

1 projects with respect to their incremental pollutant contributions, impacts to air
2 quality would remain significant and unavoidable.

3 Cumulative Mitigation:

4 Refer also to the "Project Impacts" section of the document, above, for a full
5 discussion of these measures.

6 New Mitigation Measure 4.7.A-N1 states, "In order to ensure GHG emissions resulting
7 from new development are reduced to levels necessary to meet California State
8 targets, the County of Riverside shall require all new discretionary development to
9 comply with the Implementation Measures of the Riverside County Climate Action
10 Plan or provide comparable custom measure backed by a project GHG study (for
11 example, using CalEEMod modeling) demonstrating achievement of the same target.
12 The target to be met is a GHG emissions reduction of 25% below emissions for the
13 adjusted "business as usual" (BAU) scenario for residential, commercial, industrial,
14 institutional and mixed-use projects. The adjusted BAU is based upon the 2020 BAU
15 found in the Final Supplement to the AB 32 Scoping Plan (CARB 2011)."

16 New Mitigation Measure 4.7.A-N2 states, "In lieu of a project-specific GHG analysis
17 per Mitigation Measures 4.7.A-N1, a future discretionary project pursuant to the
18 Riverside County General Plan shall incorporate into the project design, operational
19 features and/or Implementing Measures from the County Climate Action Plan (CAP),
20 in such a manner as to garnish at least 100 points. The point values within the CAP's
21 Screening Tables constitute GHG emission reductions."

22 New Mitigation Measure 4.7A-N3 states "The County of Riverside will monitor
23 implementation of the reduction measures and revise or amend the Climate Action
24 Plan as needed based upon the results of monitoring to ensure achievement of the
25 2020 Reduction Target. In addition, the County of Riverside will start update process
26 of the Climate Action Plan in 2017 to provide a post-2020 plan. The post-2020
27 Climate Action Plan update will include a specific target for GHG reductions for 2035
28 and 2050. The targets will be consistent with broader state and federal reduction

1 targets including Executive Order S-3-05 and with the scientific understanding of the
2 needed reductions by 2050. The post-2020 Climate Action Plan update will include a
3 set of updated reduction measures to achieve the 2035 and 2050 Reduction Targets
4 and updated monitoring system to ensure that the updated targets are achieved. The
5 County of Riverside will adopt the new post-2020 Climate Action Plan update by
6 January 1, 2020.”

7 With implementation of and compliance with the regulatory programs discussed in
8 EIR No. 521, Section 4.6, “Air Quality,” Riverside County ordinances, existing and
9 proposed General Plan policies, as well as proposed new Mitigation Measures 4.7.A-
10 N1 and N2 and N3, air pollutant emissions from cumulative General Plan buildout
11 would be reduced but would still exceed regulatory thresholds for the South Coast Air
12 Basin (SCAB), Salton Sea Air Basin (SSAB), and Mojave Desert Air Basin (MDAB).
13 Exceedance of regulatory thresholds would conflict with the implementation of the
14 applicable air quality plans. Implementation of greenhouse gas reduction measures
15 would afford additional reductions in criteria air pollutants; however, it would not
16 reduce cumulative criteria pollutant impacts to below regulatory thresholds. Thus,
17 cumulative impacts would remain significant and unavoidable with respect to regional
18 air quality plans.

19 Reference: Draft EIR No. 521 pages 5-79, 5-81 and 5-86 through 5-87

20 2. Cumulative Impacts: (Impact 4.6.B(1)) Cause Significant Construction (Short-Term) Air
21 Emissions

22 Construction emissions are site-specific and will vary depending on the particulars of
23 the implementing project. Because construction factors can vary so widely, estimating
24 all of the construction emissions or impacts for any of the Riverside County buildout
25 scenarios is infeasible. Instead, Table 4.6-D, “Typical Project Construction Emission
26 Estimates” in Section 4.6, “Air Quality” of EIR No. 521 shows examples of the
27 construction emissions associated with various sizes of development projects. The
28 table demonstrates the construction emissions that would result from onsite grading

1 activities, transport of materials to and from the site and the actual building
2 construction, painting and paving associated with the individual developments. Most
3 notably it shows that SCAQMD and MDAQMD thresholds for PM₁₀ will be exceeded
4 when construction activities result in the disturbance of 25 or more acres at a time. In
5 addition, the construction of 150 single-family residential units or more would also
6 exceed the SCAQMD threshold for Reactive Organic Gases (ROG).

7 Because of the ease with which individual projects can exceed regulatory thresholds,
8 construction air quality impacts would likely be considered individually significant for
9 many of these future projects. Further, since the precise timing of future
10 development cannot be controlled or readily foreseen, it is possible that multiple
11 projects would undergo construction simultaneously. The result would be
12 cumulatively considerable, even if the individual projects were individually below the
13 thresholds through mitigation. Thus, for these reasons, construction air quality
14 impacts are considered cumulatively considerable for any of the General Plan buildout
15 scenarios addressed. Even where individual future development projects were
16 successfully mitigated to less than significant levels, they would still contribute
17 incrementally to cumulatively significant air quality impacts. Further, despite
18 mitigation, the abovementioned applicable Riverside County regulations and policies
19 described in the "Project Impacts" section of this document would not fully reduce
20 the significant unavoidable cumulative impacts associated with construction-related
21 pollutant emissions. Because there is no feasible mechanism for the County of
22 Riverside to control individual projects with respect to their incremental pollutant
23 contributions, impacts to air quality would remain significant and unavoidable.

24 Cumulative Mitigation:

25 Existing Mitigation Measures 4.5.1A, 4.5.1B and 4.5.1C, and New Mitigation Measures
26 4.6.B-N1, 4.6.B-N2 and 4.6.B-N3 and 4.6.B-N4, described previously under "Project
27 Impacts," would also apply to cumulative impacts associated with operational air
28 emissions. However, as mentioned above, even with implementation of these

mitigation measures, cumulative impacts would not be reduced to less than significant levels, and impacts would remain cumulatively considerable.

Reference: Draft EIR No. 521 pages 5-75 through 5-76 and 5-82 through 5-84

3. Cumulative Impacts: (Impact 4.6.B(2)) Cause Significant Operational (Long-Term) Air Emissions

Air quality effects are most often determined on the basis of traffic patterns which reflect land use, population and employment sources. Air quality effects are also influenced by growth projections and patterns. For the Project and cumulative buildout scenarios, operational emissions were calculated using URBEMIS for stationary and mobile source emissions. Scenario-specific data for the types and amounts of land use development planned were entered into URBEMIS to determine the pollutant emissions anticipated at full buildout. This data includes the number of residential dwelling units, square footage of non-residential land uses, average daily trips, vehicle miles traveled and average trip lengths. Where Project-specific data was not available, URBEMIS defaults were used. The result of the modeling indicates estimated air quality impacts for a variety of future scenarios, including each of the General Plan buildout scenarios proposed for this cumulative analysis. For specifics on how the air quality data was modeled, see Section 4.6.4 of EIR No. 521, and the letter addendum issued by Atkins, dated July 2013 (see Appendix EIR-10).

Table 5.5-I, "Cumulative Unmitigated Operational Emissions" on pages 5-76 and 5-77 in Section 5.5 of EIR No. 521 shows the anticipated unmitigated emissions for the various buildout scenarios, and Table 5.5-J, "Cumulative Mitigated Operational Emissions" on pages 5-78 and 5-79 in Section 5.5 of EIR No. 521 shows the same results after reductions derived from proposed mitigation. Note that the buildout scenario for the existing (2009) General Plan was not modeled since it was not one of the proposed Project outcomes, and its results would only provide a plan-to-plan comparison. As indicated in Tables 5.5-I and 5.5-J, all of the buildout scenarios would result in net emissions exceeding SCAQMD and MDAQMD thresholds of significance

1 for CO, ROG, SOX, PM₁₀ and PM_{2.5}, but would be less than significant for NOX
2 emissions. The negative net emissions associated with NOX reflects the substantial
3 decrease in anticipated emissions from vehicles resulting from state and federally
4 mandated vehicle efficiency increases over time.

5 Stationary and mobile sources would emit criteria pollutants based on the level of
6 daily operation. Modeling results indicate that such emissions would be large, both
7 for the Project and cumulatively for any of the General Plan buildout scenarios, due to
8 hundreds of individual sources that would be developed across Riverside County.
9 Refer to the "Project Impacts" section of this document for a discussion of the
10 regulations, policies, and mitigation measures that would contribute to lessening the
11 Project's cumulative impacts to criteria pollutant emissions. Even with mitigation
12 through regulatory compliance and CEQA-specific mitigation measures (from both this
13 EIR and the prior EIR No. 441), operational criteria pollutant emissions would still
14 cumulatively exceed regulatory thresholds. Thus, this impact would be cumulatively
15 considerable.

16 Cumulative Mitigation:

17 Additional Project-specific Mitigation Measures 4.7.A-N1 and N2 and N3, and 4.6.B-N4
18 and N5, described previously under the "Project Impacts" section of this document,
19 are also applicable cumulative operational air emissions. However, as mentioned
20 above, even with implementation of these mitigation measures, cumulative impacts
21 would not be reduced to less than significant levels, and cumulative operational air
22 emission impacts would remain cumulatively considerable.

23 Reference: Draft EIR No. 521 pages 5-76 through 5-77, 5-80

24 4. Cumulative Impacts: (Impact 4.6.C) Cause Cumulatively Significant Project Air Quality
25 Impacts

26 Future development accommodated by the Project would result in the emission of
27 criteria pollutants for which the Project is in non-attainment during both construction
28 and operation of the new development. However, the exact location and level of

1 activity for development projects under proposed GPA No. 960 is unknown and
2 therefore cumulatively considerable increases to criteria pollutant levels cannot be
3 quantified. Even with compliance with the existing regulations and policies and the
4 implementation of existing and new mitigation measures described above in the
5 "Project Impacts" section of this document, the proposed Project would result in
6 significant and unavoidable cumulative impacts.

7 Cumulative Mitigation:

8 In EIR No. 441, prepared for the 2003 RCIP General Plan, Mitigation Measures 4.5.1A,
9 4.5.1B and 4.5.1C were imposed to reduce impacts to air quality. These measures
10 remain applicable to this Project and would lessen impacts to air quality by minimizing
11 fugitive dust during construction and reducing pollution resulting from construction
12 equipment. The measures read as follows:

13 Existing Mitigation Measure 4.5.1A states, "Applicable SCAQMD Rule 403 Measures:
14 Apply nontoxic chemical soil stabilizers according to manufacturers' specifications to
15 all inactive construction areas (previously graded areas inactive for ten days or more).

- 16 • Water active sites at least twice daily. (Locations where grading is to occur will
17 be thoroughly watered prior to earthmoving.)
- 18 • All trucks hauling dirt, sand, soil, or other loose materials are to be covered, or
19 should maintain at least two feet of freeboard in accordance with the
20 requirements of California Vehicle Code (CVC) Section 23114 (freeboard
21 means vertical space between the top of the load and top of the trailer).
- 22 • Pave construction access roads at least 100 feet onto the site from main road.
- 23 • Traffic speeds on all unpaved roads shall be reduced to 15 mph or less.

24 Existing Mitigation Measure 4.5.1B provides additional SCAQMD CEQA Air Quality
25 Handbook dust measures:

- 26 • Re-vegetate disturbed areas as quickly as possible.☐
- 27 • All excavating and grading operations shall be suspended when wind speeds
28 (as instantaneous gusts) exceed 25 mph.

- All streets shall be swept once a day if visible soil materials are carried to adjacent streets (recommend water sweepers with reclaimed water).
- Install wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash trucks and any equipment leaving the site each trip.

Existing Mitigation Measure 4.5.1C provides additional mitigation measures for construction equipment and vehicles exhaust emissions:

- The construction contractor shall select the construction equipment used on site based on low emission factors and high energy efficiency.
- The construction contractor shall ensure that construction grading plans include a statement that all construction equipment will be tuned and maintained in accordance with the manufacturer's specifications.
- The construction contractor shall utilize electric- or diesel-powered equipment, in lieu of gasoline-powered engines, where feasible.
- The construction contractor shall ensure that construction grading plans include a statement that work crews will shut off equipment when not in use. During smog season (May through October), the overall length of the construction period will be extended, thereby decreasing the size of the area prepared each day, to minimize vehicles and equipment operating at the same time.
- The construction contractor shall time the construction activities so as to not interfere with peak hour traffic and minimize obstruction of through traffic lanes adjacent to the site; if necessary, a flagperson shall be retained to maintain safety adjacent to existing roadways.
- The construction contractor shall support and encourage ridesharing and transit incentives for the construction crew.
- Dust generated by the development activities shall be retained on-site and kept to a minimum by following the dust control measures listed below.

- During clearing, grading, earthmoving, excavation, or transportation of cut or fill materials, water trucks or sprinkler systems shall be used to prevent dust from leaving the site and to create a crust after each day's activities cease.
- During construction, water trucks or sprinkler systems shall be used to keep all areas of vehicle movement damp enough to prevent dust from leaving the site. At a minimum, this would include wetting down such areas in the late morning, after work is completed for the day and whenever wind exceeds 15 miles per hour.
- Immediately after clearing, grading, earthmoving, or excavation is completed, the entire area of disturbed soil shall be treated until the area is paved or otherwise developed so that dust generation will not occur.
- Soil stockpiled for more than two days shall be covered, kept moist, or treated with soil binders to prevent dust generation.
- Trucks transporting soil, sand, cut or fill materials and/or construction debris to or from the site shall be tarped from the point of origin."

Where future development accommodated by GPA No. 960 would exceed regulatory thresholds for construction emissions, new Mitigation Measures 4.6.B-N1, 4.6B-N2 and 4.6.B-N3, as listed under Impact 4.6.B(1) above, would be implemented to further reduce construction emissions. In addition, new Mitigation Measures 4.7.A-N1 and 4.7.A-N2, as listed under Impact 4.7.A above, as well as 4.6.B-N4 and 4.6.B-N5, as listed under Impact 4.6.B above, would also be implemented for future development to further reduce criteria pollutant emissions from operational activities. Because these mitigation measures reduce emissions associated with all future development projects within the unincorporated Riverside County area, the mitigation measures will also reduce the cumulative air quality impacts associated with all future

1 development projects within the unincorporated Riverside County area, but not to a
2 level of less than significant.

3 For the reasons presented above, implementation and compliance with the above-
4 listed existing Mitigation Measures 4.5.1A, 4.5.1B and 4.5.1C from EIR No. 441, as well
5 as new Mitigation Measures 4.6.B-N1, 4.6.B-N2, 4.6.B-N3, 4.7.A-N1, 4.7.A-N2, 4.6.B-
6 N4 and 4.6.B-N5 from EIR No. 521, would reduce construction and operation-related
7 air quality impacts. However, even with these mitigation measures, future
8 construction and operational emissions would likely exceed SCAQMD and MDAQMD
9 thresholds. As a result, the Project would result in significant and unavoidable
10 cumulative impacts with respect to the emission of criteria pollutants.

11 Reference: Draft EIR No. 521 pages 5-80 and 5-82 through 5-87

12 5. Cumulative Impacts: (Impact 4.6.D) Expose Sensitive Receptors to Air Pollutants

13 Localized significance thresholds (LSTs) were developed by the SCAQMD to determine
14 maximum allowable concentrations of criteria air pollutants during construction or
15 operation for individual developments. Due to the programmatic nature of the
16 General Plan and the proposed Project, detailed construction phasing, equipment and
17 intensities are not available for the development area. Further, the exact size and
18 location of future development within Riverside County is unknown at this time.
19 Therefore, a countywide buildout analysis of impacts to sensitive receptors and
20 population groups cannot be accurately determined using LST analysis and would be
21 inappropriate under the SCAQMD's LST methodology, because specific acreages, uses
22 and distances to sensitive receptors are required in order to calculate localized
23 pollutant concentrations at sensitive receptors. For reference, however, the LST
24 emissions associated with "typical" construction and operation activities are
25 presented in Tables 4.6-I, "Localized Significant Analysis for 5-Acre Site – Construction"
26 and 4.6-J, "Localized Significant Analysis for 5-Acre Site – Operational" of Section 4.6.5
27 of EIR No. 521.
28

1 In addition to criteria pollutant analysis, localized emissions of toxic air contaminants
2 (TACs) are also of concern with respect to sensitive receptors. Sources of TACs include
3 diesel particulate matter from railroads, emissions from the combustion of airplane
4 fuel, benzene emissions in close proximity to gasoline dispensing stations, dry
5 cleaners and film processing services that use perchloroethylene, auto body shops
6 due to various solvents, furniture manufacturers and repair facilities that use
7 methylene chloride and print shops that use various solvents. The primary source of
8 TACs within Riverside County is diesel-fueled trucks and other vehicles traveling the
9 freeways and major roadways. In 2005, CARB published the "Air Quality and Land Use
10 Handbook – A Community Health Perspective," to provide guidance on how to
11 analyze TAC emissions. The CARB Guidance recommends buffer zones to insulate
12 sensitive receptors from TAC sources.

13 Due to the programmatic nature of the various General Plan buildout scenarios, it is
14 not possible to forecast the detailed construction phasing, equipment and intensities,
15 as well as project size, timing, etc., necessary to model LSTs or TACs with any degree
16 of accuracy or reliability. It can be assumed, however, that various sizes and types of
17 projects will be developed. And because of the increased densities planned on the
18 General Plan land use maps and the stated desire for residential land uses to be
19 developed close to both transit and commercial centers (to reduce vehicle miles
20 driven in the county, to improve regional air quality), it can be assumed that both the
21 construction and the operation of commercial and industrial sources would be
22 developed relatively close to sensitive receptors, including residences, schools and
23 medical facilities. Since TACs are measured based on their localized significance
24 relative to exposure of adjacent or nearby sensitive receptors, however, a cumulative
25 level of significance cannot be assigned to such values; they are only cumulatively
26 significant in terms of localized contributions. Such localized contributions cannot be
27 calculated at the programmatic level.
28

1 Future development will expose sensitive receptors (residence, school, hospital, etc.)
2 to air pollutant emissions from both construction and operational activities. Such
3 impacts are generally localized to just the sensitive receptors surrounding the
4 emission source. On a cumulative basis, impacts to sensitive receptors could be
5 cumulatively considerable where more than one source emitter occurs in proximity to
6 a sensitive receptor. Even when the individual sources are within regulatory limits, the
7 potential exists for limits to be exceeded on a cumulative basis. This is particularly
8 true for incremental mobile source (vehicular) emissions from major freeways with
9 existing or future high traffic volumes.

10 Further, as the exact location, timing and level of future development activities arising
11 from buildout of any of the General Plan scenarios cannot be foreseen to the degree
12 of specificity necessary, specific impacts to sensitive receptors cannot be quantified.
13 Thus, even after complying with the regulations, policies, and implementing all
14 mitigation measures described above in the "Project Impacts" section of this
15 document, impacts cannot be guaranteed to be reduced to below applicable agency
16 thresholds. Thus, this impact is considered cumulatively significant and unavoidable
17 with respect to exposure of sensitive receptors for any of the General Plan buildout
18 scenarios, including that encompassing the Project.

19 Cumulative Mitigation:

20 Incremental contributions of future development, including that accommodated by
21 GPA No. 960, would result in cumulatively considerable impacts to sensitive
22 receptors, both locally and regionally. Existing Mitigation Measures 4.5.1A, 4.5.1B and
23 4.5.1C, and new Mitigation Measures 4.6.B-N1, N2 and N3, described above in the
24 "Project Impacts" section of this document, would reduce cumulative impacts to
25 sensitive receptors, but not to a less than significant level. As discussed above, even
26 where individual future development projects were successfully mitigated to less than
27 significant levels, they would still contribute incrementally to cumulatively significant
28 air quality impacts. Because there is no feasible mechanism for the County of

1 Riverside to control individual projects with respect to their incremental pollutant
2 contributions, impacts to air quality would remain significant and unavoidable.

