernal pools or other suitable habitat would be affected.

The Project site was assessed for the presence of Riparian/Riverine and Vernal Pool habitats through a review of literature sources and during the various surveys conducted by HELIX biologists in 2004, 2013, and 2014. A specific Riparian/Riverine and Vernal Pool habitat assessment and search for Riparian/Riverine species was conducted by the Project biologist, Helix Environmental on April 13, 2014, the results of which are presented below. (Helix, 2015a, p. 5)

Riparian/Riverine Areas

The MSHCP defines riparian/riverine habitats as "lands that contain habitat dominated by trees, shrubs, persistent emergents, or emergent mosses and lichens, which occur close to or depend upon soil moisture from a nearby fresh water source; or areas with fresh water flow during all or a portion of the year." (Helix, 2015a, p. 4)

Source: HELIX Environmental Planning, Inc. (March 2015)

NOT TO SCALE

Figure EA-1

MSHCP Overlap Map

Riparian/Riverine habitats in the Project area cover a total of 1.14 acres (refer to Table 1 of the Project's DBESP, Technical Appendix D2). 0.34 acre of southern willow scrub, 0.25 acre of mule fat scrub, 0.17 acre of tamarisk scrub, and 0.19 acre of streambed exist within the on-site portion of TTM 36772. The off-site Riparian/Riverine habitats are composed of 0.19 acre of streambed . (Helix, 2015b, p. 5)

Section 6.1.2 of the MSHCP focuses on the protection of Riparian/Riverine areas and vernal pool habitats capable of supporting MSHCP covered species, particularly within the identified Conservation Area. The 0.66 acre of impacts associated with the drainage channel within Planning Area 2A were previously addressed under HANS 607 and JPR 05 03 29 03, and are not discussed further. The Riparian/Riverine habitats occur in the drainage course that crosses the Project area from northeast to southwest that is a tributary to the unnamed creek that forms Proposed Constrained Linkage 18. Riparian habitat occurs in scattered stands along the drainage. The functions of the drainages are primarily water conveyance, sediment transport, and energy dissipation (hydrologic regime and flood attenuation) along with toxicant trapping and filtering and live-in habitat for small animal species in the vegetated patches. The Project would result in impacts to 0.95 acre of Riparian/Riverine habitat on-site and an additional 0.19 acre off-site for a total Riparian/Riverine impact of 1.14 acres (Helix, 2015b, Table 2, p. 9).

To address impacts to the 1.14 acre of Riparian/Riverine habitat that would be affected by the Project, a DBESP was prepared and in included as Technical Appendix D2. The DBESP determined that the Riparian/Riverine habitats proposed to be impacted as part of the Project do not support Riparian/Riverine target species and do not contribute substantially to the biological values of the MSHCP (Helix, 2015b, p. 9). In addition, the DBESP noted that total avoidance of the Riparian/Riverine areas on the TTM 36722 site could result in flooding that has potential to result in damage to existing and future residential houses and infrastructure. The proposed soft bottom channelization of the Riparian/Riverine habitat would control the flood flows and allow the flows to reach the existing Riparian wildlife corridor to the south while aiding in the protection of the residential area from flooding (Helix, 2015b, pp. 9-10).

The DBESP identifies four mitigation measures, included herein as supplemental Mitigation Measures MM 11.3 through MM 11.6, to reduce impacts to the on-site portion of Riparian/Riverine habitats. With implementation of the required mitigation, Project impacts would be mitigated to below a level of significance and the Project would be consistent with MSHCP Volume I, Section 6.1.2 as it pertains to Riparian/Riverine habitat. (Helix, 2015b, p. 16).

Least Bell's Vireo, Southwestern Willow Flycatcher, and Western Yellow-Billed Cuckoo
No least bell's vireo were detected in the Project area, and no impacts to least bell's vireo or occupied least bell's vireo habitat are anticipated. No other Riparian/Riverine animal species were considered to have a potential to occur within the Project area and no other surveys were conducted (Helix, 2015a, p. 12; Helix, 2014b, p. 2). The Project would not impact habitat occupied by the least bell's vireo, southwestern willow flycatcher, or western yellow-billed cuckoo, and would be consistent with MSHCP Volume I, Section 6.1.2 as it pertains to these species.

Vernal Pools
The MSHCP defines vernal pools as "seasonal wetlands that occur in depression areas that have wetland indicators of all three parameters (soils, vegetation, and hydrology) during the

wetter portion of the growing season but normally lack wetland indicators of hydrology and/or vegetation during the drier portion of the growing season." (Helix, 2015a, p. 4)

The Project site and off-site impact areas do not contain, and therefore the Project would not impact, any MSHCP vernal pools. As such, the proposed Project would be consistent with MSHCP Volume I, Section 6.1.2 as it pertains to vernal pools. (Helix, 2015a, p. 12)

Fairy Shrimp
No areas potentially suitable for fairy shrimp occur in the project area; therefore, surveys for sensitive fairy shrimp are not required and fairy shrimp are not expected to occur in the Project area (Helix, 2015a, p. 5). Therefore, there is no potential for the Project to impact fairy shrimp. The Project would be consistent with MSHCP Volume I, Section 6.1.2 as it pertains to listed fairy shrimp.

Based on the foregoing analysis, the proposed Project would not result in any impacts to MSHCP riparian/riverine areas or vernal pools; therefore, the proposed Project would be fully consistent with MSHCP Section 6.1.2 with incorporation of the supplemental mitigation measures identified herein.

Project Compliance with MSHCP Section 6.1.3
Volume 1, Section 6.1.3 of the MSHCP requires that within Narrow Endemic Plant Species Survey Areas (NEPSSA), site-specific focused surveys for Narrow Endemic Plants Species will be required for all public and private projects where appropriate soils and habitat are present. The Project site is not within a survey area for NEPPSA species; therefore, no focused surveys for NEPSSA species are required. In addition, no NEPSSA species were observed during the various biological surveys conducted on the Project site. Therefore, no impacts to NEPSSA species are anticipated (Helix, 2015a, p. 35). As such, the proposed Project would not result in any impacts to Narrow Endemic Plant Species; therefore, the Project would be fully consistent with MSHCP Section 6.1.3.

Project Compliance with MSHCP Section 6.1.4
According to Section 6.1.4 of the MSHCP, the Urban/Wildlands Interface Guidelines are intended to address indirect effects ("edge effects") associated with locating development in proximity to MSHCP conservation areas. The Project drains to the MSHCP Conservation Area (Proposed Constrained Linkage 18) and, as such, is subject to the Urban/Wildlands Interface Guidelines that would reduce/prevent potential impacts to the reserve by the Project's development. (Helix, 2015a, p. 35)

In order to ensure consistency with the minimization measures specified in MSHCP Section 6.1.4, Project-specific measures recommended by the Project's biologist to minimize impacts from drainage, toxic substances, lighting, noise, invasive species, and barrier measures have been included as part of supplemental Mitigation Measure MM 11.7 listed below. Mitigation Measure MM 11.7 would ensure that indirect impacts to biological resources located in close proximity to the Project site do not occur. With the implementation of these measures, the proposed Project would be consistent with the MSHCP Urban/Wildland Interface Guidelines contained in MSHCP Volume I, Section 6.1.4.

A summary of the Project's potential indirect impacts and recommended measures to reduce such impacts are provided below.

Drainage
The MSHCP Conservation Area is located south of the Project area. The proposed Project includes the construction of a flood control channel that would outfall at the northern edge of the existing channelized unnamed drainage that is functioning as Proposed Constrained Linkage 18. The Project would incorporate measures, including those required through National Pollutant Discharge Elimination System (NPDES) requirements, to ensure that the quantity and quality of runoff discharged to downstream areas is not altered in an adverse way when compared with existing conditions. In particular, measures shall be put in place to avoid the discharge of untreated surface runoff into downstream waters. Storm-water systems shall be designed to prevent the release of toxins, chemicals, petroleum products, exotic plant materials, or other elements that might degrade or harm biological resources or ecosystem processes downstream of the site. This would be accomplished by incorporating one or more of the following methods: natural detention basins, grass swales, or mechanical trapping devices. Regular maintenance shall occur to ensure the effective operation of runoff control systems. Specific measures proposed include two water quality detention/sand filter basins to detain and provide first flush treatment of runoff from the Project, along with several vegetative bioswales adjacent to the flood control channel (refer to the Project's Preliminary Water Quality Management Plan within Appendix K) (Helix, 2015a, pp. 35-36). Based on the forgoing discussion, the Project would not result in adverse indirect impacts due to drainage. Therefore, the Project would not conflict with MSHCP Section 6.1.4 requirements for Drainage.

Toxics
Land uses proposed in proximity to the MSHCP Conservation Area that use chemicals or generate bio-products that are potentially toxic or may adversely affect wildlife species, habitat, or water quality shall incorporate measures to ensure that the application of such chemicals does not result in discharge to the MSHCP Conservation Area. Measures such as those employed to address drainage issues (refer to the discussion above) would be implemented by the proposed Project's conditions of approval to avoid the potential impacts of toxics (Helix, 2015a, p. 36). Therefore, the Project would not conflict with MSHCP Section 6.1.4 requirements for Toxics.

Lighting
The on-site portion of the Project is too far removed from Proposed Constrained Linkage 18 to impact the linkage from increased lighting, and, therefore, lighting restrictions are not required (Helix, 2015a, p. 36). Therefore, the Project would not conflict with MSHCP Section 6.1.4 requirements for lighting.

Noise
The on-site portion of the Project is too far removed from Proposed Constrained Linkage 18 to impact the linkage from increased noise, and, therefore, noise restrictions are not required (Helix, 2015a, p. 36). Therefore, the Project would not conflict with MSHCP Section 6.1.4 requirements for noise.

Invasives
Project landscaping shall avoid the use of plants shown on MSHCP Table 6.2 included as Appendix C in the Project's Biological Resources Assessment (Technical Appendix D1) (Helix, 2015a, p. 36). This requirement would be implemented by the proposed Project's conditions of approval to avoid the potential impacts of invasives. Therefore, the Project would fully comply

with the invasive plant species requirements of MSHCP Section 6.1.4, and impacts would be reduced to below a level of significance.

Barriers
The Project is not directly adjacent to the MSHCP Conservation Area; therefore, barriers are not required (Helix, 2015a, p. 36). Accordingly, the Project would not conflict with MSHCP Section 6.1.4 requirements for barriers.

Grading/Land Development
Manufactured slopes associated with proposed site development would not extend into the lands proposed to contribute to the MSHCP Conservation Area (Helix, 2015a, p. 36). Therefore, the Project would not conflict with MSHCP Section 6.1.4 requirements for grading/land development.

Project Compliance with MSHCP Section 6.3.2
MSHCP Section 6.3.2 requires special surveys for certain plant species for lands located within the Criteria Area Plant Species Survey Areas (CAPSSA). The Project site is not within a CAPSSA survey area; therefore, surveys for CAPSSA species are not required. None of the species discussed under MSHCP Section 6.3.2 have been observed on site (Helix, 2015a, p. 7). Therefore, the Project is consistent with MSHCP Section 6.3.2 for CAPSSA species.

MSHCP Section 6.3.2 also identifies lands requiring surveys for certain animal species (burrowing owl, mammals, and amphibians). The property is not within an amphibian or mammal survey area and no surveys or mitigation are required under the MSHCP. The Project site is however within a burrowing owl survey area. In compliance with MSHCP Section 6.3.2, burrowing owl surveys were conducted in 2014 with negative results (refer to Technical Appendix D3). None of the burrows investigated on-site showed signs of current or historic use by burrowing owl. Based on the results of the 2014 survey, no impacts to burrowing owl are anticipated (Helix, 2015a, p. 41). Therefore, the Project would be consistent with MSHCP Section 6.3.2.

Based on the foregoing analysis, the proposed Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state conservation plan. As such, impacts would be less than significant with mitigation incorporated. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

b) Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any endangered, or threatened species, as listed in Title 14 of the California Code of Regulations (Sections 670.2 or 670.5) or in Title 50, Code of Federal Regulations (Sections 17.11 or 17.12)?

c) Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U. S. Wildlife Service?

EIR No. 374 Finding: EIR No. 374 found that the project would result in the loss of plant and animal life throughout the majority of the site. Loss of open field agricultural habitat was considered a significant, adverse impact due to the dependence on this habitat type by wintering and resident raptors.

In addition, EIR No. 374 determined that the project would result in direct impacts to eight acres of Stephen's Kangaroo Rat habitat. The EIR identified Mitigation Measure 52 (renumbered herein as Mitigation Measure MM 11.2) to reduce impacts on the Kangaroo Rat. Furthermore, the EIR concluded that the project would result in the loss of 2.5 acres of willow riparian habitat which was considered a significant adverse biological impact due to the limited nature of wetland habitat in southern California. Mitigation Measure 51 (renumbered herein as Mitigation Measure MM 11.1) was identified to reduce impacts to wetland habitat by requiring replacement habitat elsewhere. However, EIR No. 374 ultimately determined that such impacts would be significant and unavoidable. (Riv. County, 1997, pp. V- 114, V-118, II-21)

No Substantial Change from Previous Analysis: Implementation of the proposed Project has the potential to directly or indirectly impact endangered or threatened plant and animal species, if such species occur within areas planned for impact by the Project.

Impacts to Listed Plant Species

According to the Project's biologist (Helix Environmental), the property is not within a Narrow Endemic Plant Species Survey Area (NEPSSA). Therefore, no focused NEPSSA surveys are required (Helix, 2015a, p. 7).

The Project's biologist determined that there are 20 sensitive plant species, 5 of which are listed at state or federal levels, which have potential to occur within the vicinity of the Project site (refer to Table 6 of the Project's Biological Resources Assessment, Technical Appendix D1). None of the 20 species were observed in the Project area, and none are expected to occur. A complete list of all plant species in the Project area was recorded in Appendix A of the Biological Resources Assessment (Helix, 2015a, p. 14). Accordingly, implementation of the Project would not impact any special-status plants.

Impacts to Listed Animal Species

There are 26 sensitive animals historically known to occur in the vicinity of the Project site, eight of which are listed at the state or federal level (refer to Table 7 of the Project's Biological Resources Assessment, Technical Appendix D1). None of the eight listed species are expected to occur in the Project area. A complete list of all animal species observed in the Project area is included as Appendix B of the Project's Biological Resources Assessment (Helix, 2015a, p. 19).

Only one of the 26 sensitive species that was observed in the Project area, the California horned lark (*Eremophila alpestris actia*), is a sensitive species (state species of concern). The California horned lark was observed in a small flock foraging in the agriculture habitat. This species is fully covered under the MSHCP and does not require species specific mitigation. The MSHCP addresses biological impacts for take of Covered Species within the MSHCP Plan Area, including threatened and endangered species. Section 4.1.6 of the MSHCP Final EIR/EIS states that the implementation of MSHCP mitigation measures would reduce identified impacts to a level below significance for all impacts except those associated with Non-Covered Species. General measures include the Local Development Mitigation Fee (LDMF), which is to be applied to all future development throughout the Project area, in order to address cumulative impacts to Covered Species throughout the region. As such, since the proposed Project complies with the MSHCP, and the Project applicant would pay the required MSHCP LDMF fees, impacts to the California horned lark would be reduced to a level below significance. (Helix, 2015a, pp. 17-18, 41)

Nesting Birds

The proposed Project has the potential to impact active bird nests if vegetation is to be removed during the nesting season (February 15 to August 31). Impacts to nesting birds are prohibited by the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (Helix, 2015a, pp. 37,41). The Project's potential to impact nesting birds regulated by the MBTA is evaluated as a significant impact for which mitigation would be required. Implementation of supplemental Mitigation Measure MM 11.6 would reduce the Project's potential impacts to nesting birds to a level below significance by requiring monitoring of site clearing and grading activities by a qualified biologist.

Based on the foregoing analysis, the proposed Project would not adversely impact any special status species and a less-than-significant impact would occur. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

d) Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

EIR No. 374 Finding: EIR No. 374 concluded that the loss of open field agricultural habitat was considered a significant, adverse impact due to the dependence on this habitat type by wintering and resident raptors. As such, EIR No. 374 determined that impacts associated with the movement of wildlife species would be significant and unavoidable. (Riv. County, 1997, pp. V-218, II-21)

No Substantial Change from Previous Analysis: As mentioned in the analysis of Threshold 7.a), the Project drains to the MSHCP Conservation Area (Proposed Constrained Linkage 18). The MSHCP is intended, in part, to facilitate wildlife movement throughout western Riverside County and the Project is fully consistent with the MSHCP requirements (assuming implementation of the EIR No. 374 Mitigation Measures, as modified/supplemented herein). As such, impacts to wildlife movement and wildlife nursery sites would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

e) Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U. S. Fish and Wildlife Service?

EIR No. 374 Finding: EIR No. 374 determined that the conversion of 2.5 acres of wetland/willow riparian woodland habitat on the project site would result in a significant biological impact due to the limited nature of wetland habitat in southern California. As such, EIR No. 374 determined that impacts to riparian habitat would be significant and unavoidable. (Riv. County, 1997, p. V-218)

No Substantial Change from Previous Analysis: The Project proposes to impact 40.62 acres on-site (refer to Figure 8 of the Biological Resources Assessment, Technical Appendix D1). As indicated in Table EA-6, *Impacts to Vegetation Communities*, implementation of the proposed Project would result in the following direct impacts: 0.34 acre of Southern willow scrub; 0.25 acre of mule fat scrub; 0.17 acre of tamarisk scrub; 38.32 acres of agricultural lands; 0.25 acre of non-native vegetation; and 1.29 acres of disturbed habitat (Helix, 2015a, p. 33).

Table EA-6 Impacts to Vegetation Communities

HABITAT	Acres
Riparian/Riverine Habitats	
Southern willow scrub	0.34
Mule fat scrub	0.25
Tamarisk Scrub	0.17
Subtotal	**0.76**
Upland Habitats	
Agriculture*	38.32
Non-native vegetation	0.25
Disturbed habitat	1.29
Developed (includes concrete apron)	--
Subtotal	**39.86**
TOTAL	**40.62**

*0.19 acre of Streambed, a Riparian/Riverine habitat occurs within the agricultural land.

(Helix, 2015a, Table 9)

A discussion of the vegetation communities located on-site is provided below:

Southern Willow Scrub: Southern willow scrub consists of dense, broad-leaved, winter-deciduous stands of trees dominated by shrubby willows in association with mule fat and with scattered emergent western cottonwood and western sycamores. This vegetation community appears as a single layer; it lacks separate shrub and tree layers and generally appears as a mass of short trees or large shrubs. It occurs on loose, sandy or fine, gravelly alluvium deposited near stream channels during flood flows. This habitat type occurs as discontinuous patches along the drainage that crosses the Project area from northeast to southwest. Species present include arroyo willow (*Salix lasiolepis*), red willow (*S. laevigata*), western cottonwood, mule fat, tamarisk, and blue elderberry (*Sambucus nigra caerulea*). A total of 0.34 acre occurs on the Project site. (Helix, 2015a, p. 9)

Mule Fat Scrub: Mule fat scrub is a depauperate, shrubby, riparian scrub community dominated by mule fat and interspersed with shrubby willows. This habitat occurs along intermittent stream channels with a fairly coarse substrate and moderate depth to the water table. This habitat occurs in patches along the drainage that crosses the Project area. In the Project area, this community is dominated by mule fat and includes a minimal understory of annuals including western ragweed (*Ambrosia psilostachya*), ripgut grass (*Bromus diandrus*), alkali mallow (*Malvella leprosa*), and tocalote (*Centaurea melitensis*). A total of 0.25 acre occurs on the Project site. (Helix, 2015a, p. 10)

Tamarisk Scrub: Tamarisk scrub is typically comprised of shrubs and/or small trees of exotic tamarisk species but may also contain willows (*Salix spp.*), salt bushes (*Atriplex spp.*), and salt grass (*Distichlis spicata*). This habitat occurs along intermittent streams in areas where high evaporation rates increase the salinity level of the soil. Species in this vegetation community within the project area include tamarisk, along with annual herbs and grasses. Approximately

0.17 acre of tamarisk scrub would be impacted within the drainages that crosses the Project site. (Helix, 2015a, p. 10)

Streambed: The drainages periodically convey surface water but do not support wetland vegetation have been classified as streambed. This habitat type is regulated by the USACE as non-wetland WUS and by CDFW as streambed. Species present include ripgut grass, tocalote, black mustard (*Brassica nigra*), and a variety of other grasses and herbs similar to the surrounding upland communities. A total of 0.19 acre of streambed occurs on-site within the agricultural lands and would be impacted by the Project. (Helix, 2015a, p. 10)

Agriculture: General agriculture land is defined broadly as land used primarily for production of food and fiber. Within the Project area, general agriculture land consists of dry farm wheat. The proposed Project would impact approximately 38.32 acres of agricultural habitat. (Helix, 2015a, p. 11)

Non-Native Vegetation: Non-native vegetation consists of cultivated plants that have naturalized into otherwise native habitat areas or that are remnants of previous cultivated land uses. This habitat type is represented on site by a 0.25 acre of olive trees (*Olea europa*) in the northwest corner of the Project area, which would be impacted with implementation of the Project. (Helix, 2015a, p. 11)

Disturbed Habitat: Disturbed habitat includes unvegetated or sparsely vegetated areas, particularly where the soil has been heavily compacted by prior development or where agricultural lands have been abandoned. Disturbed habitat is generally dominated by non-native weedy species that adapt to frequent disturbance or consists of dirt trails and roads. This habitat consists of disked land not planted with crops and land adjacent to the off-site nursery. Species present include ripgut grass, alkali mallow, black mustard, tocalote, jimson weed (*Datura wrightii*), wild oat (*Avena sp.*), Russian thistle (*Salsola tragus*), and salt heliotrope. The Project would impact approximately 1.29 acres of disturbed habitat. (Helix, 2015a, p. 11)

As noted above, the Project would result in significant impacts to approximately 0.95 acres of Riparian/Riverine habitats on-site including the following: southern willow scrub, mule fat scrub, tamarisk scrub, and streambed (Helix, 2015b, Table 2). In addition, 0.19 acre of streambed would be impacted off-site (Helix, 2015b, p. 1). The impacts to Riparian/Riverine habitat require that a DBESP be prepared. The DBESP for the off-site channel has been approved as part of JRP 05 03 29 03. The DBESP for the on-site development component that impacts 0.95 acre of Riparian/Riverine habitat has been prepared and submitted to the County and is included as Technical Appendix D2. The proposed mitigation for these impacts, including recommendations from the DBESP, are included as supplemental Mitigation Measures MM 11.3 through MM 11.5. With implementation of required mitigation, impacts to sensitive riparian habitats would be reduced to less-than-significant levels. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

f) Would the Project 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

EIR No. 374 Finding: EIR No. 374 did not identify any impacts to federally protected wetlands as defined by Section 404 of the Clean Water Act.

No Substantial Change from Previous Analysis: The Project proposes impacts to 0.15 acre of Waters of the United States, comprised entirely of non-wetland habitat (refer to Table 9 of Technical Appendix D1) (Helix, 2015a, pp. 30,32). However, as a condition of approval, the Project Applicant would be required to secure a Section 404 permit from the United States Army Corps of Engineers (USACE) prior to the initiation of grading activities. With authorization from the USACOE, impacts to jurisdictional waters would be less than significant and no additional mitigation is required. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

g) Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

EIR No. 374 Finding: EIR No. 374 did not identify any impacts to local policies or ordinances protecting biological resources.

No Substantial Change from Previous Analysis: Aside from the MSHCP (which is addressed above under Issue 7.a), the only local policy/ordinance protecting biological resources within the Project area is the Riverside County Oak Tree Management Guidelines, which requires surveys of individual trees and the minimization and/or avoidance of oak trees, where feasible. Based on the results of the site-specific Biological Technical Report (Appendix D1), the Project site and off-site impact areas do not contain any oak trees or oak woodland habitat. Accordingly, the proposed Project has no potential to conflict with the County's Oak Tree Management Guidelines, and no impact would occur. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

Mitigation:

Supplemental Mitigation Measures

EIR No. 374 includes 2 mitigation measures (renumbered herein as MM 11.1 and MM 11.2), which would continue to apply to the proposed Project. However, some of the mitigation measures identified by EIR No. 374 are out of date and do not reflect current regulatory requirements. In order to further ensure that Project-related impacts to Western Riverside Multiple Species Habitat Conservation Plan (MSHCP) covered species and other biological resources are fully precluded, the County has imposed the following new biology mitigation measures on the proposed Project. The biology requirements listed below are based on the recommendations of the Project's biologist (Helix Environmental.):

MM 11.3 Prior to issuance of the final (146th) occupancy permit, the Riverside County Planning Department shall ensure that the 1.14 acres of habitat are established within the basin and flood control channel on site. A minimum of 0.76 acre shall consist of native riparian scrub. The remaining 0.38 acres shall consist of either native riparian scrub or active streambed. In addition, the created habitat shall be composed of native shrubs and trees and shall serve to eliminate the non-native tamarisk from the site resulting in a habitat that has at least equal or higher quality functions and values. The mitigation area shall have a conservation easement or restrictive covenant placed over the area and long-term management shall be provided by a management entity acceptable to the County Environmental Programs Department (EPD), the Western Riverside County Conservation Authority (RCA), and resource agencies. Options could include the RCA, Riverside Land Conservancy, or other land conservancy. Specific management measures for the created habitat shall include:

- Fencing and signage of the open space channel and side slopes to keep children and pets out of the open space
- Annual maintenance of non-native weed species
- At least quarterly monitoring and trash removal
- Contingency funding to insure that the channel can be maintained in the event of unanticipated events that could affect the biological value and integrity of the site
- Annual monitoring and reporting

A final Long-term Management Plan (LTMP) shall be prepared by the Project Applicant for review and approval by County EPD prior to issuance of grading or building permits. The LTMP shall include a funding estimate based on a Property Analysis Record or similar method for determining long-term management costs. The applicant also shall enter into an agreement with TR 36687 immediately to the south and TR 32151 to the southwest to insure that the entire length of the channel can be constructed and that all mitigation obligations and mitigation area from the previously approved JPR 05 03 29 03 for TR 32151 will be met within the proposed channel.

MM 11.4 Prior to issuance of the final (146th) occupancy permit, the Riverside County Planning Department shall ensure that the remaining mitigation requirement of 1.18 acres (in addition the 1.14 acres referenced in MM 11.3) of riparian/riverine habitat is accomplished either within the proposed mitigation area in TTM 32151 or through mitigation credits that are purchased by the Project Applicant in the Barry Jones Mitigation Bank. The riparian habitat to be created shall be of equal or higher quality habitat than the habitat being impacted.

MM 11.5 During Project construction, the following measures shall be implemented to minimize indirect impacts to Riparian/Riverine resources during construction:

a) Best Management Practices (BMPs) shall be used during Project construction to minimize potential impacts from erosion, sedimentation, and pollutants during construction;
b) Equipment shall be stored in upland areas, outside of drainages except as required by project design (rotation, trash removal, etc.): and
c) Source control and treatment control BMPs shall be utilized to minimize potential contaminants that are generated during Project construction. Source control BMPs include landscape planting, roof runoff controls, trash storage areas, use of alternative building materials, and education of future tenants and residents. Treatment control BMPs includes detention basins, vegetated swales (bio-swales), drain inlets, and vegetated buffers. Water quality BMPs shall be implemented throughout the Project to capture and treat contaminants.
d) To avoid attracting predators, the project shall be kept clean of debris to the extent possible. All food-related trash items shall be enclosed in sealed containers and regularly removed from site.
e) Employees shall strictly limit their activities, vehicles, equipment, and construction material to the proposed project footprint, staging areas, and designated routes of travel.

f) Construction limits shall be fenced with orange snow screen, and exclusion fencing should be maintained until the completion of construction activities.