3 Reference: Draft EIR No. 521 pages 5-77 through 5-80 and 5-82 through 5-87

4 E. Greenhouse Gas Emissions

5 1. Cumulative Impacts: (Impact 4.7.A) *Generation of Greenhouse Gas Emissions*

6 Buildout of Riverside County over time pursuant to any of the General Plan scenarios,
7 including the Project, would result in future construction and operational activities
8 that generate GHGs. Either individually or collectively, these activities can result in
9 substantial emissions of GHGs; for example, exceeding the 3,000-10,000 metric tons
10 per year (MTY) thresholds proposed by the SCAQMD in Tier 3 of its 2008 Interim CEQA
11 Greenhouse Gas Significance Thresholds. For all but the cumulative scenario,
12 however, implementation of the proposed General Plan policies and particularly, the
13 Implementation Measures in the proposed Climate Action Plan (CAP), plus a variety of
14 proposed mitigation measures, would be sufficient to ensure that incremental GHG
15 emissions in Riverside County are less than significant through at least 2020 to 2035,
16 based on available technology and feasibility of current mitigation (refer to the
17 discussion included in the "Project Impacts" section of this document.) There would
18 be a marked increase in mobile source GHG emissions in both the business as usual
19 (BAU) and reduced operational emissions conditions due to increased vehicle trips
20 associated with the cumulative General Plan buildout, even with mitigation for years
21 2020 and 2035. Both scenarios (GPU and CULM) would be cumulatively considerable
22 for GHG impacts beyond 2035 to 2060 based on present technology and mitigation
23 feasibility. As shown in Tables 5.5-K, "*Cumulative Operational Greenhouse Gas*
24 *Emissions (AB 32)*" and 5.5-L, "*Cumulative Per-Capita Greenhouse Gas Emissions (SB*
25 *375)*" on page 5-90 in Section 5.5 of EIR No. 521, impacts would be cumulatively
26 significant and unavoidable because the reduction target could not be met.

27 ///

28 ///

1 Cumulative Mitigation:

2 Existing Mitigation Measure 4.5.1C includes provisions for construction equipment
3 and vehicles exhaust emissions (refer to Mitigation Measure 4.5.1C, discussed
4 previously) that would reduce cumulative greenhouse gas emission impacts, but not
5 to a level that is less than significant.

6 New Mitigation Measure 4.7.A-N1 states “In order to ensure GHG emissions resulting
7 from new development are reduced to levels necessary to meet state targets, the
8 County of Riverside shall require all new discretionary development to comply with
9 the Implementation Measures of the Riverside County Climate Action Plan or provide
10 comparable custom measures backed by a project GHG study (for example, using
11 CalEEMod modeling) demonstrating achievement of the same target. The target to be
12 met is a GHG emissions reduction of 25% below emissions for the adjusted BAU
13 scenario for residential, commercial, industrial, institutional and mixed-use projects.
14 The adjusted BAU is based upon the 2020 adjusted BAU found in the Final
15 Supplement to the AB 32 Scoping Plan (CARB 2011).”

16 New Mitigation Measure 4.7.A-N2 states, “In lieu of a project-specific analysis per
17 Mitigation Measure 4.7.A-N1, a future discretionary project proposed pursuant to the
18 Riverside County General Plan shall incorporate into the project design, operational
19 features and/or Implementing Measures from the County Climate Action Plan, in such
20 a manner as to garnish at least 100 points. The point values within the CAP’s
21 Screening Tables constitute GHG emission reductions.”

22 New Mitigation Measure 4.7.A-N3 states, “The County of Riverside will monitor
23 implementation of the reduction measures and revise or amend the Climate Action
24 Plan as needed based upon the results of monitoring to ensure achievement of the
25 2020 Reduction Target. In addition, the County of Riverside will start update process
26 of the Climate Action Plan in 2017 to provide a post-2020 plan. The post-2020
27 Climate Action Plan update will include a specific target for GHG reductions for 2035
28 and 2050. The targets will be consistent with broader state and federal reduction

1 targets including Executive Order S-3-05 and with the scientific understanding of the
2 needed reductions by 2050. The post-2020 Climate Action Plan update will include a
3 set of updated reduction measures to achieve the 2035 and 2050 Reduction Targets
4 and updated monitoring system to ensure that the updated targets are achieved. The
5 County of Riverside will adopt the new post-2020 Climate Action Plan update by
6 January 1, 2020. These new mitigation measures would reduce greenhouse gas
7 emissions, but not to a level that is less than significant. Impacts would remain
8 cumulatively considerable.”

9 Reference: Draft EIR No. 521 pages 5-89 to 5-90 and 5-93 through 5-94

10 2. Cumulative Impacts: (Impact 4.7.B) Conflict with GHG Reduction Plans, Policies or
11 Regulations

12 Implementation of the General Plan, as updated pursuant to the proposed project
13 (i.e., the GPU/GPA 960 scenario) would result in future construction and operational
14 activities that generate GHGs. This generation of GHGs would potentially conflict with
15 the implementation of AB 32 and SB 375, California policies for reducing GHG
16 emissions. However, implementation of the proposed General Plan policies and
17 particularly the Implementation Measures of the Riverside County CAP, plus proposed
18 new Mitigation Measures 4.7.A-N1 and 4.7.A-N2, would ensure that build out of the
19 General Plan, as amended by GPA No. 960, would be consistent with both Riverside
20 County’s proposed Climate Action Plan (CAP) and State of California mandates (under
21 AB 32 and SB 375), at least as applies to years 2020 and 2035, and have a less than
22 significant impact on their implementation for this interim period. Refer to the
23 “Project Impacts” section of this document for a full discussion of the regulations,
24 policies, and mitigation measures that would aid in reducing the potential significant
25 unavoidable cumulative impacts of the Project. For long-range GHG reduction targets,
26 however, both project (GPU) and CULM scenarios would result in cumulatively
27 significant impacts. In particular, GHG emissions occurring within Riverside County
28 between 2020 and 2060 would be cumulatively significant and unavoidable because

1 they would contribute to GHG levels in excess of the 2050 mitigation targets
2 established for California under Executive Order S-3-05, i.e., reducing GHG emissions
3 to "80% below 1990 levels by 2050." The County is committed toward the reduction
4 of GHG emissions. However, the means to achieve the 2050 reduction target is
5 technologically infeasible at this time. New Mitigation Measure 4.7.A-N3 requires the
6 County to provide by January 1, 2020, a post-2020 CAP that includes 2035 and 2050
7 reduction targets and specific reduction measures to achieve those targets. This
8 allows technology, the State and the County the time needed to develop reduction
9 measures able to achieve the 2050 reduction target. At present, however, there is no
10 feasible mitigation to fully reduce this cumulative impact to below the level of
11 significance in terms of 2050 targets. Thus, even though project effects may be
12 individually limited, GPA No. 960's incremental contribution to these cumulative
13 greenhouse gas impacts would be significant and unavoidable.

14 Cumulative Mitigation:

15 Refer to the Mitigation discussion in Impact 4.7.A, above. Cumulative impacts with
16 regard to conflicts with GHG reduction plans, policies or regulations would not be
17 reduced to less than significant, even with the implementation of the mitigation
18 measures discussed above.

19 Reference: Draft EIR No. 521 pages 5-91 and 5-93 through 5-94

20 F. Cultural and Paleontological Resources

- 21 1. Cumulative Impacts: (Impacts 4.9.A: – Adversely Change the Significance of Historical
22 Resources, 4.9.B: Cause the Destruction of Known Archeological Resources, 4.9.C: Cause
23 the Destruction of Unique Paleontological Resources or Sites, 4.9.D: Result in the
24 Disturbance of Human Remains)

25 Effects to known cultural resources (historical, archeological and paleontological) can
26 be mitigated to less than significant levels through the regulatory and mitigation
27 measures outlined in Section 4.9, "Cultural and Paleontological Resources" of EIR No.
28 521, as well as in the "Project Impacts" section of this document. However, since most

1 cultural resources occur below ground (particularly paleontological resources, which
2 are heavily geology-dependent), most cultural resources remain unknown and
3 undiscovered until uncovered by ground-disturbing activity, for example site grading,
4 road construction or trenching for pipelines. As a result, the likelihood of subsurface
5 resource disturbance by future development typically cannot be fully determined in
6 advance, particularly within the scope of the countywide programmatic EIR No. 521.
7 Rather, such determinations will have to be made at the individual implementing
8 project stage and addressed (mitigated) via the mechanisms outlined in EIR No. 521,
9 Section 4.9, which presents explicit, mandatory measures that must be taken when an
10 artifact or other cultural resource is unearthed.

11 Nevertheless, since paleontological resources do correlate with geology, a generalized
12 assessment of relative paleontological sensitivity was developed for much of Riverside
13 County (i.e., see Figure 4.9.3 in Section 4.9 of EIR No. 521) and the existing and
14 proposed land uses associated with the various General Plan buildout scenarios were
15 assessed against this sensitivity to examine cumulative impacts. The results of this
16 analysis are shown in Table 5.5-N on pages 5-100 and 5-101 in Section 5.5 of EIR No.
17 521.

18 The results indicate that buildout of the existing General Plan will result in disturbance
19 of a great deal of additional land with high paleontological sensitivity (e.g., Ha or Hb).
20 In particular, acreage devoted to urban/suburban uses will roughly double and the
21 area potentially developed within the interface/wildland fringes of Riverside County
22 will increase roughly ten-fold (23,000 to nearly 234,000 acres). Lastly, the area left
23 vacant and open will decrease by roughly two-thirds.

24 For the updated General Plan (with the Project) and cumulative General Plan buildout
25 scenarios, similar trends will occur, however in much smaller amounts. The
26 incremental increases associated with the individual future projects pursuant to these
27 scenarios will be individually insignificant. However, cumulatively they will amount to
28 upwards of 3% to 8% of the total area by category. Specifically, for the Project

1 scenario, uses within high-sensitivity areas will increase roughly 1% in
2 urban/suburban areas and nearly 5% for public facility uses. Though offset by a nearly
3 8% increase in open space and nearly 6% less development within interface/wildland
4 areas, the overall cumulative effects to paleontologically sensitive lands will still be
5 considerable. Similar trends are seen for the cumulative scenario, with slightly higher
6 amounts of urban/suburban and rural/agricultural uses (5% and 1%, respectively) and
7 no offsetting increase in vacant/open space. Public facility lands also remain about
8 the same.

9 Therefore, it has been determined that: a) land disturbances from construction of
10 new development would uncover and/or adversely affect presently unknown historic
11 or archeological resources; b) future development would result directly or indirectly in
12 the destruction of unique paleontological resources, sites or unique geological
13 features, particularly previously unknown subsurface resources; and c) since
14 uncovered human remains can also be of modern origins, and hence potentially part
15 of a crime scene, specific County of Riverside regulations require contacting the
16 Riverside County Coroner's Office for initial assessment of any uncovered human
17 remains. Specifically, HSC Section 7050.5(b) states that no further disturbance shall
18 occur until the Riverside County Coroner has made the necessary findings as to origin.
19 Further, pursuant to PRC Section 5097.98(b), remains shall be left in place and free
20 from disturbance until a final decision as to their treatment and disposition has been
21 made. If the remains are determined not to be modern, subsequent treatment of the
22 discovery is handled in coordination with the Tribe determined by the State of
23 California to be the "Most Likely Descendent." Subsequently, cumulatively
24 considerable impacts will occur as Riverside County grows pursuant to the General
25 Plan, regardless of the scenario. The removal or destruction of cultural resources and
26 the cumulative effect of their disturbance cannot be guaranteed to be reduced to less
27 than significant levels even with mitigation. This is due to the unknown nature of the
28 extent, location and cultural significance of such resources.

1 Cumulative Mitigation:

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

10 New Mitigation Measure 4.9.B-N1 states "If avoidance and/or preservation in place of
11 cultural resources is not feasible, the following mitigation measures shall be initiated
12 for each impacted site: a) Discoveries shall be discussed with the Native American
13 tribal (or other appropriate ethnic/ cultural group representative) and the Riverside
14 County Archeologist, and a decision shall be made with the concurrence of the
15 Planning Director, as to the appropriate mitigation (documentation, recovery,
16 avoidance, etc.) appropriate for the cultural resource; and b) Further ground
17 disturbance shall not resume within the area of the discovery until an agreement has
18 been reached by all parties as to appropriate preservation or mitigation measures."

19 As discussed above, implementation of these mitigation measures would not reduce
20 cumulative impacts to a less than significant level, and impacts would remain
21 cumulatively considerable.

22 Reference: Draft EIR No. 521 pages 5-102 through 5-107

23 G. Energy Resources

24 1. Cumulative Impacts: (Impacts 4.10.A: *Increase Demand for Electricity* and 4.10.B: *Increase*
25 *Demand for Natural Gas*)

26 Typically, the introduction of new development into an area brings with it an
27 attendant new demand for energy resources, including natural gas and, in particular,
28 electricity. Development may also utilize propane and other fuels. Accordingly, spatial

1 analysis was performed to examine the cumulative demands of General Plan buildout
2 on energy resources. To encapsulate the scope of impacts resulting from buildout, the
3 various General Plan buildout scenarios were analyzed for theoretical use/demand for
4 the energy resources. These energy analyses reflect the range of impacts associated
5 with the theoretical demand for energy (electricity and natural gas) for the specific
6 land uses indicated for each scenario. For specifics on methodology used, see Section
7 4.10.4 in EIR No. 521.

8 Tables 5.5-O and 5.5-P on pages 5-109 and 5-110 in Section 5.5 of EIR No. 521 build
9 out conditions for the three General Plan scenarios examined in Section 5.5: Existing
10 General Plan, the Updated General Plan as per GPA No. 960, and the cumulative
11 General Plan as per the additional proposed GPAs through 2009. It should be noted
12 that the baseline (existing) energy levels listed in the table are theoretical, i.e., based
13 on standardized modeling. The same modeling procedures were used to estimate
14 results for each of the buildout scenarios. By controlling these variables, valid
15 comparisons amongst the scenarios are possible.

16 These data should not be construed as the actual energy usage for a given location, a
17 specific existing use or its future development. Privacy laws protect such information
18 from being publicly released for private properties. Further, specific information is
19 typically provided by the associated utility provider when an implementing
20 development is proposed. Each utility provider has developed its own methods,
21 formulae and factors for projecting future demand, which are neither available nor
22 practicable for calculating for the programmatic EIR No. 521. In general, however,
23 where the proposed project is consistent with regional (Southern California
24 Association of Governments [SCAG]) and County growth projections, it is assumed
25 long-range planning undertaken by individual utilities and service providers would be
26 sufficient to meet future needs, since they also reference these same SCAG and
27 county projections.

1 The results of the energy modeling (electricity and natural gas, the only two energy
2 sources for which sufficient information was available for accurate modeling) for
3 baseline (existing) conditions and the various cumulative buildout scenarios are
4 presented in Tables 5.5-O and 5.5-P, respectively. All data represent direct energy
5 usage. Indirect energy uses, such as by water providers, are addressed separately at
6 the regional scale in Section 4.7, "*Greenhouse Gases*" of EIR No. 521. Because energy
7 use depends on the technology, generation source, service area size and a number of
8 other factors, specific indirect energy use projections are not feasible as part of the
9 programmatic EIR No. 521. See EIR No. 521 Section 4.10.4 for specifics on the
10 assumptions used in these analyses.

11 As shown in above-referenced Tables 5.5-O and 5.5-P, General Plan buildout (of any
12 scenario) will contribute incrementally to the demand for energy resources within
13 Riverside County and result in varying degrees of impacts in order to meet such
14 demand, depending on the size, scope and location of the incremental development
15 proposed. For both the with-Project scenario and the cumulative GPAs scenario,
16 General Plan buildout would result in cumulatively considerable increases in demand
17 for both electricity and natural gas to serve the additional residential units that would
18 result, even though individual increases associated with implementing projects over
19 time would be incrementally insignificant. For natural gas, the cumulative scenario
20 would also significantly increase incremental demand as a result of additional
21 commercial development.

22 In terms of increased demand for energy, in particular electricity and natural gas,
23 buildout of any of the above General Plan scenarios would result in cumulatively
24 considerable impacts to energy resources, even with implementation of the key
25 regulations, General Plan policies and mitigation measures discussed above in the
26 "Project Impacts" section of this document as well as on pages 5-110 through 5-112 in
27 Section 5.5 of EIR No. 521. Cumulatively considerable impacts regarding electricity
28 and natural gas would remain significant.

1 Cumulative Mitigation:

2 Existing Mitigation Measure 4.8.1A states, "The County [of Riverside] shall review all
3 development proposals prior to the approval of development plans to guarantee that
4 sufficient energy resources and facilities are available to supply adequate energy to
5 the proposed project and associated uses."

6 Existing Mitigation Measure 4.8.1B states, "The County [of Riverside] shall review all
7 development plans prior to approval to guarantee that energy conservation and
8 efficiency standards of Title 24 are met and are incorporated into the design of the
9 future proposed project."

10 As previously stated, implementation of these measures would reduce cumulative
11 impacts but not to a less than significant level.

12 Reference: Draft EIR No. 521 pages 5-108 to 5-112

13 H. Geology and Soils

- 14 1. Cumulative Impacts: (Impacts 4.12.B: *Expose People or Structures to Substantial Strong*
15 *Seismic Groundshaking* , and 4.12.D: *Expose People or Structures to Substantial Adverse*
16 *Effects Due to Landslides*)

17 Like all of Southern California, Riverside County has experienced and will continue to
18 face groundshaking resulting from activity on local and regional faults. Thus, future
19 development of any of the General Plan buildout scenarios will incrementally increase
20 the number of people and structures at risk of injury, death or property loss due to
21 substantial strong seismic groundshaking.

22 Landslides and rockfall can occur throughout Riverside County as a result of seismic
23 activity and other natural processes, as well as resulting from human activity.
24 Accordingly, future development of any of the General Plan buildout scenarios will
25 incrementally increase the number of people and structures at risk of injury, death or
26 property loss due to substantial landslide or rockfall effects.

27 However, even with mitigation, buildout of the cumulative General Plan would
28 contribute substantially to significant cumulative impacts stemming from growth

1 leading to the potential exposure of additional people and structures to substantial
2 strong seismic groundshaking and also to substantial adverse effects due to landslide
3 or rockfall. Due to the inherently growth-inducing and growth-accommodating nature
4 of a General Plan, there is no feasible mitigation that will fully reduce these
5 cumulative impacts to below the level of significance, although regulations and
6 policies, as well as mitigation to address these hazards is included in the "Project
7 Impacts" section of the document above as well as on pages 5-125 through 5-128 in
8 Section 5.5 of EIR No. 521. Thus, even though Project effects would be individually
9 limited, implementation of future development would result in incremental
10 contribution to cumulative groundshaking and landslide/rockfall hazards, and
11 cumulative impacts would be significant and unavoidable.

12 Cumulative Mitigation:

13 In EIR No. 441, which was certified for the 2003 RCIP General Plan, it was determined
14 that mitigation would be necessary in order to reduce certain impacts associated with
15 seismic groundshaking, fault rupture, soil and wind erosion, and topsoil loss. These
16 mitigation measures they remain applicable to the Project and future General Plan
17 implementing projects, and include Mitigation Measures 4.10.1A, 4.10.2A, 4.10.2B,
18 4.10.2C, 4.10.3A, 4.10.3B, 4.10.7A, 4.10.8A, 4.10.9A, 4.10.9B, and 4.10.9C. Refer to
19 pages 5-125 through 5-128 in Section 5.5 of EIR No. 521 for the full text of these
20 measures, as well as the "Project Impacts" section of this document, above. As
21 mentioned above, these measures would not reduce cumulative impacts to a less
22 than significant level.

23 Reference: Draft EIR No. 521 pages 5-124 through 5-128

24 I. Hazardous Materials and Safety

25 1. Cumulative Impacts: (Impact 4.13.H) Expose People or Structures to Significant Risk Due to
26 Wildland Fires

27 Future development occurring as the General Plan builds out will result in an increase
28 in the people, property and infrastructure needing fire protection and potentially at

1 risk of wildfire threat. The data in Table 5.5-U, *"Cumulative Fire Responsibility Area*
2 *Effects"* in Section 5.5 of EIR No. 521 show the cumulative effects of scenario build out
3 on the various Fire Responsibility Areas within Riverside County. In addition to
4 reflecting increased uses exposed to fire hazards, the future uses indicated also reflect
5 the amount of increased demand for (and wear-and-tear on) the various fire agencies,
6 equipment and personnel providing the needed fire services. See Section 4.17.2,
7 *"Public Services - Fire Protection"* in EIR No. 521 for specifics on fire departments,
8 staffing, etc., and Section 5.5.16 in EIR No. 521 for cumulative effects on fire services.
9 Per Table 5.5-U, growth pressures within Riverside County will result in increased
10 urban, suburban and rural development. Under the existing General Plan, build out
11 will greatly increase the amount of developed uses within the State Responsibility
12 Area (SRA); from roughly 150,000 acres to over 500,000 acres. Interface/wildland
13 areas, typically at greatest risk for wildfires due to adjacent and interspersed open
14 vegetation, account for nearly 350,000 acres of this increase alone. Similar increases
15 would also occur within Local Responsibility Areas as well under the current General
16 Plan scenario. As such, build out of the existing General Plan would result in
17 cumulatively considerable increases wildfire hazards within Riverside County.
18 Buildout according to the General Plan with GPA No. 960 would reduce the amount of
19 developed uses allowed within interface/wildland areas (by over 15,000 acres) and
20 increase the amount of vacant and open space land. These changes, however, would
21 be offset by increased development of urban/suburban and public facility uses in SRAs
22 and LRAs. The incremental contributions of each of these increases are individually
23 minor. However, given the significant wildland fire hazards already associated with
24 General Plan build out, even these increases would be cumulatively considerable.
25 For the cumulative scenario, both SRAs and LRAs would see even greater increases in
26 developed uses. This is particularly true of rural/agricultural uses in SRAs and
27 urban/suburban uses in LRAs. Interface/wildland uses would actually decrease under
28 the cumulative scenario. However, nearly all of the acreage decreased would instead

1 be converted to urban/ suburban or rural/agricultural uses and thus would
2 substantially reduce cumulative impacts. Thus, overall, the cumulative General Plan
3 buildout scenario would also result in incremental increases in fire hazard potential
4 that are individually minor but cumulatively considerable.

5 The incremental effect of growth within Riverside County would result in cumulatively
6 considerable fire hazard increases regardless of the General Plan build out scenario,
7 including the future growth associated with the Project. Even with regulatory
8 compliance described above in the "Project Impacts" section of this document,
9 however, the Project would contribute substantially to significant cumulative impacts
10 due to increased people and property in areas at risk for high or very high fire
11 hazards, particularly within interface/wildland areas. Build out of the cumulative
12 General Plan scenario would do likewise. Due to the vast expanse covered by
13 Riverside County, the wide variety of potential fire sources and fuels, and the sheer
14 number of people and properties involved, even with the reduction of individual
15 implementing projects to less than significant levels, the wildfire risk within Riverside
16 County overall would remain cumulatively considerable for all of the General Plan
17 build out scenarios. There is no feasible mitigation that would fully reduce these
18 cumulative impacts to below the level of significance. Thus, even though Project
19 effects would be individually limited, GPA No. 960's incremental contribution to
20 cumulative housing and population impacts would be significant and unavoidable.
21 Build out of the cumulative General Plan scenario would also result in significant and
22 unavoidable cumulative impacts to population and housing within Riverside County,
23 even when implemented alongside the regulations, policies, and mitigation measures
24 detailed in the "Project Impacts" section of this document.

25 Cumulative Mitigation:

26 As discussed above, even with regulatory compliance discussed on pages 5-134 and 5-
27 135 in Section 5.5 of EIR No. 521, cumulative impacts relative to wildlife fire exposure
28

would not be reduced to a less than significant level. Impacts would remain cumulatively significant.

Reference: Draft EIR No. 521 pages 5-132 through 5-135

J. Noise

1. Cumulative Impacts: (Impact 4.15.A) *Generate Noise or Cause Noise Exposure in Excess of Standards*

Under any of the General Plan buildout scenarios, future development of noise-sensitive uses would occur in areas that either are currently exposed to or would be exposed to future traffic, airport or railroad noise levels that exceed the current standards, resulting in incremental increases in the number of people and properties exposed. Such development could also cause incremental exposure to noise from non-transportation (stationary) noise sources that exceed standards. Where setbacks and other mitigation measures are not feasible or do not sufficiently lower noise levels, such impacts would be cumulatively considerable.

Future development would also contribute incrementally to increased traffic volumes on county roads, resulting in noise increases affecting sensitive land uses along existing and future roads. As a result, new development, particularly residential uses along and adjacent to major transit corridors, could be exposed to noise levels that exceed Riverside County's noise standards. Existing sensitive uses (residences, schools, etc.) would also be subject to these higher noise levels. Mitigation, such as setbacks and insulation are feasible for new uses. Compliance with existing noise standards, State and County regulatory programs, General Plan policies and existing mitigation measures from EIR No. 441 described above in the "Project Impacts" section of this document would aid in reducing the significant unavoidable cumulative effects of noise on new development. However, noise levels would increase incrementally over time to levels exceeding Riverside County noise standards, and thus exposure of existing sensitive uses would be significant and unavoidable. Mitigation of the extremely small but numerous incremental increases that lead to

1 this significant impact is infeasible due to the extremely widespread nature of the
2 impacts.

3 Cumulative Mitigation:

4 Existing Mitigation Measures 4.13.2A, 4.13.2B, 4.13.2C, 4.13.2D, 4.13.3A, 4.13.3B, and
5 4.13.3C, described above, would reduce cumulative (incremental) impacts associated
6 with long-term noise sources that would exceed Riverside County noise standards,
7 however, not to a level that is less than significant. Cumulative noise exposure in
8 excess of standards would remain a cumulatively significant impact even with
9 implementation of these mitigation measures.

10 Reference: Draft EIR No. 521 pages 5-144 through 5-147

11 2. Cumulative Impacts: (Impact 4.15.C) Result in a Substantial Permanent Increase in
12 Ambient Noise Levels

13 Future development accommodated by any of the General Plan buildout scenarios,
14 including that with the Project, would result in cumulatively considerable increases in
15 ambient noise levels and in the number of people and noise-sensitive land uses
16 exposed to substantial noise levels. It would also incrementally increase ambient
17 noise levels throughout Riverside County to cumulatively considerable levels in some
18 places (where regulatory and mitigation measures are insufficient to reduce noise
19 impacts). These measures would be sufficient when applied to new development, but
20 are not feasible for existing development. Thus, for impacts to existing noise-sensitive
21 uses, however, the widespread, diffuse nature of the noise impacts, particularly those
22 from increase traffic volumes resulting from buildout of any of the General Plan
23 scenarios, as well as from the Project itself, would result in cumulatively significant
24 impacts that cannot be feasibly reduced to acceptable noise levels. Thus, the Project
25 would result in incremental generation or cumulative exposure of existing uses to
26 excessive noise in some areas, or would result in a cumulatively substantial
27 permanent increase in ambient noise levels. Compliance with abovementioned
28 existing laws, federal, State and County regulatory programs, General Plan policies

1 and the existing mitigation measures from EIR No. 441, would aid in reducing
2 potential significant and unavoidable potential impacts due to increased noise levels
3 (refer to the "Project Impacts" section of this document). However, these cumulative
4 impacts would remain significant and unavoidable for the reasons outlined herein,
5 even with implementation of mitigation.

6 Cumulative Mitigation:

7 Existing Mitigation Measures 4.13.2A, 4.13.2B, 4.13.2C, 4.13.2D, 4.13.3A, 4.13.3B and
8 4.13.3C, described above in the "Project Impacts" section, are applicable to
9 cumulative impacts as well. While these measures would reduce cumulative impacts
10 due to a permanent increase in ambient noise levels, they would not be sufficient to
11 reduce cumulative impacts to a less than significant impact. Cumulative impacts
12 would remain significant for the reasons described herein.

13 Reference: Draft EIR No. 521 pages 5-144 through 5-147

14 3. Cumulative Impacts: (Impact 4.15.D) Result in a Substantial Temporary or Periodic
15 Increase in Ambient Noise Levels

16 Future development accommodated by any of the General Plan buildout scenarios,
17 including that with the Project, would result in cumulatively considerable increases in
18 ambient noise levels and in the number of people and noise-sensitive land uses
19 exposed to substantial noise levels. Compliance with the abovementioned existing
20 laws, regulatory programs, and General Plan policies, as well as the existing mitigation
21 measures from EIR No. 441, would aid in reducing potential short-term noise impacts
22 (refer to the discussion under the "Project Impacts" section of this document).
23 However, GPA No. 960 would also incrementally increase ambient noise levels
24 throughout Riverside County to cumulatively considerable levels in some places
25 (where regulatory and mitigation measures are insufficient to reduce noise impacts).
26 These measures would be sufficient when applied to new development, but are not
27 feasible for existing development. Thus, for impacts to existing noise-sensitive uses,
28 however, the widespread, diffuse nature of the noise impacts, particularly those from

1 increase traffic volumes resulting from buildout of any of the General Plan scenarios,
2 as well as from the Project itself, would result in cumulatively significant impacts that
3 cannot be feasibly reduced to acceptable noise levels. Thus, the Project would result
4 in incremental generation or cumulative exposure of existing uses to excessive noise
5 in some areas, or would result in a cumulatively substantial temporary increase in
6 ambient noise levels. These cumulative impacts would be significant and unavoidable
7 for the reasons outlined herein, even with implementation of mitigation.

8 Cumulative Mitigation:

9 Existing Mitigation Measures 4.13.1A and 4.13.1B, described above in the "Project
10 Impacts" Section, are applicable to cumulative impacts as well. While these measures
11 would reduce cumulative impacts due to temporary increases in ambient noise levels,
12 they would not be sufficient to reduce cumulative impacts to a less than significant
13 impact. Cumulative impacts would remain significant for the reasons described
14 herein.

15 Reference: Draft EIR No. 521 pages 5-144 through 5-147

16 K. Parks and Recreation

17 1. Cumulative Impacts: (Impact 4.16.A) Increase the Use of Existing Parks of Other
18 Recreational Facilities Resulting in Their Substantial Physical Deterioration

19 Growth pressures within Riverside County will result in development that causes the
20 incremental increases in use of existing parks, trails and other recreational facilities,
21 both within unincorporated Riverside County and its cities, regardless of the General
22 Plan buildout scenario. Provision of additional facilities, as per the policies and
23 regulations discussed on page 5-151 in Section 5.5 of EIR No. 521, would offset many
24 of these impacts. However, due to the sheer size of the population growth, overall
25 impacts to existing facilities would be cumulatively considerable for any of the
26 General Plan buildout scenarios analyzed in Section 5.5 of EIR No. 521. Similarly,
27 future development pursuant to any of the scenarios would also increase demand for
28 additional trails and bikeways within new development and increase use of existing

trails and bikeways, particularly those that connect new uses to existing destinations (schools, bus stops, retail areas, etc.). Therefore, where new facilities are not provided to offset such increased use, this would contribute to cumulatively substantial increases in the wear and tear on existing park and recreational facilities, including trails. Compliance with the abovementioned existing State and County regulatory programs and General Plan policies would further aid in reducing significant and unavoidable cumulative Project-related effects on existing parks or recreation facilities (refer to the discussion under the "Project Impacts" section of this document). However, due to the inherently growth-inducing and growth-accommodating nature of a General Plan, there is no feasible mitigation to fully reduce this cumulative impact to below the level of significance. Thus, even though Project effects would be individually limited, the cumulative (incremental) contribution to impacts on existing parks and recreational facilities would be significant and unavoidable.

Reference: Draft EIR No. 521 pages 5-150 and 5-151

L. Public Facilities

1. Cumulative Impacts: (Impacts 4.17.A: Cause Adverse Environmental Effects Due to the Need for Fire Protection Services, 4.17.B: Cause Adverse Environmental Effects Due to the Need for Law Enforcement Services, 4.17.C(1): Adversely Affect or Exceed the Permitted Capacity of a Landfill, 4.17.D: Cause Adverse Environmental Effects Due to the Need for Schools, 4.17.E: Cause Adverse Environmental Effects Due to the Need for Library Services, and 4.17.F: Cause Adverse Environmental Effects Due to the Need for Medical Facilities)

The ongoing growth of Riverside County over time will introduce people, property and structures into previously undeveloped areas and also increase urban densities through infill and expansion, all of which would require adequate public services and facilities to ensure their health, safety and well-being. In terms of future conditions, a variety of data and analyses were collected or performed to determine what effects buildout of Riverside County over time (in any of the respective scenarios, including

1 cumulative) would have on existing public facilities, as well as the demand for future
2 services. The results of these analyses are shown in the following tables in on pages 5-
3 157 through 5-159 in Section 5.5 of EIR No. 521: Table 5.5-X, "*Cumulative Effect on*
4 *Theoretical Demand for Fire Protection*"; Table 5.5-Y, "*Cumulative Effect on*
5 *Theoretical Demand for Law Enforcement*"; Table 5.5-Z, "*Cumulative Effect on*
6 *Theoretical Solid Waste Generation*"; Table 5.5-AA, "*Cumulative Effect on Theoretical*
7 *Student Generation*"; Table 5.5-AB, "*Cumulative Effect on Theoretical Library*
8 *Demand*"; and Table 5.5-AC, "*Cumulative Effect on Theoretical Hospital Demand.*"
9 These tables show the cumulative conditions for the three General Plan buildout
10 scenarios examined in Section 5.5, including the cumulative scenario.

11 It should be noted that the public services addressed here encompass the jurisdictions
12 and responsibilities of numerous independent public agencies, both within and at
13 times outside of Riverside County. Thus, for baseline (existing) services, a theoretical
14 value is used rather than actual data because of the variability in existing conditions
15 and the amount of data available. For all of the metrics, the same modeling
16 procedures used to estimate theoretical needs in Section 4.17, "*Public Facilities*" of
17 EIR No. 521 were used. Estimates consist of theoretical data because specific area-by-
18 area calculations for each resource, using each independent agency's own variables
19 and procedures were beyond the scope of this programmatic analysis. Also,
20 controlling these variables in the modeling process by using standardized factors
21 countywide enables valid comparisons amongst the various scenarios without
22 inconsistencies caused by varying models amongst agencies.

23 These data should not be construed as the actual specific demands for public facilities
24 that shall arise for a given location. Such determinations will be made on a project-by-
25 project basis as development occurs and may vary based on the surrounding area. For
26 resources or areas overseen by a specific public entity (e.g., individual school
27 districts), that agency will have final say on the future facilities needed, as well as
28 where, how, when and to what standards such facilities are ultimately developed.

1 Further, each agency has its own plans, standards and requirements that will apply.

2 The values presented here are for comparative planning purposes only.

3 The theoretical projections are also based on the assumption that all the land uses
4 proposed under each scenario will develop fully and as mapped/planned. As such,
5 each represents the theoretical, worst-case scenario and likely over-states the actual
6 real-world development potential likely to result, even though in real life, 100-percent
7 build out of all areas throughout the County is highly unlikely based on historical
8 development patterns. Actual future development of individual parcels and areas
9 mapped in the various buildout scenarios are subject to the discretion of many
10 hundreds to thousands of individual property owners, including private individuals,
11 business entities and even various public agencies and other entities. The County has
12 little to no control over the decision to propose development (new or redeveloped)
13 on a given site although the County is the entity with discretion for review and
14 approval of such development applications for most cases within unincorporated
15 Riverside County. Demand for additional development is often a result of many
16 interrelated factors, including population growth and economic demand, as well as
17 location, local supply, infrastructure availability, costs, etc.

18 Review of the theoretical demand calculations in the tables below reveal several
19 trends, which is expected since each is derived from the same population and land
20 use data. In general, buildout of the current General Plan will result in cumulatively
21 significant impacts across the gamut of public services. For many, the demand for
22 services will be roughly doubled over the next 50 or so years. This applies to schools,
23 as evidenced by the predicted 151% increase in the expected number of students by
24 2060. Law enforcement services show nearly 700 (205%) additional sworn officers
25 being needed. Library services show over 2.8 million volumes would be needed to
26 serve the projected buildout population of Riverside County. Similarly, demand for
27 medical services would also be significantly affected, as indicated by the projected
28 209% increase in the number of hospital beds that would be needed to serve the

1 population of Riverside County at buildout. Further, these projections are merely
2 indicators for the overall needs of each public service; for example, to meet the needs
3 of the students projected per Table 5.5-AA, affected primary school districts will need
4 to incrementally add schools, teachers, support staff, etc., for elementary, middle and
5 high school, as the student census increases. Secondary education services and
6 facilities, such as continuing education and adult schools, junior colleges, vocational
7 schools and universities, as well as private schools, specialty schools, etc., will be
8 similarly affected.

9 For a few public services, current General Plan buildout would contribute fewer, but
10 still significant, cumulative increases. These include fire protective services, which
11 have a projected increase in demand of 25% over existing needs. These demands take
12 the form of increased numbers of both people and property needing protection from
13 fires, both urban and wildfires. For fire services, cumulative impacts are particularly
14 significant due to the extensive incremental expansion of urban fringes and rural
15 development into interface/wildland and open, undeveloped areas that are at greater
16 risk for wildland fires (see Section 4.17.2 in EIR No. 521) and also more remote, which
17 results in longer response times and greater difficulty in providing services. For solid
18 waste disposal capacity, the projected increase is also cumulatively significant, 43%
19 over the next 50-plus years. The various waste stream reduction and recycling
20 (diversion) laws enacted by the state and implemented at the county and city level
21 continue to contribute to the lower rates of cumulative increase being projected.
22 Nevertheless, because of existing environmental constraints, landfill siting difficulties
23 and also the long-term environmental impacts inherent in landfill operations
24 (particularly emissions from trucks hauling wastes), EIR No. 441, certified for the
25 current General Plan, found these cumulative impacts to be significant for existing
26 waste disposal facilities.

27 As shown in the tables cited above, buildout of each of the various General Plan
28 scenarios shown will contribute incrementally to utilization of existing public facilities

1 and demand for additional public facilities and services in Riverside County. On a
2 cumulative basis, the effect of General Plan buildout with the Project added to it
3 would generally be very slightly reduced (1-2%). Compared to the environmental
4 baseline, however, the incremental increases in demand on public services would be
5 cumulatively considerable due mainly to the constraints upon the County of
6 Riverside's ability to mitigate demands. For the cumulative projects, most services
7 would see an incremental increase of 1-6%. For this alternative, all of the projected
8 cumulative impacts would be significant, particularly the increase in demand for solid
9 waste disposal due to the increased amount of commercial land uses proposed.

10 Therefore, it has been determined that future development will contribute
11 incrementally to cumulative impacts to public services and facilities as Riverside
12 County builds out over time pursuant to the Riverside County General Plan (regardless
13 of the various applicable regulations, policies, and mitigation measures described in
14 the "Project Impacts" section of this document). Specific impacts of the severities
15 indicated will include the following:

16 Fire Protection Services

- 17 • Future development would introduce additional people and property requiring
18 fire protection and emergency response services. This would result in
19 additional fire and emergency responses from existing facilities, increasing
20 wear and tear on equipment and necessitating additional facilities and staff.
21 Where the incremental increase in demand exceeds available services, this
22 impact would be cumulatively significant for any of the buildout scenarios.
- 23 • When new development is located outside the normal radius for acceptable
24 response times, in particular in the urban fringe and wildland areas, additional
25 wildland fire hazards would be created or exacerbated, with people and
26 property at increased risk due to delayed response. In areas without adequate
27 services nearby, this could result in the exposure of people and property to
28 high fire hazard conditions without adequate fire protection.