MM 11.6 To the extent feasible, construction between February 1 and August 31 shall be avoided to minimize impacts to nesting birds. If construction activities cannot be avoided during this time, a survey by a professional biologist shall verify that no migratory birds are nesting within the area to be cleared and grubbed. If active nests are identified, the biologist shall establish buffers around the vegetation containing the active nest (up to 200 feet for non-raptors). The vegetation containing the active nest shall not be removed, and no grading shall occur within the established buffer, until a qualified biologist has determined that the nest is no longer active. In addition, because raptors are known to begin nest building in January and February, if vegetation clearing occurs during this time period, a nesting raptor survey shall be shall be conducted. A buffer zone of up to 500 feet shall be established by the biologist for any active raptor nest that is found to prevent impacts to nesting raptors. The vegetation containing the active nest shall not be removed, and no grading shall occur within the established buffer, until a qualified biologist has determined that the nest is no longer active.

MM 11.7 As a condition of approval, the following measures shall be implemented prior to final building permit inspection to minimize indirect impacts to biological resources:

a) All Project runoff shall be treated prior to exiting the site to reduce toxins.
b) Detention basins shall capture runoff from the development prior to it entering the proposed flood control channel.
c) Project lighting shall be selectively placed, directed, and shielded away from conserved habitats along the open space borders of the development. Spotlight type backyard lighting directed into conserved habitat shall be prohibited.
d) No plants included on the California Invasive Plan Council's list of invasive species (or in Table 6-2 of the MSHCP) shall be used anywhere on the site, and only native species or non-native species shall be planted adjacent to conservation areas. A list of prohibited species shall be provided to homebuyers.
e) The Project Applicant shall ensure that no additional take of conserved habitat shall be necessary for fuel modification purposes.
f) The Project Applicant shall ensure that enclosure fences (wood, tubular steel) are installed along the interface where residential development abuts created riparian habitat. Signs shall be posted at potential access points to the MSHCP conservation area that inform residents of the wildlife habitat value of open space areas.

Monitoring:

MM 11.3 Prior to the issuance of the final (146th) occupancy permit, the Riverside County Environmental Programs Department shall verify that 1.14 acres of habitat have been created within the basin and flood control channel on site. A minimum of 0.76 acre shall consist of native riparian scrub (combination of mule fat scrub and southern willow scrub). The remaining 0.38 acres shall consist of either riparian scrub or active streambed.

MM 11.4 Prior to the issuance of the final (146th) occupancy permit, the Riverside County Environmental Programs Department shall verify that at least an additional 1.18 acres of

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis

riparian habitat have been restored on-site and that an additional 0.83 acre are restored either through the purchase of mitigation credits or through additional restoration on-site as described in the *Determination of Biologically Equivalent or Superior Preservation Report*, dated March 11, 2015.

MM 11.5 Riverside County shall ensure compliance with this requirement as part of inspections of the Project site.

MM 11.6 Prior to issuance of grading permits, the Riverside County Environmental Programs Department shall review the results of the preconstruction nesting bird survey that all measures specified therein to protect nesting birds are adhered to during grading activities. Alternatively, if no grading is anticipated during the avian nesting season, then the Environmental Programs Department shall ensure that implementing grading permits are conditioned to prohibit grading activities during the nesting season (February 1st through August 31).

MM 11.7 Riverside County shall ensure compliance with this requirement as part of inspections of the Project site.

CULTURAL RESOURCES Would the project				
8. Historic Resources a) Alter or destroy an historic site?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of a historical resource as defined in California Code of Regulations, Section 15064.5?	☐	☐	☐	☒

Source: Project Application Materials; *Cultural Resources Survey*, Dudek, November 2014

Findings of Fact:

a) Would the Project alter or destroy an historic site?

b) Would the Project cause a substantial adverse change in the significance of a historical resource as defined in California Code of Regulations, Section 15064.5?

EIR No. 374 Finding: EIR No. 374 did not identify any impacts associated with historic sites or historical resources.

No Substantial Change from Previous Analysis: The Project proposes changes to the boundaries, acreage, and unit allocations of proposed Planning Areas 1, 2A, 3, 5A, 6, 7, 52A, and 52B. Planning Area 5A is currently built out with 118 single-family homes and no development is proposed within Planning Are 7 as part of the Project. Physical impacts to Planning Areas 5A and 7 were fully evaluated and disclosed as part of EIR No. 374, and no new or increased impacts would occur with implementation of the Project.

Although impacts to proposed Planning Areas 1, 2A, 3, 6, 52A, and 52B (within TTM 36722) were previously evaluated within EIR No. 374, a Cultural Resources Survey was prepared for the Project site by Dudek (refer to Technical Appendix E1). No historical resources were identified in the Project area

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis

during a records search or field survey of the property (Dudek, 2014a, pp. 23-24). Accordingly, there would be no impact to historic resources as a result of the proposed Project. As such, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact analyzed in EIR No. 374.

Mitigation: No additional mitigation is required.

Monitoring: No additional monitoring is required.

9. Archaeological Resources				
a) Alter or destroy an archaeological site?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to California Code of Regulations, Section 15064.5?	☐	☐	☐	☒
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☐	☒
d) Restrict existing religious or sacred uses within the potential impact area?	☐	☐	☐	☒

Source: *Project Application Materials; Cultural Resources Survey*

Findings of Fact:

The Project proposes changes to the boundaries, acreage, and unit allocations of proposed Planning Areas 1, 2A, 3, 5A, 6, 7, 52A, and 52B. Planning Area 5A is currently built out with 118 single-family homes and no development is proposed within Planning Are 7 as part of the Project. Physical impacts to Planning Areas 5A and 7 were fully evaluated and disclosed as part of EIR No. 374, and no new or increased impacts would occur with implementation of the Project. Although archaeological impacts within proposed Planning Areas 1, 2A, 3, 6, 52A, and 52B were previously evaluated within EIR No. 374, a Cultural Resources Survey was prepared for the Project site by Dudek (refer to Technical Appendix E1), the results of which are included in the analysis below.

a) Would the Project alter or destroy an archaeological site?

b) Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to California Code of Regulations, Section 15064.5?

EIR No. 374 Finding: EIR No. 374 disclosed that eight archaeological sites existed within the project boundaries. Mitigation Measures 55 and 56 (renumbered herein as Mitigation Measure MM 15.1 and MM 15.2) were identified to reduce potential impacts to archaeological sites and associated resources. With mitigation, impacts were determined to be less than significant with mitigation incorporated. (Riv. County, 1997, pp. V-129, II-24)

No Substantial Change from Previous Analysis: A records search performed by Dudek concluded that no cultural resources were identified in the Project area; however, three cultural resources were identified in the 0.5 mile record search area, including two prehistoric isolates. In addition, a field survey was performed for the Project site and no cultural resources were identified (Dudek, 2014a, pp. 23-24). Based on the survey and records search results, Dudek concluded that the site has a low potential to for the inadvertent discovery of archaeological resources during construction (Dudek, 2014a, p. 29). Accordingly, the Project would not alter or destroy an archaeological site, nor would the Project cause

a substantial adverse change in the significance of an archaeological resource pursuant to California Code of Regulations, Section 15064.5. Therefore, impacts would be less than significant, and monitoring during ground disturbing activities is not required (Dudek, 2014a, p. 29). However, Mitigation Measure MM 15.2 (as revised/ supplemented herein) would continue to apply to the Project to ensure that impacts to potentially uncovered archaeological resources would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact analyzed in EIR No. 374.

c) Would the Project disturb any human remains, including those interred outside of formal cemeteries?

EIR No. 374 Finding: EIR No. 374 did not identify any impacts due to disturbance of human remains.

No Substantial Change from Previous Analysis: The Project site does not contain a cemetery and no known formal cemeteries are located within the immediate site vicinity. Field surveys conducted on the Project site did not identify the presence of any human remains and no human remains are known to exist beneath the surface of the site. Nevertheless, the remote potential exists that human remains may be unearthed during grading and excavation activities associated with Project construction. In the event that human remains are discovered during Project grading or other ground disturbing activities, the Project would be required to comply with the applicable provisions of California Health and Safety Code §7050.5 as well as Public Resources Code §5097 et. seq. California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin. Pursuant to California Public Resources Code Section 5097.98(b), remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made by the Coroner. If the Coroner determines the remains to be Native American, the California Native American Heritage Commission (NAHC) must be contacted and the NAHC 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. Consistent with the findings of EIR No. 374, and assuming mandatory compliance with state law, implementation of the proposed Project would not result in any adverse impacts to any human remains. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact analyzed in EIR No. 374.

d) Would the Project restrict existing religious or sacred uses within the potential impact area?

EIR No. 374 Finding: EIR No. 374 did not identify any impacts to existing religious or sacred uses within the Project site.

No Substantial Change from Previous Analysis: There are no religious or sacred uses occurring within the proposed Project site or off-site impact areas. Consistent with the findings of EIR No. 374, implementation of the proposed Project would not result in any adverse impacts to any religious or sacred uses. As such, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact analyzed in EIR No. 374.

Mitigation:

Revised Mitigation Measures

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis

EIR No. 374 includes 2 mitigation measures (55 and 56, renumbered herein as MM 15.1 and 15.2), which would continue to apply to the proposed Project. However, one of the mitigation measures identified by EIR No. 374 is out of date and does not reflect current regulatory requirements. Accordingly, the following EIR No. 374 Mitigation Measure would be superseded and replaced by the revised (and more stringent) requirements listed below, and are based on the recommendations of the Project's archaeologist (Dudek):

MM 15.2 In addition to the existing archaeological sites, potential materials could be encountered during grading activities. ~~Should this event occur, a qualified archaeologist shall be contacted to evaluate the resource's significance and, if necessary, develop a mitigation plan prior to further grading.~~ If a significant archaeological resource(s) is discovered on the property, ground disturbing activities shall be suspended 100 feet around the resource(s). The archaeological monitor and a representative of the appropriate Native American Tribe(s), the Project Proponent, and the County of Riverside Planning Department shall confer regarding mitigation of the discovered resource(s). A treatment plan shall be prepared and implemented by the archaeologist to protect the identified archaeological resource(s) from damage and destruction. The treatment plan shall contain a research design and data recovery program necessary document the size and content of the discovery such that the resource(s) can be evaluated for significance under CEQA criteria. The research design shall list the sampling procedures appropriate to exhaust the research potential of the archaeological resource(s) in accordance with current professional archaeology standards (typically this sampling level is two (2) to five (5) percent of the volume of the cultural deposit). The treatment plan shall require monitoring by the appropriate Native American Tribe(s) during data recovery excavations of archaeological resource(s) of prehistoric origin, and shall require that all recovered artifacts undergo laboratory analysis. At the completion of the laboratory analysis, any recovered archaeological resources shall be processed and curated according to current professional repository standards. The collections and associated records shall be donated to an appropriate curation facility, or, the artifacts may be delivered to the appropriate Native American Tribe(s) if that is recommended by the County of Riverside. A final report containing the significance and treatment findings shall be prepared by the archaeologist and submitted to the Riverside County Planning Department and the Eastern Information Center.

Monitoring:

MM 15.2 If significant prehistoric resources are discovered during grading activities, the Riverside County Planning Department shall ensure that an appropriate treatment plan is implemented.

10. Paleontological Resources a) Directly or indirectly destroy a unique paleontological resource, or site, or unique geologic feature?	☐	☐	☐	☒

Source: *Riverside County General Plan; Paleontological Resources Survey*

Findings of Fact:

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis

a) Would the Project directly or indirectly destroy a unique paleontological resource, or site, or unique geologic feature?

EIR No. 374 Finding: EIR No.374 determined that although no paleontological resources were encountered on the project site, the contents of on-site soils may have contained potential fossil bearing qualities. As such, the EIR identified Mitigation Measures 57 through 62 (renumbered herein as Mitigation Measure MM 15.3 through 15.8) to ensure the proper handling and treatment of paleontological resources. EIR No. 374 concluded that impacts to paleontological and geological resources, sites, and features would be less than significant with mitigation incorporated. (Riv. County, 1997, pp.V-129, II-24 - II-26)

No Substantial Change from Previous Analysis: The Project proposes changes to the boundaries, acreage, and unit allocations of proposed Planning Areas 1, 2A, 3, 5A, 6, 7, 52A, and 52B. Planning Area 5A is currently developed with 118 single-family homes; thus, existing development within Planning Area 5A has no potential to result in new or more severe impacts to paleontological resources or unique geologic features. Although Planning Area 7 ultimately would be developed with up to 85 dwelling units, development within Planning Area 7 would require subsequent discretionary approvals that would be subject to CEQA. Other than the reduced unit allocation and diminishment of the size of Planning Area 7, no development would occur in Planning Area 7 as a result of the Project; thus, impacts associated with future development of Planning Area 7 are not evaluated herein because such impacts were fully evaluated as part of EIR No. 374. Although impacts to proposed Planning Areas 1, 2A, 3, 6, 52A, and 52B (within TTM 36722) were previously evaluated within EIR No. 374, a Paleontological Resources Survey was prepared for the Project site by Dudek (refer to Technical Appendix E2), the results of which are summarized below.

According to Riverside County General Plan Figure OS-8, the Project site is determined to have a "Low" potential for uncovering paleontological resources (Riv. County, 2003a, Figure OS-8). Nonetheless, there is a potential that during grading of the property, unique paleontological resources or sites could be uncovered.

According to the Paleontological Resources Survey, the Project site is partially underlain by young alluvial valley deposits (Qya) that are Holocene to late Pleistocene in age, as well as very old alluvial valley deposits (Qvoa) that are early to middle Pleistocene in age (Dudek, 2014b, p. 7). A records search of paleontological locality information revealed that no known fossil localities have been identified within the Project area or within a one mile radius of the Project site. However, geological records indicate that the site is situated on Pleistocene-age alluvial sediments which have produced numerous plant and animal fossils in the wider region (Dudek, 2014b, p. 14) . Mitigation Measures 57 through 62 (renumbered herein as Mitigation Measure MM 15.3 through MM 15.8) identified by EIR No. 374 would continue to apply to the Project to ensure that in the event that paleontological resources are uncovered, resources would be appropriately treated, which would reduce impacts to a level below significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in EIR No. 374.

Mitigation: No additional mitigation is required.

Monitoring: No additional monitoring is required.

Table 2-1 Land Use Comparison- Existing Approved Specific Plan vs. Proposed Amendment No. 6

Approved SP 286 Amendment No. 5					Proposed SP 286 Amendment No. 6				
Planning Area	**Land Use**	**Gross Acreage**	**Target Density (du/ac)**	**DUs**	**Planning Area**	**Land Use**	**Gross Acreage**	**Target Density (du/ac)**	**DUs**
1	Residential- Very High Density	17.9	15.0	269	1	Residential- Medium Density	5.4	4.3	23
2A	Conservation/Drainage	10.0	--	--	2A	Open Space – Conservation/ Drainage	15.6	--	--
3	Parks and Conservation	5.0	--	--	3	Residential- Medium High	12.0	5.2	62
5A	Residential-Medium Low	33.4	3.5	118	5A	Residential- Medium Low	38.8	3.0	118
6	Schools	10.0	2.7	27	6	Residential- Medium High	11.0	5.5	61
7	Residential-Medium	23.0	3.7	85	7	Residential- Medium	21.1	4.0	85
--	--	--	--	--	52A	Open Space/Drainage	0.9	--	--
--	--	--	--	--	52B	Open Space/Drainage	0.7	--	--
PROJECT TOTALS (SP 286A5):		**99.3**	**--**	**499**	**PROJECT TOTALS (SP 286A6):**		**105.5**	**--**	**349**

du/ac = dwelling units per gross acre; DUs = dwelling units

Note: The discrepancy in gross acreage value shown for Amendment Nos. 5 and 6 is due to changes in roadway acreage and more modern and accurate estimates of site acreage.

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
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: *Preliminary Geotechnical Investigation,* John R. Byerly Incorporated, December 11, 2014; Riverside County GIS database (RCLIS)

The Project proposes changes to the boundaries, acreage, and unit allocations of proposed Planning Areas 1, 2A, 3, 5A, 6, 7, 52A, and 52B. Planning Area 5A is currently developed with 118 single-family homes; thus, existing development within Planning Area 5A has no potential to result in new or more severe impacts associated with seismic hazards. Although Planning Area 7 ultimately would be developed with up to 85 dwelling units, development within Planning Area 7 would require subsequent discretionary approvals that would be subject to CEQA. Other than the reduced unit allocation and diminishment of the size of Planning Area 7, no development would occur in Planning Area 7 as a result of the Project; thus, impacts associated with future development in Planning Area 7are not evaluated herein because such impacts were fully evaluated as part of EIR No. 374. Accordingly, because no new or more severe impacts would occur within Planning Area 7 as a result of the Project, the analysis herein focuses instead on the Project's physical impacts associated with implementation of TTM 36722. Although impacts to proposed Planning Areas 1, 2A, 3, 6, 52A, and 52B (within TTM 36722) were previously evaluated within EIR No. 374, a preliminary geotechnical investigation has been prepared for this portion of the Project site. Findings from the geotechnical report are incorporated into the analysis of Thresholds 11 through 18, below.

Findings of Fact:

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

b) Would the Project be subject to rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

EIR No. 374 Finding: EIR No. 374 determined that the project site was not located within any Alquist-Priolo Fault Zones but was located approximately five miles northeast of the Elsinore Fault Zone, and 12.0 miles southwest of the San Jacinto Fault Zone. The EIR concluded that the probability of strong ground shaking on-site in response to an earthquake was high. Therefore, the EIR identified Mitigation Measures 1 and 2 (renumbered herein as Mitigation Measures MM 1.1 and MM1.2) to ensure that impacts associated with fault hazards would be less than significant with mitigation incorporated. (Riv. County, 1997, pp. V-19, II-6)

No Substantial Change from Previous Analysis: The Project site is not located within or adjacent to an Alquist-Priolo Earthquake Fault Zone (A-P EFZ). The closest A-P EFZ is along the Elsinore fault

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis

zone, located approximately 9 miles southwest of the site (Byerly, 2014, Enclosure 7, p. 5). In addition, the site is not located within or adjacent to a County of Riverside Fault Hazard Zone. The closest County of Riverside Fault Hazard zone, associated with the Murrieta Hot Springs fault, is located approximately 4 miles south of the Project site. (Riv. County, 2014a; Riv. County, 2003a, Figure S-2). Because there are no faults located on the Project site, there is no potential for the Project to expose people or structures to adverse effects related to ground rupture, nor would the Project expose people or structures to potential adverse effects associated with geologic hazards. Accordingly, impacts would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in EIR No. 374.

Mitigation: No additional mitigation is required.

Monitoring: No additional monitoring is required.

12. Liquefaction Potential Zone a) Be subject to seismic-related ground failure, including liquefaction?	☐	☐	☐	☒

Source: Riverside County GIS database (RCLIS); *Preliminary Geotechnical Investigation,* John R. Byerly Incorporated, December 11, 2014.

Findings of Fact:

a) Would the Project be subject to seismic-related ground failure, including liquefaction?

EIR No. 374 Finding: EIR No. 374 determined that the site may be subject to moderate liquefaction. However the EIR determined that with incorporation of Mitigation Measure 3 (renumbered herein as Mitigation Measure 1.3), potential impacts associated with liquefaction would be less than significant. (Riv. County, 1997, pp. V-19, II-6)

No Substantial Change from Previous Analysis: Riverside County GIS shows the Project site as having a "low" to "moderate" liquefaction potential (Riv. County, 2014a). Seismically-induced liquefaction occurs when dynamic loading of a saturated sand or silt causes pore-water pressures to increase to levels where grain-to-grain contact is lost and material temporarily behaves as a viscous fluid. Liquefaction can cause settlement of the ground surface, settlement and tilting of engineered structures, flotation of buoyant structures, and fissuring of the ground surface. Typically, liquefaction occurs in areas where groundwater occurs in close proximity to the ground surface.

Most of the Project site is underlain by dense older alluvium at a relatively shallow depth. Therefore, the majority of the site is not expected to be subject to liquefaction due to its very dense nature. However, loose alluvium occurs within the on-site drainage area (Byerly, 2014, Enclosure 7, p.15). EIR No. 374 Mitigation Measure 3 (renumbered herein as Mitigation Measure 1.3) would continue to apply to the proposed Project to ensure that on-site liquefaction hazards are mitigated to a less than significant level. As such, the proposed Project would not be subject to seismic-related ground failure, including liquefaction, and impacts would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis

Mitigation: No additional mitigation is required.

Monitoring: No additional monitoring is required.

13. Ground-shaking Zone Be subject to strong seismic ground shaking?	☐	☐	☐	☒

Source: Riverside County GIS database (RCLIS); *Preliminary Geotechnical Investigation* John R. Byerly Incorporated, December 11, 2014.

Findings of Fact:

a) Would the Project be subject to strong seismic ground shaking?

EIR No. 374 Finding: EIR No. 374 determined that the project site was not located within any Alquist-Priolo Fault Zones but was located approximately five miles northeast of the Elsinore Fault Zone, and 12.0 miles southwest of the San Jacinto Fault Zone. The EIR concluded that the probability of strong ground shaking on-site in response to an earthquake was high. Therefore, the EIR identified mitigation Measures 1 and 2 (renumbered herein as Mitigation Measures MM 1.1 and MM1.2) to reduce impacts associated with ground shaking to below a level of significance. (Riv. County, 1997, pp. V-19, II-6)

No Substantial Change from Previous Analysis: According to information contained in the Project-specific preliminary geotechnical investigation (Technical Appendix F), and as discussed above under the analysis of Threshold 11.a), the Project site is not located within or adjacent to an Alquist-Priolo Earthquake Fault Zone (A-P EFZ). The closest A-P EFZ is along the Elsinore fault zone, located approximately 9 miles southwest of the site (Byerly, 2014, Enclosure 7, p. 5). In addition, the site is not located within or adjacent to a County of Riverside Fault Hazard Zone. The closest County of Riverside Fault Hazard zone, associated with the Murrieta Hot Springs fault, is located approximately 4 miles south of the Project site. (Riv. County, 2014a; Riv. County, 2003a, Figure S-2)

However, as indicated on Riverside County General Plan Figures S-1 and S-2, the Project site is located in a seismically active area of Southern California (Riv. County, 2003a). As a standard condition of Project approval, the Project would be required to construct proposed structures in accordance with the California Building Standards Code (CBSC), also known as California Code of Regulations (CCR), Title 24. The CBSC is designed to resist significant adverse effects associated with strong seismic ground shaking. With mandatory compliance with the 2010 California Building Code requirements, or the applicable building code at the time of Project construction, impacts due to strong seismic ground shaking would be less than significant, and no mitigation would be required. Moreover, the Project would be conditioned to comply with EIR No. 374 Mitigation Measures 1 through 3 (renumbered herein as Mitigation Measures MM 1.1 through MM 1.3) to reduce impacts from seismic activity. Consistent with the findings of EIR No. 374, the proposed Project's impacts from strong seismic shaking would be less than significant with mitigation. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

Mitigation: No additional mitigation is required.

Monitoring: No additional monitoring is required.

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
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: Riverside County General Plan; Project Application Materials; *Preliminary Geotechnical Investigation,* John R. Byerly Incorporated, December 11, 2014.

Findings of Fact:

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

EIR No. 374 Finding: EIR No. 374 determined that secondary seismic-related impacts such as ground rupture, shallow ground cracking, and landsliding were not anticipated to occur on the project site,. Therefore, EIR No. 374 did not identify any impacts associated with landslide risk. (Riv. County, 1997, p. V-21)

No Substantial Change from Previous Analysis: SWAP Figure 14, *Slope Instability*, does not identify the Project site within an area at risk to landslide or landslide hazards (Riv. County, 2014b). In addition, the Project site was evaluated for geologic hazards, by John R. Byerly, Inc. The Project's preliminary geotechnical investigation indicates that the Project site is located on a large structural block of land known as the Perris Block, which is considered to be relatively stable (Byerly, 2014, Enclosure 7, Page 4). There are no steep slopes on-site or in the immediate surrounding area, thus the Project has no potential to result in or be affected by landslide or rockfall hazards (Google Earth, 2013). The preliminary geotechnical investigation did not identify any adverse soil conditions that could result in lateral spreading or collapse. Consistent with the findings of EIR No. 374, the proposed Project's landslide risk would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

Mitigation: No additional mitigation is required.

Monitoring: No additional 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: Riverside County General Plan, Project Application Materials; *Preliminary Geotechnical Investigation,* John R. Byerly Incorporated, December 11, 2014.

Findings of Fact:

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis

a) Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in ground subsidence?

EIR No. 374 Finding: EIR No. 374 did not identify any impacts associated with ground subsidence.

No Substantial Change from Previous Analysis: Figure S-7 of the Riverside County General Plan indicates that the Project site is "susceptible" to ground subsidence, although no areas of documented subsidence occur in the Project area (Riv. County, 2003a, Figure 7). In addition, due to the relatively shallow depth to bedrock and the dense, Pleistocene age sediments on the site, subsidence is not expected to be a hazard on the Project site (Byerly, 2014, Enclosure 7, p. 15). Accordingly, the proposed Project would not 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. Thus, impacts would be less than significant and no mitigation is required. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

Mitigation: No additional mitigation is required.

Monitoring: No additional monitoring is required.

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

Source: Riverside County General Plan; *Preliminary Geotechnical Investigation,* John R. Byerly Incorporated, December 11, 2014.

Findings of Fact:

a) Would the Project be subject to geologic hazards, such as seiche, mudflow, or volcanic hazard?

EIR No. 374 Finding: EIR No. 374 noted that portions of the project site may be subject to seismically induced flooding and seiches caused by failure of Lake Skinner Dam. Location of the project site within the Lake Skinner Dam Inundation Area could expose future residents to flooding in the event of a seismic event. The EIR identified Mitigation Measure 21 (renumbered herein as Mitigation Measures MM 4.4) to reduce impacts related to flooding by requiring notification to future property owners and coordination with emergency management agencies to ensure public safety in the event of a seiche. EIR No. 374 concluded that with incorporation of mitigation, impacts would be less than significant. (Riv. County, 1997, pp. V-21, II-10)

No Substantial Change from Previous Analysis: According to the site specific geotechnical investigation, seismically induced failure of the San Diego Canal, which feeds Lake Skinner, may induce flooding along the drainage area located on the Project site (Byerly, 2014, Enclosure 7, p.16). However, Mitigation Measure 21 identified in EIR No.374 (renumbered herein as Mitigation Measures MM 4.4) would continue to apply to the proposed Project and would reduce impacts associated with flooding to a less than significant level. In addition, and according to Riverside County General Plan Figure S-10, the Project site is not subject to inundation due to the failure of any nearby dams (Riv. County, 2003a, Figure S-10). Accordingly, impacts associated with seiches, mudflows, volcanic hazards, or other geologic hazards would be less than significant with mitigation. Therefore, implementation of the

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis

proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

Mitigation: No additional mitigation is required.

Monitoring: No additional monitoring is required.

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

Source: Project Application Materials; *Preliminary Geotechnical Investigation,* John R. Byerly Incorporated, December 11, 2014.

Findings of Fact:

a) Would the Project change topography or ground surface relief features?