- Fire and emergency vehicles and equipment responding would experience increased wear and tear due to additional distances traveled. Increased travel times would also decrease the number of calls that could be responded to during a shift. When demand is great enough in a given region, additional fire facilities would be built. However, the provision of additional services would also require financial resources to support additional manpower, equipment and fire stations or other facilities.
- Existing fire facilities may be expanded or new facilities constructed to ensure adequate levels of service and response times. In particular, new fire stations would be needed to serve outlying wildland and urban fringes as growth expands into these areas. In areas where development remains sparse and new facilities are not added, response times may drop below acceptable levels. This impact would be cumulatively significant.
- The construction of new fire stations has the potential to cause adverse environmental impacts in their own right. They will, however, be subject to a number of regulatory measures, Riverside County building codes, CEQA mitigation measures, etc., which should be sufficient to ensure no significant environmental impacts occur. See discussion for Impact 4.17.A in Section 4.17.2 of EIR No. 521.
- Overall, future growth within unincorporated Riverside County, including as a result of GPA No. 960, will substantially contribute to a significant cumulative impact on fire protection personnel, equipment and facilities.

Law Enforcement Services

- New development would introduce additional people and property requiring law enforcement services, including emergency response. This would result in additional routine and emergency responses from existing facilities and create demand for additional facilities and staff. Where the incremental increase in

1 demand exceeds available services, this impact would be cumulatively
2 significant for any of the buildout scenarios.

- 3 • When new development is located outside the normal radius for acceptable
4 response times, in particular in the urban fringe and wildland areas, hazards
5 related to personal safety and crime would be created or exacerbated, and
6 people and property would be at increased risk due to delayed response. In
7 areas without adequate services nearby, this could result in the exposure of
8 people and property to higher safety hazards and security risks.
- 9 • Law enforcement (e.g., County Sheriff Department) vehicles and equipment
10 responding to calls would experience increased wear and tear due to
11 additional distances traveled. Increased travel times would also decrease the
12 number of calls that could be responded to during a shift. When demand is
13 great enough in a given region, additional facilities (i.e., Sheriff Dept.
14 substations) would be built. However, the provision of additional services
15 would also require financial resources to support additional manpower,
16 equipment, substations, correctional facilities, legal/judicial services, etc.
- 17 • Existing law enforcement facilities may be expanded and/or new facilities
18 constructed to ensure adequate levels of service and response times
19 throughout Riverside County. In particular, new substations would be needed
20 to serve outlying wildland and urban fringes as growth expands into these
21 areas. In areas where development remains sparse and new facilities are not
22 added, however, response times may drop below acceptable levels. This
23 impact would be cumulatively significant, regardless of buildout scenario.
- 24 • The construction of new substations has the potential to cause adverse
25 environmental impacts in their own right. They will, however, be subject to a
26 number of regulatory measures, Riverside County building codes, CEQA
27 mitigation measures, etc., which should be sufficient to ensure no significant
28

1 environmental impacts occur. See discussion for Impact 4.17.B in Section
2 4.17.3 of EIR No. 521.

- 3 • Overall, future growth within unincorporated Riverside County, including as a
4 result of GPA No. 960, will substantially contribute to a significant cumulative
5 impact on law enforcement (e.g., County Sheriff Department) personnel,
6 equipment and facilities.

7 Solid Waste Management

- 8 • The growth population from new residential uses and jobs and economic
9 activity from new commercial, industrial and institutional uses occurring as
10 Riverside County builds out over time would result in a corresponding increase
11 the amount of solid waste generated by these various uses. The disposal of
12 this additional waste would incrementally increase the wastes going into
13 existing landfills, potentially hastening the end of their usable lives, and
14 contribute to the need for new or expanded sanitary landfill facilities.
- 15 • Continued growth within Riverside County will incrementally increase the
16 amount of refuse and other solid waste generated, also causing a
17 corresponding increase in the need for disposal services, including hauling,
18 sorting, recycling, ABOP and hazardous materials disposal, as well as an
19 increased need for landfill space. It would also incrementally increase the
20 number (and/or duration) of truck trips occurring within Riverside County for
21 the collection of said wastes.
- 22 • The increase in disposal need may hasten existing landfills in reaching their
23 permitted capacity, decreasing their expected lifespan. This incremental
24 contribution of growth, as projected for the proposed Project or any of the
25 other General Plan buildout scenarios, will result in incremental, but non-
26 substantial, cumulative impacts to existing landfills.
- 27 • Continued long-range planning by the Riverside County Waste Management
28 Department will ensure that new disposal facilities (landfills) are developed to

1 meet increasing needs and, in particular, to accommodate the loss of existing
2 landfills as they reach permitted capacity and lifespan. The construction of
3 additional landfills would be addressed through both existing mitigation and
4 additional mitigation as deemed necessary based on project-specific analyses.

5 Schools

- 6 • New development will incrementally introduce additional people, particularly
7 schoolchildren, requiring school services within Riverside County. This would
8 result in the need for additional classroom space, as well as teaching and
9 support staff at levels exceeding current capacity. Where increased demand
10 (increased student populations) exceeds available school services and space,
11 impacts will be cumulatively substantial, for any of the General Plan buildout
12 scenarios. Mitigation for such impacts will be provided in accordance with
13 Riverside County Ordinance No. 575 and state law pursuant to the Leroy F.
14 Green School Facilities Act (aka Senate Bill 50), which prohibits local agencies
15 from imposing school impact mitigation fees, dedications or other
16 requirements in excess of those provided by statute. However, to the extent
17 the financial resources generated pursuant to statute are not sufficient to
18 satisfy demand, cumulatively significant school impacts would result.
- 19 • Where increases trigger new school facilities or expansion of existing facilities,
20 environmental impacts may occur in association with their construction
21 and/or operation. Adverse environmental impacts would be associated with
22 construction of new school sites/facilities to the extent their location,
23 construction methods or operations affect the surrounding area. The
24 construction of additional school facilities, particularly large campuses
25 associated with high schools, have the potential to result in additional
26 cumulatively significant environmental impacts in their own right.

27 ///

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Library Services

- New development will incrementally introduce additional people utilizing library services within Riverside County. This would result in the need for additional library space, reading material and media, as well as librarians and support staff. Where increased demand exceeds available library services, impacts will be cumulatively substantial for any of the General Plan buildout scenarios if not met with additional services and facilities.
- Mitigation of cumulative impacts to library services will be contingent upon the ability of the County to provide adequate funding and the availability of suitable library sites. Where such financial resources are not sufficient to meet increased need, or where increased service provision lags behind the incremental increase in demand, cumulatively significant impacts to library services will result.
- Where increases trigger the need for new libraries or the expansion of existing facilities, environmental impacts may occur in association with their construction and/or operation. However, due to the relatively small footprints typically associated with libraries, their typically centralized, urban locations, as well as the potential for existing buildings to be retrofitted as libraries, environmental impacts associated with the construction of new facilities can feasibly be limited to less than significant levels.

Medical Services and Services

- New development will incrementally introduce additional people within Riverside County needing a wide range of health and medical services. This would result in a corresponding increase in the need for additional medical facilities, including community clinics, hospitals, mental health services, specialty services, skilled nursing facilities, rehabilitation units, pharmacies, imaging and diagnostic laboratories and services, public health services, etc., as well as the skilled staff needed to operate them. Where increased demand

exceeds available services, impacts would be cumulatively substantial for any of the General Plan buildout scenarios if not met with additional services and facilities.

- Mitigation of cumulative impacts to Riverside County medical services will be contingent upon the ability of the County to provide adequate funding and the availability of suitable sites. Where such financial resources are not sufficient to meet increased need, or where increased service provision lags behind the incremental increase in demand, cumulatively significant impacts will result. This may be particularly true for remote, rural or other underserved areas distant from existing major medical centers.
- Where increases trigger the need for new or expanded medical facilities, environmental impacts may occur in association with their construction and/or operation. For community clinics and other smaller scale facilities, the relatively small typical footprints and their typically centralized, urban locations, as well as the potential for retrofitting of existing buildings, environmental impacts associated with the construction of new medical or health facilities can feasibly be limited to less than significant levels.
- For major medical centers that will be needed to serve growing regions, however, adverse environmental impacts would be associated with construction of new facilities to the extent their location, construction methods and operations affect the surrounding area. Thus, the large campuses typically associated with major medical centers have the potential to result in additional significant environmental impacts in their own right.

Cumulative Mitigation:

Implementation of key regulations, General Plan policies and mitigation measures provided on pages 5-159 through 5-161 in Section 5.5 of EIR No. 521, would help reduce, avoid or minimize the various cumulative impacts to public services and facilities. Specifically, Existing Mitigation Measures 4.15.2A, 4.15.2B, 4.15.2C, 4.15.2D,

4.15.3A, 4.15.3B, 4.15.3C, 4.15.3D, 4.15.3E, 4.15.3F, 4.15.6A, 4.15.7A, and 4.15.7B are applicable to cumulative impacts to public facilities; refer to pages 5-160 and 5-161 in Section 5.5 for the full text of these measures. However, while public service impacts associated with the Project, GPA No. 960, are individually less than significant, for some public services, incremental impacts will remain cumulatively substantial, even with the implementation of all feasible mitigation. Specifically, incremental increases in demand for fire protection and law enforcement services, schools, libraries and medical services will be cumulatively significant under any of the buildout scenarios examined herein.

Reference: Draft EIR No. 521 pages 5-156 through 5-166

M. Transportation and Circulation

1. Cumulative Impacts: (Impact 4.18.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, Impact 4.18.B: Conflict with an Applicable Congestion Management Program, Including, but Not Limited to Level of Service Targets and Travel Demand Measures, or Other Targets Established by the County Congestion Management Agency for Designated Roads or Highways)

The Circulation Element policies provide a framework for development and implementation of the multi-modal transportation system envisioned by the General Plan, as proposed by the Project, GPA No. 960. However, even with the identified policies, numerous facilities will operate at unacceptable levels of service. Future development accommodated by any of the General Plan buildout scenarios would result in cumulatively considerable increases in traffic levels with related decreases in roadway segments operating at acceptable standards at various locations throughout

1 Riverside County based on both existing and projected traffic volumes and roadway
2 configurations.

3 As a result, some roadways within Riverside County would also conflict with
4 applicable congestion management plan standards or policies, such as level of service
5 standards and travel demand measures. Implementation of the various regulatory
6 programs and mitigation measures listed above in the "Project Impacts" section of
7 this document, as well as on pages 5-177 through 5-179 in Section 5.5 of EIR No. 521,
8 would help reduce the above cumulative impacts, but according to the analysis
9 provided in Section 4.18.5, "*Transportation and Circulation*" of EIR No. 521, they
10 would not be fully sufficient to ensure that all cumulative impacts are reduced to less
11 than significant levels. The changes proposed under the Project (GPA No. 960) serve
12 to reduce the predicted traffic generated and raise the LOS improvement trigger
13 ranges, resulting in a forecast of lower traffic impacts when compared to the existing
14 General Plan. When compared against the existing environmental conditions,
15 however, the Project will still result in cumulatively considerable traffic impacts as a
16 result of General Plan implementation.

17 Cumulative Mitigation:

18 The following existing and new mitigation measures are also applicable to all future
19 General Plan implementing projects and their cumulative impacts. Compliance with
20 these measures would help mitigate significant cumulative transportation and
21 circulation impacts, however, not to a level that is less than significant. Refer to the
22 "Project Impacts" section of this document for further discussion.

23 Existing Mitigation Measure 4.16.1A states "As part of its review of land development
24 proposals, the County shall require project proponents to make a "fair share"
25 contribution to required intersection and/or roadway improvements. The required
26 intersection and/or roadway improvements shall be based on maintaining the
27 appropriate level of service (LOS D within Community Development Areas designated
28 by the 2002 Riverside County General Plan and within adjacent jurisdictions; LOS C

1 within those portions of unincorporated Riverside County outside of Community
2 Development Areas). The fair share contribution shall be based on the percentage of
3 project-related traffic to the total future traffic."

4 Existing Mitigation Measure 4.16.1B states "As part of its review of land development
5 proposals, the County shall ensure sufficient right-of-way is reserved on critical
6 roadways and at critical intersections to implement the approach lane geometrics
7 necessary to provide the appropriate levels of services."

8 New Mitigation Measure 4.18.1A-N1 states "As part of its review of land development
9 proposals, the County shall require project proponents to make a "fair share"
10 contribution to required intersection and/or roadway improvements. The required
11 intersection and/or roadway improvements shall be based on maintaining the
12 appropriate level of service (LOS D or better). The fair share contribution shall be
13 based on the percentage of project-related traffic to the total future traffic."

14 New Mitigation Measure 4.18.1B-N1 states that as part of its review of land
15 development proposals, the County shall ensure sufficient right-of-way is reserved on
16 critical roadways and at critical intersections to implement the approach lane
17 geometrics necessary to provide the appropriate levels of services.

18 New Mitigation Measure 4.18.1C-N1 states, "The County [of Riverside] shall seek ways
19 and means to increase the capacity of Circulation Element roadways (where needed
20 and appropriate) by such measures as adding through-travel lanes or additional
21 turning lanes without increasing the right-of-way width requirement for the
22 classification of the facility."

23 New Mitigation Measure 4.18.1D-N1 states, "The County [of Riverside] shall
24 collaborate with the California Department of Transportation (Caltrans) and other
25 appropriate agencies (where needed and appropriate) to add auxiliary and mainline
26 lanes on the freeway system within available rights-of-way."

27 New Mitigation Measure 4.18.1E-N1 states, "The County [of Riverside] shall
28 collaborate with Caltrans and other appropriate agencies to develop direct

connections between the HOV/HOT lanes at the following freeway interchanges: I-15 at SR-91, SR-60 at SR-91/I-215 West junction, SR-60 at I-215 East junction, and at other locations as needed. To the extent that such improvements may be possible within existing rights-of-way, environmental impacts would be less than significant.”

New Mitigation Measure 4.18.1F-N1 states, “The County [of Riverside] shall collaborate with Caltrans and other appropriate agencies (where appropriate) to develop HOV lanes along the entire length of I-215 within Riverside County and along I-10 between the San Bernardino County line and Indio.”

Reference: Draft EIR No. 521 pages 5-175 through 5-179

N. Water Resources

1. Cumulative Impacts: (Impact 4.19.A): Result in Insufficient Water Supply

Over time, ongoing growth will increase the amount of people, property, structures and new uses in the County, which will generate additional demand for water supplies. Table 5.5-AE, “*Cumulative Effect on Theoretical Potable Water Demand*” on pages 5-183 and 5-184 in Section 5.5 of EIR No. 521 provides a summary of demand for potable water within the County according to theoretical estimates associated with existing land uses, as well as for each of the General Plan buildout scenarios listed. As shown in Table 5.5-AE, buildout of each of the various General Plan scenarios shown will contribute incrementally to utilization of existing water and sewer infrastructure, as well as increase demand for water from both local and imported sources.

For potable water, Table 5.5-AE indicates existing General Plan buildout will nearly double demand by roughly 318,000 acre-feet per year. Meeting this demand will require additional water supplies from a combination of imported (i.e., state), local (groundwater) and recycled/reclaimed water sources. All of these supply sources are extremely limited in their capacities to provide additional water. Increased reliance on local groundwater sources would further increase the rate of basin drawdown and the cumulative effects, such as poor water quality and harm to biota, that result.

1 Although there is room for increased utilization of recycled and reclaimed water
2 sources, and indeed most water districts are aggressively pursuing improved
3 efficiencies for these sources, such programs remain relatively costly using current
4 technologies.

5 As a result, even though buildout of the General Plan with the Project added would
6 incrementally decrease cumulative potable water demand slightly (as compared to
7 existing General Plan build out [CURR scenario]), the Project's contribution is still
8 cumulatively considerable on a countywide basis when compared to baseline
9 environmental conditions (EXIST scenario). The cumulative GPAs buildout scenario,
10 with an 11% increase in demand over the existing General Plan, would also have a
11 cumulatively significant impact on water supply. Thus, based on the present level of
12 water planning and supply allocation for the state in general, and the water agencies
13 serving Riverside County in particular, buildout of any of the General Plan scenarios
14 would cumulatively result in an "insufficient water supply" within Riverside County.

15 Table 5.5-AG, "*Cumulative Effect on Theoretical Water Supply and Suppliers*" shows a
16 *theoretical* projection of how additional development accommodated by the various
17 scenarios would increase demand for water supplies within each of the service areas
18 of the various major (wholesale) water suppliers located in the County. Continued
19 urbanization and growth within western Riverside County would yield increases of 50-
20 100% in developed uses needing potable water service within the major water
21 districts' service areas (particularly EMWD and WMWD). Similar trends would also
22 occur in the Coachella Valley. Though currently less developed than western county
23 areas, the Coachella Valley increases are even more cumulatively significant due to
24 the extremely limited water supply to the region and it's extremely hot and dry desert
25 climate. For both regions, however, impacts to available water supplies will be
26 cumulatively significant for any of the build out scenarios analyzed.

27 Of particular concern are the areas that fall under "Rest (Not in Water Districts),"
28 which are areas not served by existing water agencies. As such, development in these

1 areas must rely upon self-produced water, typically from on-site (or local area)
2 groundwater pumping, assuming such water is available and of sufficient quality for
3 residential use. All three scenarios show a common trend of large losses of vacant
4 open space areas as development spreads further in the interface fringe and wildland
5 areas of Riverside County. Because of the remote nature of such areas and lack of
6 public water services, this type of development pattern has a significant effect on
7 groundwater basins. Notwithstanding recent changes in California water law, the
8 pumping of groundwater on private property is largely unregulated and
9 unconstrained. For this reason, groundwater demand is a classic example of the type
10 of incremental uses that are individually inconsiderable (e.g., groundwater pumped
11 and used by an individual household) but cumulatively significant. As a result of the
12 incremental usage, where demand exceeds recharge rates, such levels of
13 groundwater drawdown are not sustainable, particularly in dry years or during
14 prolonged drought conditions. The resultant drawdown causes significant adverse
15 environmental impacts, both to the homeowner, whose well may go dry, and to the
16 natural ecosystem, plants and animals that all rely on local water supplies for their
17 survival.

18 Future development (pursuant to any of the buildout scenarios discussed, including
19 the with-Project scenario) will incrementally increase demand for water supplies in
20 areas where such supplies are insufficient or unavailable to serve the project from
21 existing entitlements and resources. This will necessitate new or expanded water
22 supplies (entitlements) in order to adequately serve future development. In some
23 areas, the adequacy of water supplies is already known to be insufficient or supplies
24 are already utilized at their maximum sustainable level. In both cases, water supplies
25 would be insufficient to meet incremental increases in demand using existing
26 technologies.

27 Due to the variability and unpredictability of water supplies from year to year, in some
28 cases, the adequacy of future water supplies cannot be ascertained at this time at the

1 programmatic level of EIR No. 521. Even through a demonstrated compliance with
2 abovementioned existing laws, federal, State and County regulatory programs,
3 General Plan policies and the existing mitigation measures from EIR No. 441 described
4 below, in light of future growth, as well as environmental and regulatory constraints,
5 adequate water supplies for all forecast future development cannot be assured. As a
6 result, in areas of Riverside County where sufficient water supply is not available or
7 cannot be assured into the future, cumulative impacts would be significant and
8 unavoidable.

9 Cumulative Mitigation:

10 Existing Mitigation Measures 4.17.1C, 4.17.1D, 4.17.1E, described in the "Mitigation"
11 discussion above, as well as Existing Mitigation Measures 4.17.2A and 4.17.3A,
12 described under Impact 4.19.B, below, are also applicable to cumulative impacts.
13 These measures would aid in reducing impacts to water supplies, however, not a less
14 than significant level. Cumulative impacts to water supply would remain significant
15 and unavoidable even with implementation of mitigation.

16 Reference: Draft EIR No. 521 pages 5-183 through 5-189 and 5-195 through 5-198

17 2. Cumulative Impacts: (Impact 4.19.B) Substantially Deplete Groundwater Supplies or
18 Interfere Substantially With Groundwater Recharge

19 At present roughly one-third of Riverside County's water demand is met by
20 groundwater, according to the cumulative analysis on water resources in Section 5.5
21 of EIR No. 521 (page 5-180). In regards to effects on local, groundwater supplies,
22 Table 5.5-AH, "Cumulative Effect on Groundwater Basins" on pages 5-186 and 5-187 in
23 Section 5.5 of EIR No. 521 shows the amount of land within the various regions' basins
24 affected by the various development categories. (Basins are grouped by region
25 because they are too numerous to depict individually; see Appendix EIR-11 in EIR No.
26 521 for full details and data.) In the urbanizing regions (western Riverside County and
27 the Coachella Valley), the table shows the general trend of lands going from less
28 intense interface/wildland uses vacant/open space uses to more intense

1 urban/suburban uses. The mostly rural areas (far east region and areas not underlain
2 by any groundwater basin) show a similar shift from rural to urban as well. Both the
3 with-project (GPU) and CULM build out scenarios show the familiar trend of growth
4 and urbanization pressures causing interface areas and wildlands to convert to more
5 rural, suburban and urban uses. This trend is particularly evident in the Coachella
6 Valley. As a result, both the GPU and CULM scenarios show that development
7 footprints would increase over the watersheds and groundwater basins in the
8 Coachella Valley. Their extent would be slightly less extensive than the current
9 General Plan (CURR scenario) everywhere outside of the Coachella Valley.
10 Nevertheless, for all of the groundwater basins associated with increasing
11 development footprints, the growth associated with any of the General Plan build out
12 scenarios would be cumulatively considerable if imported water supplies are limited
13 or unavailable in these areas.

14 Unavailability or unpredictability of imported water supplies, overdraft of
15 groundwater basins, increasing demand due to growth in Riverside County, as well as
16 environmental factors, such as climate change effects and drought, all play roles in
17 limiting the availability of water within Riverside County. As mentioned above, in
18 some remote locations, particularly in the far eastern desert beyond the Coachella
19 Valley and the region south of the San Jacinto Mountains between Anza and Coachella
20 Valley, lack of groundwater and lack of delivery infrastructure also are limiting factors.
21 For all of these reasons, the cumulative effects on water supply would be significant
22 and unavoidable at this time.

23 In attempting to meet the increased demand for water outlined above, future
24 development from any General Plan buildout scenario would incrementally increase
25 use of local groundwater supplies, both by water districts and individual landowners
26 through private pumps. This is particularly likely in areas of the County without
27 municipal water service or other access to imported water supplies or where new
28 development would rely solely on groundwater for supply. Compliance with

1 abovementioned existing laws, federal, State and County regulatory programs,
2 General Plan policies and the existing mitigation measures from EIR No. 441 described
3 below would not fully reduce the significant and unavoidable cumulative impacts to
4 groundwater, as increased development will incrementally increase the impermeable
5 surfaces in Riverside County and interfere with groundwater recharge. Refer to the
6 "Project Impacts" section of this document for a full discussion of the regulatory
7 programs, policies, and mitigation measures that would be applied to this impact.
8 Where increased groundwater pumping exceeds the rate of basin recharge, it would
9 cumulatively result in the substantial depletion of groundwater in the County.

10 Cumulative Mitigation:

11 Existing Mitigation Measures 4.17.1C, 4.17.1D and 4.17.1E, listed under Impact
12 4.19.A, above, and Existing Mitigation Measures 4.17.2A and 4.17.2B, also above,
13 would reduce cumulative impacts to groundwater supply and recharge, however, not
14 to a less than significant level. While mitigation would reduce or minimize impacts to
15 groundwater supply and recharge, impacts to groundwater and groundwater
16 recharge would remain significant and unavoidable for the reasons described herein.

17 Reference: Draft EIR No. 521 pages 5-189 and 5-195

18 3. Cumulative Impacts: (Impact 4.19.H) Substantially Alter Existing Drainage Patterns
19 Resulting in Substantial Erosion or Siltation

20 The California Department of Water Resources (DWR) organizes the state into ten
21 major surface water drainage regions, two of which (the South Coast Region and the
22 Colorado River Region) include portions of Riverside County. Generally, the western
23 one-third of Riverside County lies within the South Coast Region, west of the San
24 Jacinto Mountains, and the eastern two-thirds of Riverside County lie within the
25 Colorado River Region. Designated watershed areas are included within each region,
26 several of which partially lie within Riverside County. Figure 4.19.3 in Section 4.19,
27 "Water Resources" in EIR No. 521 shows the major watersheds as they fall within
28

1 Riverside County. Additional information about the existing hydrological conditions in
2 these watersheds is provided in Section 4.19.2 in EIR No. 521.

3 Increased development resulting from General Plan implementation would also
4 incrementally reduce the distribution and extent of permeable surfaces suitable for
5 recharge. It may also increase runoff and subsequent flow in streams, and increase
6 the amount of non-point source pollutants that enter watercourses and recharge
7 areas. Development activities may also result in the incremental alteration or
8 elimination of features essential to local or regional hydrologic systems, or the
9 interruption of hydrologic processes leading to cumulatively considerable impacts.

10 Therefore, cumulative development could substantially alter existing drainage
11 patterns, resulting in substantial erosion or siltation. Even with compliance of key
12 regulations and programs provided above in the "Project Impacts" section of this
13 document, as well as on pages 5-192 and 5-193 in Section 5.5 of EIR No. 521, and the
14 implementation of the mitigation measures described below, cumulative impacts to
15 existing hydrology would remain cumulatively considerable, and would not be
16 reduced to a less than significant level.

17 Cumulative Mitigation:

18 In addition to the below specific mitigation measures from EIR No. 441 that address
19 drainage patterns and erosion directly, existing Mitigation Measures 4.17.5B and
20 4.17.5D, 4.17.5E and 4.9.1D, described in earlier sections of these findings, would also
21 aid in reducing impacts on existing drainage patterns, erosion and siltation. However,
22 cumulative impacts would not be reduced to a less than significant level.

23 Existing Mitigation Measure 4.17.4A states, "Where development may interfere with,
24 disrupt, or otherwise affect surface or subsurface hydrologic baseline conditions (as
25 determined by the Riverside County Flood Control and Water Conservation District,
26 the United States Army Corps of Engineers, the California Department of Fish and
27 Wildlife, and/or the Regional Water Quality Control Board), preparation of a project-
28 specific hydrologic study shall be required. The hydrologic study shall include (but

1 shall not be limited to): an inventory of surface and subsurface hydrologic conditions
2 existing at the time of the study; an analysis of how the proposed development would
3 affect these hydrologic baseline conditions; and specific measures to limit or eliminate
4 the interference or disruption of the onsite hydrologic process. The hydrologic study
5 shall evaluate the feasibility of incorporating bioengineering measures into any
6 project that may alter the hydrologic process. Where required by the County, the
7 hydrologic study shall include analysis of, at an equal level of detail, potential impacts
8 to tributary or downstream areas. The hydrologic study shall be submitted to the
9 County or responsible entity for review and shall be approved prior to the issuance of
10 any entitlement that would result in the physical modification of the project site."

11 Existing Mitigation Measure 4.17.4B states, "The project applicant shall submit to the
12 County for review and approval, evidence that the specific measures to limit or
13 eliminate the disruption or interference to the hydrologic process resulting from the
14 entire development process, will be implemented as set forth in the hydrologic study.
15 Such evidence may take the form of (but shall not be limited to): a development
16 agreement; land banking; the provision of adequate funds to guarantee the
17 construction, maintenance or restoration of hydrologic features; or any other
18 mechanism that will achieve said goals. Said evidence shall be submitted and
19 approved prior to the issuance of any entitlement that would result in the physical
20 modification of the project site."

21 Existing Mitigation Measure 4.17.4C states, "Bioengineering measures shall be
22 incorporated into any project that may alter the hydrologic process, where
23 determined feasible by the County or responsible entity."

24 Existing Mitigation Measure 4.9.1C states, "The County shall not necessarily require all
25 land uses to withstand flooding. These may include land uses such as agricultural, golf
26 courses, and trails. For these land uses, flows shall not be obstructed, and upstream
27 and downstream properties shall not be adversely affected by increased velocities,
28

erosion backwater effects, concentration of flows, and adverse impacts to water quality from point and nonpoint sources of pollution.”

Existing Mitigation Measure 4.9.2C states, “Riverside County shall require that for agricultural, recreation or other low-density uses, flows are not obstructed and that upstream and downstream properties are not adversely affected by increased velocities, erosion backwater effects or concentration of flows.”

Existing Mitigation Measure 4.10.9A states, “Riverside County, where required, and in accordance with issuance of a National Pollutant Discharge Elimination System (NPDES) permit, shall require the construction and/or grading contractor for individual developments to establish and implement specific Best Management Practices (BMPs) at time of project implementation.”

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

- Grading and development plans shall be designed in a manner which minimizes the amount of terrain modification.
- Surface water shall be controlled and diverted around potential landslide areas to prevent erosion and saturation of slopes.
- Structures shall not be sited on or below identified landslides unless slides are stabilized.
- The extent and duration of ground disturbing activities during and immediately following periods of rain shall be limited, to avoid the potential for erosion which may be accelerated by rainfall on exposed soils.
- To the extent possible, the amount of cut and fill shall be balanced.

- The amount of water entering and exiting a graded site shall be limited through placement of interceptor trenches or other erosion control devices.
- Erosion and sediment control plans shall be submitted to the County [of Riverside] for review and approval prior to the issuance of grading permits."

Existing Mitigation Measure 4.10.9C states, "Drainage design measures shall be incorporated into the final design of individual projects onsite, where required. These measures shall include, but will not be limited to:

- Runoff entering developing areas shall be collected into surface and subsurface drains for removal to nearby drainages.
- Runoff generated above steep slopes or poorly vegetated areas shall be captured and conveyed to nearby drainages.
- Runoff generated on paved or covered areas shall be conveyed via swales and drains to natural drainage courses.
- Disturbed areas that have been identified as highly erosive shall be (re)vegetated.
- Irrigation systems shall be designed, installed and maintained in a manner which minimizes runoff.
- The landscape scheme for projects within the project site shall utilize drought-tolerant plants.

Erosion control devices such as rip-rap, gabions, small check dams, etc., may be utilized in gullies and active stream channels to reduce erosion."

As mentioned previously, implementation of these mitigation measures would reduce cumulative impacts, but not to a less than significant level.

Reference: Draft EIR No. 521 pages 5-181, 5-190 and 5-192 through 5-198

4. Cumulative Impacts: (Impact 4.19.I) Cause Runoff Exceeding Stormwater Drainage System Capacity or Cause Substantial Water Pollution

Buildout of any of the General Plan scenarios would result in the incremental development of vacant lands within Riverside County. The addition of impervious

1 surfaces from such development would incrementally increase stormwater runoff
2 within the affected watersheds. In some areas, existing drainage facilities may not be
3 adequate to accommodate the increase, leading to cumulatively significant impacts to
4 existing stormwater drainage facilities or triggering the need for new facilities.
5 New land uses would incrementally increase the amount of stormwater runoff due to
6 the increase in impermeable surfaces. This would also increase the amount of
7 pollutants conveyed to groundwater basins and surface waters in creeks and rivers.
8 The extensive stormwater management measures required by the County of Riverside
9 would reduce urban runoff impacts from new development. However, where existing
10 storm drainage facilities are inadequate or, in particular, where no regional storm
11 drain infrastructure exists (e.g., in wildland and fringe areas), incremental increases in
12 runoff would result in cumulatively significant impacts. Even with the implementation
13 of the abovementioned federal, State, and County regulatory programs, existing laws,
14 ordinances, and General Plan policies listed on pages 4.19-332 through 4.19-336 of
15 Section 4.19, "*Water Resources*" of EIR No. 521, and the implementation of all feasible
16 mitigation, impacts would remain significant and unavoidable.

17 Cumulative Mitigation:

18 Existing Mitigation Measures 4.9.2C, 4.10.9A, 4.10.9B, 4.10.9C, and 4.17.5B, described
19 in previous sections of these findings, would also aid in reducing cumulative impacts
20 due to runoff. In addition, the measures described below would also help reduce this
21 impact; however, as discussed above, cumulative impacts would remain significant
22 and unavoidable, even with implementation of mitigation.

23 Existing Mitigation Measure 4.17.5E states, "For each new development project, the
24 following principles and policies shall be considered and implemented:

- 25 a. Avoid or limit disturbance to natural water bodies and drainage systems (including
26 ephemeral drainage systems) when feasible. Provide adequate buffers of native
27 vegetation along drainage systems to lessen erosion and protect water quality.
28

- 1 b. Appropriate best management practices (BMPs) must be implemented to lessen
2 impacts to waters of the United States and/or waters of the State of California
3 resulting from development. Drainages should be left in a natural condition or
4 modified in a way that preserves all existing water quality standards where
5 feasible. Any discharges of sediment or other wastes, including wastewater, to
6 Waters of the United States or Waters of the State must be avoided to the
7 maximum extent practicable. All such discharges will require an NPDES permit
8 issued by the Regional Water Quality Control Board (RWQCB).
- 9 c. Small drainages shall be preserved and incorporated into new development, along
10 with adequate buffer zones of native vegetation, to the maximum extent
11 practicable.
- 12 d. Any impacts to waters of the United States require a Section 401 Water Quality
13 Standards Certification from the RWQCB. Impacts to these waters shall be avoided
14 to the maximum extent practicable. Where avoidance is not practicable, impacts
15 to these waters shall be minimized to the maximum extent practicable. Mitigation
16 of unavoidable impacts must, at a minimum, replace the full function and value of
17 the affected water body. Impacts to waters of the United States also require a
18 Clean Water Act Section 404 Permit from the United States Army Corps of
19 Engineers and a Streambed Alteration Agreement from the California Department
20 of Fish and Wildlife.
- 21 e. The County shall encourage the use of pervious materials in development to
22 retain absorption and allow more percolation of stormwater into the ground. The
23 use of pervious materials, such as grass, permeable/porous pavement, etc., for
24 runoff channels and parking areas shall also be encouraged. Lining runoff channels
25 with impermeable surfaces, such as concrete or grouted riprap, will be
26 discouraged.
- 27 f. The County shall encourage construction of detention basins or holding ponds
28 and/or constructed wetlands within a project site to capture and treat dry

1 weather urban runoff and the first flush of rainfall runoff. These basins should be
2 designed to detain runoff for a minimum time, such as 24 hours, to allow particles
3 and associated pollutants to settle and to provide for natural treatment.

- 4 g. The County shall encourage development to retain areas of open space as natural
5 or landscaped to aid in the recharge and retention of runoff. Native plant
6 materials shall be used in replanting and hydroseeding operations, where feasible.
- 7 h. The County shall require that environmental documents for proposed projects in
8 areas tributary to Canyon Lake Reservoir, Lake Elsinore, sections of the Santa Ana
9 River, Fulmar Lake, and Mill Creek (as a result of the proposed 2002 303 (d) listing
10 of these waterbodies) include discharge prohibitions, revisions to discharge
11 permits, or management plans to address water quality impacts in accordance
12 with the controls that may be applied pursuant to state and federal regulation.
13 Environmental documents shall acknowledge that additional requirements may be
14 imposed in the future for projects in areas tributary to the water bodies listed
15 above.
- 16 i. The County shall ensure that in new development, post-development stormwater
17 runoff flow rates do not differ from the pre-development stormwater runoff flow
18 rates.
- 19 j. All construction projects should be designed and implemented to protect, and if at
20 all possible, to improve the quality of the underlying groundwater.
- 21 k. The County shall encourage the enhancement of groundwater recharge wherever
22 possible. Measures such as keeping stream/river channels and floodplains in
23 natural conditions or with pervious surfaces, as well as keeping areas of high
24 recharge as open space will be considered.
- 25 l. The County shall prohibit the discharge of waste material resulting from any type
26 of construction into any drainage areas, channels, streambeds, streams, lakes,
27 wetlands or rivers. Spoil sites shall be prohibited within any streams or areas
28 where spoil material could be washed into a water body.

1 m. The County shall require that appropriate BMPs be developed and implemented
2 during construction efforts to control the discharge of pollutants, prevent sewage
3 spills, and to avoid discharge of sediments into the streets, stormwater
4 conveyance channels or waterways.”

5 Existing Mitigation Measure 4.9.1.D states, “The County shall require the 10-year
6 flood flows to be contained within the top of curbs and the 100-year flood flows
7 within the street rights-of-way.”

8 Reference: Draft EIR No. 521 pages 5-190 and 5-194 through 5-198

9 5. Cumulative Impacts: (Impact 4.19.J) Cause Significant Adverse Effects Due to the Need for
10 New or Expanded Stormwater Drainage Facilities

11 Refer to discussion in Cumulative Impact 4.19.I, above. Cumulative General Plan
12 buildout would result in the need for new or expanded stormwater drainage facilities,
13 and impacts would be cumulatively considerable, even with implementation of the
14 abovementioned existing federal, State and County regulations, laws, ordinances,
15 General Plan policies, and all feasible mitigation.

16 Cumulative Mitigation:

17 Mitigation Measures 4.17.5D, 4.17.5E, 4.10.9A, 4.10.9B, 4.10.9C, 4.17.4A, 4.17.4B and
18 4.17.4C, described in previous sections of these findings, would also aid in reducing
19 impacts due to the need for new or expanded storm drain facilities.

20 Existing Mitigation Measure 4.9.1.D states, “The County [of Riverside] shall require
21 the 10-year flood flows to be contained within the top of curbs and the 100-year flood
22 flows within the street rights-of-way.”

23 These measures would help reduce cumulative impacts related to the need for new or
24 expanded stormwater drainage facilities; however, the measures would reduce
25 cumulative impacts to a less than significant level. Cumulative impacts would remain
26 significant and unavoidable.

27 Reference: Draft EIR No. 521 pages 5-190 and 5-194 through 5-198
28

1 **BE IT FURTHER RESOLVED** by the Board of Supervisors that it has considered the following
2 alternatives identified in EIR No. 521 in light of the environmental impacts which cannot be avoided or
3 substantially lessened and has rejected those alternatives as failing to meet most of the Project's
4 objectives, as failing to reduce or avoid the Project's significant impacts or as infeasible for the reasons
5 hereinafter stated:

6 A. Pursuant to Public Resources Code Section 21002 and the State CEQA Guidelines section
7 15126.6(a), an EIR must assess a reasonable range of alternatives to the project action or
8 location. Section 15126.6(a) places emphasis on focusing the discussion on alternatives which
9 provide opportunities for eliminating any significant adverse environmental impacts, or
10 reducing them to a level of insignificance, even if these alternative would impede to some
11 degree the attainment of the project objectives, or would be more costly. In this regard, the
12 EIR must identify an environmentally superior alternative among the other alternatives. As
13 with cumulative impacts, the discussion of alternatives is governed by the "rule of reason".
14 The EIR need not consider an alternative whose effect cannot be reasonably ascertained, or
15 does not contribute to an informed decision-making and public participation process. The
16 range of alternatives is defined by those alternatives, which could feasibly attain the
17 objectives of the project. As directed, in State CEQA Guidelines section 15126.6(c), an EIR
18 shall include alternatives to the project that could feasibly accomplish most of the basic
19 objectives of the project.