EIR No. 374 Finding: EIR No. 374 determined that grading of the site would be tailored to existing topography and would be sensitive to natural landforms where practical. However, the EIR noted that development of the project would create artificial cuts and fills to accommodate structures and roads. EIR No. 374 identified 13 Mitigation Measures (Mitigation Measures 4 through 16, renumbered herein as MM 2.1 through MM 2.13) to ensure that impacts associated with topographical changes would be less than significant. (Riv. County, 1997, pp. V-29, II-7 - II-9)

No Substantial Change from Previous Analysis: Under existing conditions, the Project site is relatively flat and slopes downward to the south at a gradient of less than 3 percent (Byerly, 2014, p. 2). Implementation of the proposed Project would require grading activities as necessary to accommodate residential development. As part of the Project's grading plan, hillsides within the Project site would be graded at a maximum 2:1 gradient to increase areas suitable for residential development while providing fill material to facilitate the construction of residential pads in other portions of the site. Although the Project would result in a change to the site's existing topography, there would be no adverse effects to the environment resulting from site grading beyond what is already evaluated and disclosed throughout this EIR Addendum. In addition, Mitigation Measures identified in EIR No. 374 (renumbered herein as MM 2.1 through MM 2.13) would continue to apply to the proposed Project. Accordingly, impacts due to changes to the site's topography and ground surface relief features would be less-than-significant. As such, the Project would not create a new impact due to changes to the site's topography and ground surface relief features. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

b) Would the Project create cut or fill slopes greater than 2:1 or higher than 10 feet?

EIR No. 374 Finding: EIR No. 374 determined that most cut and fill slopes associated with the project would be designed in accordance with County of Riverside standards (ensuring that slopes would be no steeper than 2:1 or taller than ten feet in height). However, EIR No. 374 indicated that slopes in

portions of SP 286 would require slopes steeper than 2:1 or taller than 10 feet in height. To ensure the safety of such slopes, EIR No. 374 identified Mitigation Measures 7 and 10 (renumbered herein as MM 2.4 through MM 2.7), which require detailed landscape plans and a soils report demonstrating the safety of any cut or fill slopes greater than 2:1 or higher than 10 feet. Therefore, EIR No. 374 determined that with mitigation, impacts associated with slopes would be less than significant. (Riv. County, 1997, pp. V-29, II-7 - II-8)

No Substantial Change from Previous Analysis: As shown on TTM 36722, all slopes proposed as part of the Project would be constructed at a maximum slope angle of 2:1. In addition, the Project's preliminary geotechnical report recommends that slopes on site not exceed a maximum height of 15 feet (Byerly, 2014, p. 18). The Project's geologist (John R. Byerly) did not identify any slopes that are expected to be unstable as designed. Furthermore, all recommendations contained within the preliminary geotechnical investigation shall be enforced by Riverside County through conditions of approval imposed on the Project. Accordingly, impacts due to the creation of slopes greater than 2:1 or higher than 10 feet in height would not occur. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

c) Would the Project result in grading that affects or negates subsurface sewage disposal systems?

EIR No. 374 Finding: EIR No. 374 did not identify any impacts to subsurface sewage disposal systems that would result from grading.

No Substantial Change from Previous Analysis: There are no subsurface sewage disposal systems within the areas that would be permitted for physical disturbance as part of the proposed Project. As such, no impact would occur. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

Mitigation: No additional mitigation is required.

Monitoring: No additional 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?	☐	☐	☐	☒	
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: *Hydrology Analysis for SABA Tract 36722*, Hunsaker & Associates, 2014; *Preliminary Geotechnical Investigation,* John R. Byerly Incorporated, December 11, 2014; Project Application Materials

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis

Findings of Fact:

a) Would the Project result in substantial soil erosion or the loss of topsoil?

EIR No. 374 Finding: EIR No. 374 determined grading of the project site would somewhat reshape natural contours and slightly increase the erosion potential of the project site. The EIR noted however, that erosion on site could be easily mitigated by proper engineering techniques. As such, the EIR identified mitigation measures (Mitigation Measure 4 through 16, renumbered herein as MM 2.1 through 2.13) to ensure that impacts associated with soil erosion on site would be less than significant. (Riv. County, 1997, pp. V-29, II-7 - II-9)

No Substantial Change from Previous Analysis: Proposed grading activities associated with the Project would temporarily expose underlying soils to water and air, which would increase erosion susceptibility while the soils are exposed. Exposed soils would be subject to erosion during rainfall events or high winds due to the removal of stabilizing vegetation and exposure of these erodible materials to wind and water. Erosion by water would be greatest during the first rainy season after grading and before the Project's structure foundations are established and paving and landscaping occur. Erosion by wind would be highest during periods of high wind speeds when soils are exposed.

Pursuant to the requirements of the State Water Resources Control Board, the Project Applicant is required to obtain a National Pollutant Discharge Elimination System (NPDES) permit for construction activities. The NPDES permit is required for all projects that include construction activities, such as clearing, grading, and/or excavation that disturb at least one acre of total land area. Additionally, during grading and other construction activities involving soil exposure or the transport of earth materials, Chapter 15.12 (Uniform Building Code) of the Riverside County Municipal Code, which establishes, in part, requirements for the control of dust and erosion during construction, would apply to the Project. As part of the requirements of Chapter 15.12, the Project Applicant would be required to prepare an erosion control plan that would address construction fencing, sand bags, and other erosion-control features that would be implemented during the construction phase to reduce the site's potential for soil erosion or the loss of topsoil. Requirements for the reduction of particulate matter in the air also would apply, pursuant to SCAQMD Rule 403. Mandatory compliance with the Project's NPDES permit and applicable regulatory requirements would ensure that water and wind erosion impacts would be less than significant. Mitigation is not required.

Following construction, wind and water erosion on the Project site would be minimized, as the areas disturbed during construction would be landscaped or covered with impervious surfaces. Only nominal areas of exposed soil, if any, would occur in the site's landscaped areas. The only potential for erosion effects to occur during Project operation would be indirect effects from storm water discharged from the property. All flows entering the on-site storm drainage system, including flows from the portion of McColery Road that would be improved as part of the Project, would be directed toward the water quality detention/sand filter basins planned within Lots 147 and 148 via subsurface storm drain pipes. Following treatment of these flows within the water quality detention/sand filter basins, flows would be conveyed into the proposed flood control channel within Lot 149. On-site drainage would largely mimic existing conditions. Based on the analysis presented in the Project's hydrology study (Technical Appendix L), post-development runoff from the site would slightly decrease during 10-year (24-hour duration) storm events (i.e., from 51.3 CFS under existing conditions to 43.0 CFS under post-development conditions) (Hunsaker & Associates, 2014a, Section E). Accordingly, total runoff from the site would not substantially increase with Project implementation, thereby demonstrating that the Project would not substantially increase erosion hazards downstream as compared to the existing condition. Since the drainage associated with the Project would be fully controlled via the on-site drainage plan

and/or would be similar to existing conditions, soil erosion and the loss of topsoil would not increase substantially as compared to existing conditions.

In addition, the Project Applicant is required to prepare and submit to the County for approval of a Project-specific Storm Water Pollution Prevention Plan (SWPPP) and Water Quality Management Plan (WQMP). The SWPPP and WQMP must identify and implement an effective combination of erosion control and sediment control measures (i.e., Best Management Practices) to reduce or eliminate discharge to surface water from storm water and non-storm water discharges. Adherence to the requirements noted in the Project's required WQMP (refer to Technical Appendix K) and site-specific SWPPP would further ensure that potential erosion and sedimentation effects would be less than significant. As such, impacts due to substantial soil erosion or the loss of topsoil would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

b) Would the Project 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?

EIR No. 374 Finding: EIR No. 374 did not identify any impacts to life or property due to expansive soils.

No Substantial Change from Previous Analysis: According to the Project's preliminary geotechnical investigation (Technical Appendix F), the expansion potential for on-site soils ranges from "very low" to "medium" (Byerly, 2014, p. 5). The preliminary geotechnical investigation provides recommendations for the foundation design of residences on-site. These recommendations have been incorporated into the Project's conditions of approval. Adherence to the recommendations within the preliminary geotechnical investigation would ensure that the Project would not create substantial risks to life or property from exposure to expansive soils. As such, impacts would be less than significant and no additional mitigation is required. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

c) Would the Project 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?

EIR No. 374 Finding: EIR No. 374 did not identify any impacts associated with soils incapable of adequately supporting use of septic tanks or alternative waste water disposal systems.

No Substantial Change from Previous Analysis: No septic tanks or alternative waste water disposal systems are proposed to be constructed or expanded as part of the Project. Sanitary sewer service to the site would instead be provided by the EMWD, and the Project would connect to existing sewer lines. Accordingly, the Project would not result in the introduction of septic systems on soils incapable of adequately supporting use of septic tanks or alternative waste water disposal systems, and no impact would occur. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

Mitigation: No mitigation is required beyond mandatory compliance with the BMPs specified in the site-specific WQMP and recommendations within the site-specific preliminary geotechnical investigation, both of which would be enforced as part of the Project's conditions of approval.

Monitoring: Annual inspections would verify compliance with the Project's conditions of approval.

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
19. Erosion				
a) Change deposition, siltation, or erosion that may modify the channel of a river or stream or the bed of a lake?	☐	☐	☐	☒
b) Result in any increase in water erosion either on or off site?	☐	☐	☐	☒

Source: *Hydrology Analysis for SABA Tract 36722*, Hunsaker & Associates, 2014; Project Application Materials.

Findings of Fact:

a) Would the Project change deposition, siltation, or erosion that may modify the channel of a river or stream or the bed of a lake?

b) Would the Project result in any increase in water erosion either on or off site?

EIR No. 374 Finding: EIR No. 374 noted that implementation of the Winchester 1800 Specific Plan could result in short-term erosion and sedimentation impacts during grading. Grading activities would temporarily expose ground surface, thereby creating the potential for erosion and sedimentation of local drainage courses. The EIR imposed Mitigation Measures 46 through 48 (renumbered herein as MM 7.1 through 7.3) to ensure that impacts associated with erosion would be less than significant. (Riv. County, 1997, pp. V-64, II-17)

No Substantial Change From Previous Analysis: As indicated under the discussion and analysis of Threshold 18.a), above, proposed grading activities associated with the Project would temporarily expose underlying soils to water and air, which would increase erosion susceptibility while the soils are exposed. Exposed soils would be subject to erosion during rainfall events or high winds due to the removal of stabilizing vegetation and exposure of these erodible materials to wind and water. Erosion by water would be greatest during the first rainy season after grading and before the Project's structure foundations are established and paving and landscaping occur. Erosion by wind would be highest during periods of high wind speeds when soils are exposed.

Pursuant to the requirements of the State Water Resources Control Board, the Project Applicant is required to obtain a National Pollutant Discharge Elimination System (NPDES) permit for construction activities. The NPDES permit is required for all projects that include construction activities, such as clearing, grading, and/or excavation that disturb at least one acre of total land area. Additionally, during grading and other construction activities involving soil exposure or the transport of earth materials, Chapter 15.12 (Uniform Building Code) of the Riverside County Municipal Code, which establishes, in part, requirements for the control of dust and erosion during construction, would apply to the Project. As part of the requirements of Chapter 15.12, the Project Applicant would be required to prepare an erosion control plan that would address construction fencing, sand bags, and other erosion-control features that would be implemented during the construction phase to reduce the site's potential for soil erosion or the loss of topsoil. Requirements for the reduction of particulate matter in the air also would apply, pursuant to SCAQMD Rule 403. Mandatory compliance with the Project's NPDES permit and these regulatory requirements would ensure that erosion impacts during construction activities would be less than significant. Mitigation is not required.

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis

Following construction, erosion on the Project site would be minimized, as the areas disturbed during construction would be landscaped or covered with impervious surfaces. Only nominal areas of exposed soil, if any, would occur in the site's landscaped areas. The only potential for erosion effects to occur during Project operation would be indirect effects from storm water discharged from the property. All flows entering the on-site storm drainage system, including flows from the portion of McColery Road that would be improved as part of the Project, would be directed toward the water quality detention/sand filter basins planned within Lots 147 and 148 via subsurface storm drain pipes. Following treatment of these flows within the water quality detention/sand filter basins, flows would be conveyed into the proposed flood control channel within Lot 149. On-site drainage would largely mimic existing conditions.

Based on the analysis presented in the Project's hydrology study (Technical Appendix L), post-development runoff from the site would slightly decrease during 10-year (24-hour duration) storm events (i.e., from 51.3 CFS under existing conditions to 43.0 CFS under post-development conditions) (Hunsaker & Associates, 2014a, Section E). Accordingly, the rate of runoff from the site would not substantially increase with Project implementation, thereby demonstrating that the Project would not substantially increase off-site erosion hazards as compared to the existing condition. Since the drainage associated with the Project would be fully controlled via the on-site drainage plan and/or would be similar to existing conditions, the rate and amount of erosion would not increase substantially as compared to existing conditions; thus, impacts due to water erosion would be less than significant under long-term conditions.

Furthermore, because the Project would not substantially alter the drainage patterns of the site as compared to the existing condition, there would be no impact due to changes in the deposition, siltation, or erosion that may modify the channel of a river or stream or the bed of a lake, and no impact would occur. In addition, Mitigation Measures 46 through 49 (renumbered herein as MM 7.1 through 7.3), identified in EIR No. 374, would continue to apply to the Project and would further reduce the Project's potential to result in wind or water-related erosion that could adversely affect the environment. Consistent with the findings of EIR No. 374, Project-related impacts due to erosion-related hazards would be less than significant with mitigation. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact analyzed in EIR No. 374.

Mitigation: No mitigation is required beyond mandatory compliance with the BMPs specified in the site-specific WQMP, and the mitigation measures identified in EIR No. 374, which would be enforced as part of the Project's conditions of approval.

Monitoring: Annual inspections would verify compliance with the Project's conditions of approval.

20.	**Wind Erosion and Blowsand from project either on or off site.** a) Be impacted by or result in an increase in wind erosion and blowsand, either on or off site?	☐	☐	☐	☒

Source: *Riverside County General Plan; Project Application Materials*

Findings of Fact:

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis

a) **Would the Project be impacted by or result in an increase in wind erosion and blowsand, either on or off site?**

EIR No. 374 Finding: EIR No. 374 determined that although the project site was not within the County's designated Wind Erosion of Blowsand Area, construction activities associated with project would generate fugitive dust. Therefore, the EIR identified Mitigation Measure 17 (renumbered herein as MM 3.1) to ensure that surfaces were regularly watered and ground cover was utilized in accordance with SCAQMD Rule 403. With incorporation of mitigation, EIR No. 374 determined that impacts associated with wind erosion and blowsand would be less than significant. (Riv. County, 1997, pp. V-32, II-11)

No Substantial Change from Previous Analysis: Proposed grading activities would expose underlying soils at the Project site, which would increase erosion susceptibility during grading and construction activities. Exposed soils would be subject to erosion due to the removal of stabilizing vegetation and exposure of these erodible materials to wind. Erosion by wind would be highest during periods of high wind speeds.

The Project site is considered to have a "moderate" susceptibility to wind erosion (Riverside County, 2003a, Figure S-8). During grading and other construction activities involving soil exposure or the transport of earth materials, significant short-term impacts associated with wind erosion would be precluded with mandatory compliance with the Project's SWPPP and Riverside County Ordinance No. 484.2, which establishes requirements for the control of blowing sand. In addition, the Project would be required to comply with SCAQMD Rule 403, which addresses the reduction of airborne particulate matter with mandatory compliance to these regulatory requirements. With mandatory compliance to regulatory requirements, wind erosion impacts would be less than significant during construction and mitigation is not required.

Following construction, wind erosion on the Project site would be negligible, as the disturbed areas would be landscaped or covered with impervious surfaces. Therefore, implementation of the proposed Project would not significantly increase the risk of long-term wind erosion on- or off-site, and impacts would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

Mitigation: No mitigation is required beyond mandatory compliance with the BMPs specified in the site-specific WQMP (Appendix K) and the mitigation measures identified in EIR No. 374, both of which would be enforced as part of the Project's conditions of approval.

Monitoring: Inspections shall be conducted by Riverside County during Project construction to verify compliance with the Project's conditions of approval.

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?	☐	☐	☐	☒

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis

Source: *Greenhouse Gas Assessment*, Mestre Greve Associates, December 18, 2014; Project Application Materials.

Findings of Fact:

a) Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

EIR No. 374 Finding: Although EIR No. 374 did not address this subject, EIR No. 374 contained enough information about projected air quality emissions associated with proposed Specific Plan that with the exercise of reasonable diligence, information about the project's potential effect due to greenhouse gas (GHG) emissions was readily available to the public. EIR No. 374 did not evaluate impacts due to GHG emissions.

a) **No Substantial Change From Previous Analysis:** The Project proposes changes to the boundaries, acreage, and unit allocations of proposed Planning Areas 1, 2A, 3, 5A, 6, 7, 52A, and 52B. Planning Area 5A is currently developed with 118 single-family homes; thus, existing development within Planning Area 5A has no potential to result in new or more severe impacts due to GHG emissions. Although Planning Area 7 ultimately would be developed with up to 85 dwelling units, development within Planning Area 7 would require subsequent discretionary approvals that would be subject to CEQA. Other than the reduced unit allocation and diminishment of the size of Planning Area 7, no development would occur in Planning Area 7 as a result of the Project; thus, impacts associated with future development of Planning Area 7 are not evaluated herein because such impacts were fully evaluated as part of EIR No. 374. Although impacts associated with proposed Planning Areas 1, 2A, 3, 6, 52A, and 52B (within TTM 36722) also were previously evaluated within EIR No. 374, a greenhouse gas assessment has been prepared for this portion of the Project site. Findings from the greenhouse gas assessment are incorporated into the analysis below.

Background

Global GHG emissions are measured in million metric tons of carbon dioxide equivalent ("MMT CO_2EQ") units. A metric ton is approximately 2,205 lbs. Some GHGs emitted into the atmosphere are naturally occurring, while others are caused solely by human activities. The principal GHGs that enter the atmosphere because of human activities are:

- **Carbon dioxide (CO_2)** enters the atmosphere through the burning of fossil fuels (oil, natural gas, and coal), agriculture, irrigation, and deforestation, as well as the manufacturing of cement.

- **Methane (CH_4)** is emitted through the production and transportation of coal, natural gas, and oil, as well as from livestock. Other agricultural activities influence methane emissions as well as the decay of waste in landfills.

- **Nitrous oxide (N_2O)** is released most often during the burning of fuel at high temperatures. This greenhouse gas is caused mostly by motor vehicles, which also include non-road vehicles, such as those used for agriculture.

- **Fluorinated Gases** are emitted primarily from industrial sources, which often include hydrofluorocarbons (HRC), perfluorocarbons (PFC), and sulfur hexafluoride (SF6). Though they are often released in smaller quantities, they are referred to as High Global Warming Potential Gases because of their ability to cause global warming. Fluorinated gases are often used as substitutes for ozone depleting substances.

These gases have different potentials for trapping heat in the atmosphere, called global warming potential ("GWP"). For example, one pound of methane has 21 times more heat capturing potential than one pound of carbon dioxide. When dealing with an array of emissions, the gases are converted to carbon dioxide equivalents for comparison purposes. (MGA, 2014c, p. 3)

Methodology

The CEQA Guidelines do not include or recommend any particular threshold of significance; instead, they leave that decision to the discretion of the lead agency. The Significance Threshold that was utilized by the Project's greenhouse gas analyst (Mestre Greve Associates) is based on SCAQMD's suggested tiered approach which is consistent with CARB's recommendations. The Project is compared with the requirements of each tier sequentially and if it complies with any tier, it is determined to not result in a significant impact. Tier 1 excludes projects that are specifically exempt from SB 97 from resulting in a significant impact. Tier 2 excludes projects that are consistent with a GHG reduction plan that has a certified final CEQA document and complies with AB 32 GHG reduction goals. Tier 3 excludes projects with annual emissions lower than a screening threshold. Tier 4 consists of three decision tree options. Under the first option, the project would be excluded if design features and/or mitigation measures resulted in emissions 30 percent lower than business as usual emissions. Under the second option, the project would be excluded if it had early compliance with AB 32 through early implementation of CARB's Scoping Plan measures. Under the third option, project would be excluded if it met sector based performance standards. However, the specifics of the Tier 4 compliance options were not adopted by the SCAQMD board to allow further time to develop the options and coordinate with CARB's GHG significance threshold development efforts. Tier 5 would exclude projects that implement offsite mitigation (GHG reduction projects) or purchase offsets to reduce GHG emission impacts to less than the proposed screening level. (MGA, 2014c, p. 21)

The Project is not specifically exempted in SB97 and there are no GHG reduction plans that are consistent with the AB32 GHG reduction goals with a certified final CEQA document that are applicable to the proposed Project. Therefore, the Project is not compliant with Tiers 1 or 2. The significance of the Project will instead be determined based on compliance with the Tier 3 and 4 requirements. The Project would be considered to have a significant impact if total annual GHG emissions exceed 3,000 metric tons equivalent carbon dioxide (CO_2) (MT CO_2EQ). If the 3,000 threshold is exceeded then the annual emissions per service population (the number of residents and persons employed by the residential complex in this case) should not exceed 4.6 MT CO_2EQ/yr, or a significant impact will be determined. Note that this methodology recommends that total construction emissions be amortized over a 30-year period or the project's expected lifetime if it is less than 30 years. (MGA, 2014c, p. 21)

Project-Related Greenhouse Gas Emissions

Construction Emissions

Temporary impacts would result from Project construction activities. The primary source of GHG emissions generated by construction activities is from the use of diesel-powered construction equipment. Typical emission rates for construction equipment were obtained from CalEEMod (California Emissions Estimator Model) which was released by the SCAQMD in 2013. The Project would involve site preparation, grading, and construction of the residences. Paving and painting would also be part of the construction effort and would also generate some GHG emissions. It is anticipated that the construction of the Project would start in 2015 and be complete in 2020. (MGA, 2014c, p. 21)

Using CalEEMod, the emissions from construction for the proposed Project were calculated and are presented in Table EA-7, *Greenhouse Gas Emissions - Construction*. These emissions represent the

total level of emissions based on the construction schedule. According to the SCAQMD's CEQA Handbook (Greenhouse Gas CEQA Significance Threshold Stakeholder Working Group #5, August 27, 2008), construction emissions are amortized over the life of the project, defined by SCAQMD as 30 years, and are added to the annual operation emissions. Thus, the Project's annualized construction emissions will be added to the operational emissions (refer to Table EA-8 below) and compared to the applicable GHG significance threshold. Worksheets showing the specific data used to calculate the construction emissions are presented in the appendix on the greenhouse gas analysis (Technical Appendix G). (MGA, 2014c, pp. 22-23)

Table EA-7 Greenhouse Gas Emissions - Construction

	CO2	CH4	N2O	CO2EQ
Total Construction Emissions (Metric Tons)	462.748	0.109	0.000	465.032
Averaged Over 30 Years (Metric Tons Per Year)	15.425	0.004	0.000	15.501

All measurements are in metric tons per year.
MTCO2EQ = metric tons equivalent carbon dioxide (CO2).
(MGA, 2014c, Table 3)

Construction and Operational Emissions

The primary sources of GHG emissions generated by the proposed Project would be from the electric consumption associated with their water usage, motor vehicles including the trucks serving the facility, and the decomposition of solid waste. Traffic data from the Project's traffic impact analysis (Appendix J) was used for the analysis. (MGA, 2014c, p. 23)

The California Emissions Model (CalEEMod) developed by the SCAQMD in conjunction with CARB was used to estimate the GHG emissions. The results are presented in Table EA-8, *Annual Project GHG Emissions.* A complete breakdown of the emissions is provided in the appendix on the greenhouse gas analysis (Technical Appendix G). (MGA, 2014c, p. 23)

Table EA-8 Annual Project GHG Emissions

	CO2	CH4	N2O	CO2EQ
Annual Operational Emissions	2,812.7207	2.4773	0.0163	2,869.8103
Annualized Construction Emissions	15.425	0.004	0.000	15.501
Total Annual Emissions	**2,828.15**	**2.48**	**0.02**	**2,885.31**

All measurements are in metric tons.
(MGA, 2014c, Table 4)

Table EA-8 shows that the GHG emissions for the Project would be approximately 2,885 $MTCO_2EQ$ per year. This is lower than the SCAQMD Tier 3 screening threshold of 3,000 $MTCO_2EQ$ per year (MGA, 2014c, p. 24). As noted previously, pursuant to the SCAQMD Interim CEQA GHG Significance

Threshold for Stationary Sources, Rules and Plans, if a project is below the screening threshold, additional mitigation is not required. As noted by the SCAQMD:

> "...the...screening level for stationary sources is based on an emission capture rate of 90 percent for all new or modified projects...the policy objective of [SCAQMD's] recommended interim GHG significance threshold proposal is to achieve an emission capture rate of 90 percent of all new or modified stationary source projects. A GHG significance threshold based on a 90 percent emission capture rate may be more appropriate to address the long-term adverse impacts associated with global climate change because most projects will be required to implement GHG reduction measures. Further, a 90 percent emission capture rate sets the emission threshold low enough to capture a substantial fraction of future stationary source projects that will be constructed to accommodate future statewide population and economic growth, while setting the emission threshold high enough to exclude small projects that will in aggregate contribute a relatively small fraction of the cumulative statewide GHG emissions. This assertion is based on the fact that [SCAQMD] staff estimates that these GHG emissions would account for slightly less than one percent of future 2050 statewide GHG emissions target (85 [MMTCO2e/yr]). In addition, these small projects may be subject to future applicable GHG control regulations that would further reduce their overall future contribution to the statewide GHG inventory. Finally, these small sources are already subject to [Best Available Control Technology] (BACT) for criteria pollutants and are more likely to be single-permit facilities, so they are more likely to have few opportunities readily available to reduce GHG emissions from other parts of their facility." (SCAQMD, 2008, p. 3-2)

As such, because the Project's total annual GHG emissions would be below the Tier 3 threshold of 3,000 MT CO_2e per year, the Project would not generate substantial GHG emissions – either directly or indirectly – that would have a significant impact on the environment. Impacts would be less than significant and no mitigation is required. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

b) Would the Project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

EIR No. 374 Finding: Although EIR No. 374 did not address this subject, EIR No. 374 contained enough information about projected air quality emissions associated with proposed Specific Plan that with the exercise of reasonable diligence, information about the project's potential effect due to greenhouse gas (GHG) emissions was readily available to the public. EIR No. 374 did not evaluate impacts due conflicts with existing plans, policies, or regulations adopted for the purpose of reducing the emissions of GHGs.

No Substantial Change from Previous Analysis: AB 32 is the State of California's primary GHG emissions regulation. The SCAQMD GHG significance threshold was designed to ensure compliance with AB 32 emissions reductions requirements in the SCAB. Therefore, if a proposed project emits below the significance threshold it can be assumed to comply with AB 32 within the SCAQMD's jurisdiction. As the Project would emit less than 3,000 $MTCO_2EQ$ per year, the Project would not conflict with the state's ability to achieve the reduction targets defined in AB 32 (refer to response to Threshold 21.a), above).

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis

The Project also would comply with a number of regulations that would further reduce GHG emissions, including the following regulations that are particularly applicable to the Project and that would assist in the reduction of GHG emissions:

- Global Warming Solutions Act of 2006 (AB32)
- Regional GHG Emissions Reduction Targets/Sustainable Communities Strategies (SB 375)
- Pavely Fuel Efficiency Standards (AB1493). Establishes fuel efficiency ratings for new vehicles.
- Title 24 California Code of Regulations (California Building Code). Establishes energy efficiency requirements for new construction. Title 24 will become even more stringent beginning January 1, 2014.
- Title 20 California Code of Regulations (Appliance Energy Efficiency Standards). Establishes energy efficiency requirements for appliances.
- Title 17 California Code of Regulations (Low Carbon Fuel Standard). Requires carbon content of fuel sold in California to be 10% less by 2020.
- California Water Conservation in Landscaping Act of 2006 (AB1881). Requires local agencies to adopt the Department of Water Resources updated Water Efficient Landscape Ordinance or equivalent to ensure efficient landscapes in new development and reduced water waste in existing landscapes.
- Statewide Retail Provider Emissions Performance Standards (SB 1368). Requires energy generators to achieve performance standards for GHG emissions.
- Renewable Portfolio Standards (SB 1078). Requires electric corporations to increase the amount of energy obtained from eligible renewable energy resources to 20 percent by 2010 and 33 percent by 2020.