20 B. The Project has been developed to achieve the following goals:

- 21 1. Assess General Plan progress and issues related to its implementation: Ensure that the
22 General Plan continues to provide a clear and consistent set of directions for
23 implementing the Riverside County Vision throughout Riverside County over the next five
24 to ten years and into the future (2035 and beyond).
- 25 2. Initiate necessary changes among Foundation Components within the General Plan:
26 Ensure that the land use direction and planned intensities remain appropriate for their
27 given locations. Likewise, ensure that Policy Areas, Study Areas and Overlays throughout
28

Riverside County continue to plan for coordinated development at appropriate intensities in the manner envisioned in the General Plan.

3. Develop policy, entitlement and technical amendments, as warranted: Update or correct mapping items in the General Plan found to be inconsistent or inappropriate. Ensure that resource maps and other data-based information in the General Plan accurately reflect current data. Update the General Plan to accurately reflect current statutes, regulations and policies of the County of Riverside and applicable outside agencies. Update General Plan policies where necessary to reflect these items and to provide additional guidance where found to be necessary.
4. Update future projections: Extend planning projections another five to ten years into the future and adjust the General Plan to accommodate previously unanticipated needs.
5. Reassess the General Plan's Vision and Planning Principles: Recommit to and further the General Plan Vision and Planning Principles through the addition of policies and plans that expand upon them.

C. Accordingly, the following criteria were used to ascertain if a proposed alternative sufficiently addressed the objective listed.

1. Further Progress: An alternative would successfully meet this objective if it ensures the General Plan remains suitable as a plan for the coordination of future growth within Riverside County (for example, provides additional policies and plans, such as new Rural Village Overlays, where warranted to appropriately handle emerging growth patterns).
2. Update Land Use: An alternative would successfully meet this objective if it provides updates to land use designations and Foundational components where necessary to ensure that the General Plan remains suitable as a plan for the coordination of future growth within Riverside County (for example, change mapped land use designations [LUDs] and Foundations where warranted to appropriately handle emerging growth patterns).
3. Update Technical Data: An alternative would successfully meet this objective if it provides updates to General Plan's technical information (e.g., resource mapping, regulations,

demographics and statistics, etc.) where necessary to ensure that the General Plan continues to accurately reflect the current environmental, regulatory, socioeconomic and development status of Riverside County (for example, updating General Plan maps to reflect newly released mineral data from the State of California and adding a forest resources map to better coordinate with new CEQA policies addressing forest resources).

4. Address New Needs: An alternative would successfully meet this objective if it provides updates to the General Plan that enable it to appropriately plan, coordinate and implement new policies and programs necessitated by regulatory changes or by previously unanticipated needs (for example, adding greenhouse gas and climate change policies to the General Plan Air Quality Element in response to California State directives aimed at reducing carbon emissions).

5. Further County Vision: An alternative would successfully meet this objective if the changes it proposes serve to enhance and extend the continued progress of the General Plan in achieving the long-range goals established in the Riverside County Vision (for example, the addition of the "Healthy Communities" Element to the General Plan to encourage healthy living enabled by appropriate patterns of development).

As directed in State CEQA Guidelines section 15126.6(c), an EIR shall include alternatives to the project that could avoid or substantially reduce one or more of the significant effects. Because not all significant effects can be substantially reduced to a less than significant level either by adoption of mitigation measures, Project Design Features, existing regulations or by standard conditions of approval, the following section considers the feasibility of the Project alternatives as compared to the proposed Project. As explained below, these findings describe and reject, for reasons documented in the Final Program EIR No. 521 and summarized below, each one of the Project alternatives. The evidence supporting these findings is presented in Section 6.0, "Alternatives Analysis" of the Draft EIR and elsewhere in the administrative record as a whole.

A. Added Community Centers Alternative

1. The Added Community Centers Alternative addresses the effects of growth and development pressure by proposing to transfer development intensity planned for lands

1 identified for future open space conservation into a series of additional community
2 centers along transportation corridors. The overall number of residential units projected
3 for unincorporated Riverside County would remain the same, but their locations, and
4 possibly their densities, would change.

- 5 2. Overall, the shifting of open space-rural land uses to high density residential and retail-
6 commercial uses in the proposed community centers under this alternative serves a
7 number of complimentary purposes. Even though open space conservation is increased
8 greatly (by over 1 million acres), with the increase in urban uses, this alternative would
9 yield an increase of nearly 7,000 dwelling units and over 90,000 jobs, plus a population
10 increase of roughly 12,600 people as compared to buildout under the General Plan as
11 amended per the Project. Compared to the existing General Plan, population and dwelling
12 units both decrease (by 12,100 and 3,700, respectively) and jobs increase by only 56,000.
13 As a result of these changes, future development would be focused within existing and
14 burgeoning community centers along existing major transportation routes. The footprint
15 of new development within the open space and interface/wildland areas of Riverside
16 County would be greatly reduced (by roughly 80%). The reduced footprint in these rural
17 and open areas would better focus suburban and urban development in areas mapped
18 and already planned for such uses, both within County unincorporated areas as well as in
19 cities.

- 20 3. This alternative would have a number of significant environmental effects (either
21 individual, in localized areas, or cumulative). Certain of these significant environmental
22 effects would be substantially worse than those associated with the Project-updated
23 General Plan. These effects include:
24 a. Greenhouse gas emissions.
25 b. Increased use of existing parks and recreational facilities.
26 c. Growth effects resulting in the need for new or expanded parks or recreational
27 facilities.
28 d. Circulation system effectiveness and congestion management conflicts.

1 e. Increased traffic levels in localized areas.

2 4. In terms of the Project's stated objectives, this alternative would satisfy all but one. It
3 would provide a suitable plan for "further progress" within Riverside County, since it
4 provides for additional urban development in Riverside County. It would provide updated
5 technical data, simply by definition. It also would address the updated regulatory
6 environment that future development within Riverside County would need to comply
7 with (e.g., AB 32 and greenhouse gas reduction planning) for similar reasons, even though
8 it would require additional CAP measures to reduce to the additional greenhouse gas
9 emissions associated with this alternative. Nevertheless, it could still be said to
10 adequately meet the "address new needs" objective. It also may further the Riverside
11 County Vision by allowing higher growth in certain urban cores, extending or enhancing
12 "continued progress" within Riverside County. The only objective not met is that it does
13 not include any LUD updates, and thus does not address the "updated land use"
14 objective.

15 5. Although its overall development footprint is smaller, this alternative would result in a
16 small (roughly 1%) increase in both people and homes within the urban areas of Riverside
17 County and a larger increase (16%) in jobs associated with the commercial uses added in
18 the additional community centers. As such, this alternative's growth-inducing effects
19 would also be slightly higher than those of the proposed Project. Akin to those of the
20 Project, most of this alternative's growth-inducing impacts, both individually and
21 cumulatively, would be significant and unavoidable. This alternative would foster direct
22 and indirect population growth and economic growth; it would also facilitate construction
23 of additional housing. It does not, however, address existing Rural Village Study Areas
24 (RVSA's) and Rural Village Overlays. Thus, this alternative does not remove the substantial
25 obstacles growth that has arisen in the existing General Plan due to lack of detailed
26 planning for these RVSA's. This alternative would, however, have substantially less
27 impacts than Project buildout in terms of facilitation of additional environmental impacts,
28 specifically those due to encroachment into isolated or remote areas, due to the greatly

1 reduced footprint within rural, interface and wildland areas. In total, all of the growth
2 inducement impacts outlined in Section 5.4, "*Growth Inducement*" in EIR No. 521 (pages
3 5-29 through 5-42), except Impact 5.4.E, were found to be individually and cumulatively
4 significant for this alternative.

- 5 6. The Added Community Centers Alternative would enable increased growth in urban cores
6 while lessening some of the significant effects associated with the proposed Project. It
7 addresses nearly all of the significant environmental impacts identified for the Project and
8 greatly reduces a number of effects, particularly spatial impacts, as a result of the
9 reduced development footprint.

10 Some, but not all, of the Project's significant cumulative impacts are lessened under this
11 alternative; however these effects are offset by the localized increases that would result
12 within the urbanized Community Centers proposed. Specifically, due to the increase in
13 housing, population, jobs, traffic and associated economic activity, this alternative would
14 result in substantial individual and/or cumulative impacts in a number of areas, including
15 greenhouse gas emissions and traffic congestion. Also, because of the disproportionate
16 effects of growth in urban areas, this alternative would also have substantially greater
17 impacts on existing parks and recreational facilities and cause growth effects triggering
18 the need for additional facilities. It would also have growth-inducing effects on Riverside
19 County, its cities and the surrounding communities, cities and counties. In all other areas,
20 significant impacts either individually or cumulatively would be generally similar to those
21 associated with buildout of the General Plan pursuant to the Project, GPA No. 960.

22 Taken together, this alternative addresses six of the seven areas of significant effects
23 associated with the proposed Project. However, it only substantially lessens or avoids
24 significant impacts for one of the seven (agriculture); for air quality, noise and growth
25 inducement, this alternative's impacts are generally similar to those of the Project.
26 Although an improvement in many ways over the Project, because of the absolute
27 limiting effect of the finite water supply availability, this alternative will cause an increase
28

1 in greenhouse gas emissions and traffic congestion. For these reasons, this alternative
2 was not deemed the environmentally superior alternative.

3 Further, although this alternative meets four of the five objectives of the Project, it does
4 so while increasing growth and localized urban impacts beyond that of the proposed
5 Project or existing General Plan. Thus, this alternative is not deemed the favored means
6 for achieving the stated Project objectives and, for these reasons, the Added Community
7 Centers Alternative is not deemed the preferred alternative.

8 **B. Agricultural Emphasis Alternative**

- 9 1. The Agricultural Emphasis Alternative addresses the effects of development pressure on
10 agricultural resources by proposing a scenario in which removal of land from the
11 Agricultural Foundation would only be allowed every eight years. Within the Eastern
12 Coachella Valley Area Plan, future conversions would be limited to 50% of the proposed
13 site; the remainder of the site would be required to be placed into permanent agricultural
14 easements.
- 15 2. The shifting of open space-rural land uses to agriculture and conserved open proposed
16 under this alternative serves a number of complimentary purposes. Even though open
17 space conservation is increased greatly, with the increase in agricultural uses, this
18 alternative would yield an increase of nearly 9,000 dwelling units and over 44,000 jobs,
19 plus a population increase of 19,000 people as compared to buildout under the updated
20 General Plan. It does so by expanding the agricultural footprint of Riverside County and
21 slightly increasing the average densities of the developed (urban and suburban) portions
22 of unincorporated Riverside County. (From an average density of 1.8 to 2.0 dwelling unit
23 per acre [du/ac] for single-family residential uses and from 8.3 to 8.7 du/ac for multi-
24 family residential.) The restriction on Agriculture Foundation conversion would focus
25 suburban and urban development in areas mapped and already planned for such uses,
26 both within Riverside County unincorporated areas as well as in cities.
- 27 3. This alternative would have a number of significant environmental effects (either
28 individual, in localized areas or cumulative). Certain of these significant environmental

effects would be substantially worse than those associated with the Project-updated General Plan. These effects include:

- a. Induce direct or indirect population growth (within the urban areas benefitting from rural density transfers).
- b. Increase greenhouse gas emissions.
- c. Increase demand for energy (electricity and natural gas).
- d. Increase demand for water supplies, both imported and groundwater.
- e. Cause significant environmental impacts due to the construction of additional infrastructure needed to harvest and/or deliver additional water to meet demand.

4. In terms of the Project's stated objectives, this alternative does not satisfy several objectives. It would not provide a suitable plan for further progress within Riverside County since it does not update the study areas identified in 2003 for future planning specifications. It does not include any LUD updates and thus does not address the updated land use objective. It would provide updated technical data, simply by definition. It also would address the updated regulatory environment that future development within Riverside County would need to comply with (e.g., AB 32 and greenhouse gas reduction planning) for similar reasons. It would not, however, fully comply with AB 32 due to the substantial increase in greenhouse gas emissions associated with this alternative. Nevertheless, in all, this alternative could be said to adequately meet the "address new needs" objective. It does not, however, further the Riverside County Vision in regards to growth since the restrictions on agricultural conversion would significantly hinder (not "enhance" or "extend") "continued progress" within Riverside County.

5. With its slightly larger urban development potential and slightly smaller rural residential footprint, the Agricultural Emphasis Alternative would accommodate a slightly higher number of homes, population and workforce than the proposed Project. As such, this alternative's growth-inducing effects would also be slightly higher than those of the Project. Akin to those of the Project, most of this alternative's growth-inducing impacts would be significant and unavoidable. This alternative would foster direct and indirect

1 population growth and economic growth. It would also facilitate the construction of
2 additional housing. It does not, however, address (update) existing Rural Village Study
3 Areas (RVSA) or Rural Village Overlays. As such, this alternative would not remove the
4 obstacles to growth that have arisen in the existing General Plan due to lack of detailed
5 planning for the RVSA. And, in fact, by requiring an eight-year window for all Agriculture
6 Foundation LUD changes (except those within ECVAP), this alternative would actually
7 create additional growth inhibitors within Riverside County.

- 8 6. The Agricultural Emphasis Alternative would cause slightly more significant environmental
9 impacts in the growing urban and suburban portions of unincorporated Riverside County,
10 while substantially reducing many (but not all) impacts associated with spatial effects in
11 the rural portions of Riverside County. In several key areas, this alternative would avoid,
12 minimize or reduce impacts found significant under the proposed Project to less than
13 significant levels. These include: conversion of state-designated farmlands and
14 encroachment or conflicts with existing agricultural uses; exposure of people or
15 structures to wildland fire risks; and, facilitation of environmental effects due to the
16 encroachment of development into isolated or remote areas.

17 With its greatly reduced rural development footprint, it would also avoid cumulatively
18 significant cumulative impacts to archeological and paleontological resources, hazards
19 (particularly in interface and wildland areas), demand for fire protection services and
20 effects on water resources and groundwater basins. The smaller development footprint
21 means cumulative effects on existing hydrology and stormwater drainage systems would
22 also be less than significant. This alternative would also avoid significant growth-inducing
23 effects resulting from facilitating encroachment into isolated or remote areas. However,
24 because this alternative restricts agricultural conversion, it would hinder (reduce)
25 significant growth-inducing effects by creating (rather than removing) obstacles to
26 population growth within Riverside County.

27 Lastly, this alternative would also result in several substantially greater (worse)
28 environmental impacts, including: greatly increased demand for water, both imported

1 and local (groundwater); increased demand for energy (electricity and natural gas) due
2 mainly to increased agricultural uses (particularly water pumping) and related economic
3 uses (dairies, commercial, industrial, etc.); and increased energy use and increased off-
4 road equipment and vehicle operations associated with agricultural uses, contributing to
5 substantial cumulative greenhouse gas emissions; and lastly, environmental impacts
6 associated with the need for new or expanded water infrastructure. Except for the
7 greenhouse gas emissions, however, none of these cumulatively significant impacts are
8 new as compared to those of the Project-updated General Plan.

9 Taken together, this alternative adequately addresses four of the seven areas of
10 significant effects associated with the proposed Project, including having substantial
11 improvements over the Project in terms of both agricultural impacts and on-road vehicle
12 traffic levels. It would also, however, be associated with three areas of more severe,
13 environmental impacts, including increased water demand and increased cumulative
14 impacts in several areas. Although an improvement over the Project in some ways, this
15 alternative would not be the environmentally superior alternative due to the severe
16 limitations and significant environmental impacts that would result in conjunction with
17 the greatly increased water demand under this alternative. For these reasons, this
18 alternative was not deemed the environmentally superior alternative.

19 Further, as outlined above, this alternative only meets two of five of the objectives of the
20 Project. Thus, this alternative is not an acceptable means for achieving the stated Project
21 objectives. For all of these reasons, the Agricultural Emphasis Alternative is not deemed
22 the preferred alternative.

23 C. Reduced Rural Villages Alternative

- 24 1. The Reduced Rural Villages Alternative would be similar to the changes to Rural Village
25 Overlays (RVOs) proposed under GPA No. 960 in terms of eliminating RVO study areas
26 (RVOSAs). However, it would also include additional reductions in development potential
27 through the deletion of the two new RVOs proposed as part of GPA No. 960. Specifically,
28 both the existing "Study Area" designations and the proposed new RVOs for the Good

1 Hope and Meadowbrook areas would be deleted. Land uses would remain in their
2 existing LUDs, with no alternative development potential added through the RVO overlay
3 function. Unlike GPA No. 960, it would also omit several Policy Areas (either existing or
4 proposed under GPA No. 960) that provide for future urbanization within specific areas,
5 including in Anza in the hills of southern Riverside County and the Vista Santa Rosa region
6 in the Coachella Valley, among others.

- 7 2. The reductions in development potential (residential densities and economic use
8 intensities) proposed under this alternative serve a number of complementary purposes.
9 The reduction in housing (11,400 fewer units than proposed for the existing General Plan)
10 would have a corresponding effect on Riverside County population, decreasing it by
11 37,000 people. Similarly, the reduced commercial and industrial uses proposed would
12 result in roughly 42,000 fewer jobs at buildout. This decrease in workers would yield
13 complementary decreases in vehicle miles traveled for commuters, reducing traffic
14 congestion and the associated effects on air quality, greenhouse gas emissions and noise
15 levels. The decreased population would also lessen demand for and effects on public
16 services and facilities, such as schools, parks, etc. Unlike the Green Energy Alternative
17 (described immediately following this alternative), the Reduced Rural Villages
18 Alternative's population decreases would not be offset by other proposed increases
19 elsewhere in unincorporated Riverside County. Accordingly, this alternative does not
20 cause any impacts that would be substantially greater than those for buildout of either
21 the existing or updated General Plans.
- 22 3. The Reduced Rural Villages Alternative would generally have environmental effects within
23 unincorporated Riverside County similar to, but mostly less substantial than, those
24 forecast for buildout of either the existing General Plan or the General Plan as amended
25 per the Project. The fewer homes and employment-generating land uses proposed under
26 this alternative means that increases in both population and jobs would be reduced and,
27 with this the attendant environmental effects would be lessened as well. The reduced
28 population at buildout would mean fewer population-driven demands for increased

1 infrastructure, public services and facilities, such as parks, schools, post offices, hospitals,
2 etc. Fewer homes and jobs in Riverside County would also mean fewer trips within
3 Riverside County traveled by residents and commuters, resulting in lower VMT, less wear-
4 and-tear on roads and less congestion compared to the General Plan buildout scenarios.
5 It should be noted, however, that these effects would be slight compared to the proposed
6 Project, GPA No. 960, as this alternative's reduction in jobs and housing only average
7 about 1% each.

8 In terms of spatial impacts, this alternative proposed an overall development footprint
9 that is largely similar to that associated with the Project. The exception, however, is in
10 areas where RVOs and RVSA's are removed under this alternative (particularly in the
11 Aguanga and Anza regions in southwestern Riverside County). These areas would have
12 smaller development footprints with fewer attendant spatial environmental impacts. For
13 this reason, environmental impacts associated with spatial changes (i.e., those tied
14 directly to land itself and the resources on or in it) would generally be less significant
15 under this alternative. This includes all of the impacts associated with: forestry resources,
16 biological resources, including wildlife and its habitat, cultural resources, including
17 historical and archeological artifacts and sites, paleontological resources, flooding and
18 dam inundation hazards, hazards to or due to geology, soils or seismicity, including known
19 earthquake faults, liquefaction zones, expansive soils, etc., exposure to hazardous
20 materials and sites as a result of existing or past activities, and changes in hydrology,
21 drainage or groundwater runoff. Since the areas reduced are small portions of the overall
22 unincorporated Riverside County, the overall effect on the environment relative to these
23 areas would be large similar to those outlined for the proposed Project.

24 In addition, though minor in most cases, this alternative would nevertheless yield
25 decreased impacts across most of the environmental areas examined in this EIR,
26 particularly as compared to those associated with existing General Plan buildout. While
27 lowered, the overall levels of significance for most of these are roughly the same as those
28 predicted for the proposed Project. In only a few areas does this alternative differ from

1 the project; specifically, the reduced development potential to accommodate
2 urbanization means this alternative would be unlikely to result in cumulatively significant
3 inducement of population growth. In addition, the limits on urban population increases
4 (due to the removal of the RVOs) would also prevent cumulatively significant demands on
5 existing parks and recreational facilities.

6 This alternative was found to have overall higher impacts in two areas. First, its
7 encroachment effects on isolated and remote areas would likely be greater than the
8 Project's because of greater economic pressure to meet housing demands that could not
9 be provided in more urban areas (refer to Section 5.4, "*Growth Inducement*" in EIR No.
10 521, Impact 5.4.E). This effect would also be noticeable in the cities and in the counties
11 adjacent to Riverside County. Second, the reduced urbanization under this alternative
12 would remain a greater obstacle to growth (refer to Section 5.4, "*Growth Inducement*" in
13 EIR No. 521, Impact 5.4.D).

- 14 4. In terms of the Project's stated objectives, this alternative does adequately meet 60% of
15 them. It would provide LUD updates, and thus, address the updated land use objective. It
16 would also provide updated technical data, by definition, and would address the updated
17 regulatory environment that future development within Riverside County would need to
18 comply with (e.g., AB 32 and greenhouse gas reduction planning) for similar reasons.
19 Thus, it is would meet some of the objective for meeting new needs. It would not,
20 however, provide future planning necessary to address and accommodate the new needs
21 related to urbanizing growth pressures on rural areas located near urban fringes. As such,
22 it also would not accommodate further progress within Riverside County. Rather than
23 providing plans to handle future demand for urbanizing uses within unincorporated
24 Riverside County, this alternative actually limits further progress in terms of future
25 development necessary to meet population growth forecast for Riverside County.
26 Similarly, it also would not "further the County Vision," as its limits on urbanization in
27 growing rural-fringe areas would limit, rather than enhancing or extending, continued
28 progress within Riverside County.

1 5. With its slightly smaller development potential and footprint, the Reduced Rural Villages
2 Alternative would accommodate a slightly smaller resident population and workforce,
3 with an attendant reduction in the growth-inducing effects. As such, this alternative's
4 overall growth-inducing effects, both economic- and population-related, would be slightly
5 lower than the Project's within unincorporated Riverside County. The reduced population
6 growth expected would also slightly reduce the overall potential for strain on community
7 services and facilities, as compared to buildout of either the existing General Plan or the
8 amended plan as proposed by GPA No. 960.

9 In two areas, however, this alternative's impacts would be greater. First, rather than
10 removing obstacles to population growth, by limiting the potential for urbanization in key
11 rural areas, this alternative increased these obstacles. And, as a result, this limit would
12 increase pressure on rural areas to develop to provide the necessary housing stock
13 demanded in Riverside County. This pressure would also increase growth in non-county
14 jurisdictions as well. Thus, the result of this Project would be encroachment into the more
15 isolated and remote portions of Riverside County that would have otherwise seen limited
16 development pressure. With increased development in such areas there would be an
17 attendant increase in the potential for other activities leading to significant
18 environmental effects, for example, increased wildfire risks, increased pet predation,
19 human disturbance, increases in light and sound, and other wildland-interface fringe
20 effects. However, since the buildout of the General Plan pursuant to the Project would
21 also allow increased development in interface and wildland areas (as compared to the
22 existing General Plan), this alternative's impacts, while significant, are not considered
23 new.

24 6. The Reduced Rural Villages Alternative would likely cause slightly fewer significant
25 environmental impacts within the unincorporated portions of Riverside County as a result
26 of the small (1-4%) decrease in the number of houses, people, jobs and economic uses
27 proposed. These slight reductions mean that impacts associated with this alternative
28 would be largely the same or substantially similar to those forecast for buildout of the

1 General Plan as amended pursuant to the Project, GPA No. 960. Particularly as a result of
2 fewer vehicle miles traveled in Riverside County, impacts associated with traffic, noise
3 and air quality would be lower under this alternative. A lower population at buildout
4 would also mean that risks to people, such as from seismic, flood, air travel and
5 hazardous material use, for example, would be slightly lower. Impacts resulting from the
6 presence of people, such as demand for parks, schools, landfills, hospitals and other
7 public services, as well as for water, wastewater treatment, electricity, roads and other
8 infrastructure, would also be correspondingly reduced. In most cases, however,
9 incremental impacts in these areas would still be cumulatively substantial. Lastly, this
10 alternative does not adequately address significant adverse effects to agriculture because
11 the reduced potential for urbanizing development in key locations would contribute to an
12 increase in development within areas that would otherwise remain rural and
13 undeveloped, particularly within wildland and interface portions of Riverside County, nor
14 does it provide adequate plans for handling future urbanizing growth pressures and, as a
15 result, would tend to lead to sprawling growth within the rural portions of Riverside
16 County, particularly within the Rural Community Foundation.

17 In terms of environmental impacts, this alternative was found to "substantially lessen"
18 traffic impacts because of the reduced urban areas allowed. It was also found to
19 successfully address, though not "substantially lessen," impacts in six areas of significant
20 effects associated with the proposed Project. It was not found to cause any new
21 significant impacts or substantially increase any already expected to be significant
22 pursuant to Project analyses.

23 Although a slight improvement over the Project, because of the reduced urban
24 development accommodated under this alternative, it would induce significant growth
25 within cities and adjacent counties as a result of the unmet growth pressures within the
26 unincorporated areas. Nevertheless, notwithstanding these impacts outside
27 unincorporated Riverside County, this alternative does reduce, either slightly or
28 substantially, a majority of the significant adverse impacts associated with the Project

(i.e., buildout of the General Plan pursuant to GPA No. 960). For this reason, this alternative is considered the environmentally superior alternative. However, because of the limitations on future urbanization inherent in this alternative, it only meets two of five of the project objectives (40%). For this reason, despite being environmentally favorable, this alternative would not be an acceptable means for achieving the stated Project objectives. Accordingly, the Reduced Rural Villages Alternative is not deemed the preferred alternative.

D. Green Economy Alternative

1. The Green Economy Alternative would entail revisions to the General Plan to encourage the development and utilization of the green (renewable) energy resources available in unincorporated Riverside County (e.g., wind, solar and geothermal). It would allow the transfer of development density/intensity from lands of high fire hazard into areas with alternative energy availability. The overall number of residential units and business uses (commercial and industrial) projected for unincorporated Riverside County would remain the same, but their locations, and possibly their densities, would change.
2. The shifting of open space-rural land uses to green energy, light industrial and conserved open space proposed under this alternative serves a number of complementary purposes. With the shift of housing to industrial uses, the unincorporated portion of Riverside County would offer roughly 15,400 fewer homes under this alternative as compared to buildout of the existing General Plan. This means nearly 60,000 fewer people would be accommodated as Riverside County residents, lessening the increases in demand for additional schools, parks and other public services. Despite this, the additional industrial uses could provide nearly a million additional jobs (904,500) at buildout of this alternative, if fully realized. Such an increase would greatly alter Riverside County's jobs-to-housing balance and shift workers from commuting out of Riverside County for jobs to commuting into Riverside County. This influx of workers, however, would come at a cost: increased vehicular traffic and increases in other vehicle-associated impacts, such as air pollutant and greenhouse gas emissions, noise levels and wear-and-tear on roads.

- 1 3. This alternative would have a number of significant environmental effects (either
2 individual, in localized areas, or cumulative). Certain of these significant environmental
3 effects would be substantially worse than those associated with the project-updated
4 General Plan. These effects include:
- 5 a. Greenhouse gas emissions.
 - 6 b. Circulation system effectiveness.
 - 7 c. Increased traffic levels in localized areas.
 - 8 d. Fostering of direct and indirect economic growth due to the large increase in available
9 jobs proposed.
- 10 4. In terms of the Project's stated objectives, this alternative appears to satisfy all of them. It
11 provides a suitable plan for further progress within Riverside County, particularly in terms
12 of increasing jobs availability. Even though it does not update the RVOSAs identified in
13 2003 for future planning specifications, it provides an alternate plan for future
14 development and would also provide LUD updates; thus, it does address the updated land
15 use objective. It would provide updated technical data, simply by definition. And, despite
16 increased greenhouse gas emissions, it would address the updated regulatory
17 environment that future development within Riverside County would need to comply
18 with (e.g., AB 32 and greenhouse gas reduction planning). Thus, it would adequately meet
19 the "address new needs" objective. Lastly, it would further the Riverside County Vision,
20 since it proposes to greatly increase jobs in the region, helping to balance a region that
21 traditionally has more homes than jobs, while preserving open space and the quality of
22 life for Riverside County residents. This new economy would serve to "enhance" and
23 "extend" the "continued progress" within Riverside County.
- 24 5. With its slightly smaller development potential and footprint, but larger overall industrial
25 uses, including a substantial increase in the area devoted to green energy generation, the
26 Green Economy Alternative would accommodate a slightly smaller resident population,
27 but a much larger workforce than the proposed Project. Thus, this alternative's overall
28 growth-inducing effects would be somewhat higher than the Project's. As with those for

1 General Plan buildout pursuant to the Project, most of this alternative's growth-inducing
2 impacts would be significant and unavoidable. It would foster direct and indirect
3 population growth. In particular, it would foster substantially greater levels of direct and
4 indirect economic growth as a result of the nearly one million additional jobs created. It
5 would also facilitate the construction of additional housing (presumably to supply
6 demand created by workers looking to reduce their commutes from outlying areas).

7 It does not, however, address existing Rural Village Study Areas (RVSA's) and Rural Village
8 Overlays. Thus, this alternative does not remove the substantial obstacles to growth that
9 have arisen in the existing General Plan due to lack of detailed planning for these RVSA's.
10 By reducing the development envelope allowed for OS-RUR in wildlands and interface
11 areas, it does, however, prevent growth that would cause additional significant
12 environmental effects through encroachment into these isolated and remote parts of
13 Riverside County. It also limits to some extent the extent of population growth that would
14 be expected, thus slightly reducing the overall potential for strain on community services
15 and facilities, as compared to buildout of either the existing General Plan or the amended
16 plan as proposed by GPA No. 960.

- 17 6. The Green Economy Alternative seeks to provide the planning needed to help California,
18 and the country, transition from the existing, petroleum-based economy to a new,
19 cleaner "Green Economy" based on alternative energy generation and related industries.
20 Despite the decreased reliance on fossil fuels, however, the analysis herein finds that this
21 alternative would have environmental impacts of similar severity to those forecast for
22 buildout of the General Plan as updated per GPA No. 960. In certain areas, in fact, this
23 alternative would have substantially greater significant impacts driven mostly by the large
24 increase in jobs created in Riverside County.

25 While it would reduce certain regional impacts (such as greenhouse gases and, possibly,
26 traffic congestion), it would do so at the expense of substantial increases in cumulative
27 environmental impacts within Riverside County itself. In particular, key areas adversely
28 affected are those associated with the increased number of commuters heading into

1 Riverside County for work: increased traffic and congestion (due to increased vehicle
2 miles traveled within the county), higher ambient noise levels (increased due to roadway
3 traffic noise), increased localized and regional air pollution and greenhouse gas emissions.
4 This alternative would also result in specific new significant impacts to viewsheds and
5 aesthetics (including scenic highways) and to roadways and intersections in which the
6 additional traffic volumes cause LOS ranges to be exceeded above and beyond those
7 already identified by either the existing General Plan or for this proposed Project (i.e., in
8 Section 4.18, "*Transportation and Circulation*" of EIR No. 521). Lastly, even though not
9 new significant impacts, water-related impacts to domestic and groundwater supplies
10 would also be substantially greater under this alternative.

11 Taken together, this alternative only addresses four of the seven areas of significant
12 effects associated with the proposed Project. Although an improvement in many ways
13 over the Project, because of the increase in jobs and the improved jobs-to-housing
14 balance, this alternative has substantially greater adverse effects associated with this
15 greenhouse gases, traffic and aesthetics. Even though this alternative meets all of the
16 Project objectives, it does so at the expense of greater environmental effects. For all of
17 these reasons, this alternative would not be deemed the environmentally superior
18 alternative.

19 In summary, this alternative is not an acceptable means for achieving the stated Project
20 objectives and for all of the above reasons, the Green Economy Alternative is not deemed
21 the preferred alternative.

22 E. No Build/No Growth Alternative

- 23 1. The No Build/No Growth Alternative is one type of "no project" scenario addressed by
24 CEQA for comparison purposes. It would entail no growth occurring at all within
25 unincorporated Riverside County (i.e., the County of Riverside would not approve any
26 additional development applications). The only growth occurring in Riverside County
27 would be within its cities, which are assumed to buildout according to their General Plans.
28 As a result, the environmental baseline of Riverside County would be preserved in many

1 areas, except where adversely affected by the growing demands of the cities within
2 Riverside County (e.g., water use, traffic generation, land annexations, etc.).

3 2. For this alternative, with no additional development occurring in unincorporated
4 Riverside County, most of the environmental impacts within Riverside County would be
5 substantially less adverse than those of the proposed Project. In a few areas, such as
6 certain air quality impacts, seismic risks, noise exposure, traffic levels and stormwater
7 drainage needs, existing (baseline) environmental effects are already at a significant level
8 and this alternative would not relieve or lessen these impacts.

9 3. However, this alternative would have a number of significant environmental effects
10 (either individual, in localized areas or cumulative). Certain of these significant
11 environmental effects would be substantially worse than those associated with the
12 Project-updated General Plan. These effects include the following:

- 13 a. Greenhouse gas emissions and conflicts with regulatory compliance.
- 14 b. Inefficient use of energy.
- 15 c. Circulation system effectiveness and congestion management conflicts.
- 16 d. Increased traffic levels in localized areas.
- 17 e. Groundwater depletion or overdraft.
- 18 f. Population increase straining community services or facilities.
- 19 g. Facilitation of other activities leading to significant environmental effects (in
20 particular, increasing the rate of growth within the cities of Riverside County and
21 surrounding cities and counties).

22 4. In terms of the Project's stated objectives, this alternative does not satisfy several
23 objectives. It would not provide a suitable plan for "further progress" within Riverside
24 County since it posits no growth and no development. Nor would it address new needs,
25 since it pushes all new growth into the cities where Riverside County's General Plan does
26 not apply. It would provide updated technical data, simply by definition, but would not
27 provide any updated land uses within Riverside County (since no further development
28 would be permitted). And, most particularly, it does not further the Riverside County

Vision in any way since it does not permit or promote any “continued progress” within the County.

5. It is possible that under this alternative, increased growth pressure in the cities could lead to increased development above that currently planned. At present, the cities of Riverside County are projected to provide a total of approximately 1.04 million dwelling units at buildout (83% of the countywide total) with unincorporated Riverside County only providing roughly 207,000 more units. This would leave a housing deficit of over 520,000 homes within the unincorporated areas under this alternative. Notwithstanding the existing cities’ general plans, making up this half-million-plus deficit within the cities would require significant changes in city general plans and result in a number of additional significant impacts within the cities.

6. Overall, the No Build/No Growth Alternative would “substantially lessen” most of the significant environmental impacts within the unincorporated portions of Riverside County, as indicated in Table 6.4-B on pages 6.0-14 through 6.0-17 in EIR No. 521, Section 6.0, “*Alternatives Analysis*”. In a few areas under this alternative, however, a number of existing impacts would remain significant and would not be mitigated. These include: increased traffic network congestion and inadequate levels of service and groundwater depletion.

In addition, new impacts would arise where future conditions do not conform to regulatory conditions. In particular, these include: conflicts with greenhouse gas reduction plans (particularly AB 32 and the associated CARB Scoping Plan) and increasingly inefficient uses of energy (particularly electricity) as a result of failure to implement the CARB Scoping Plan, the proposed Climate Action Plan (CAP), new California State Title 24 energy efficiency standards, and other related plans.

Taken together, the substantial reduction in significant impacts associated with this alternative would make it appear to be the “environmentally superior” alternative addressed under CEQA. However, Section 15126.6(e)(2) of the State CEQA Guidelines

1 notes, "If the environmentally superior alternative is the 'no project' alternative, the EIR
2 shall also identify an environmentally superior alternative among the other alternatives."
3 In addition, as outlined above, this alternative meets only one of five of the objectives of
4 the Project. This means that this alternative is not an acceptable means for achieving the
5 stated Project objectives. For all of these reasons, despite being found "environmentally
6 superior" to the proposed Project, the No Build/No Growth Alternative is not deemed the
7 preferred alternative.

8 **F. No Project/Status Quo Alternative**

- 9 1. The No Project/Status Quo Alternative is the key CEQA-mandated "no project" alternative
10 called out in State CEQA Guidelines section 15126.6(e). For this EIR, the scenario assumes
11 that GPA No. 960 is not adopted and that the existing RCIP General Plan (adopted in
12 October 2003, and as amended through 2010), remains the guiding document dictating
13 future growth within unincorporated Riverside County. Accordingly, this alternative can
14 also be said to represent the "status quo."
- 15 2. Because it does not include the reductions associated with GPA No. 960's proposed Rural
16 Village Study Area changes, buildout under this alternative would generally result in
17 slightly greater adverse environmental impacts than that associated with the Project. In
18 particular, this alternative does not address new environmental concerns, such as
19 greenhouse gas emissions, traffic (VMT) reductions, energy conservation or water
20 conservation. In some areas, such as certain types of air pollution, noise exposure and
21 traffic levels, existing (baseline) environmental effects are already at a significant level
22 and the alternative would not relieve or lessen these impacts.
- 23 3. This alternative would have a number of significant environmental effects (either
24 individual, in localized areas or cumulative). Certain of these significant environmental
25 effects would be substantially worse than those associated with the Project-updated
26 General Plan. These effects include:
- 27 a. Adverse effects to existing visual character, light and glare, and other aesthetic
28 effects.

- b. Increased greenhouse gas emissions and conflicts with existing regulations seeking to reduce greenhouse gases.
 - c. Impacts to biota and sensitive biological resources in areas not covered by a MSCHP.
 - d. Inefficient use of energy.
 - e. Increased people and property exposed to excess noise.
 - f. Circulation system effectiveness and congestion management conflicts.
 - g. Increased demand on existing water supplies and need for additional water.
 - h. Groundwater depletion or overdraft.
 - i. Population increase straining community services or facilities.
 - j. Facilitation of other activities leading to significant environmental effects (in particular, increasing the rate of growth within the cities of Riverside County and surrounding cities and counties).
4. In terms of the Project's stated objectives, this alternative does not satisfy several objectives. It would not provide a suitable plan for further progress within Riverside County since it does not update the study areas identified in 2003 for future planning specifications. It does not include any LUD updates and thus does not address the updated land use objective. Since it does not address updated regulations that future development within Riverside County would need to comply with (e.g., AB 32 and greenhouse gas reduction planning), it does not satisfy the address new needs objective. It would provide updated technical data, simply by definition (this is the only Project objective that would be met by this alternative). Lastly, it does not further the Riverside County Vision in any way since it does not "enhance" or "extend" the "continued progress" within Riverside County.
5. With its slightly larger development potential and footprint, the No Project/Status Quo Alternative would accommodate a slightly larger population and workforce than the proposed Project. As such, this alternative's growth-inducing effects would also be slightly higher than the Project. Similar to that of the Project, most of this alternative's growth-inducing impacts would be significant and unavoidable. It would foster direct and indirect

1 population growth and economic growth. This would also facilitate the construction of
2 additional housing and lead to other significant environmental growth-related effects,
3 such as encroachment into isolated areas and increased human trespass into remote
4 areas.