There are no other plans, policies, or regulations that have been adopted for the purpose of reducing the emissions of GHGs that are applicable to the proposed Project. As such, the proposed Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, and impacts would be less-than-significant (MGA, 2014c, p. 24). Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

Mitigation: No mitigation is required.

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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
c) Impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan?	☐	☐	☐	☒
d) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
e) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒

Source: Project Application Materials; Google Earth; *Phase I Environmental Site Assessment*, LOR Geotechnical Group, Inc., July 31, 2013.

Findings of Fact:

a) Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

b) Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

EIR No. 374 Finding: EIR No. 374 determined that development of the project would not generate any toxic waste but could include small quantity generators that produce less than 1,000 kilograms of hazardous waste per year. These generators may include medical offices, drycleaners, painting, and solvent supplies. The EIR recognized that under no circumstances would outside storage of hazardous materials be permitted and there would be no exposure of hazardous materials to the public. However, EIR No. 374 nonetheless identified Mitigation Measure 49 (renumbered herein as MM 8.1) to ensure that proposed commercial and retail developments on site were reviewed by the Riverside County Health Department to determine the potential for existence and use of toxic materials. With mitigation incorporated, EIR No. 374 determined that impacts related to the routine transport, use, disposal or reasonably foreseeable upset of hazardous materials into the environment would be less than significant. (Riv. County, 1997, pp. V-68, II-18)

No Substantial Change From Previous Analysis: The Project proposes changes to the boundaries, acreage, and unit allocations of proposed Planning Areas 1, 2A, 3, 5A, 6, 7, 52A, and 52B. Planning Area 5A is currently developed with 118 single-family homes; thus, existing development within Planning Area 5A has no potential to result in new or more severe impacts associated with hazardous materials. Although Planning Area 7 ultimately would be developed with up to 85 dwelling units, development within Planning Area 7 would require subsequent discretionary approvals that would be subject to CEQA. Other than the reduced unit allocation and diminishment of the size of Planning Area 7, no development would occur in Planning Area 7 as a result of the Project; thus, impacts associated with future development of Planning Area 7 are not evaluated herein because such impacts were fully evaluated as part of EIR No. 374. Although impacts to proposed Planning Areas 1, 2A, 3, 6, 52A, and 52B (within TTM 36722) were previously evaluated within EIR No. 374, a Phase I Environmental Site Assessment (ESA) has been prepared for this portion of the Project site. Findings from the ESA are incorporated into the analysis below.

The Project has the potential to create a significant hazard to the public or environment based on existing site conditions, construction of the proposed Project, and long-term operation. Each is discussed below.

Impact Analysis for Existing Conditions

An environmental site assessment was conducted for the property by LOR Geotechnical Group to assess existing conditions (refer to Technical Appendix H). In 2004, a Phase I ESA was conducted by GSI. Similar to the conditions that existed in 2004, the subject site currently is composed of vacant land and has recently been used for wheat or other dry land crop harvesting and sheep grazing. Some items of trash and debris have been illegally dumped at the site, particularly near the northwest corner of the TTM 36722 boundary. No containers of hazardous materials or waste were uncovered and no significant soil staining was observed. Within the right-of way for Koon Street, adjacent to the south of the subject site, several water tanks, ranging in size from approximately 1,000 to 3,000 gallons, were observed. The onsite trash and debris may be recycled or disposed of at a Class III (nonhazardous) municipal landfill. Some of the trash and debris, including electronic waste and tires, would require special handling and disposal or recycling. (LOR Geotechnical Group, 2013, p. 10)

Past and recent usage of the subject site has included dry land farming. Dry land farming is not an economically intensive operation, and no significant concentrations of residual pesticides, if any, are anticipated to be present in onsite soils. Due to concerns that municipal sewage sludge may have been applied to the subject site as a fertilizer/soil amendment, a limited site characterization (LSC) was performed by LOR Geotechnical Group to assess onsite soils for potential metals impacts. Four soil samples were collected and analyzed for California Title 22 metals (total). All four samples had reportable concentrations of arsenic, barium, chromium, cobalt, copper, lead, molybdenum, nickel, vanadium, and/or zinc within expected background ranges for natural soils. (LOR Geotechnical Group, 2013, p. 11) The Phase I ESA did not reveal any evidence of recognized environmental conditions (RECs) indicative of releases or threatened releases of hazardous substances on, at, in, or to the subject site and no further environmental assessment was recommended. Accordingly, impacts associated with the site's existing condition would be less than significant. (LOR Geotechnical Group, 2013, p. 11)

Impact Analysis for Project Construction Activities

Heavy equipment (e.g., dozers, excavators, tractors) would be operated on the subject property during construction of the Project. This heavy equipment would likely be fueled and maintained by petroleum-based substances such as diesel fuel, gasoline, oil, and hydraulic fluid, which is considered hazardous if improperly stored or handled. In addition, materials such as paints, adhesives, solvents, and other substances typically used in building construction would be located on the Project site during construction. Improper use, storage, or transportation of hazardous materials can result in accidental releases or spills, potentially posing health risks to workers, the public, and the environment. This is a standard risk on all construction sites, and there would be no greater risk for improper handling, transportation, or spills associated with the proposed Project than would occur on any other similar construction site. Construction contractors would be required to comply with all applicable federal, state, and local laws and regulations regarding the transport, use, and storage of hazardous construction-related materials, including but not limited requirements imposed by the Environmental Protection Agency (EPA), California Department of Toxic Substances Control (DTSC), South Coast Air Quality Management District (SCAQMD), and Santa Ana Regional Water Quality Control Board (RWQCB). Because compliance with these regulatory requirements by construction contractors is

mandatory, impacts due to hazardous materials used, transported, and/or stored during construction would be less than significant.

Impact Analysis for Long-Term Operational Activities

The Project site would be primarily developed with residential land uses and supporting recreational and open space land uses, which are land uses not typically associated with the transport, use, or disposal of hazardous materials. Although residential land uses may utilize household products that contain toxic substances, such as cleansers, paints, adhesives, and solvents, these products are usually in low concentration and small in amount and would not pose a significant risk to humans or the environment during transport to/from or use at the Project site. Pursuant to State law and local regulations, residents would be required to dispose of household hazardous waste (e.g., batteries, used oil, old paint) at a permitted household hazardous waste collection facility. Accordingly, the Project would not expose people or the environment to significant hazards associated with the disposal of hazardous materials at the Project site. Long-term operation of the Project would not expose the public or the environment to significant hazards associated with the transport, use, or disposal of hazardous materials and impacts would be less than significant.

Upset and Accident Conditions

Accidents involving hazardous materials that could pose a significant hazard to the public or the environment would be highly unlikely during the construction and long-term operation of the Project and are not reasonably foreseeable. As discussed above, the transport, use and handling of hazardous materials on the Project site during construction is a standard risk on all construction sites, and there would be no greater risk for upset and accidents than would occur on any other similar construction site. Upon buildout, the Project site would operate as a residential community, which is a land use type not typically associated with the transport, use, or disposal of hazardous materials that could be subject to upset or accident involving the release of hazardous materials into the environment. Accordingly, impacts associated with the accidental release of hazardous materials would be less than significant during both construction and long-term operation of the Project.

Conclusion

Consistent with the findings of EIR No. 374, potential impacts due to the routine transport, use, and disposal of hazardous materials or upset and accident conditions would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact analyzed in EIR No. 374.

c) Would the Project impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan

EIR No. 374 Finding: EIR No. 374 did not identify any impacts to an adopted emergency response plan or an emergency evacuation plan.

No Substantial Change from Previous Analysis: The Project site does not contain any emergency facilities nor does it serve as an emergency evacuation route. Under long-term operational conditions, the proposed Project would be required to maintain adequate emergency access for emergency vehicles on-site as required by the County. Furthermore, the Project would not result in a substantial alteration to the design or capacity of any existing public road that would impair or interfere with the implementation of evacuation procedures. Because the Project would not interfere with an adopted emergency response or evacuation plan, no impact would occur. Therefore, implementation of the

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis

proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact analyzed in EIR No. 374.

d) Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

EIR No. 374 Finding: EIR No. 374 did not identify any hazardous or acutely hazardous materials, substances, or waste that would be handled or create emissions within one-quarter mile of an existing or proposed school.

No Substantial Change from Previous Analysis: Based on a review of the Riverside County General Plan and aerial photos, the Project site is not located within 0.25-mile of an existing or proposed school (Google Earth, 2013; Riv. County, 2003a). Accordingly implementation of the proposed Project would have no potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, and no impact would occur. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact analyzed in EIR No. 374.

e) Would the Project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

EIR No. 374 Finding: EIR No. 374 did not identify any impacts associated with future development on lands that are included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.

No Substantial Change from Previous Analysis: Based on a review of available government databases by the Project's hazardous materials consultant (LOR Geotechnical Group), the Project site is not included on any list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (LOR Geotechnical Group, 2013, p. 8). Accordingly, no impact would occur. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact analyzed in EIR No. 374.

Mitigation: No additional mitigation is required.

Monitoring: No additional monitoring is required.

23. Airports a) Result in an inconsistency with an Airport Master Plan?	☐	☐	☐	☒
b) Require review by the Airport Land Use Commission?	☐	☐	☐	☒
c) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
d) For a project within the vicinity of a private airstrip, or heliport, would the project result in a safety	☐	☐	☐	☒

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
hazard for people residing or working in the project area?				

Source: Riverside County Airport Land Use Compatibility Plan; Google Earth.

Findings of Fact:

a) Would the Project result in an inconsistency with an Airport Master Plan?

b) Would the Project require review by the Airport Land Use Commission?

EIR No. 374 Finding: EIR No. 374 determined that Planning Areas 20, 35, 36, 37, 38A, 45, and 46 of the Winchester 1800 Specific Plan would lie within Area III of the Airport Influence Area (AIA) for the French Valley Airport. In addition, the EIR noted that the westernmost portion of Planning Areas 35, 38A and 45 would be within Area II of the AIA. The ALUC approved the Winchester 1800 Specific Plan subject to three conditions. While no mitigation was required by EIR No. 374 to ensure the Specific Plan's consistency with the French Valley Airport's land use plan, the EIR nonetheless identified Mitigation Measure 113 (renumbered herein as MM 27.1) addressing aviation easements. As such, EIR No. 374 determined that impacts associated with the airports would be less than significant. (Riv. County, 1997, pp. V-196, II-44)

No Substantial Change from Previous Analysis: The Project site is located approximately 3.5 miles northeast of the French Valley Airport (Google Earth, 2013). The *Airport Master Plan for French Valley Airport* (April 2009) is the applicable Airport Master Plan for this facility. The nearest portion of the French Valley Airport property that is included in the Airport Master Plan occurs approximately 2.75 miles southwest of the Project site, and there are no facilities identified by the Airport Master Plan for lands extending beyond the airport property (Google Earth, 2013; Coffman Associates, 2009, Exhibit 5A). Therefore, there are no components of the Airport Master Plan that could be adversely affected by implementation of the proposed Project, nor are there any policies specified in the Airport Master Plan that would apply to the Project site. In addition, the Project site is located outside the airport influence area (AIA) of the French Valley Airport (ALUC, 2007, Map FV-6). Therefore, the Project would not require review by the Riverside County Airport Land Use Commission (ALUC). As such, impacts would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

c) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

d) For a project within the vicinity of a private airstrip, or heliport, would the project result in a safety hazard for people residing or working in the project area?

EIR No. 374 Finding: EIR No. 374 did not identify any airport-related safety hazards affecting future site residents or workers.

No Substantial Change From Previous Analysis: As mentioned in the analysis of Threshold 23a) and 23b), the Project site is not located within the French Valley Airport Influence Area. Given the Project's distance from the French Valley Airport (3.5 miles), implementation of the proposed Project would not result in a safety hazard for people residing or working in the area. In addition, the Project site is not located within the vicinity of any private airports or heliports. Accordingly, the proposed

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis

Project would not result in a safety hazard for people residing or working in the area and impacts would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

Mitigation: No additional mitigation is required.

Monitoring: No additional monitoring is required.

24. Hazardous Fire Area a) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐	☒

Source: Riverside County GIS database (RCLIS); Project Application Materials

Findings of Fact:

a) Would the Project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

EIR No. 374 Finding: EIR No. 374 found that the project site was within a County designated High Fire Area. In addition, the EIR determined that the project would have a cumulative adverse impact on the Fire Department's ability to provide an acceptable level of service to surrounding communities. Therefore, EIR No. 374 identified Mitigation Measures 80 through 86 (renumbered herein as MM 18.1 through MM 18.7) to reduce the project's impacts associated with fire danger. With mitigation incorporated EIR No. 374 determined that impacts associated with fire danger would be less than significant. (Riv. County, 1997, pp. V-161, II-33 -II-34)

No Substantial Change from Previous Analysis: According to Riverside County GIS data, the Project site is not located within an area that is mapped as having a "high" susceptibility to wildland fire hazards (Riv. County, 2014a). The nearest portion of Riverside County that is identified as occurring within a "high fire area" occurs approximately 1.5 miles east of the Project site and north of Lake Skinner. Additionally, the Project site is located adjacent to land uses that do not pose a high fire risk, including rural residential areas, agricultural lands, urban residential areas, and agricultural support uses. As such, the proposed Project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires and impacts would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
HYDROLOGY AND WATER QUALITY Would the project				
25. Water Quality Impacts a) Substantially alter the existing drainage pattern of the site or area, including the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or off-site?	☐	☐	☐	☒
b) Violate any water quality standards or waste discharge requirements?	☐	☐	☐	☒
c) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☐	☒
d) Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☐	☒
e) Place housing within a 100-year flood hazard area, as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒
f) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☐	☒
g) Otherwise substantially degrade water quality?	☐	☐	☐	☒
h) Include new or retrofitted stormwater Treatment Control Best Management Practices (BMPs) (e.g. water quality treatment basins, constructed treatment wetlands), the operation of which could result in significant environmental effects (e.g. increased vectors or odors)?	☐	☐	☐	☒

Source: Riverside County General Plan; *Hydrology Analysis for SABA Tract 36722*, Hunsaker & Associates, 2014; *Project Specific Water Quality Management Plan*, Hunsaker & Associates, 2014c; Project Application Materials.

The Project proposes changes to the boundaries, acreage, and unit allocations of proposed Planning Areas 1, 2A, 3, 5A, 6, 7, 52A, and 52B. Planning Area 5A is currently developed with 118 single-family homes; thus, existing development within Planning Area 5A has no potential to result in new or more severe impacts to hydrology or water quality. Although Planning Area 7 ultimately would be developed with up to 85 dwelling units, development within Planning Area 7 would require subsequent discretionary approvals that would be subject to CEQA. Other than the reduced unit allocation and diminishment of the size of Planning Area 7, no development would occur in Planning Area 7 as a result of the Project; thus, impacts associated with future development of Planning Area 7 are not evaluated

herein because such impacts were fully evaluated as part of EIR No. 374. Although impacts to proposed Planning Areas 1, 2A, 3, 6, 52A, and 52B (within TTM 36722) were previously evaluated within EIR No. 374, a new hydrology report and water quality management plan (WQMP) have been prepared for this portion of the Project site. Findings from these analyses are summarized below within Thresholds 25.a) through 25.g).

Findings of Fact:

a) Would the Project substantially alter the existing drainage pattern of the site or area, including the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or off-site?

EIR No. 374 Finding: EIR No. 374 found that implementation of SP 286 could result in short-term erosion and sedimentation impacts during project grading. Grading activities would temporarily expose ground surfaces during construction thereby creating the potential for erosion and sedimentation of local drainage courses. In addition, the EIR noted that development of the specific plan would alter the composition of surface runoff which would incrementally contribute to the degradation of downstream water quality. As such, EIR No. 374 identified Mitigation Measures 46 through 48 (renumbered herein as MM 7.1 through MM 7.3) to ensure that impacts to water quality would be reduced to a level below significant. (Riv. County, 1997, pp. V-64, V-65, II-17)

No Substantial Change from Previous Analysis: As detailed in the hydrology technical report prepared for the Project (refer to Technical Appendix L), under existing conditions, the TTM 36722 site drains to the southwest. TTM 36722 is designed to follow the existing flow patterns throughout the site and maintain the same area flow for each drainage sub area post construction (Hunsaker & Associates, 2014a, Section I.E). The site's existing hydrology conditions are depicted in Section VI of the hydrology report while the proposed conditions are depicted in Figure 2-9, above.

As part of the proposed Project, on-site stormwater runoff is engineered to be conveyed through public street improvements and storm drains, which generally would convey all runoff toward the water quality/detention basins proposed within Lots 147 and 148 of TTM 36722. Following treatment of these flows within the water quality detention/sand filter basins, flows would be conveyed into the proposed flood control channel within Lot 149. The drainage system proposed by TTM 36722 is designed to accommodate flows originating off-site to the north and east. As proposed, these existing off-site flows would be collected within Lot 150, which would be surrounded by rip-rap to reduce storm flow volumes. Flows from within Lot 150 would then be conveyed via a culvert under Fields Drive to Lot 149. Flows from Lot 149 would then be conveyed to the southwestern corner of the subdivision, where an additional culvert under Koon Street would convey flows off-site to the south and southwest similar to what occurs under existing conditions.

Along the eastern and northern boundaries of the TTM 36722 property, three (3) foot wide v-ditches are designed at the rear of the residential lots to collect minor flows from the backs of the residential lots, as well as flows from off-site areas to the north and east. A portion of the flows that would be conveyed by the v-ditch planned along the northern property boundary would be routed westerly to a proposed storm drain to be constructed within open space Lot 164 (i.e., at the westerly terminus of Street 'A') and conveyed via the on-site storm drainage system to the water quality detention/sand filter basin within Lot 148. The remaining stormwater flowing along the northern property boundary would be routed easterly to an under driveway drain proposed between Lots 7 and 9. A portion of the flows from the v-ditch to be constructed along the eastern boundary of the site would be routed northerly to the channel in lot 150 and conveyed into the proposed flood control channel in Lot 149. The remaining drainage

along the eastern boundary would be routed southerly to existing storm drain facilities located near the intersection of Fields Drive and Koon Street.

Although the Project would alter the existing drainage pattern of the site through grading to facilitate residential development, the rate of runoff from the site would not increase under post-development conditions. With incorporation of the detention basins in Lots 147 and 148, peak runoff from Area A would be reduced from 51.3 cfs to 41.3 cfs during 10-year (24-hour duration) storm events and from 79.5 cfs to 77 cfs during 100 year (24-hour duration) storm events (Hunsaker & Associates, 2014a, Section I.E). Thus, the rate of runoff from the site under post-development conditions would not substantially increase such that erosion or siltation would increase on- or off-site. As such, following implementation of the Project, runoff from the site would not result in substantial erosion or siltation on- or off-site. In addition, Mitigation Measures 46 through 48 (renumbered herein as MM 7.1 through MM 7.3) identified in EIR No. 374 would continue to apply to the Project to ensure best management practices during Project construction. Accordingly, impacts would be less than significant and no additional mitigation would be required. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

b) Would the Project violate any water quality standards or waste discharge requirements?

EIR No. 374 Finding: EIR No. 374 determined that the project was compatible with the comprehensive General Plan Land Use standard for drainage and water quality, and no significant impacts to water quality were anticipated (Riv. County, 1997, p. V-65). As such, EIR No. 374 determined that impacts to water quality standards would be less than significant.

No Substantial Change from Previous Analysis: The California Porter-Cologne Water Quality Control Act (Section 13000 ("Water Quality") et seq., of the California Water Code), and the Federal Water Pollution Control Act Amendment of 1972 (also referred to as the Clean Water Act (CWA)) require that comprehensive water quality control plans be developed for all waters within the State of California. The Project site is located within the jurisdiction of the San Diego Regional Water Quality Control Board (RWQCB). Water quality information for the Santa Margarita River Watershed is contained in the San Diego RWQCB's Water Quality Control Plan for the San Diego Basin (as most recently amended on April 4, 2011). This document is herein incorporated by reference and is available for public review at the San Diego RWQCB office located at 9174 Sky Park Court, Suite 100, San Diego, CA 92123-4340.

The CWA requires all states to conduct water quality assessments of their water resources to identify water bodies that do not meet water quality standards. Water bodies that do not meet water quality standards are placed on a list of impaired waters pursuant to the requirements of Section 303(d) of the CWA. The Project site resides within the Santa Margarita Watershed. Receiving waters for the property's drainage are the Warm Springs Creek, Murrieta Creek, and Santa Margarita River, and the Santa Margarita Lagoon, which discharges into the Pacific Ocean. The Warm Springs Creek is impaired by pathogens, nutrients, and metals; the Murrieta Creek is impaired by pathogens, nutrients, metals, and toxicity; the Santa Margarita River is impaired by pathogens, nutrients, and toxicity; and the Santa Margarita Lagoon is impaired by nutrients. (Hunsaker & Associates, 2014b, pp. 10-11)

A specific provision of the CWA applicable to the proposed Project is CWA Section 402, which authorizes the National Pollutant Discharge Elimination System (NPDES) permit program that covers point sources of pollution discharging to a water body. The NPDES program also requires operators of construction sites one acre or larger to prepare a Stormwater Pollution Prevention Plan (SWPPP) and obtain authorization to discharge stormwater under an NPDES construction stormwater permit.

Impact Analysis for Construction-Related Water Quality

Construction of the proposed Project would involve clearing, grading, paving, utility installation, building construction, and landscaping activities, which would result in the generation of potential water quality pollutants such as silt, debris, chemicals, paints, and other solvents with the potential to adversely affect water quality. As such, short-term water quality impacts have the potential to occur during construction of the Project in the absence of any protective or avoidance measures.

Pursuant to the requirements of the San Diego RWQCB and the County of Riverside, the Project would be required to obtain a NPDES Municipal Stormwater Permit for construction activities. The NPDES permit is required for all projects that include construction activities, such as clearing, grading, and/or excavation that disturb at least one acre of total land area. In addition, the Project would be required to comply with the San Diego RWQCB's Water Quality Control Plan for the San Diego Basin. Compliance with the NPDES permit and the Water Quality Control Plan for the San Diego Basin involves the preparation and implementation of a SWPPP for construction-related activities. The SWPPP is required to specify the Best Management Practices (BMPs) that the Project would be required to implement during construction activities to ensure that all potential pollutants of concern are prevented, minimized, and/or otherwise appropriately treated prior to being discharged from the subject property. Mandatory compliance with the SWPPP would ensure that the proposed Project does violate any water quality standards or waste discharge requirements during construction activities. Therefore, with mandatory adherence to the future required SWPPP, water quality impacts associated with construction activities would be less than significant and no mitigation measures would be required.

Post-Development Water Quality Impacts

Storm water pollutants commonly associated with the land uses proposed by the Project (i.e., residential, park, and open space) include bacterial indictors, nutrients, pesticides trash and debris, sediments, and oil and grease. Based on current receiving water impairments (303(d) List) and allowable discharge requirements (USEPA TMDL List), the Project's pollutants of concern are bacterial indicators) and nutrients (Hunsaker & Associates, 2014b, p. 30). To meet NPDES requirements, the Project's proposed storm drain system is designed to route first flush runoff to a water quality/detention basins (Lots 147 and 148) located on-site prior to discharging to the on-site drainage channel in Lot 149. The water quality/detention basins have been sized to treat the first flush volumes from the residential portions of the site, as well as runoff from the areas to the north and east of the TTM 36722 area (refer to the Project's WQMP in Technical Appendix K).

Furthermore, the Project would be required to implement a Water Quality Management Plan (WQMP), pursuant to the requirements of the applicable NPDES permit. The WQMP is a post-construction management program that ensures the on-going protection of the watershed basin by requiring structural and programmatic controls. The Project's Preliminary WQMP is included as Technical Appendix K. The WQMP identifies structural controls (including the water quality/detention basin) and programmatic controls (including educational materials for property owners, activity restrictions, common area litter control, street sweeping, drainage facility and maintenance, etc.) to minimize, prevent, and/or otherwise appropriately treat storm water runoff flows before they are discharged from the site. Mandatory compliance with the WQMP would ensure that the Project does violate any water quality standards or waste discharge requirements during long-term operation. Therefore, water quality impacts associated with post-development activities would be less than significant with mandatory WQMP compliance and no mitigation measures would be required.

Based on the foregoing analysis, the Project would not violate any applicable water quality standards or waste discharge requirements, and, consistent with the findings of EIR No. 374, impacts would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

c) **Would the Project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?**

EIR No. 374 Finding: EIR No. 374 did not identify any impacts to groundwater supplies.

No Substantial Change from Previous Analysis: No potable groundwater wells are proposed as part of the Project; therefore, the Project would not deplete groundwater supplies through direct extraction. Domestic water supplies from the EMWD are reliant on imported water from the Metropolitan Water District (MWD), recycled water, local groundwater production, and desalted groundwater (EMWD, 2011, p. 27). Because the Project proposes to reduce the maximum number of dwelling units allowed within SP 286 by 150 units, the ultimate water demand within SP 286 would be less than what was disclosed in EIR No. 374 and the Project's water demand is therefore fully accounted for by the EMWD's Urban Water Management Plan (UWMP); thus, the Project would not increase the demand for groundwater resources beyond what is already assumed by the EMWD as part of their long-term planning efforts. As such, impacts due to the depletion of groundwater supplies would be less than significant.

The proposed Project would increase impervious surface coverage on the site, which would in turn reduce the amount of direct infiltration of runoff into the ground. However, the Project's stormwater runoff is engineered to be conveyed through public street improvements and storm drains, which would discharge into the drainage channel within Lot 149, which would convey flows southerly to the Warm Springs Creek where groundwater recharge would continue to occur. Thus, with buildout of the Project, the local groundwater levels would not be significantly affected. Accordingly, the proposed Project would not interfere substantially with groundwater recharge, and there would be no net deficit in aquifer water volumes or groundwater table levels as a result of the Project. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

d) **Would the Project create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?**

EIR No. 374 Finding: EIR No. 374 determined that runoff entering the storm drain system would contain minor amounts of pollutants typical or urban use including pesticides, fertilizers, oil and rubber residues, detergents, hydrocarbon particles and other debris. The EIR concluded that this type of runoff would contribute to the incremental degradation of water quality downstream. As such, EIR No. 374 identified Mitigation Measures 46 through 48 (renumbered herein as MM 7.1 through MM 7.3) to ensure that impacts to water quality would be less than significant. EIR No. 374 also did not identify any impacts associated with runoff that could exceed the capacity of existing or planned stormwater drainage systems. (Riv. County, 1997, pp. V-64, V-65, II-17)

No Substantial Change from Previous Analysis: As indicated under the evaluation of Threshold 25.a), on-site stormwater runoff associated with the Project is engineered to be conveyed through public

street improvements and storm drains, which would discharge to the proposed water quality/detention basins in Lots 147 and 148 prior to being conveyed to the on-site drainage channel within Lot 149. Existing off-site flows would be collected within Lot 150, which would be surrounded by rip-rap to reduce the rate of storm flows. Flows from within Lot 150 would then be conveyed via a culvert under Fields Drive to Lot 149. Flows from Lot 149 would then be conveyed to Warm Springs Creek, Murrieta Creek, Santa Margarita River, Santa Margarita Lagoon, and ultimately to the Pacific Ocean. The existing natural drainage that traverses the TTM 36722 site under existing conditions generally would be retained as part of the Project, while runoff from on-site residential areas would be treated via proposed water quality basins prior to discharging into the drainage channel within Lot 149 and then off-site to the southwest. With incorporation of the detention basins in Lots 147 and 148, peak runoff from would be reduced from 51.3 cfs to 41.3 cfs during 10-year (24-hour duration) storm events and from 79.5 cfs to 77 cfs during 100 year (24-hour duration) storm events (Hunsaker & Associates, 2014a, Section I.E). As such, because peak runoff rates would be reduced by the Project as compared to existing conditions, and because the Project generally maintains the site's existing drainage pattern, the Project has no potential to exceed the capacity of any existing or planned stormwater drainage systems. Additionally, with required adherence to a SWPPP and WQMP as discussed above under Threshold 25.b), the Project would not provide substantial additional sources of polluted runoff. Therefore, less-than-significant impacts would occur and mitigation is not required. Accordingly, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

e) Would the Project place housing within a 100-year flood hazard area, as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

f) Would the Project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

EIR No. 374 Finding: EIR No. 374 determined that the project site was not located within a mapped floodplain or flood hazard area. As such, impacts were determined to be less than significant. (Riv. County, 1997, p. V-36)

No Substantial Change from Previous Analysis: According to Riverside County General Plan Figure S-9, *100 and 500 Year Flood Hazard Zones*, the Project site is not located in a flood hazard zone. In addition, the Project site is not located in a dam failure inundation zone (Riv. County, 2003a, Figure S-10). As such, no impacts due to flooding would occur. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

g) Would the Project otherwise substantially degrade water quality?

EIR No. 374 Finding: EIR No. 374 did not identify any additional impacts to water quality.

No Substantial Change from Previous Analysis: Mandatory compliance with the BMPs specified in the Project's WQMP (refer to Technical Appendix L) would ensure that the Project does not result in any other impacts to water quality. There are no conditions associated with the proposed Project that could result in the substantial degradation of water quality beyond what is described above in the responses to Thresholds 25.a), 25.b), or 25.d). Accordingly, no impact would occur. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis

h) **Would the Project include new or retrofitted stormwater Treatment Control Best Management Practices (BMPs) (e.g. water quality treatment basins, constructed treatment wetlands), the operation of which could result in significant environmental effects (e.g. increased vectors or odors)?**

EIR No. 374 Finding: EIR No. 374 did not identify any impacts due to new or retrofitted stormwater Treatment Control Best Management Practices.

No Substantial Change from Previous Analysis: The proposed water quality/detention basins in Lots 147 and 148 are designed to treat runoff from the residential portions of the Project site prior to discharging flows into the drainage channel within Lot 149. As such, these water quality BMPs would not result in the detention of water on-site for long periods of time such that vectors (e.g., mosquitoes) or odors could result. Accordingly, the Project would not include any new or retrofitted stormwater BMPs that could result in significant environmental effects, and no impact would occur. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

Mitigation: No additional mitigation is required.

Monitoring: No additional monitoring is required.

26. Floodplains

Degree of Suitability in 100-Year Floodplains. As indicated below, the appropriate Degree of Suitability has been checked.

NA - Not Applicable ☒ U - Generally Unsuitable ☐ R - Restricted ☐

a) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	☐	☐	☐	☒
b) Changes in absorption rates or the rate and amount of surface runoff?	☐	☐	☐	☒
c) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam (Dam Inundation Area)?	☐	☐	☐	☒
d) Changes in the amount of surface water in any water body?	☐	☐	☐	☒

Source: Riverside County General Plan; *Hydrology Analysis for SABA Tract 36722*, Hunsaker & Associates, 2014; *Project Specific Water Quality Management Plan*, Hunsaker & Associates, 2014c; Project Application Materials.

The Project proposes changes to the boundaries, acreage, and unit allocations of proposed Planning Areas 1, 2A, 3, 5A, 6, 7, 52A, and 52B. Planning Area 5A is currently developed with 118 single-family homes; thus, existing development within Planning Area 5A has no potential to result in new or more severe impacts to hydrology or water quality beyond what was evaluated and disclosed by EIR No. 374. Although Planning Area 7 ultimately would be developed with up to 85 dwelling units, development within Planning Area 7 would require subsequent discretionary approvals that would be subject to

CEQA. Other than the reduced unit allocation and diminishment of the size of Planning Area 7, no development would occur in Planning Area 7 as a result of the Project; thus, impacts associated with future development of Planning Area 7 are not evaluated herein because such impacts were fully evaluated as part of EIR No. 374. Although impacts to proposed Planning Areas 1, 2A, 3, 6, 52A, and 52B (within TTM 36722) also were previously evaluated within EIR No. 374, a new hydrology report and water quality management plan (WQMP) have been prepared in association with TTM 36722. Findings from these reports are summarized below within Thresholds 26.a) through 26.d).

Findings of Fact:

a) **Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?**

EIR No. 374 Finding: EIR No. 374 did not identify any impacts due to the changes in the existing drainage pattern of the area or due to an increase in the rate or amount of surface runoff that could result in flooding on- or off-site.

No Substantial Change from Previous Analysis: Based on the analysis presented in the Project's hydrology study (Technical Appendix L), with incorporation of the detention basins in Lots 147 and 148, peak runoff from the Project site would be reduced from 51.3 cfs to 41.3 cfs during 10-year (24-hour duration) storm events and from 79.5 cfs to 77 cfs during 100 year (24-hour duration) storm events (Hunsaker & Associates, 2014b, Section I.E). Thus, runoff from the site under post-development conditions would not substantially increase such that flood hazards would be increased on- or off-site. Accordingly, impacts would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

b) **Would the Project result in changes in absorption rates or the rate and amount of surface runoff?**

EIR No. 374 Finding: EIR No. 374 did not identify any impacts to absorption rates or the rate and amount of surface runoff.

No Substantial Change from Previous Analysis: Under existing conditions, the Project site drains to the southwest and is ultimately conveyed to the Warm Springs Creek. Due to the undeveloped nature of the Project site, a portion of the site's natural drainage likely infiltrates into the groundwater table. Under the Project, the TTM 36722 portion of the site (Planning Areas 1, 2A, 3, 6, 52A, and 52B) would be improved with residential and open space land uses, which would substantially increase impervious conditions on-site. However, runoff from the site would be conveyed to Warm Springs Creek, which is a soft-bottomed channel that would allow for infiltration into the groundwater table, thereby ensuring that the developed nature of the Project site does not substantially reduce the total amount of water that infiltrates into the groundwater basin. Additionally, and based on the analysis presented in the Project's hydrology study (Technical Appendix L), with incorporation of the detention basins in Lots 147 and 148, peak runoff from the Project site would be reduced from 51.3 cfs to 41.3 cfs during 10-year (24-hour duration) storm events and from 79.5 cfs to 77 cfs during 100 year (24-hour duration) storm events (Hunsaker & Associates, 2014b, Section I.E). There would be no increase in the total volume discharged from the site as compared to existing conditions or the conditions that were evaluated in EIR No. 274. As such, the Project would not result in any changes in absorption rates or the rate and

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis

amount of surface runoff, and impacts would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

c) Would the Project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam (Dam Inundation Area)?

EIR No. 374 Finding: EIR No. 374 found that the project site was located within a dam inundation area on the General Plan Map of Dam Inundation Areas. To address potential flood hazards associated with dam inundation, EIR No. 374 identified Mitigation Measure 21 (renumbered herein as MM 4.4) to ensure that future residents in the project area and the Murrieta Valley Unified School District received written notice of potential dam inundation and respective evacuation routes. With mitigation incorporated, EIR No. 374 concluded that impacts would be less than significant. (Riv. County, 1997, p. II-10)

No Substantial Change from Previous Analysis: According to Figure 10 from the SWAP (Southwest Area Plan Flood Hazards), the Project site is not located within areas subject to dam inundation hazards associated with Lake Skinner. The Project site is located approximately 1.5 miles north of the nearest area identified as being subject to dam inundation hazards (Riv. County, 2014b, Figure 10; Google Earth, 2013). There are no levees within the Project vicinity that could expose the Project site to flood hazards. In addition, Mitigation Measure 21 (renumbered herein as MM 4.4) would continue to apply to the proposed Project. Accordingly, no impact would occur. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

d) Would the Project result in changes in the amount of surface water in any water body?

EIR No. 374 Finding: EIR No. 374 did not identify any impacts due to changes in the amount of surface water in any water body.

No Substantial Change from Previous Analysis: As discussed above in the responses to Thresholds 26.a) and 26.b), implementation of the proposed Project would not substantially alter the historical drainage patterns of the TTM 36722 site, nor would the Project affect the total volume of flows that are discharged from the site. Because the Project would not substantially alter the drainage characteristics of the site and would not affect the total volume of water leaving the site, Project implementation would not result in substantial changes in the amount of surface water in any downstream water body. Therefore, impacts would be less than significant. Accordingly, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

Mitigation: No additional mitigation is required.

Monitoring: No additional monitoring is required.

LAND USE/PLANNING Would the project				
27. Land Use a) Result in a substantial alteration of the present or planned land use of an area?	☐	☐	☐	☒

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
b) Affect land use within a city sphere of influence and/or within adjacent city or county boundaries?	☐	☐	☐	☒

Source: Riverside County General Plan; Project Application Materials; City of Temecula General Plan

Findings of Fact:

a) Would the Project result in a substantial alteration of the present or planned land use of an area?

EIR No. 374 Finding: EIR No. 374 found that implementation of the project would amend the Open Space and Conservation Map from "Agriculture" on a portion of the site to "Specific Plan." In addition, the project would result in urban development on "Locally Important Farmland." However, such, impacts to agricultural land uses are discussed above in the Agriculture and Forest Resources section. EIR No. 374 did not identify any additional project impacts due to a substantial alteration of the present or planned land use of an area. (Riv. County, 1997, p. V-98)

No Substantial Change from Previous Analysis: Under existing conditions, Planning Area 5A is developed with 118 single-family homes while the remainder of the Project site is composed of undeveloped lands or lands utilized for agricultural production. Land uses within Planning Area 5A would not be affected by the Project.

The Project proposes a Specific Plan Amendment (SP 286A6), Change of Zone (CZ 07823), and Tentative Tract Map (TTM 36722) to provide amended land use and development standards for newly proposed planning areas, formalize planning area boundaries, and to allow for the development of 146 single-family units in Planning Areas 1, 3, and 6. As part of the Project, the total number of units allocated to SP 286 would be reduced by 150 homes. Changes to the site's Specific Plan land use designations would provide for the development of residential uses, similar to the residential uses called for by the existing approved SP 286. Thus, the Project would not substantially affect the planned land uses of the Project site, and impacts would be less than significant.

Although the change from undeveloped land to a master-planned residential community represents a change to the site's present use, environmental impacts associated with such conversion are evaluated throughout this EIR Addendum and mitigation measures have been revised/supplemented where necessary to ensure impacts remain below a level of significance. As such, the proposed Project would not result in a substantial alternation of the present or planned land use of an area in a manner that could increase environmental effects, and a less than significant impact would occur. Therefore, the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

b) Would the Project affect land use within a city sphere of influence and/or within adjacent city or county boundaries?

EIR No. 374 Finding: EIR No. 374 concluded that the Winchester 1800 project was located within the City of Temecula's sphere of influence and would fit within a logical pattern of development consistent with the ongoing development in adjacent urban areas consistent with the City of Temecula's Draft Preferred Land Use Plan. As such, EIR No. 374 did not identify any impacts to the City of Temecula sphere of influence. (Riv. County, 1997, p. V-6)

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis

No Substantial Change from Previous Analysis: The Project site is located in unincorporated Riverside County, within the sphere of influence for the City of Temecula. According to Figure L-3 of the Temecula General Plan, the Project site is pre-zoned for "Low-Medium Residential" (3-6 du/ac), "High Residential" (13-20 du/ac), "Public Institutional Facilities," and "Open Space" (Temecula, 2008). Although the proposed Project would not be consistent with the site's pre-zoning designations, no physical land use impacts would occur as a result of the Project's proposal to develop the subject property in a manner inconsistent with the City of Temecula's pre-zoning designations. Furthermore, land uses proposed by the Project are fully consistent with the Riverside County General Plan Land Use Plan. Although the Project would result in a change to the site's planned land uses as shown in the Temecula General Plan, such impacts would be less than significant because the proposed change in land uses would not result in, induce, or require changes to surrounding planned land uses and would not result in land use compatibility conflicts. Accordingly, the proposed Project would not adversely affect land use within the City of Temecula sphere of influence or Riverside County, and would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in the EIR No. 374.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

28.	**Planning** a) Be consistent with the site's existing or proposed zoning?	☐	☐	☐	☒
	b) Be compatible with existing surrounding zoning?	☐	☐	☐	☒
	c) Be compatible with existing and planned surrounding land uses?	☐	☐	☐	☒
	d) Be consistent with the land use designations and policies of the Comprehensive General Plan (including those of any applicable Specific Plan)?	☐	☐	☐	☒
	e) Disrupt or divide the physical arrangement of an established community (including a low-income or minority community)?	☐	☐	☐	☒

Source: Riverside County General Plan, Riverside County GIS Database; Riverside County Ord. 348

Findings of Fact:

a) Would the Project be consistent with the site's existing or proposed zoning?

EIR No. 374 Finding: At the time EIR No. 374 was certified, the project site was largely composed of lands zoned for agricultural and residential-agricultural uses. EIR No. 374 concluded that adoption of SP 286 would change the site's zoning to "Specific Plan Zone (SP-Zone)" to facilitate for the development of Specific Plan 286 (Riv. County, 1997, p.V-72). The EIR did not identify any conflicts associated with the site's existing or proposed zoning.

No Substantial Change from Previous Analysis: Under existing conditions, the Project site is zoned by Riverside County for "Specific Plan (SP)" (Riv. County, 2014a), which would allow for development of very high multi-family, medium density residential, medium low density residential, drainage facilities, and a 10.0-acre school site. The reallocation of residential density would not result in a conflict with the

site's existing zoning designation, as the Project proposes residential uses in generally the same area as called for by the existing approved SP 286. With approval of Change of Zone No. 07823, the Project would be fully consistent with the site's zoning designation. As such, the proposed Project would not conflict with the site's existing or proposed zoning and no impact would occur. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

b) Would the Project be compatible with existing surrounding zoning?

EIR No. 374 Finding: At the time EIR No. 374 was certified, SP 286 was surrounded by lands zoned for agricultural, residential-agricultural, and rural-residential uses and identified a potentially significant impact due to a conflict with these off-site uses. The EIR identified Mitigation Measure 50 (renumbered herein as MM 10.1) to require compliance with the Riverside County "Right to Farm" Ordinance (Ord. No. 625), which would ensure that buildout of SP 286 does not conflict with surrounding agricultural zoning. With mitigation incorporated, conflicts with existing surrounding agricultural zones were determined to be less than significant. (Riv. County, 1997, pp.V-72, II-20)

No Substantial Change from Previous Analysis: Zoning designations surrounding the Project site include the following: "Specific Plan Zone (SP Zone)" to the south, east, and west; and Agricultural (A-1-5) to the north (Riv. County, 2014a). The Project proposes to adjust the density, unit allocations, and/or boundaries of (existing) Planning Areas 1, 2A, 3, 5A, 6 and 7 to allow for lower density residential development as compared to the existing approved SP 286. The Project, which proposed primarily residential land uses, would be fully compatible with the residential communities that have been established in the southern portions of SP 286. In addition, Mitigation Measure 50 (renumbered herein as MM 10.1) identified by EIR No. 374 would continue to apply to the proposed project to ensure that the development of the site with residential uses would not conflict with agricultural zoning to the north. Accordingly, the proposed Project would be compatible with existing surrounding zoning and impacts would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

c) Would the Project be compatible with existing and planned surrounding land uses?

EIR No. 374 Finding: At the time EIR No. 374 was certified, the project site was surrounded by lands that were either vacant, used for agricultural uses, or used for residential (large lot family) uses. The EIR identified Mitigation Measure 50 (renumbered herein as MM 10.1) to ensure compliance with the Riverside County "Right to Farm" Ordinance (Ord. No. 625) which would ensure that the project would not conflict with surrounding agricultural uses. With mitigation incorporated, conflicts with existing surrounding agricultural zones were determined to be less than significant. (Riv. County, 1997, pp.V-71, II-20)

No Substantial Change from Previous Analysis: Since certification of EIR No. 374, land uses in the surrounding area have changed. Areas to the south of the Project site and west of Washington Street are located within SP 286 and either have been or are in the process of being developed with a variety of residential, recreation, and open space/drainage land uses. To the west of the Project site are lands that also are located within SP 286, but that are currently being used for agricultural production (greenhouses and dryland farming). Areas to the north of the Project site include agricultural lands and rural residential uses. To the east of the Project site and westerly of Washington Street are agricultural support uses and fallow lands that appear to have been used for agricultural production in the past. To the east of the Project site, and easterly of Washington Street, are a mixture of agricultural and open

space lands, an existing residential community containing single-family homes, and Washington Park. (Google Earth, 2013)

As indicated under the discussion and analysis of Threshold 28.b), although the residential uses proposed as part of the Project have the potential to conflict with the existing agricultural uses to the surrounding the site, mandatory compliance with Ordinance No. 625 would ensure that potential conflicts between proposed residential uses on-site and existing agricultural uses do not occur.

Additionally, agricultural lands surrounding the Project site are planned for non-agricultural development (Riv. County, 2014a). To the north of the Project site are lands designated "Rural Residential (R-R) land uses, while lands to the east, south, and west are planned for residential and commercial land uses. The residential uses proposed as part of the Project would be fully consistent with these surrounding land use designations.

Based on the foregoing analysis, and consistent with the findings of EIR No. 374, land use compatibility impacts would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

d) Would the Project be consistent with the land use designations and policies of the Comprehensive General Plan (including those of any applicable Specific Plan)?

EIR No. 374 Finding: EIR No. 374 evaluated the establishment of the Winchester 1800 Specific Plan (Specific Plan No. 286). The project evaluated in EIR No. 374 was inherently compatible with the land use designations and policies of the Winchester 1800 Specific Plan. In addition, the EIR did not identify any conflicts with the land use designations or policies of the Riverside County General Plan.

No Substantial Change from Previous Analysis: The Project proposes a specific plan amendment (SP 286A6) to alter the land uses within the northern portion of the Winchester 1800 Specific Plan (refer to Table 2-1 for a detailed comparison of the existing approved and proposed land uses). Upon approval of SP 286A6, the Project would be consistent with the land use designations of the Winchester 1800 Specific Plan. Additionally, the County has reviewed the proposed Project and determined that it meets all applicable policies of SP 286.

The proposed Project is located within the SWAP Highway 79 Policy Area (Riv. County, 2014b, Figure 4). The purpose of the Highway 79 Policy Area is to address transportation infrastructure capacity within the policy area. Specifically, the following policies apply to projects located within the Highway 79 Policy Area:

SWAP 9.1 Accelerate the construction of transportation infrastructure in the Highway 79 Policy Area. The County shall require that all new development projects demonstrate adequate transportation infrastructure capacity to accommodate the added traffic growth. The County shall coordinate with cities adjacent to the policy area to accelerate the usable revenue flow of existing funding programs, thus assuring that transportation infrastructure is in place when needed.

SWAP 9.2 Establish a program in the Highway 79 Policy Area to ensure that overall trip generation does not exceed system capacity and that the system operation continues to meet Level of Service standards. In general, the program would establish guidelines to be incorporated into individual Traffic Impact Analysis that

would monitor overall trip generation from residential development to ensure that overall within the Highway 79 Policy Area development projects produce traffic generation at a level that is 9% less than the trips projected from the General Plan traffic model residential land use designations. Individually, projects could exceed the General Plan traffic model trip generation level, provided it can be demonstrated that sufficient reductions have occurred on other projects in order to meet Level of Service standards. (Riv. County, 2014b, p. 29)

The proposed Project would have no potential to conflict with Policy SWAP 9.1, as this policy merely provides direction to County staff and decision-makers for the construction of transportation-related facilities and for the coordination with other local jurisdictions in the funding and construction of transportation infrastructure.

With respect to Policy SWAP 9.2, SP 286 currently allows for 493 dwelling units and a 10-acre school site. With approval of the Project, a maximum of 349 dwelling units would be allocated to the Project site, and the previously-proposed 10-acre school site would be eliminated. The Project's proposed reduction in residential intensity alone would result in a decrease in traffic from the site by 29% less than the trips projected from the General Plan traffic model, which assumed buildout in accordance with the approved SP 286. Accordingly, because the Project would result in a net reduction of traffic that exceeds 9%, the Project would be consistent with Policy SWAP 9.2.

As demonstrated above, the Project would be consistent with the SWAP's Highway 79 Policy Area. The proposed Project also would not conflict with any other policies of the General Plan or the SWAP. Accordingly, no impact would occur. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

e) Would the Project disrupt or divide the physical arrangement of an established community (including a low-income or minority community)?

EIR No. 374 Finding: EIR No. 374 did not identify any impacts to the physical division of an established community (including a low-income or minority community).

No Substantial Change from Previous Analysis: Planning Area 5A (included in the Project area) and off-site lands to the south of the Project site are developed with residential uses as part of the Winchester 1800 Specific Plan. Lands to the north, east, and west of the Project site are primarily developed with rural residential and agricultural land uses. These areas do not comprise an "existing community," and implementation of residential uses on-site would not result in a physical division of any community because the residential uses on-site would effectively serve as an extension of the residential uses planned or in existence within the Winchester 1800 Specific Plan. Moreover, with buildout of the Project's proposed residential uses, public access would be afforded via public roads to be constructed on-site and immediately adjacent to the site. Accordingly, the proposed Project would not disrupt or divide the physical arrangement of an established community, and no impact would occur. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

Mitigation: No additional mitigation is required.

Monitoring: No additional monitoring is required.

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
MINERAL RESOURCES Would the project				
29. Mineral Resources a) Result in the loss of availability of a known mineral resource that would be of value to the region or the residents of the State?	☐	☐	☐	☒
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒
c) Be an incompatible land use located adjacent to a State classified or designated area or existing surface mine?	☐	☐	☐	☒
d) Expose people or property to hazards from proposed, existing or abandoned quarries or mines?	☐	☐	☐	☒

Source: Riverside County General Plan; Google Earth; Project Application Materials.

Findings of Fact:

a) Would the Project result in the loss of availability of a known mineral resource that would be of value to the region or the residents of the State?

b) Would the Project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

EIR No. 374 Finding: EIR No. 374 determined that no mineral resources were present on the property. As such, EIR No. 374 concluded that no adverse impacts associated with the loss of mineral resources would not occur. (Riv. County, 1997, p. V-119)

No Substantial Change from Previous Analysis: Based on available information, the Project site has never been the location of mineral resource extraction activity and no mines are located on the property under existing conditions. According to Figure OS-5 of the Riverside County General Plan, the Project site and off-site impact areas are designated within Mineral Resources Zone 3 (MRZ-3) pursuant to the Surface Mining and Reclamation Act of 1975 (SMARA) (Riv. County, 2003a, Figure OS-5). MRZ-3 is defined by the State of California Department of Conservation SMARA Mineral Land Classification Project as "Areas where the available geologic information indicates that mineral deposits are likely to exist, however, the significance of the deposit is undetermined." Thus, the Project site does not contain any known mineral resources that would be of value to the region or residents of the State. Furthermore, the Project site is not identified as an important mineral resource recovery site by the County General Plan. Accordingly, the proposed Project would not result in the loss of availability of a known mineral resource that would be of value to the region or the residents of the State, nor would the Project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan, and no impact would occur. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis

c) Would the Project be an incompatible land use located adjacent to a State classified or designated area or existing surface mine?

EIR No. 374 Finding: EIR No. 374 did not identify any impacts associated with incompatible land uses located adjacent to surface mining areas.

No Substantial Change from Previous Analysis: The area surrounding the Project site is not classified as an important mineral resource area, and there are no existing surface mines in the vicinity of the subject property (Riv. County, 2003a, Figure OS-5). Accordingly, there is no potential for the Project to be an incompatible land use adjacent to an important mineral resource recovery zone or existing, active mine and no impact would occur. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

d) Would the Project expose people or property to hazards from proposed, existing or abandoned quarries or mines?

EIR No. 374 Finding: EIR No. 374 did not identify any hazards from proposed, existing or abandoned mines or quarries.

No Substantial Change from Previous Analysis: The proposed Project would include residential and open space land uses and does not involve the construction or operation of a mine or quarry. As described above under Issue 29.c), the Project is not located in close proximity to any planned, existing, for former (i.e., closed, abandoned) surface mines or quarries. Accordingly, the Project would not expose people or property to hazards related to mines or quarries and no impact would occur. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

NOISE Would the project result in				
Definitions for Noise Acceptability Ratings Where indicated below, the appropriate Noise Acceptability Rating(s) has been checked. NA - Not Applicable A - Generally Acceptable B - Conditionally Acceptable C - Generally Unacceptable D - Land Use Discouraged				
30. Airport Noise a) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport would the project expose people residing or working in the project area to excessive noise levels? NA ☒ A ☐ B ☐ C ☐ D ☐	☐	☐	☐	☒
b) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels? NA ☒ A ☐ B ☐ C ☐ D ☐	☐	☐	☐	☒

Source: *Riverside County General Plan; Google Earth*

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis

Findings of Fact:

a) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport would the project expose people residing or working in the project area to excessive noise levels?

b) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

EIR No. 374 Finding: EIR No. 374 determined that the project site was outside of the French Valley Airport's Traffic Pattern Zone and outside the 55 CNEL noise contour according to the French Valley Airport Comprehensive Land Use Plan. However, the EIR also noted that due to the expanded "Interim Airport-Influence Area" portions of the site were within Area III of the AIA. Mitigation Measure 25 (renumbered herein as MM 5.2) was identified by EIR No. 374 to ensure that the project would not expose people residing or working in the area to excessive noise levels. As such, EIR No, 374 determined that impacts would be less than significant with mitigation. (Riv. County, 1997, pp. V-196 - 197, II-12)

No Substantial Change from Previous Analysis: According to Map FV-3 of the 2007 Airport Land Use Compatibility Plan for the French Valley Airport, the Project site is located approximately 2.0 miles northeast of the nearest portion of the County that is affected by airport-related noise exceeding 55 dBA CNEL (ALUC, 2007, Figure FV-3) In addition, there are no private use airports or private airstrips located within the vicinity of the Project site. The nearest private airstrip (Pines Airpark) is located approximately 1.75 northwest of the Project site (Google Earth, 2013). As such, the proposed Project would not expose people residing or working in the Project area to excessive airport-related noise levels and impacts would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

Mitigation: No additional mitigation is required.

Monitoring: No additional monitoring is required.

31. Railroad Noise NA ☒ A ☐ B ☐ C ☐ D ☐	☐	☐	☐	☒

Source: Google Earth

Findings of Fact:

EIR No. 374 Finding: EIR No. 374 did not identify any impacts from noise associated with railroad use or rail transport.

No Substantial Change from Previous Analysis: The Project site is located approximately 5.8 miles south of the nearest railroad corridor and no aspect of the proposed Project involves rail use or rail transport (Google Earth, 2013). Due to the attenuating effects of distance, intervening development, and topography, traffic from the rail corridor nearest the Project site would not expose the subject property to substantial noise levels. Accordingly, and consistent with the finding of EIR No. 374, no

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis

railroad-related noise impact would occur. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

32. Highway Noise NA ☒ A ☐ B ☐ C ☐ D ☐	☐	☐	☐	☒

Source: Project Application Materials; *Project-Specific Noise Impact Analysis*, Mestre Greve Associates, July 16, 2014.

Findings of Fact:

EIR No. 374 Finding: EIR No. 374 determined that most of the project site proposed for residential development would experience traffic noise greater than 60 CNEL without mitigation. This included lots along Winchester Road (Highway 79). In addition, the EIR noted that commercial land uses located along Winchester Road would also experience noise levels in excess of 65 CNEL. EIR No. 374 identified Mitigation Measures 26 through 28 (renumbered herein as MM 5.3 through MM 5.5) to ensure that noise impacts on surrounding roadways, including Winchester Road, would be less than significant with mitigation incorporated. (Riv. County, 1997, pp.V-44, II-12)

No Substantial Change from Previous Analysis: The nearest highway to the Project site is Highway 79/Winchester Road, located approximately 0.09-mile west of the site. The County of Riverside requires that the capacity of the roadway be used in the noise exposure calculations. Winchester Road is scheduled to be an expressway and Keller Road will be a collector. Therefore, Winchester Road and Keller Road were modeled at 40,900 and 25,900 vehicles per day, respectively. Based on the analysis conducted by Mestre Greves (Appendix I), the 65 Ldn noise level from Winchester Road is only exceeded for one residential lot (i.e., Lot 23). The noise level from the future expressway would be 65.6 Ldn at Lot 23. All lots directly adjacent to Keller Road would experience noise levels greater than 65 Ldn. In fact, homes directly adjacent to Keller Road would experience noise levels about 69.5 Ldn in the yard areas. These noise levels exceed the County's standard of 65.0 Ldn. However, as required by Mitigation Measure 26 (renumbered and revised herein as Mitigation Measure MM 5.3), future implementing building permit applications would be required to demonstrate that the outdoor noise standard of 65 Leq and interior noise standard of 45 Leq are not exceeded. Mitigation Measure MM 5.3 would continue to apply to the proposed Project, although revisions to the Mitigation Measure MM 5.3 have been incorporated to reflect the site-specific acoustical analysis recommendations. With implementation of the required mitigation, and consistent with the conclusion reached in EIR No. 374, on-site noise impacts (both exterior and interior) would be reduced to below a level of significance. With compliance to the required mitigation, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

Mitigation:
Although the Project complies with (existing) Mitigation Measure 26 from EIR No. 374, this mitigation measure has been revised based on the site-specific analysis conducted by the Project's acoustical consultant.

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis

~~26.~~MM 5.3 ~~Mitigation measures are needed to reduce traffic noise levels in outdoor and indoor residential areas exposed to noise levels greater than 60 CNEL. Specifically, lots along Winchester Road, Keller Road, Street "A", Street "B", Street "I", Pourroy Road, Benton, Thompson Road, Auld Road and Washington Street will require a more detailed noise analysis, detailing noise barrier heights and location, prior to grading plan approval.~~ Prior to issuance of building permits for any residence along Keller Road or within Lot 23, a detailed noise assessment shall be prepared to demonstrate that the exterior noise levels would not exceed 65 Ldn and interior noise levels would not exceed 45 Ldn and that exterior noise levels will not exceed 65 Ldn. The noise assessment shall be prepared by a qualified acoustical consultant and shall document the sources of noise impacting the building and describe any measures required to meet the County's standard. These measures will be incorporated into the project plans. The report shall be completed and approved by the County prior to issuance of building permits.

Monitoring: The Riverside County Planning Department shall review the future noise impact analysis to ensure that future residents on-site are not exposed to noise levels exceeding 65 Ldn in outdoor areas or exceeding 45 Leq in indoor areas.

33. Other Noise NA ☒ A ☐ B ☐ C ☐ D ☐	☐	☐	☐	☒

Source: Project Application Materials

Findings of Fact:

EIR No. 374 Finding: EIR No. 374 did not identify any additional noise impacts beyond what is discussed above and below.

No Substantial Change from Previous Analysis: There are no other known sources of noise within the Project vicinity that could expose future Project residents to noise levels above the County General Plan standards, nor are there any other components of the Project that could expose off-site properties to unacceptable noise levels. Accordingly, no impact would occur. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

34. Noise Effects on or by the Project a) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☐	☒
b) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☐	☒
c) Exposure of persons to or generation of noise levels in excess of standards established in the local	☐	☐	☐	☒

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
general plan or noise ordinance, or applicable standards of other agencies?				
d) Exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels?	☐	☐	☐	☒

Source: Riverside County General Plan; Project Application Materials; Riverside County Ordinance No. 555; Riverside County Ordinance No. 847; *Project-Specific Noise Impact Analysis*, Mestre Greve Associates, July 16, 2014.

The Project proposes changes to the boundaries, acreage, and unit allocations of proposed Planning Areas 1, 2A, 3, 5A, 6, 7, 52A, and 52B. Planning Area 5A is currently developed with 118 single-family homes; thus, existing development within Planning Area 5A has no potential to result in new or more severe impacts to noise as compared to what was evaluated and disclosed by EIR No. 374. Although Planning Area 7 ultimately would be developed with up to 85 dwelling units, development within Planning Area 7 would require subsequent discretionary approvals that would be subject to CEQA. Other than the reduced unit allocation and diminishment of the size of Planning Area 7, no development would occur in Planning Area 7 as a result of the Project; thus, impacts associated with future development of Planning Area 7 are not evaluated herein because such impacts were fully evaluated as part of EIR No. 374. Although impacts to proposed Planning Areas 1, 2A, 3, 6, 52A, and 52B (within TTM 36722) were previously evaluated within EIR No. 374, a new noise analysis has been prepared for this portion of the Project site. Findings from the noise analysis are summarized below within Thresholds 34.b) through 34.d).

Findings of Fact:

a) Would the Project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

b) Would the Project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

EIR No. 374 Finding: EIR No. 374 determined the implementation of SP 286 would result in a temporary increase in ambient noise levels during construction. The EIR noted that construction occurring adjacent to existing residential areas would be restricted to hours specific within Riverside County Ordinance No. 457.78. In addition, EIR No. 374 determined that development of the Winchester 1800 Specific Plan would generate traffic and would alter the noise levels in surrounding areas. As such, EIR No. 374 identified Mitigation Measures 24 through 28 (renumbered herein as MM 5.1 through MM 5.5) to reduce temporary and permanent ambient noise impacts. EIR No. 374 concluded that noise impacts would be less than significant with mitigation incorporated. (Riv. County, 1997, pp. V-41, II-12)

No Substantial Change from Previous Analysis: The Project consists of a master-planned residential community, and would include residential and open space land uses. The land uses proposed by the Project are not typically associated with substantial sources of stationary noise. There are no components of the Project that would generate or amplify noise on the Project site. The Project would generate traffic that would emit noise; however, as discussed in detail in the response to Threshold 34.c), below, Project-related traffic would not generate substantial noise during long-term operation. Accordingly, implementation of the Project would not result in a substantial permanent increase in ambient noise levels and impacts would be less than significant.

Construction activities on the Project site, especially those involving heavy equipment, would initially create intermittent, short-term noise increases in the vicinity of the Project site, representing a temporary effect on ambient noise levels. Noise generated by construction equipment, including trucks, graders, bulldozers, concrete mixers, and portable generators, can reach high levels (MGA, 2014b, p. 11).

The nearest residences during construction would be about 50 feet away from the Project site. Generally construction equipment would be at a greater distance, but could be as close as 50 feet. Examples of construction noise at 50 feet are presented in Exhibit 6 of the Project's Noise Impact Analysis (Technical Appendix I). Based on this distance, the worst case unmitigated peak (Lmax) construction noise levels would be in the 80 to 95 dBA range for very short periods. The average construction noise levels are typically 5 to 15 dB lower than the peak noise levels. Average construction noise levels (Leq) at the nearby residences could be in the range of 65 to 85 dBA. These noise levels are substantially above current noise levels experienced in the area (refer to Table 1 of Technical Appendix I), and therefore, significant noise increases would temporarily occur due to construction noise. The Project site is within one-quarter mile of existing residences and therefore construction on-site would be subject to the hourly limits set in Section 9.52.020(I) of the County's Noise Ordinance. Limiting construction to those hours in Section 9.52.020(I) of the County's Noise Ordinance would avoid significant impacts. (MGA, 2014b, p. 12).

Based on the foregoing analysis, the Project's impacts on temporary, periodic, or permanent increases in noise levels would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

c) Would the Project expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

EIR No. 374 Finding: As noted in the summary of EIR No. 374's conclusions under Thresholds 34.a) and 34.b), above, near- and long-term operations at the site were expected to increase ambient noise levels on-site. As such, EIR No. 374 proposed Mitigation Measures 24 through 28 (renumbered herein as MM 5.1 through MM 5.5) to ensure that acceptable interior and exterior noise levels for residential and commercial land uses were attained, both on- and off-site. EIR No. 374 concluded that noise impacts would be less than significant with mitigation incorporated. (Riv. County, 1997, pp. V-41, II-12)

No Substantial Change from Previous Analysis: The proposed Project has the potential to expose nearby sensitive receptors to noise levels in excess of the County standard. Sensitive receptors within the immediate vicinity of the Project site include existing residential uses within the Winchester 1800 Specific Plan, and residential uses along Keller Road, while additional sensitive receptors may be located along study area roadway segments that would experience increased traffic levels as a result of the Project. Development of the Project site as a residential community has the potential to expose persons to or result in elevated noise levels that exceed the County's standards during both near-term construction activities, under long-term conditions due to the potential exposure of future on-site residents to traffic-related noise from nearby streets, and under long-term conditions due to the potential for Project-related traffic to create or contribute to noise levels along off-site streets. Near-term (i.e., temporary) and long-term (i.e., permanent) noise impacts associated with the Project are discussed below.

Impact Analysis for Construction Noise

The County's Noise Ordinance (Ordinance No. 847) includes a provision that exempts construction activities from any maximum noise level standard, provided that construction activities occur between the hours of 6:00am-6:00pm during the months of June through September or 7:00am-6:00pm during the months of October through May. As concluded in Threshold 34.b), limiting construction to those hours in Section 9.52.020(I) of the County's Noise Ordinance would avoid significant temporary noise impacts. The Project would be required to comply with the County's Noise Ordinance; therefore, implementation of the Project would not expose persons to or generate noise levels in excess of standards adopted by the County.

Off-Site Traffic Related Noise Impacts

A Noise Impact Analysis (Technical Appendix I) was prepared to evaluate the Project's potential to expose future on-site residents to noise levels exceeding the County's interior and exterior noise standards. For noise-sensitive uses, such as schools and single-family homes, the Riverside County General Plan indicates that exterior noise levels should remain below 65 dBA CNEL, while interior noise levels should remain below 45 dBA CNEL. (Riverside County, 2003a, pp. N-6 and N-18)

The traffic study for the Project (refer to Technical Appendix J) forecasts that the Project would generate 1,390 trips per day. If all of these vehicles traveled down the same road at 40 miles per hour, they would generate a noise level of 56 Ldn at 50 feet from the roadway centerline. This level is low enough that it would not cause any areas to be above the County's exterior standard of 65 Ldn even when added to other forecasted traffic. That is, the amount of traffic generated by the Project would generate an insignificant level of noise on the nearby roadways. Finally, it should be noted that the traffic study indicates that 23,543 trips would be generated by other projects in the area. If all 23,543 vehicular trips were traveling down one road, and all of the Project's traffic was then added to that road, the noise levels would only be increased by 0.2 dB. This again points out that the Project would not add significantly to the traffic noise in the area (MGA, 2014b, p. 12). Therefore, the Project's off-site traffic related noise impacts would be less than significant.

On-Site Traffic Related Noise Impacts

This site is potentially subject to traffic noise from highway vehicles. The Project site is adjacent to Winchester Road (State Route 79) and Keller Road. The distances to the future Ldn noise contours for the roadways in the vicinity of the Project site were calculated by the Project's noise analyst, Mestre Greve Associates. Spreadsheets showing the calculations are included in the Appendix of the Project's noise impact analysis (Technical Appendix I).

In the future, Winchester Road is scheduled to be an expressway and Keller Road will be a collector road. Therefore, Winchester Road and Keller Road were modeled at 40,900 and 25,900 vehicles per day, respectively. The 65 Ldn exterior noise level from Winchester Road would only be exceeded for one residential lot (i.e., Lot 23). The noise level from the future expressway would be 65.6 Ldn at Lot 23. However, all lots directly adjacent to Keller Road would experience noise levels greater than 65 Ldn. In fact, homes directly adjacent to Keller Road would experience noise levels about 69.5 Ldn in the yard areas (MGA, 2014b, p. 14). As such, noise barriers would be required to ensure that exterior noise levels at Lot 23 and at the residential lots along Keller Road would not exceed the 65 Ldn exterior noise standard. Revised Mitigation Measure 26 (renumbered herein as MM 5.3) would ensure that the Project meets the County's exterior noise standards. Therefore, on-site traffic related noise impacts would be less than significant with incorporation of mitigation.

In addition, the noise impact analysis concluded that residences proposed along Keller Road and Lot 23 would require more than 20 dB of outdoor-to-indoor noise reduction to meet the County's interior noise standards of 45 Ldn. Typical residential construction achieves at least 20 dB of outdoor-to indoor noise reduction. Detailed calculations are required to demonstrate achievement of more than 20 dB of reduction. These calculations require near complete architectural drawings for the proposed buildings, which are not available at this time. Worst-case buildings would require less than 25 dB of reduction along Keller Road. This level of reduction is usually achievable with upgraded windows (MGA, 2014b, p. 15). Revised Mitigation Measure 26 (renumbered herein as MM 5.3) would ensure that the Project meets the County's interior noise standards. Therefore, on-site traffic related impacts would be less than significant with incorporation of mitigation.

Conclusion

Based on the foregoing analysis, the Project would not exceed County noise standards during near-term construction activities or long-term operation with incorporation of revised Mitigation Measure MM 5.3 (as revised herein). Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

d) Would the Project result in the exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels?

EIR No. 374 Finding: EIR No. 374 did not identify any impacts associated with ground-borne vibration of ground-borne noise levels.

No Substantial Change from Previous Analysis: Under existing conditions, there are no known sources of ground-borne vibration or noise that affect the Project site. The Project would not generate ground-borne vibration or ground-borne noise, except, potentially, during the construction phase from the use of heavy construction equipment. According to California Department of Transportation's Transportation and Construction-Induced Vibration Guidance Manual, ground-borne vibration from heavy construction equipment does not create vibration amplitudes that could cause structural damage, when measured at a distance of 10 feet (California DOT, 2004, Tables 13 and 18). The nearest existing off-site structures are located approximately 50 feet from the nearest point of construction activities and would not be exposed to substantial ground-borne vibration due to the operation of heavy construction equipment on the Project site. Furthermore, the Project is not expected to employ any pile driving, rock blasting, or rock crushing equipment during construction activities, which are the primary sources of ground-borne noise and vibration during construction. As such, impacts from ground-borne vibration and noise during near-term construction would be less than significant.

There are no conditions associated with the long-term operation of the proposed Project that would result in the exposure of on- or off-site sensitive receptors to excessive ground-borne vibration or noise. The proposed Project would develop the subject property with residential uses and supporting open space land uses, and would not include nor require equipment, facilities, or activities that would generate ground-borne vibration or ground-borne noise. In addition, the Project site is not located in the vicinity of a railroad line or any other use associated with ground-borne vibration or ground-borne noise; therefore, the Project would not expose future on-site residents or any off-site sensitive receptors to substantial ground-borne vibration or noise. Accordingly, under long-term operation, the Project would not expose on- or off-site sensitive receptors to substantial ground-borne vibration or ground-borne noise. Impacts are less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

Mitigation:

Revised Mitigation Measures

EIR No. 374 includes 5 mitigation measures (24 through 28, renumbered herein as MM 5.1 through 5.4), which would continue to apply to the proposed Project. However, one of the mitigation measures identified by EIR No. 374 (Mitigation Measure 26; renumbered herein as Mitigation Measure MM 5.3) is out of date and does not reflect current regulatory requirements. Accordingly, Mitigation Measure 26 would be superseded and replaced by the revised (and more stringent) requirements listed below, which are based on the recommendations of the Project's noise analyst (Mestre Greve Associates):

MM 5.3 ~~Mitigation measures are needed to reduce traffic noise levels in outdoor arid indoor residential areas exposed to noise levels greater than 60 CNEL. Specifically, lots along Winchester Road, Keller Road, Street "A", Street "B", Street "I", Pourroy Road, Benton, Thompson Road, Auld Road and Washington Street will require a more detailed noise analysis, detailing noise barrier heights and location, prior to grading plan approval.~~ Prior to issuance of building permits for any residence along Keller Road plus Lot 23 a detailed noise assessment shall be prepared to demonstrate that the interior noise levels will not exceed 45 Ldn and that exterior noise levels will not exceed 65 Ldn. The noise assessment shall be prepared by a qualified acoustical consultant and shall document the sources of noise impacting the building and describe any measures required to meet the County's standard. These measures will be incorporated into the project plans. The report shall be completed and approved by the County prior to issuance of building permits.

Monitoring:

MM 5.3 The Project Applicant shall be responsible for preparing a Final Noise Study as part of future building permit applications. The Final Noise Study shall be subject to review and approval by the Riverside County Department of Environmental Health, Office of Industrial Hygiene prior to the issuance of building permits. Additionally, the Riverside County Building and Safety Department shall ensure that the required exterior and interior noise mitigation features, as specified in the Final Noise Study, have been constructed prior to the issuance of occupancy permits for Lot 8 and Lots 11 through 45 of Tentative Tract Map No. 36722.

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
POPULATION AND HOUSING Would the project				
35. Housing a) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
b) Create a demand for additional housing, particularly housing affordable to households earning 80% or less of the County's median income?	☐	☐	☐	☒
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
d) Affect a County Redevelopment Project Area?	☐	☐	☐	☒
e) Cumulatively exceed official regional or local population projections?	☐	☐	☐	☒
f) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒

Source: Project Application Materials, Google Earth, Draft Riverside County General Plan Update.

Findings of Fact:

a) Would the Project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

c) Would the Project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

EIR No. 374 Finding: EIR No. 374 did not identify any impacts associated with the displacement of housing or people necessitating the construction of housing elsewhere.

No Substantial Change from Previous Analysis: Under existing conditions, 118 homes are developed within Planning Area 5A. In addition, several residential structures currently exist within Planning Area 7. No other residences exist within the Project area (Google Earth, 2013). As part of the proposed Project, the 118 homes within Planning Area 5A would remain. In addition, Planning Areas 1, 2A, 3, 6, 52A and 52B (within TTM 36722) would be developed with residential and open space land uses. Furthermore, development in this area has been planned since the Winchester 1800 Specific Plan was approved in 1995. In addition, the Project would allow for the development of up to 349 single-family homes on the Project site (including 106 dwelling units within Planning Area 7), which would provide for new housing opportunities within the County that would attenuate any impacts associated with removal of housing from the Project site. Therefore, implementation of the proposed Project would not displace housing or people, necessitating the construction of replacement housing elsewhere and impacts would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

b) Would the Project create a demand for additional housing, particularly housing affordable to households earning 80% or less of the County's median income?

EIR No. 374 Finding: EIR No. 374 did not identify impacts associated with demands for additional housing, including housing affordable to households earning 80% or less of the County's median income.

No Substantial Change from Previous Analysis: The Project is a proposed residential community and would provide for the development of up to 349 new homes providing housing for approximately 999 residents (including 418 residents from the TTM 36722 portion of the site), based on the population generation estimates provided by CalEEMod (SCAQMD, 2013, Appendix D). The Project would provide for new housing opportunities on the site, which would help meet the current population growth trends in western Riverside County. The residential dwelling units proposed as part of the Project would not result in an increased demand for affordable housing. Therefore, the proposed Project would not create a demand for additional housing, including housing affordable to households earning 80% or less of the County's median income, and no impact would occur. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

d) Would the Project affect a County Redevelopment Project Area?

EIR No. 374 Finding: EIR No. 374 did not identify any impacts to any County Redevelopment Project Areas.

No Substantial Change from Previous Analysis: According to Riverside County GIS, the Project site is not located within or adjacent to any County Redevelopment Project Areas (Riv. County, 2014a). Accordingly, the Project has no potential to affect a County Redevelopment Project Area, and no impact would occur. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

e) Would the Project cumulatively exceed official regional or local population projections?

f) Would the Project induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

EIR No. 374 Finding: EIR No. 374 did not conclude that the Project would cumulatively exceed official regional or local population projections, nor did the EIR conclude that the project would induce substantial population growth in an area, either directly or indirectly.

No Substantial Change from Previous Analysis: Under existing conditions, the Project site is designated by the Winchester 1800 Specific Plan for "Very High Density Multi-Family Residential," "Medium Density Residential," "Medium-Low Density Residential," "Public Facilities," and "Open Space-Recreation" land uses. The Project proposes a Specific Plan Amendment (SP 286A6) to alter the existing land uses and planning area boundaries on the site to allow for the development of up to 349 units (refer to Table 2-1). The 349 units that could potentially result from the Project represent a decrease of 150 units when compared to the existing approved Specific Plan land uses. According to the population estimates provided in CalEEMod, 349 units would result in a population of 999 (SCAQMD, 2013 Appendix D). Since regional and local population projections rely, in part, on land uses proposed as part of the County's General Plan (which is implemented by the Specific Plan), and since the proposed Project would decrease the number of units on-site, thereby decreasing the

projected population on-site, the Project would not exceed the regional or local population projections for the site and no impact would occur. Furthermore, all lands surrounding the Project site are planned by the Riverside County General Plan for development with residential uses at various densities (with exception of the commercial retail area located off-site and to the west of the site), and it is unlikely that development of the Project site with residential uses would induce these nearby properties to be developed in accordance with their existing General Plan land use designations because there are no regional improvements proposed by the Project that would remove obstacles to development, such as the construction of a regional sewer line.

Under CEQA, direct population growth by a project is not considered necessarily detrimental, beneficial, or of little significance to the environment. Typically, population growth would be considered a significant impact pursuant to CEQA if it directly or indirectly affects the ability of agencies to provide needed public services and requires the expansion or new construction of public facilities and utilities, or if it can be demonstrated that the potential growth results in a physical adverse environmental effect. As documented in this Addendum to EIR No. 374, activities of the proposed Project's population would not result in impacts that are more severe than those analyzed previously within EIR No. 374. Accordingly, the Project's direct impacts associated with population inducement would be less than significant.

As such, the proposed Project would not cumulatively exceed official regional or local population projections or induce substantial population growth in an area. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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

Source: Project Application Materials, Riverside County Fire Department Fire Protection and Emergency Medical Master Plan, Ordinance No. 659, Google Earth

Findings of Fact:

EIR No. 374 Finding: EIR No. 374 determined that the project would have a cumulative adverse impact on the Fire Department's ability to provide an acceptable level of service to surrounding properties. These impacts would result from an increase in the number of emergency and/or public service calls due to an increase in the population. The EIR also noted that after the proposed French Valley Fire Station was completed, the French Valley and Rancho California Fire Stations would provide Category II protection to the project site in conformance with the Fire Protection Master Plan. EIR No. 374 identified seven Mitigation Measures (Mitigation Measure 80 through 86, renumbered herein as MM 18.1 through MM 18.7) to ensure that impacts to fire services were reduced to less than significant levels. (Riv. County, 1997, pp. V-162, II-33 - II-34)

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis

No Substantial Change from Previous Analysis: The Riverside County Fire Department provides fire protection services to the Project area. Pursuant to the Riverside County Fire Department *Fire Protection and Emergency Medical Master Plan*, with development of residential land uses on the Project site would require a "Category II – Urban" level of service, which requires a fire station to be within three (3) roadway miles of the Project and a full first alarm assignment team operating on the scene within 15 minutes of dispatch (RCFD, 1986). The Project area would be primarily served by the Winchester Fire Station (Station No. 34), located at 32655 Haddock Street in Winchester, or approximately 5.7 roadway miles from the site. Although the Project site is not located within three (3) roadway miles of this fire station, the Project site would be accessed primarily via Highway 79, which would allow for fire protection vehicles (including a full first alarm assignment team) to arrive at the site in approximately 7 minutes (Google Maps, 2014), which would meet the Category II – Urban level of service criteria established by the Riverside County Fire Department. In addition, the Project has been reviewed by the Riverside County Fire Department, which determined that the Project would be served by adequate fire protection services in accordance with the Riverside County Fire Department Fire Protection and Emergency Medical Master Plan.

Development of the proposed Project would affect fire protection services by placing an additional demand on existing Riverside County Fire Department resources should its resources not be augmented. To offset the increased demand for fire protection services, the proposed Project would be conditioned by the County to provide a minimum of fire safety and support fire suppression activities, including compliance with State and local fire codes, fire sprinklers, a fire hydrant system, paved access, and secondary access routes. Furthermore, the Project would be required to comply with the provisions of the County's Development Impact Fee (DIF) Ordinance (Riverside County Ordinance 659), which requires a fee payment to assist the County in providing for fire protection services. Payment of the DIF fee would ensure that the Project provides fair share funds for the provision of additional public services, including fire protection services, which may be applied to fire facilities and/or equipment, to offset the incremental increase in the demand for fire protection services that would be created by the Project. In addition, the mitigation measures identified in EIR No. 374 would continue to apply to the proposed Project.

Based on the foregoing analysis, implementation of the Project would not result in the need for new or physically altered fire protection facilities, and would not exceed applicable service ratios or response times for fire protections services. As such, impacts to fire protection services would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

Mitigation: No additional mitigation is required.

Monitoring: No additional monitoring is required.

37. Sheriff Services	☐	☐	☐	☒

Source: Project Application Materials, Ordinance No. 659, Google Earth, Riverside County Draft General Plan Update

Findings of Fact:

EIR No. 374 Finding: EIR No. 374 concluded that the project would result in the need for 26 additional officers, approximately four civilian personnel, and an additional nine patrol cars to provide adequate protection SP 286. As such, EIR No. 374 identified Mitigation Measures 87 and 88 (renumbered herein as MM 19.1 and MM 19.2) to off-set potential impacts to sheriff facilities and services. EIR No. 374 concluded that that impacts to sheriff facilities would be less than significant with mitigation. (Riv. County, 1997, pp. V-165, II-35)

No Substantial Change from Previous Analysis: The Riverside County Sheriff's Department provides community policing to the Project area via the Southwest Sheriff's Station located at 30755-A Auld Road in the City of Murrieta, or approximately 5.0 roadway miles southwest from the Project area. The Riverside County Sheriff's Department has set a minimum level of service standard of 1.0 deputy per 1,000 people.

At full buildout, Planning Areas 1, 3, 5A, 6, and 7 would introduce approximately 999 residents to the area, based on the population generation rates utilized by CalEEMod (SCAQMD, 2013, Appendix D). TTM 36722 proposes 146 residential units which would introduce approximately 418 new residents. Planning Area 5A is fully built out with 118 units contributing approximately 338 residents to the surrounding area and Planning Area 7 could be developed in the future with up to 85 units adding an additional 244 residents to the surrounding area. There is not a direct correlation between population growth, the number of crimes committed, and the number of Sheriff's Department personnel needed to respond to these increases. As the population and use of an area increases, however, additional financing of equipment and manpower needs are required to meet the increased demand. The proposed Project would result in an increase in the cumulative demand for services from the Riverside Sheriff's Department. To maintain the desirable level of service, buildout of the proposed Project would generate a need for approximately one deputy. The proposed Project would not, however, result in the need for new or expanded physical sheriff facilities because the addition of one new deputy would not necessitate the construction of new or modified sheriff facilities.

The proposed Project's demand on sheriff protection services would not be significant on a direct basis because the Project would not create the need to construct a new Sheriff station or physically alter an existing station. The Project would be required to comply with the provisions of the County's DIF Ordinance (Ordinance 659), which requires a fee payment to assist the County in providing for public services, including police protection services. Payment of the DIF fee would ensure that the Project provides fair share funds for the provision of additional police protection services, which may be applied to sheriff facilities and/or equipment, to offset the incremental increase in the demand that would be created by the Project. Furthermore, the mitigation measures identified in EIR No. 374 would continue to apply to the proposed Project. Therefore, Project's incremental demand for sheriff protection services would be less than significant with the Project's required payment of DIF fees. Accordingly, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

Mitigation: No additional mitigation is required.

Monitoring: No additional monitoring is required.

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
38. Schools	☐	☐	☐	☒

Source: Project Application Materials, Riverside County General Plan EIR.

Findings of Fact:

EIR No. 374 Finding: EIR No. 374 concluded that development of the project would increase the demand on existing education facilities in the project area by generating additional students requiring accommodation within the Hemet Unified School District, Menifee Union School District, and Murrieta Valley Unified School District. The EIR identified five Mitigation Measures (Mitigation Measures 89 through 93, renumbered herein as MM 20.1 through 20.5) to ensure that adequate school facilities would be available to serve future residents of SP 286. EIR No. 374 concluded that impacts to schools would be less than significant with mitigation incorporated. (Riv. County, 1997, pp. V-169, II-36 - II-37)

No Substantial Change from Previous Analysis: The proposed Project would be served by the Hemet Unified School District (HUSD). Students generated by the Project likely would attend the Temecula Preparatory School, located approximately 1.5 roadway miles from the site. The Temecula Preparatory School provides K-12 education.

Buildout of the proposed Project would result in an increase in demand for school services as compared to existing conditions. Table EA-9, *Project Related School Services Demand*, provides an estimate of future students that would be generated by the Project, based on the student generation factors provided in the Riverside County General Plan EIR (Riv. County, 2003b, Table 4.15.E). As shown in Table EA-9, the Project would result in the generation of approximately 285 new students (annually), including 129 elementary students, 70 middle school students, and 86 high school students. Table EA-9 assumes full buildout of the Project area with 349 units including: development of 146 single-family homes on Planning Areas 1, 3, and 6 (as shown on TTM 36722 in Figure 2-7); the existing 118 units within Planning Area 5A; and the buildout of Planning Area 7 with 85 units.

Table EA-9 Project Related School Services Demand

School Type	Project Units	Student Generation Factor	Total Number of Students
Elementary	349	0.369	129
Middle School	349	0.201	70
High School	349	0.246	86
		Total Project-Related Students:	**285**

(Riverside County, 2003b, Table 4.15.E)

Although it is possible that the HUSD may ultimately need to construct new school facilities in the region to serve the growing population within their service boundaries, such facility planning is conducted by HUSD and is not the responsibility of the Project. Furthermore, the proposed Project would be required to contribute fees to the HUSD in accordance with the Leroy F. Greene School Facilities Act of 1998 (Senate Bill 50). Pursuant to Senate Bill 50, payment of school impact fees constitutes complete mitigation for project-related impacts to school services. Therefore, mandatory payment of school impact fees would reduce the Project's impacts to school facilities to a level below significance and no additional mitigation beyond the measures identified in EIR No. 374 would be required. Accordingly, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis

Mitigation: No additional mitigation is required.

Monitoring: No additional monitoring is required.

39. Libraries	☐	☐	☐	☒

Source: Project Application Materials, Ordinance No. 659

Findings of Fact:

EIR No. 374 Finding: EIR No. 374 concluded that development of the project would increase the regional population, in turn creating additional demand for library facilities and services. The EIR identified Mitigation Measure 108 (renumbered herein as MM 24.1) to ensure that appropriate fees were paid in accordance with Riverside County Ordinance No. 659. With mitigation incorporated, EIR No. 374 concluded that impacts to library facilities would be less than significant. (Riv. County, 1997, pp. V-187, II-43)

No Substantial Change from Previous Analysis: Implementation of the Project would result in an increase in the population in the Project area and would increase the demand for library services. The Project would be required to comply with the provisions of the County's DIF Ordinance (Ordinance 659), as noted in Mitigation Measure 108 (renumbered herein as MM 24.1), which requires a fee payment to assist the County in providing public services, including library services. Payment of the DIF fee would ensure that the Project provides fair share funds for the provision of library services, and these funds may be applied to the acquisition and/or construction of public services and/or equipment (including library books). Consistent with the finding of EIR No. 374, mandatory payment of DIF fees would ensure that Project-related impacts to library services would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

Mitigation: No additional mitigation is required.

Monitoring: No additional monitoring is required.

40. Health Services	☐	☐	☐	☒

Source: *Project Application Materials, Ordinance No. 659*

Findings of Fact:

EIR No. 374 Finding: EIR No. 374 concluded that the project would accommodate approximately 10-acres of medical office use within Planning Area 9. The EIR noted that the intention of this design was to reduce the necessity of on-site residents travelling to neighboring communities to seek medical services. EIR No. 374 concluded that SP 286 would not impact health services in the area and no mitigation was proposed or required by the EIR. (Riv. County, 1997, p. V-190)

No Substantial Change from Previous Analysis: The 349 residential units that could result from full buildout of the Project area (refer to Table 2-1 for dwelling unit breakdown by planning area) would increase the regional population and would thereby result in an increased demand for medical facilities.

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis

The provision of private health care is largely based on economic factors and demand and is beyond the scope of analysis required for this EIR Addendum. However, mandatory compliance with County Ordinance No. 659 requires a development impact fee payment to the County that is partially allocated to public health services and facilities. As such, impacts to public medical facilities and resources associated with the proposed Project would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

RECREATION				
41. Parks and Recreation				
a) Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒
b) Would the project include the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
c) Is the project located within a Community Service Area (CSA) or recreation and park district with a Community Parks and Recreation Plan (Quimby fees)?	☐	☐	☐	☒

Source: *Riverside County GIS Database (RCLIS); County of Riverside Ord. No. 460, Section 10.35 and Ord. No. 659; Project Application Materials, Valley Wide Parks & Recreation Master Plan*

Findings of Fact:
For purposes of analyzing impacts to parks, this analysis relies on the population generation rate within the Valley Wide Parks & Recreation Master Plan (VWPRMP), which uses a different rate than is reflected in the County's Draft General Plan Update. The person per household rates listed on Table 14 of the VWPRMP are used for community planning efforts by the District, and thus is used herein to evaluate Project impacts in a manner consistent with the Valley Wide Parks & Recreation Master Plan.

a) Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

EIR No. 374 Finding: EIR No. 374 noted that the project would result in the development of 38.4 acres of neighborhood parks ranging in size from 5 acres to 16 acres. 14.1 acres would be designated as open space/ drainage and a regional recreation trail would provide jogging, biking and walking opportunities. EIR No. 374 identified Mitigation Measures 94 through 97 (renumbered herein as MM 21.1 through MM 21.4) to reduce impacts associated with the construction and operation of recreational facilities. With mitigation incorporated, EIR No. 374 concluded that impacts to the environment from

the construction or expansion of recreational facilities would be less than significant. (Riv. County, 1997, pp. V-175 - 176, II-37 -38)

No Substantial Change from Previous Analysis: Full buildout the Project area (Planning Areas 1, 3, 6, and 7) would introduce up to 231 dwelling units to Riverside County, in addition to the 118 units that were previously constructed within Planning Area 5A. Pursuant to the population estimates contained in the Valley-Wide Recreation & Park District Master Plan (VWRPD, 2010, Table 14), the 349 units proposed within the Project area would result in a future population of between 1,117 and 1,284 residents, depending on whether proposed residential uses include attached or detached garages. Based on the Valley-Wide Recreation & Park District's (VWRPD) goal of providing 5.0 acres of park land for each 1,000 residents, the Project would generate a demand for between 5.6 and 6.4 acres of park land.

No park facilities are proposed as part of the Project. The VWRPD Master Plan indicates that "Where the amount of parkland to be dedicated is less than 5 acres, the developer will be required to pay in-lieu fees" (VWRPD, 2010, p. 28). Pursuant to the requirements of the VWRPD Master Plan, the Project would be required to pay in-lieu fees, the amount of which would be based on the fair market value of land which would otherwise be required for dedication. With the payment of mandatory park fees in accordance with Section 10.35 of Riverside County Ordinance 460, the Project would fully fund its fair share of park demand.

Although the Project would require additional parkland to meet the recreational needs of future and current Project residents, the construction of such parkland would be conducted by Riverside County and/or the VWRPD. As the precise nature of parkland improvements that would be constructed, in part, using the Project's in-lieu fee contribution cannot be determined at this time, it would be speculative to attempt to analyze impacts to the environment that may result from such future park construction. Prior to construction of any future park improvements, Riverside County and/or the VWRPD would need to approve such park improvements, and before issuing such approvals, Riverside County and/or the VWRPD would need to comply with CEQA. Since the precise nature of future park improvements warranted to serve the Project are unknown at this time, impacts due to the construction of such park facilities are evaluated as speculative pursuant to CEQA Guidelines § 15145.

Based on the foregoing analysis, it is concluded that the proposed Project would result in a less-than-significant impact due to the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

b) Would the project include the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

EIR No. 374 Finding: EIR No. 374 concluded that SP 286 would place additional demands on recreational facilities including local recreational community parks in Murrieta, Temecula, and Rancho California, and on park facilities at Lake Skinner, Lake Perris, Lake Elsinore, and the Santa Rosa Plateau. EIR No. 374 identified Mitigation Measure 94 (renumbered herein as MM 21.1) to reduce the project's impacts on existing recreational facilities by ensuring payment of "in-lieu" fees to satisfy both the County Parks Department and State Quimby Act requirements. With mitigation incorporated, EIR No. 374 concluded that impacts to existing recreational facilities would be less than significant. (Riv. County, 1997, pp. V-174 - 175, II-37)

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis

No Substantial Change from Previous Analysis: As indicated in the analysis of Threshold 41.a), the proposed Project would not construct any recreational facilities on-site and would be required to contribute in-lieu fees for the acquisition and/or improvement of additional parkland facilities within the County. With the payment of in-lieu fees, the Project would not result in a substantial increase in the use of existing neighborhood parks, regional parks, or recreational facilities such that overuse would lead to or substantially contribute to their physical deterioration. Therefore, a less-than-significant impact would occur and mitigation is not required. Accordingly, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

c) Is the project located within a Community Service Area (CSA) or recreation and park district with a Community Parks and Recreation Plan (Quimby fees)?

EIR No. 374 Finding: EIR No. 374 determined that the project was within the Valley-Wide Recreation and Park District. In addition, the EIR noted that maintenance responsibilities for common project facilities may fall partially on local County Service Areas (CSA). Mitigation Measure 94 (renumbered herein as MM 21.1) was identified to ensure that the project provides adequate park, open space, and recreational facilities and/or pays "in-lieu" fees to satisfy both the County Parks Department and State Quimby Act requirements. With mitigation incorporated, EIR No. 374 concluded that impacts would be less than significant. (Riv. County, 1997, pp. V-176, II-37)

No Substantial Change from Previous Analysis: According to Riverside County GIS, a portion of the Project site (Planning Areas 5A and 7) is located within County Service Area (CSA) No. 103 (Riv. County, 2014a). As indicated under the discussion and analysis of Threshold 41.a), the Project site is located also within the VWRPD Master Plan area. However, the Project already would be conditioned to comply with the provisions of Section 10.35 of Riverside County Ordinance 460 and would be conditioned to contribute in-lieu fees for the acquisition and/or improvement of additional parkland facilities within the County. Accordingly, recreation impacts resulting from the Project's location within the VWRPD and CSA No. 103 would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

Mitigation: No additional mitigation is required.

Monitoring: No additional monitoring is required.

42. Recreational Trails	☐	☐	☐	☒

Source: Southwest Area Plan; Project Application Materials.

Findings of Fact:

EIR No. 374 Finding: EIR No. 374 noted that the project would create a fourteen foot wide Regional Recreational Trail along the open space/drainage corridor in Planning Area 2B. Impacts associated with the creation of this trail were evaluated in Section V.D.6. of EIR No. 374 which concluded that impacts associated with the construction of park and recreation facilities would be less than significant with incorporation of Mitigation Measures 94 through 97 (renumbered herein as MM 21.1 through MM 21.4). (Riv. County, 1997, II-37 - II-38)

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis

No Substantial Change from Previous Analysis: According to Figure 8 of the Southwest Area Plan, there are no recreational trails planned within or adjacent to the Project area (Riv. County, 2014b, Figure 8). However, according to Figure IV-18 of SP 286, an optional trail system access is identified within Planning Area 2A and a Class I Bike Trail is planned along Washington Street. Implementation of the Project would not affect any trail facilities planned within Planning Area 2A, and such trails are identified as "optional" and are not required for future implementing projects. Although Planning Area 5A abuts Washington Street, no improvements to Planning Area 5A are proposed as part of the Project, as this area is fully built-out. As part of the construction of Planning Area 5A, a 10-foot decomposed granite trail was constructed along the western alignment of Washington Street. Thus, the Project either has accommodated or is not required to accommodate trail facilities as identified by SP 286. Accordingly, implementation of the proposed Project would not result in environmental impacts associated with the construction of recreational trails, and no impact would occur. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

Mitigation: No additional mitigation is required.

Monitoring: No additional monitoring is required.

TRANSPORTATION/TRAFFIC Would the project				
43. Circulation a) Conflict with an applicable plan, ordinance or policy establishing a measure of effectiveness for the performance of the circulation system, taking into account all modes of transportation, including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☐	☐	☐	☒
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or high-ways?	☐	☐	☐	☒
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒
d) Alter waterborne, rail or air traffic?	☐	☐	☐	☒
e) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?	☐	☐	☐	☒
f) Cause an effect upon, or a need for new or altered maintenance of roads?	☐	☐	☐	☒
g) Cause an effect upon circulation during the project's construction?	☐	☐	☐	☒

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
h) Result in inadequate emergency access or access to nearby uses?	☐	☐	☐	☒
i) Conflict with adopted policies, plans or programs regarding public transit, bikeways or pedestrian facilities, or otherwise substantially decrease the performance or safety of such facilities?	☐	☐	☐	☒

Source: *Project Application Materials; Riverside County General Plan; Project Specific Traffic Impact Analysis; Riverside County Congestion Management Program*

The Project proposes changes to the boundaries, acreage, and unit allocations of proposed Planning Areas 1, 2A, 3, 5A, 6, 7, 52A, and 52B. Planning Area 5A is currently developed with 118 single-family homes; thus, existing development within Planning Area 5A has no potential to result in new or more severe impacts to air quality. Although Planning Area 7 ultimately would be developed with up to 85 dwelling units, development within Planning Area 7 would require subsequent discretionary approvals that would be subject to CEQA. Other than the reduced unit allocation and diminishment of the size of Planning Area 7, no development would occur in Planning Area 7 as a result of the Project; thus, impacts associated with future development of Planning Area 7 are not evaluated herein because such impacts were fully evaluated as part of EIR No. 374. Although impacts to proposed Planning Areas 1, 2A, 3, 6, 52A, and 52B (within TTM 36722) were previously evaluated within EIR No. 374, a traffic impact analysis has been prepared for this portion of the Project site. Findings from the traffic impacts analysis are summarized below within Thresholds 43.a) and 43.b).

Findings of Fact:

a) **Would the Project conflict with an applicable plan, ordinance or policy establishing a measure of effectiveness for the performance of the circulation system, taking into account all modes of transportation, including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?**

EIR No. 374 Finding: EIR No. 374 concluded that the project would generate and attract motor vehicle trips associated with the human use of the subject property. Table XVII of the EIR concluded that the project would generate a total of 113,190 daily vehicle trips. In addition, the traffic study prepared for SP 286 did not identify any significant impacts as a result of the project and EIR No. 374 determined that the traffic study prepared for the project was consistent with General Plan Circulation Policies for Category II land uses. In addition, EIR No. 374 imposed Mitigation Measure 68 (renumbered herein as MM 16.6) to ensure that minimum level of service as required by the General Plan was evaluated at each phase of project development. Therefore, EIR No. 374 concluded that the project would not conflict with an applicable plan, ordinance or policy and impacts would be less than significant with mitigation. (Riv. County, 1997, pp. V-146, II-28)

No Substantial Change from Previous Analysis: In compliance with mitigation Measure 68 (renumbered herein as MM 16.6), a site-specific traffic impact analysis (TIA) was prepared for the Project. For purposes of analyzing the Project's potential impacts to traffic, the County or Riverside identified the traffic impact study area in conformance with their TIA preparation guidelines. Based on these guidelines, the minimum area to be studied includes any intersection of "Collector" or higher classification streets, at which a proposed Project would add 50 or more peak hour trips. For the proposed Project, the traffic study impact area includes six (6) existing and future intersections. Refer

to Technical Appendix J for more information about the analysis methodologies employed in the Project-specific TIA prepared by Trames Solutions, Inc.

Existing Conditions

Based on the scope of the proposed Project, a study area was established encompassing a total of six (6) existing intersections, as follows:

- Menifee Road/Scott Road
- Briggs Road/Leon Road
- Leon Road/ Scott Road
- Winchester Road (SR-79)/ Scott Road- Washington Street
- Winchester Road (SR-79)/ Pourroy Road- Abelia Street
- Washington Street/ Fields Drive

These six intersections were selected for analysis because the Project is anticipated to contribute 50 or more peak-hour trips to these intersections. There are no other intersections within the Project's vicinity that are projected to receive more than 50 Project-related peak hour trips. (Trames Solutions, 2014, p. 3)

In order to assess the existing conditions of the study area, manual AM and PM peak hour turning movement counts were conducted in April 2014 and May 2014 by the Project's traffic consultant (Trames Solutions, Inc.). Table EA-10, *Existing (2014) Conditions Intersection Operations Analysis Summary*, summarizes the existing level of service (LOS) at the six study area intersections. The intersection operations analysis results indicate that the existing study area intersections are currently operating at acceptable LOS during the peak hours, with the exception of the following intersection:

- Leon Road/ Scott Road

Based on a traffic signal warrants analysis, the intersection of Leon Road at Scott Road appears to warrant a traffic signal under existing conditions (Trames Solutions, 2014, p. 13).

Table EA-10 Existing (2014) Conditions Intersection Operations Analysis Summary

ID	Intersection	Traffic Control [1]	Intersection Approach Lanes [2]												Delay [3] (secs.)		Level of Service [3]	
			Northbound			Southbound			Eastbound			Westbound						
			L	T	R	L	T	R	L	T	R	L	T	R	AM	PM	AM	PM
1	Menifee Rd. / Scott Rd.	TS	1	1	1	1	1	0	1	2	0	1	2	0	44.4	33.2	D	C
2	Briggs Rd. / Scott Rd.	TS	0	1!	0	0.5	0.5	1	1	2	0	1	2	1	22.1	21.1	C	C
3	Leon Rd. / Scott Rd.	AWS	0	1!	0	0	1!	0	0	1!	0	0	1!	0	23.9	36.5	C	E
4	Winchester Rd. / Scott Rd. - Washington St.	TS	1	1	0	1	1	1	0	1!	0	0	1!	0	42.6	34.3	D	C
5	Winchester Rd. / Pourroy Rd. - Abelia St.	TS	1	2	1	1	2	1	1	2	0	1	2	0	36.5	32.4	D	C
6	Washington St. / Fields Dr.	TS	1	3	0	1	3	0	1	1	0	1	1	0	27.3	26.4	C	C

[1] TS = Traffic Signal; AWS = All-Way Stop

2 When a right turn is designated, the lane can either be striped or unstriped. To function as a right turn lane there must be sufficient width for right turning vehicles to travel outside the through lanes. L = Left; T = Through; R = Right; 1! = Shared Left-Through-Right Lane; 0.5 = Shared Lane

3 Delay and level of service calculated using the following analysis software: Traffix 8.0 R1

(Trames Solutions, 2014, Table 2-1)

Project Trip Generation and Distribution

Trip generation represents the amount of traffic which is attracted and produced by a development. The trip generation for the project is based upon the specific land use which has been planned for this development. For the purpose of this analysis, the trip generation from 146 single family (detached) residential dwelling units was analyzed, which is the number of dwelling units proposed as part of TTM 36722. Traffic impacts associated with Planning Area 5A already were evaluated for potential impacts to traffic. The Project only proposes to diminish the size of and reduce the number of dwelling units within Planning Area 7; thus, traffic impacts associated with buildout of Planning Area 7 were fully accounted for in EIR No. 374 and are not considered herein

Trip generation rates for proposed TTM 36722 are shown in Table EA-11, *Project Trip Generation Rates*. The trip generation rates are based upon data collected by the Institute of Transportation Engineers (ITE). (Trames Solutions, 2014, p. 15).

Table EA-11 Project Trip Generation Rates

LAND USE	ITE CODE	QUANTITY[2]	PEAK HOUR TRIP RATES[1] AM IN	AM OUT	AM TOTAL	PM IN	PM OUT	PM TOTAL	DAILY
Single Family Residential	210	146 DU	0.19	0.56	0.75	0.63	0.37	1.00	9.52

1 Source: ITE (Institute of Transportation Engineers) Trip Generation Manual, 9th Edition, 2012.
2 DU = Dwelling Units
(Trames Solutions, 2014, Table 3-1)

The daily and peak hour trip generations for the proposed Project are shown on Table EA-12, *Project Trip Summary.* The proposed development is projected to generate a total of approximately 1,390 trip-ends per day with 110 vehicles per hour during the AM peak hour and 146 vehicles per hour during the PM peak hour. (Trames Solutions, 2014, p. 16)

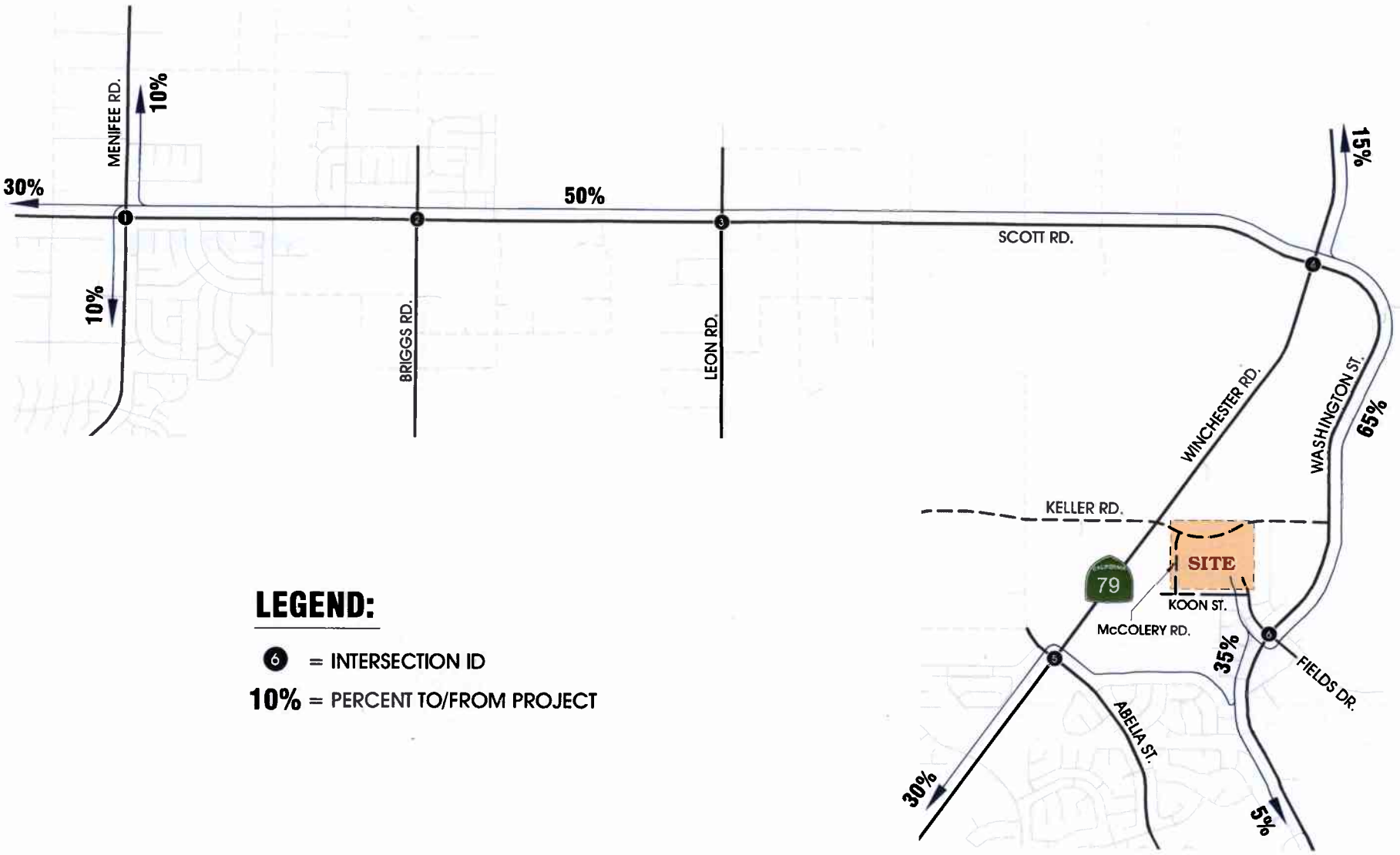
Table EA-12 Project Trip Summary

LAND USE	QUANTITY[1]	PEAK HOUR AM IN	AM OUT	AM TOTAL	PM IN	PM OUT	PM TOTAL	DAILY
Single Family Residential	146 DU	28	82	110	92	54	146	1,390
TOTAL PROJECT TRIPS		28	82	110	92	54	146	1,390

1 DU = Dwelling Units
(Trames Solutions, 2014, Table 3-2)

Trip distribution represents the directional orientation of traffic to and from the Project site. The Project's trip distribution patterns are based on the proximity of the residential units to the proposed driveway locations, the surrounding trip attractors (employment bases, commercial opportunities, schools, recreation centers, etc.), and the regional freeway interchanges. The trip distribution pattern for the Project is illustrated on Figure EA-2, *Project Trip Distribution.* (Trames Solutions, 2014, p. 16)

The Project consists of residential units that do not generate a significant amount of pass-by trips. Furthermore, it is unlikely that trips will be reduced to/from the site by non-motorized modes of travel due to the lack of; 1) convenient transit opportunities, 2) bike lanes, and 3) pedestrian trails. (Trames Solutions, 2014, p. 16)



Source: Trames Solutions Inc. (07-10-14)

NOT TO SCALE

Figure EA-2

Project Trip Distribution

The assignment of traffic from the site to the adjoining roadway system has been based upon the site's trip generation, trip distribution, proposed arterial highway and local street systems, which would be in place by the time of initial occupancy of the site. Based on the identified Project traffic generation and distribution, project peak hour intersection traffic volumes and average daily traffic (ADT) volumes are shown on Figure EA-3, *Project Average Daily Traffic.* (Trames Solutions, 2014, p. 16)

Existing Plus Project Traffic Conditions

Existing plus Project (EP) AM and PM peak hour intersection turning movement volumes and ADT volumes are shown on Figure 3-C of the Project's TIA (Technical Appendix J). The results of the EP conditions intersection are summarized in Table EA-13, *Intersection Analysis for Existing Plus Project Conditions.* The EP condition operations analysis worksheets are provided in Appendix "E" of the TIA.

The study area intersections are projected to operate at an acceptable level of service (LOS "D" or better) during the peak hours with the existing geometry and traffic controls, except at the following location:

- Leon Road / Scott Road

For E+P traffic conditions, the study area intersections are projected to operate at an acceptable level of service (LOS "D" or better) during the peak hours with existing geometry, except at the intersection previously identified under Existing (2014) conditions (Leon Road / Scott Road). Improvements identified below are anticipated to mitigate the deficient intersection to acceptable level of service (LOS "D" or better). Improvements to this intersection include the following and will address the current and anticipated deficiencies:

- Install a traffic signal.
- Provide a dedicated northbound left turn lane.
- Provide a dedicated southbound left turn lane.
- Provide a dedicated eastbound left turn lane.
- Provide a dedicated westbound left turn lane.

Table EA-13 Intersection Analysis for Existing Plus Project Conditions

ID	Intersection	Traffic Control [1]	Intersection Approach Lanes [2]												Delay [3] (secs.)		Level of Service [3]	
			Northbound			Southbound			Eastbound			Westbound						
			L	T	R	L	T	R	L	T	R	L	T	R	AM	PM	AM	PM
1	Menifee Rd. / Scott Rd.	TS	1	1	1	1	1	0	1	2	0	1	2	0	45.1	33.5	D	C
2	Briggs Rd. / Scott Rd.	TS	0	1!	0	0.5	0.5	1	1	2	0	1	2	1	22.0	21.3	C	C
3	Leon Rd. / Scott Rd.																	
	- Without Improvements	AWS	0	1!	0	0	1!	0	0	1!	0	0	1!	0	27.8	51.9	D	F
	- With Improvements	TS	1	1	0	1	1	0	1	1	0	1	1	0	26.6	31.8	C	C
4	Winchester Rd. / Scott Rd - Washington St.	TS	1	1	0	1	1	1	0	1!	0	0	1!	0	47.4	38.4	D	D
5	Winchester Rd. / Pourroy Rd - Abelia St.	TS	1	2	1	1	2	1	1	2	0	1	2	0	38.2	32.7	D	C
6	Washington St. / Fields Dr.	TS	1	3	0	1	3	0	1	1	0	1	1	0	30.9	32.0	C	C

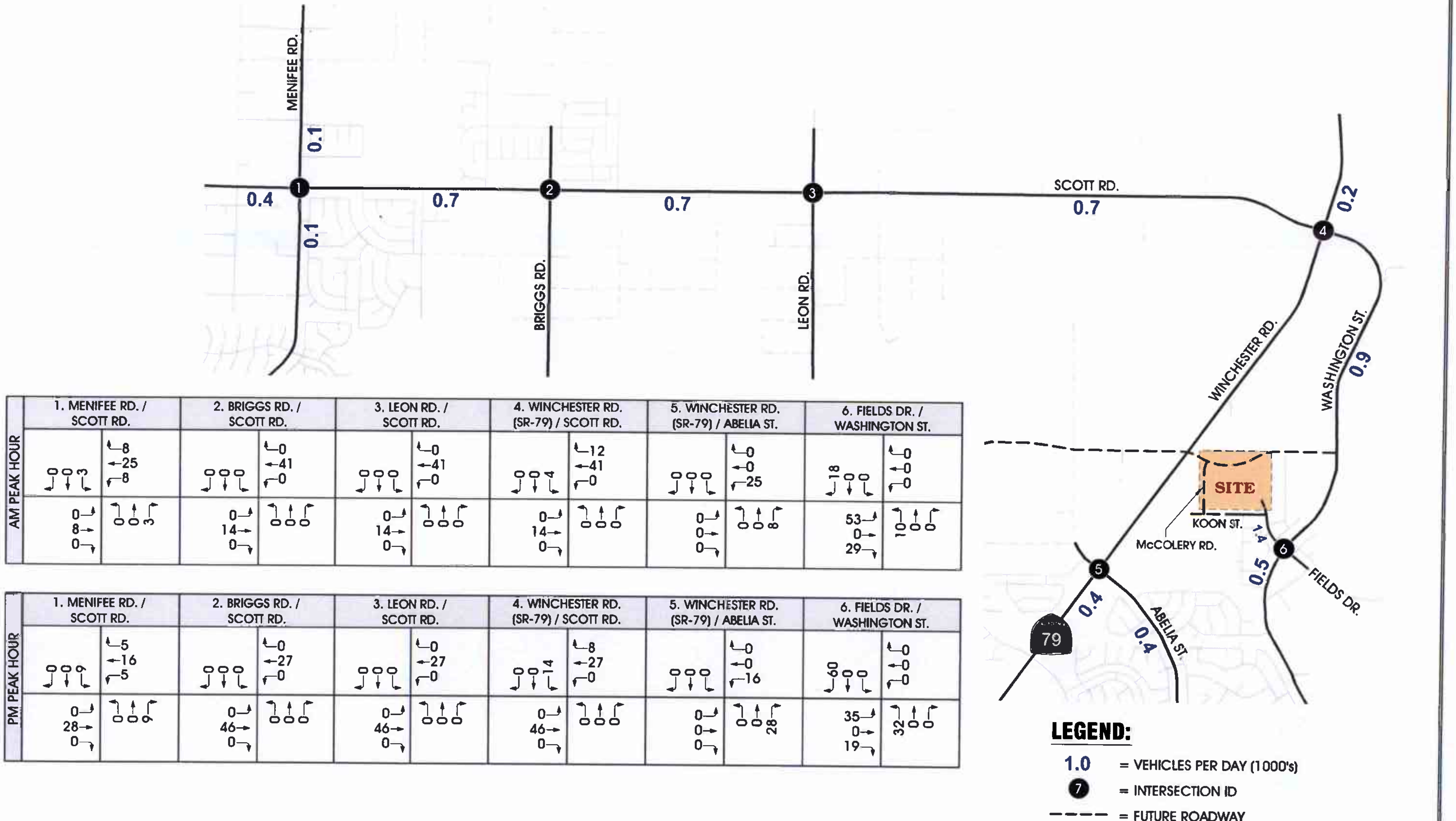
1 TS = Traffic Signal; AWS = All-Way Stop

2 When a right turn is designated, the lane can either be striped or unstriped. To function as a right turn lane there must be sufficient width for right turning vehicles to travel outside the through lanes.

L = Left; T = Through; R = Right; 1! = Shared Left-Through-Right Lane; 0.5 = Shared Lane; 1 = Improvement

3 Delay and level of service calculated using the following analysis software: Traffix 8.0 R1

(Trames Solutions, 2014, Table 3-3)



Source: Trames Solutions Inc. (07-10-14)

NOT TO SCALE

Figure EA-3

Project Average Daily Traffic

EA #42681

The payments by the Project towards the TUMF and DIF programs are expected to address the Project-related impacts at this intersection and are required pursuant to supplemental Mitigation Measure MM 16.12. With mitigation incorporated, the Project's impacts under E+P conditions would be less than significant. (Trames Solutions, 2014, pp. 35, 38)

Existing plus Ambient plus Project (EAP 2016) Conditions

Intersection levels of service for the EAP 2016 traffic conditions are shown in Table EA-14, *Intersection Analysis for Existing Plus Ambient Plus Project (EAP 2016) Conditions*. Table EA-14 shows HCM calculations based on the geometrics at the study area intersections and for conditions without and with intersection improvements. The operation analysis worksheets for EAP traffic conditions are provided in Appendix "G". For EAP traffic conditions, the study area intersections are projected to operate at an acceptable level of service during the peak hours with existing geometry, except at the following location:

- Leon Road / Scott Road

For EAP traffic conditions, the study area intersections are projected to operate at an acceptable level of service (LOS "D" or better) during the peak hours with existing geometry, except at the intersection previously identified under E+P conditions (Leon Road / Scott Road). There are no new improvements recommended for EAP conditions, other than those previously identified under E+P conditions. As such, impacts under EAP conditions would be less than significant with payment of appropriate TUMF and DIF fees required by supplemental Mitigation Measure MM 16.12. (Trames Solutions, 2014, pp. 34-35)

Cumulative Development Traffic

To assess existing plus ambient plus cumulative plus project traffic conditions, Project traffic is combined with existing traffic, area-wide growth and other future developments which are approved or being processed concurrently in the study area. Developments which are being processed concurrently in the study area have been provided by county staff. (Trames Solutions, 2014, p. 21)

Table EA-14 Intersection Analysis for Existing Plus Ambient Plus Project (EAP 2016) Conditions

ID	Intersection	Traffic Control [1]	Intersection Approach Lanes [2] Northbound L	T	R	Southbound L	T	R	Eastbound L	T	R	Westbound L	T	R	Delay [3] (secs.) AM	PM	Level of Service [3] AM	PM
1	Menifee Rd. / Scott Rd	TS	1	1	1	1	1	0	1	2	0	1	2	0	47.3	34.1	D	C
2	Briggs Rd. / Scott Rd.	TS	0	1!	0	0.5	0.5	1	1	2	0	1	2	1	21.1	21.4	C	C
3	Leon Rd. / Scott Rd.																	
	- Without Improvements	AWS	0	1!	0	0	1!	0	0	1!	0	0	1!	0	34.4	63.2	D	F
	- With Improvements	TS	1	1	0	1	1	0	1	1	0	1	1	0	27.7	33.5	C	C
4	Winchester Rd. / Scott Rd. - Washington St.	TS	1	1	0	1	1	1	0	1!	0	0	1!	0	54.3	43.0	D	D
5	Winchester Rd. / Pourroy Rd. - Abelia St.	TS	1	2	1	1	2	1	1	2	0	1	2	0	38.7	33.1	D	C
6	Washington St. / Fields Dr.	TS	1	3	0	1	3	0	1	1	0	1	1	0	30.9	29.7	C	C

1 TS = Traffic Signal; AWS = All-Way Stop

2 When a right turn is designated, the lane can either be striped or unstriped. To function as a right turn lane there must be sufficient width for right turning vehicles to travel outside the through lanes.

L = Left; T = Through; R = Right; 1! = Shared Left-Through-Right Lane; 0.5 = Shared Lane; 1 = Improvement

3 Delay and level of service calculated using the following analysis software: Traffix 8.0 R1

(Trames Solutions, 2014 Table 4-1)

The cumulative developments have been included along with the land use associated with each project. The location of the cumulative projects provided by the county and nearby jurisdictions are shown on Figure 3-D of the Project's TIA (Technical Appendix J). (Trames Solutions, 2014, p. 21)

For cumulative projects, ITE Trip Generation Rates (9th Edition) were used. Table 3-5 of the Project's TIA presents the cumulative development land uses and trip generation summary. As presented in Table 3-5, cumulative developments are projected to generate a total of approximately 23,543 trip-ends per day with 1,852 vehicles per hour during the AM peak hour and 2,462 vehicles per hour during the PM peak hour. (Trames Solutions, 2014, p. 21)

Based on the identified trip distribution for the cumulative development on arterial highways throughout the study area, cumulative development peak hour intersection turning movement volumes and ADT volumes are shown on Figure 3-E of the Project's TIA (Technical Appendix J). (Trames Solutions, 2014, p. 24)

Existing plus Ambient plus Project plus Cumulative (EAPC 2016) Conditions

Intersection levels of service for the EAPC traffic conditions are shown in Table EA-15, *Intersection Analysis for Existing Plus Ambient Plus Project Plus Cumulative (EAPC 2016) Conditions*. Table EA-15 shows HCM calculations based on the geometrics at the study area intersections and for conditions without and with intersection improvements. The operation analysis worksheets for EAPC traffic conditions are provided in Appendix "H".

Table EA-15 Intersection Analysis for Existing Plus Ambient Plus Project Plus Cumulative (EAPC 2016) Conditions

ID	Intersection	Traffic Control [1]	Intersection Approach Lanes [2] Northbound L	T	R	Southbound L	T	R	Eastbound L	T	R	Westbound L	T	R	Delay [3] (secs.) AM	PM	Level of Service [3] AM	PM
1	Menifee Rd. / Scott Rd.																		
	- Without Improvements	TS	1	1	1	1	1	0	1	2	0	1	2	0	64.4	49.8	E	D
	- With Improvements	TS	1	1	1	1	1	1	1	2	0	1	2	0	46.5	49.7	D	D
2	Briggs Rd. / Scott Rd.	TS	0	1!	0	0.5	0.5	1	1	2	0	1	2	1	22.9	25.3	C	C
3	Leon Rd. / Scott Rd.																		
	- Without Improvements	AWS	0	1!	0	0	1!	0	0	1!	0	0	1!	0	>80.0	>80.0	F	F
	- With Improvements	TS	1	1	0	1	1	0	1	1	1>	1	1	0	43.0	48.7	D	D
4	Winchester Rd. / Scott Rd. - Washington St.																		
	- Without Improvements	TS	1	1	0	1	1	1	0	1!	0	0	1!	0	–[4]	–[4]	F	F
	- With Improvements	TS	1	2	0	1	2	0	1	1	0	1	1	1	40.2	53.1	D	D
5	Winchester Rd. / Pourroy Rd. - Abelia St.	TS	1	2	1	1	2	1	1	2	0	1	2	0	44.1	36.8	D	D
6	Washington St. / Fields Dr.	TS	1	3	0	1	3	0	1	1	0	1	1	0	35.2	33.1	D	C

1 TS = Traffic Signal; AWS = All-Way Stop

2 When a right turn is designated, the lane can either be striped or unstriped. To function as a right turn lane there must be sufficient width for right turning vehicles to travel outside the through lanes.

L = Left; T = Through; R = Right; 1! = Shared Left-Through-Right Lane; 0.5 = Shared Lane; 1 = Improvement

3 Delay and level of service calculated using the following analysis software: Traffix 8.0 R1

4 LOS "F"; Volume to capacity ratio (v/c) > 1.0

(Trames Solutions, 2014, Table 5-1)

For EAPC traffic conditions, the study area intersections are projected to continue to operate at an acceptable level of service during the peak hours with existing geometry, except at the following locations:

- Menifee Road / Scott Road
- Leon Road / Scott Road
- Winchester Road (SR-79) / Scott Road – Washington Street

For EAPC traffic conditions, the intersections of Menifee Road / Scott Road and Winchester Road (SR-79) / Scott Road – Washington Street are projected to operate at deficient level of service (LOS "E" or worse) during the peak hours, in addition to intersection (Leon Road / Scott Road) previously identified under EP conditions. Improvements identified below are anticipated to mitigate the deficient intersections to acceptable level of service (LOS "D" or better). (Trames Solutions, 2014, p. 35)

- Menifee Road / Scott Road Improvements:
  - Provide a separate southbound right turn lane.

- Leon Road / Scott Road Improvements:
  - Install a traffic signal. (Same as EAP conditions)
  - Provide a dedicated northbound left turn lane. (Same as EAP conditions)
  - Provide a dedicated southbound left turn lane. (Same as EAP conditions)
  - Provide a dedicated eastbound left turn lane. (Same as EAP conditions)
  - Provide a separate eastbound right turn lane with overlap phasing.
  - Provide a dedicated westbound left turn lane. (Same as EAP conditions)

- Winchester Road (SR-79) / Scott Road – Washington Street Improvements:
  - Provide a 2nd northbound through lane and a 2nd receiving lane.
  - Convert the existing southbound right turn lane into a 2nd through lane and
  - Provide a 2nd receiving lane.
  - Provide a dedicated eastbound left turn lane.
  - Provide a dedicated westbound left turn lane and a separate right turn lane.

Project contributions to the TUMF and DIF programs are expected to address the above-listed Project-related impacts at these intersections, as required by supplemental Mitigation Measure MM 16.12. With mitigation incorporated, the Project's impacts under EAPC conditions would be less than significant.(Trames Solutions, 2014, p. 35)

Conclusion

Pursuant to supplemental Mitigation Measure MM 16.12, the Project Applicant would be required to participate in the Western Riverside County TUMF program. The Project also would be required to participate in the County's DIF program pursuant to Ordinance No. 659. Participation in these mitigation fee programs would fund the construction of improvements to the local roadway system necessary to provide adequate LOS and would offset the Project's contribution of traffic to local roadways and intersections. As such, impacts to these intersections under EP, EAP, and EAPC conditions would be reduced to less-than-significant levels with adherence to required mitigation. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis

b) Would the Project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or high-ways?

EIR No. 374 Finding: EIR No. 374 did not identify any impacts due to a conflict with an applicable congestion management program.

No Substantial Change from Previous Analysis: The congestion management program (CMP) applicable to the Project area is the Riverside County Transportation Commission's (RCTC) *2011 Riverside County Congestion Management Program*. Within the Project's vicinity, Highway 79 and I-15 are identified as CMP facilities (CMP Highway and CMP Interstate, respectively) (RCTC, 2011, Exhibit 2-1). However, and consistent with the findings of the Project's traffic impact analysis (Technical Appendix J), the proposed Project would not contribute more than 50 peak hour trips to Highway 79, I-15, or any other CMP facility. 50 peak hour trips is considered the threshold above which an analysis of CMP facilities may be required (California DOT, 2002, p. 2). Accordingly, the Project has no potential to conflict with the level of service standards as specified in the 2011 CMP, nor would the Project interfere with the CMP's travel demand measures. As such, the proposed Project would not conflict with the applicable CMP and no impact would occur. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

c) Would the Project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

d) Would the Project alter waterborne, rail or air traffic?

EIR No. 374 Finding: EIR No. 374 did not identify any impacts to air traffic patterns, or waterborne, rail, or air traffic.

No Substantial Change from Previous Analysis: The Project site is located approximately 3.5 miles northeast of the French Valley Airport (Google Earth, 2013). According to Map FV-6 of the 2007 Airport Land Use Compatibility Plan for the French Valley Airport, the Project site is located outside of the airport influence area (AIA) for the French Valley Airport (ALUC, 2007). Accordingly, the proposed Project would have no potential to result in any hazards to air traffic, and would not result in a change in air traffic patterns. Therefore, the Project would have no adverse effects to air traffic. In addition, there are no rail lines or waterborne traffic in the Project area under existing conditions. Accordingly, the proposed Project would not alter waterborne or rail traffic. As such, the proposed Project would have no impact on air traffic, waterborne traffic, or rail traffic. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

e) Would the Project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?

EIR No. 374 Finding: EIR No. 374 concluded that the project would ensure that curves and roads would be designed to permit safe movement of vehicular traffic through the project area. EIR No. 374 did not identify any increase in hazards due to a design feature or incompatible uses. (Riv. County, 1997, p. V-149)

No Substantial Change from Previous Analysis: All roadway improvements planned as part of the Project would be in conformance with applicable Riverside County standards, and would not result in any hazards due to a design feature. Additionally, the Project area is currently characterized with rural and urban density residential units, with some areas that are still under cultivation with dry land crop production. Activities associated with dry land crop production would not result in any safety hazards due to incompatibility between Project-related traffic and farm equipment because this type of agricultural activity does not involve the routine use of tractors or other equipment that would need to utilize roadways that would serve future traffic generated by the site. Accordingly, impacts would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

f) Would the Project cause an effect upon, or a need for new or altered maintenance of roads?

EIR No. 374 Finding: EIR No. 374 concluded that the Riverside County Circulation Element would be amended by both the project and the Airport Community transportation Study and would include the extension and expansion of Pourroy Road, and the addition three Secondary Roadway links (Street "A," Street "B," and Street "I) to interconnect land uses and arterials within the project area. Impacts associated with the construction of new and expanded roads were analyzed in EIR No. 374 which concluded that impacts would be less than significant with incorporation of Mitigation Measures 63 through 72 (renumbered herein as MM 16.1 through MM 16.11). (Riv. County, 1997, pp. V-140, II-27 - II-29)

No Substantial Change from Previous Analysis: Implementation of the proposed Project would result in the establishment of several new roadways within and extending from the Project site that would require maintenance. Maintenance of the major roadways planned for improvement by the Project would not result in any significant impacts to the environment. Impacts associated with the physical construction of these roadways already are evaluated in appropriate sections of this Addendum to EIR No. 374. Maintenance of these major roadway facilities would be funded through the Project developer's payment of Development Impact Fees (DIF) and future Project residents' payment of property taxes. Furthermore, mitigation measure identified in EIR No. 374 would continue to apply to the proposed Project. As such, the Project would have a less-than-significant impact due to the need for new or altered maintenance of roads. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

g) Would the Project cause an effect upon circulation during the project's construction?

EIR No. 374 Finding: EIR No. 374 did not identify any impacts to circulation during construction activities.

No Substantial Change from Previous Analysis: The proposed Project is not anticipated to affect any roadways in the vicinity of the site during construction, as it is anticipated that surrounding roadways have sufficient capacity to accommodate construction vehicle traffic traveling to and from the site because construction-related traffic would not exceed traffic volumes anticipated upon buildout of the Project, which were found to be less than significant with the payment of TUMF and DIF fees. Accordingly, impacts to the circulation system during Project construction would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis

h) Would the Project result in inadequate emergency access or access to nearby uses?

EIR No. 374 Finding: EIR No. 374 did not identify any impacts to emergency access or access to nearby uses.

No Substantial Change from Previous Analysis: The proposed Project would be required to comply with Riverside County Ordinance Nos. 460 & 461, which regulate access road provisions. The requirement to provide adequate paved access to the Project site would be required as a condition of Project approval. Additionally, the proposed Project would not affect any roadways that provide emergency access under existing conditions. With required adherence to County requirements for emergency access, impacts would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

i) Would the Project conflict with adopted policies, plans or programs regarding public transit, bikeways or pedestrian facilities, or otherwise substantially decrease the performance or safety of such facilities?

EIR No. 374 Finding: EIR No. 374 identified Mitigation Measures 64 and 65 to ensure that the project would provide adequate sidewalks or pathways in residential and commercial areas, and bike lanes, bike trails, and bus stops within the project area. With incorporation of these mitigation measure, EIR No. 374 concluded that impacts to adopted policies, plans or programs regarding public transit, bikeways, or pedestrian facilities would be less than significant. (Riv. County, 1997, p. II-27)

No Substantial Change from Previous Analysis: The Riverside County General Plan does not identify the Project site for any bikeways, or pedestrian facilities (Riv. County, 2003a, Figure C-7). In addition, there are no public transit facilities located in the vicinity of the Project site although Route 79 exists to the west of the Project site along Winchester Road (Hwy 79) (RTA, 2014). In addition, there are no components of the proposed Project that would substantially decrease the performance or safety of such facilities. Accordingly, there would be no impact due to a conflict with adopted policies, plans or programs regarding public transit, bikeways, or pedestrian facilities. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

Mitigation:

Supplemental Mitigation Measures

EIR No. 374 includes 11 mitigation measures (renumbered herein as MM 16.1 through 16.11), which would continue to apply to the proposed Project. In order to ensure that Project-related impacts to traffic are fully precluded, the County has imposed the following traffic mitigation measure on the proposed Project. The requirement listed below is based on the recommendations of the Project's traffic consultant (Trames Solutions, Inc.):

MM 16.12 Prior to the issuance of any building permits, the Project Proponent shall make required per-unit fee payments associated with the Western Riverside County Transportation Uniform Mitigation Fees (TUMF), and the County of Riverside Development Impact Fee (DIF).

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis

Monitoring:

MM 16.12 Prior to issuance of the first building permit, the Riverside County Building and Safety Department shall ensure that appropriate fees have been paid in accordance with the Western Riverside County Transportation Uniform Mitigation Fees (TUMF) and the County of Riverside Development Impact Fee (DIF) programs.

44. Bike Trails	☐	☐	☐	☒

Source: *Southwest Area Plan; Project Application Materials*

Findings of Fact:

EIR No. 374 Finding: EIR No. 374 concluded that buildout of Winchester 1800 Specific Plan would result in the construction public roads. EIR No. 374 identified Mitigation Measure 64 (renumbered herein as MM 16.2) to ensure that all bike trails developed as part of the project would be designed as Class I bikeways generally located in separate rights-of-way. With incorporation of mitigation, EIR No. 374 determined that impacts to bike trails would be less than significant. (Riv. County, 1997, p. II-27)

No Substantial Change from Previous Analysis: According to Figure 8 of the Southwest Area Plan (SWAP), there are no bike trails or facilities planned within the Project vicinity (Riv. County, 2014b, Figure 8). SP 286 identifies a Class I Bike Trail along the western edge of Washington Street, which was constructed concurrent with buildout of Planning Area 5A. There are no other bike trails planned for the Project site by SP 286, and no bike trails are proposed as part of the Project, although public streets to be constructed as part of the Project would afford access to bicycles. Impacts associated with the construction of roadways by the Project have been evaluated throughout this EIR Addendum, and where necessary mitigation measures have been identified to reduce impacts to less-than-significant levels. Accordingly, impacts due to the construction of bike trails would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

Mitigation: No additional mitigation is required.

Monitoring: No additional monitoring is required.

UTILITY AND SERVICE SYSTEMS Would the project				
45. Water				
a) Require or result in the construction of new water treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects?	☐	☐	☐	☒
b) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☐	☒

Source: *Eastern Municipal Water District Urban Water Management Plan; Project Application Materials*

Findings of Fact:

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis

a) Would the Project require or result in the construction of new water treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects?

EIR No. 374 Finding: EIR No. 374 concluded additional water storage would be necessary to serve the project. The Eastern Municipal Water District (EMWD) indicated that EMWD would have the ability to serve the project provided that improvement facilities were implemented. EIR No. 374 identified Mitigation Measures 74 through 79 (renumbered herein as MM 17.1 through MM 17.6) to ensure that construction of water facilities and infrastructure would be reduced to below a level of significance. (Riv. County, 1997, pp. V-155, II-31)

No Substantial Change from Previous Analysis: The proposed Project would construct an on-site network of water pipes on the TTM 36722 portion of the Project site (within Planning Areas 1, 3, and 6). The installation of water lines as proposed by the Project would result in physical impacts to the surface and subsurface of infrastructure alignments. These impacts are considered to be part of the Project's construction phase and are evaluated throughout this addendum to EIR No. 374 accordingly. The construction of water lines as necessary to serve the proposed Project would not result in any significant physical effects on the environment that are not already identified and disclosed as part of this Addendum. Accordingly, additional mitigation measures beyond those identified throughout this Addendum to EIR No. 374 would not be required. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in EIR No. 374.

b) Would the Project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

EIR No. 374 Finding: The EIR noted that project development would increase the demand on water service in the area by approximately 3.42 million gallons per day (MGD). However, the EIR noted that the EMWD would have adequate water supplies available to serve the project. As such, the EIR noted that impacts associated with water supplies would be less than significant. (Riv. County, 1997, pp. V-158 - 159)

No Substantial Change from Previous Analysis: Water to the Project site would be provided by the Eastern Municipal Water District (EMWD). The EMWD has prepared an Urban Water Management Plan (UWMP) dated June 2011, which provides for the long-range planning efforts of water purveyance within its district.

According to the UWMP, EMWD has four existing sources of water supply: imported water from MWD, recycled water, local groundwater production and desalted groundwater. A detailed account of current and projected EMWD water supplies is available in the UWMP, which is herein incorporated by reference and available for review at the EMWD, 2270 Trumble Road, Perris, CA 92570, or on-line at http://www.emwd.org/home/showdocument?id=1506. Between 2004 and 2010, EMWD's reliance on imported water has remained proportionally consistent or decreased, even as EMWD added over 20,000 new water connections. This has been achieved through the construction of desalination facilities, a commitment to increase recycled water use and through a decrease in demand resulting from water efficiency. These efforts have increased the reliability of supplies and decreased the dependence on imported water sources. (EMWD, 2011, p. 27)

Demands for EMWD were developed using projections provided by the Riverside County Center for demographic research, which develops its projections, in part, based on the General Plans for the