- 5 6. The significant impacts within Riverside County associated with this alternative are
6 generally substantially similar to those anticipated for the proposed Project. This
7 alternative, however, proposes slightly higher levels of population, housing, workforce
8 and employment-generating land uses (roughly 2-6%). As such, even in instances where
9 both the Project and this alternative have similarly significant impacts, this alternative
10 would be slightly more severe than the Project.

11 Thus, overall the No Project/Status Quo Alternative would cause slightly more significant
12 environmental impacts within the unincorporated portions of Riverside County. It would
13 also result in several new significant impacts where the proposed Project's would be less
14 than significant (e.g., cumulative impacts due to GHG emissions and GHG reduction plan
15 inconsistencies, in particular).

16 Taken together, the significant new greenhouse gas impacts and slightly higher significant
17 impacts across many areas of environmental concern mean this alternative is not the
18 environmentally superior alternative. Further, this alternative meets only one of five of
19 the objectives of the Project, as described above. This means that this alternative is not
20 an acceptable means for achieving the stated Project objectives. For these reasons, the
21 No Project/Status Quo Alternative is deemed not the preferred alternative.

22 **BE IT FURTHER RESOLVED** by the Board of Supervisors that it has, pursuant to State CEQA
23 Guidelines section 15093, balanced the benefits of the General Plan Update Project Certifying Program
24 EIR No. 521 against the significant and unavoidable adverse environmental effects described herein, and
25 has determined that each and every one of the following benefits individually outweigh and render
26 acceptable each and every one of those significant environmental effects. The Board of Supervisors
27 hereby declares that the EIR has identified and discussed significant effects that may occur as a result of
28 the Project. With the implementation of the mitigation measures discussed in the EIR, these impacts

1 can be mitigated to a level of less than significant except for the unavoidable and significant impacts
2 discussed in the findings herein. The Board of Supervisors further finds that except for the Project, all
3 other alternatives set forth in the EIR are infeasible because they would prohibit the realization of the
4 Project objectives and/or specific economic, social or other benefits that the Board finds outweigh any
5 environmental benefits of the alternatives.

6 The Board of Supervisors hereby declares that, having reduced the adverse significant
7 environmental effects of the Project, to the extent feasible by adopting the proposed mitigation
8 measures and general plan policies, having considered the entire administrative record on the Project
9 and having weighed the benefits of the Project against its unavoidable significant impacts after
10 mitigation, the Board has determined that the social, economic and environmental benefits of the
11 Project outweigh the potential unavoidable significant impacts and render those potential significant
12 impacts acceptable based upon the following considerations.

13 The Riverside County General Plan is intended to be a blueprint for Riverside County's future. It
14 describes the future growth and development within Riverside County over the long-term. GPA No. 960
15 was designed to provide an update to the existing General Plan's policies, maps and implementing
16 directions. Pursuant to the "Certainty System" established in the Administration Element of the General
17 Plan, the following objectives are to be achieved by this periodic review and update. The General Plan
18 was reviewed and the proposed changes in GPA No. 960 are designed to:

- 19 • Assess General Plan progress and issues related to its implementation.
- 20 • Perform necessary changes amongst Foundation Components within the General Plan.
- 21 • Develop policy, entitlement and technical amendments, as warranted.
- 22 • Extend planning projections another five to ten years into the future and adjust the
23 General Plan to accommodate previously unanticipated needs.
- 24 • Enable the County of Riverside to reassess the Vision and Planning Principles of the
25 General Plan and recommit to them.

26 Accordingly, GPA No. 960 also involved cataloging the amendments that have occurred since
27 2003 and examining the planned intensities and policies of the General Plan to determine if any
28 revisions are needed. Figure 3.2 (Key Regions of Interest for GPA No. 960 (Western County)) and Figure

3.3 (Key Regions of Interest for GPA No. 960 (Eastern County)) in Section 3.0, "*Project Description*" of EIR No. 521 show the general locations of land use-related proposals with spatial components under consideration as part of this Project.

To achieve the update objectives established in the General Plan Administration Element, the General Plan was evaluated and proposals were developed by staff so that:

- The General Plan provides a clear and consistent set of directions for implementing the Riverside County Vision throughout the county over the next five to ten years and into the future (2035 and beyond). Where clarification or additional direction is needed, policies were added or modified. Where no longer relevant or appropriate, policies were deleted or revised.
- The General Plan's Elements, Area Plans and policies continue to provide clear, consistent direction for implementing Riverside County's Vision. A thorough evaluation was conducted to determine that the land use direction and planned intensities in these areas remain appropriate for their given locations. Mapping items found to be inconsistent or inappropriate were corrected.
- Policy Areas, Study Areas and Overlays throughout Riverside County continue to ensure coordinated development occurs at appropriate intensities in the manner envisioned in the General Plan. All such policy areas throughout Riverside County were evaluated towards this end to ensure their continued utility.
- Resource maps and other data-based information in the General Plan accurately reflect current data. Towards this end, these maps and other data-based information in the General Plan were examined and updated, as needed. Similarly, the General Plan policies and directives related to these resource maps were also revised where warranted by the updates.
- The references and discussions in the General Plan reflect and address the current statutes, regulations and policies of the County of Riverside and applicable outside agencies. Updates were made as needed to ensure this.

1 **BE IT FURTHER RESOLVED** by the Board of Supervisors that the State CEQA Guidelines section
2 15126 (g) require an EIR to discuss how a proposed project could directly or indirectly lead to economic,
3 population, or housing growth. A project may be growth-inducing if it removes obstacles to growth,
4 taxes community service facilities or encourages other activities which cause significant environmental
5 effects. The discussion is provided in Section 5.4 of EIR No. 521, on pages 5-29 through 5-42, and is
6 summarized as follows:

7 Many of the proposed changes associated with GPA No. 960 would either limit or impede growth
8 (for example, by placing further restrictions on floodplains or wildfire hazard areas) or would induce
9 insignificant amounts of growth (less than 0.1% of the overall growth by Area Plan). The provision of
10 small, scattered incidental rural-commercial retail uses in under-served regions that is expected to result
11 from the proposed incidental rural-commercial policy proposal is an example of this kind of limited,
12 insignificant growth. Only several key specific types of future development actions or projects resulting
13 from GPA No. 960 would, in fact, have the potential to induce significant growth within Riverside
14 County.

15 The proposals that would foster economic, population and housing growth within a portion of
16 Riverside County include the proposed Meadowbrook and Good Hope Rural Village Land Use Overlays
17 (refer to page 5-35 in Section 5.4 of EIR No. 521), and the proposed Northeast Business Park Overlay
18 (refer to page 5-36 in Section 5.4 of EIR No. 521). Changes to sites in the Criteria 2 LUD category would
19 also result in significant growth-inducing effects due to their encroachment into remote or isolated
20 areas. In addition, the proposed changes to the countywide circulation network also have the potential
21 to induce significant growth because of the essential nature of roads in providing access to remote or
22 isolated regions, and in removing impediments to growth by establishing an essential public facility. And,
23 lastly, the proposed circulation level of service (LOS) changes would be directly and indirectly
24 significantly growth-inducing due to the removal of barriers to growth resulting from decreased the time
25 and expense of transportation-related improvements associated with implementing a proposed project.

26 This finding of significant growth-inducing effects associated with GPA No. 960 is not unexpected,
27 however, given the programmatic nature of the Project, its countywide scope and the nearly 50-year
28 buildout period involved. The nature and purpose of a General Plan is inherently growth-inducing, in

1 that it represents a plan for ensuring the orderly growth and development of land within unincorporated
2 Riverside County over time. As such, the myriad policies, plans, procedures and standards outlined
3 throughout the Riverside County General Plan, as updated pursuant to GPA No. 960, as well as EIR No.
4 521 and the existing EIR No. 441, certified for the 2003 RCIP General Plan, collectively serve to mitigate
5 and reduce, where possible, the severity of the environmental effects associated with growth and
6 buildout of Riverside County. With continued diligence in implementing the General Plan, long-term
7 growth within the County of Riverside can continue while environmental effects are kept to the
8 minimum feasible and the unique biological and other important natural resources of Riverside County
9 are protected for the health and enjoyment of both existing residents and future generations to come.

10 Therefore, the Board of Supervisors has, in accordance with CEQA Guidelines Section 15093,
11 balanced the benefits of the County of Riverside General Plan Update against the significant and
12 unavoidable impacts of the County of Riverside General Plan Update and finds that such impacts are
13 outweighed by the benefits of the County of Riverside General Plan Update that may result from this
14 growth inducement that are specified in the immediately prior section of this resolution. The Board
15 acknowledges this growth as a necessary byproduct and desired result of the Project, which has been
16 developed to stimulate the orderly, balanced development of the Project area.

17 **BE IT FURTHER RESOLVED** by the Board of Supervisors that the Final EIR also discusses, pursuant
18 to State CEQA Guidelines section 15126(c) and 15126.2(c), significant irreversible environmental
19 changes and provided in Section 5.2 of EIR No. 521, on pages 5-19 through 5-26. Page 5-22 states the
20 following: "GPA No. 960 does not propose or include any actual development as part of the Project. It
21 does, however, propose changes at the General Plan level that could result in future development of
22 lands, as well as infrastructure, particularly roads and trails. This is most evident in the project
23 components related to land use. In many cases, the Project merely proposes to change the land use
24 potential of a site (i.e., through land use designation change) or area (due to a new or revised policy
25 area, overlay or other policy) in a manner that may increase or lessen future development potential on a
26 site either already developed or already proposed for development under the existing General Plan. In
27 these instances, the proposed changes would not cause new impacts due to the commitment of future
28 generations to similar uses. Likewise, the various informational item changes proposed in the Safety

1 Element and Multipurpose Open Space Element also would not affect future commitments. Because
2 they disturb such small areas and are typically easily reversible, the new trail alignments proposed in
3 GPA No. 960 also would not be considered a source of significant irreversible change.”

4 Additionally, with regard to non-renewable resources (resources that comes from the earth and
5 cannot be readily replenished within the human timescale, including but not limited to, mineral
6 resources, particularly aggregate and metal ores, and fossil energy resources, such as oil, coal and
7 natural gas), pages 5-20 and 5-21 state that the Project would “potentially enable future development in
8 a variety of areas – increasing development potential in some areas, decreasing the potential in others.
9 Among the project items with a land use component, no refineries, large-scale manufactories or large-
10 scale infrastructure development (i.e., hydroelectric dams, nuclear reactors, wastewater treatment
11 facilities, canals, interstate freeways, etc.) or other massive structures (skyscrapers, penitentiaries, etc.)
12 are proposed or planned which would necessitate the commitment of large amounts of aggregates,
13 including rock, sand, gravel, cement and other minerals to accommodate the project. Road-building,
14 which utilizes large amounts of aggregates, will occur throughout Riverside County as per the
15 countywide circulation network proposed for the updated General Plan. These roads, however, would
16 be constructed incrementally in segments over the next 50 years. Accordingly, demands for aggregate
17 resources would remain relatively consistent over this period, with demand increasing roughly according
18 to county growth rates. As such, demand for aggregate materials would be relatively constant,
19 fluctuating mainly with growth rates and well within the forecast horizons of supply availability for the
20 Riverside County’s Production-Consumption Regions (refer to Section 4.14, “*Mineral Resources*” in EIR
21 No. 521 for more details on mineral resources). Similarly, in relation to ores and metals, no foreseeable
22 mining uses, large-scale manufactories, foundries, smelters, high-tech device plants or energy-
23 generation uses, which include wind farms, non-photovoltaic solar farms and other energy plant
24 facilities that would require large amounts of various metals, particularly copper, for use in the motors
25 that ultimately generate the electricity, are proposed or planned which would necessitate the
26 commitment of large amounts of ore or metals in their construction or operation. In total, none of the
27 items proposed as part of GPA No. 960 would necessitate a large commitment of nonrenewable
28

1 resources in a manner that makes their later removal or non-use unlikely. The Project would not result
2 in a significant irreversible change in the environment due to the use of non-renewable resources.”

3 In conclusion, page 5-26 states that, “The future development potentially accommodated in
4 some locations as a result of the LUD changes proposed under GPA No. 960 would, however, lead to
5 irreversible changes in the middle of vacant, undeveloped land with intact native vegetation and other
6 natural resources, due to development and possibly the need to provide access, water, sewer collection
7 and other infrastructure. In other areas, it would result in the extension of an existing development
8 pattern (most typically rural or agricultural) into open lands lying on the border between developing
9 areas and native open space. Because of the difficulty in restoring previously untouched areas to fully
10 functional natural resource values, including biological, hydrological, geological, in addition to edge
11 effects, the future development of these areas would represent significant irreversible changes in the
12 environment and likely commit future generations to perpetuating the resultant developed uses.
13 Introduction of roads into previously inaccessible areas would have a similar effect. Although roads in
14 and of themselves can have relatively small impact footprints, in some cases the growth-inducing effects
15 that accompany such roads (due to opening access to new areas) create a whole suite of attendant
16 effects that can collectively result in significant irreversible impacts to previously untouched, vacant
17 open space lands. The individual environmental effects of future development in specific locations are
18 addressed and, in many cases mitigated to less than significant levels, in the respective parts of Section
19 4.0 of EIR No. 521. However, notwithstanding these mitigation measures, the irreversible nature of the
20 effects to natural open space areas would remain significant due to their essentially irreversible nature.
21 This effect is a cumulative outcome would result from the buildout of the General Plan, both the existing
22 General Plan and for the updated General Plan, as proposed pursuant to GPA No. 960. As such, the
23 policies and programs outlined in the General Plan itself, as well as the proposed Climate Action Plan,
24 EIR No. 521 and existing EIR No. 441, which was certified for the 2003 adoption of the RCIP General Plan,
25 provide a suite of measures that mitigate the effects of continued county growth. However, no other
26 specific mitigation measures are feasible with regard to this effect. As such, this impact would remain
27 significant and unavoidable.”

1 **BE IT FURTHER RESOLVED** by the Board of Supervisors that it has reviewed and considered EIR
2 No. 521 in evaluating the County of Riverside General Plan Update that EIR No. 521 is an accurate and
3 objective statement that complies with CEQA and reflects the County's independent judgment, and that
4 EIR No. 521 is incorporated herein by this reference.

5 **BE IT FURTHER RESOLVED** by the Board of Supervisors that it ADOPTS the statement of
6 overriding considerations, CERTIFIES EIR No. 521, and ADOPTS the Mitigation Monitoring and Reporting
7 Plan (MMRP) attached as Attachment A hereto. To the extent that there are inconsistencies between
8 the mitigation measures set forth in EIR No. 521 and those set forth in the Mitigation and Monitoring
9 Plan, the Mitigation and Monitoring Plan shall control.

10 **BE IT FURTHER RESOLVED** by the Board of Supervisors that it ADOPTS the Climate Action Plan, as
11 proposed, in compliance with AB 32 in order to reduce greenhouse gas emissions to 1990 levels by 2020.

12 **BE IT FURTHER RESOLVED** by the Board of Supervisors that the custodians of the documents and
13 other materials that constitute the record of proceeding upon which this decision is based are the Clerk
14 of the Board of Supervisors and the County Planning Department and that such documents are located
15 at 4080 Lemon Street, Riverside, California.

16
17
18 ROLL CALL:

19 Ayes: Jeffries, Tavaglione, Washington, Benoit and Ashley
20 Nays: None
Absent: None

21 The foregoing is certified to be a true copy of a resolution duly
22 adopted by said Board of Supervisors on the date therein set forth.

23 KECIA HARPER-IHEM, Clerk of said Board

24 By  _____

Deputy

**RESOLUTION NO. 2015-260
AMENDING THE RIVERSIDE COUNTY
GENERAL PLAN**

(Third Cycle General Plan Amendments for 2015)

WHEREAS, pursuant to the provisions of Government Code Section 65350 et seq., notice was given and public hearings were held before the Riverside County Board of Supervisors and before the Riverside County Planning Commission in Riverside, California to consider proposed amendments to the Riverside County General Plan; and,

WHEREAS, the Administration Element of the Riverside County General Plan provides that a General Plan Review Cycle shall begin in 2008 and occur periodically every eight years thereafter; and,

WHEREAS, the General Plan Review Cycle is intended to assess the General Plan progress and issues related to its implementation and may include policy, entitlement, technical and Foundation Component amendments; and,

WHEREAS, all provisions of the California Environmental Quality Act ("CEQA") and Riverside County CEQA implementing procedures have been satisfied; and,

WHEREAS, the proposed general plan amendment was discussed fully with testimony and documentation presented by the public and affected government agencies; now, therefore,

BE IT RESOLVED, FOUND, DETERMINED AND ORDERED by the Board of Supervisors of the County of Riverside in regular session assembled on December 8, 2015 that:

1. General Plan Amendment No. 960 (GPA No. 960) represents the first comprehensive General Plan update since the adoption of the 2003 Riverside County General Plan and was initiated by the Board of Supervisors on October 21, 2008.

2. In accordance with the General Plan's Administration Element, GPA No. 960 is a comprehensive review of the County's General Plan and incorporates changes to the Vision Statement, modifications to seven of the nine General Plan Elements and all 19 Area Plans, numerous mapping and statistical updates, land use changes on more than 21,000 acres, modifications to seven appendices, and the addition of five new appendices. Additionally, GPA No. 960 does the following:

a. Updates existing General Plan policies, maps and implementing directions.

FORM APPROVED COUNTY COUNSEL
BY: MICHELLE CLACK
DATE: 11/30/15

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- b. Ensures that the General Plan's Elements, Area Plans and policies continue to provide clear, consistent direction for implementing Riverside County's Vision.
- c. Updates Policy Areas, Study Areas and Overlays throughout Riverside County to ensure their continued utility and that coordinated development occurs at appropriate intensities in the manner envisioned in the General Plan.
- d. Updates resource maps and other data-based information in the General Plan as well as the related General Plan policies and directives.
- e. Updates references and language in the General Plan to reflect current statutes, regulations and policies of the County of Riverside and applicable outside agencies.
- f. Corrects mapping items found to be inconsistent or inappropriate.

3. The updates to Overlays referenced above revise policy language and figures in the County's General Plan. These revisions do not change a specific property's land use designation. In order to develop consistent with the policies set forth in an Overlay, property owners need to submit and process a separate application for the appropriate General Plan amendment.

4. All updates and revisions made to the County's General Plan by GPA No. 960 and by privately initiated General Plan amendments that were adopted by the Board of Supervisors from January 1, 2010 through September 22, 2015 shall be read together so as to give effect to each and not render any one of them meaningless. GPA No. 960 does not nullify the privately initiated General Plan amendments adopted by the Board of Supervisors from January 1, 2010 through September 22, 2015.

5. GPA No. 960 also incorporates the Riverside County Climate Action Plan (CAP) pursuant to state law.

6. The Planning Commission considered GPA No. 960, the accompanying CAP and EIR No. 521 at public hearings held on August 19, 2015, August 26, 2015 and September 16, 2015. The Planning Commission recommended approval of GPA No. 960 with modifications.

7. The Board of Supervisors considered GPA No. 960 with the Planning Commission's modifications and the associated CAP and EIR No. 521 at a public hearing held on November 10, 2015.

1 8. After considering all the interests presented during the public hearings and the written
2 testimony, the Board of Supervisors closed the public hearing, continued the item to December 8, 2015
3 and directed staff to prepare the final necessary documents for approval.

4 **BE IT FURTHER RESOLVED** by the Board of Supervisors, based on the evidence presented
5 on this matter, both written and oral, including Program EIR No. 521, that:

6 1. The General Plan Administration Element requires a General Plan Review Cycle every
7 eight years to assess the General Plan progress, the County Vision, policies of the General Plan, Planning
8 Principles and issues related to the General Plan's implementation. One objective of the General Plan's
9 Certainty System is to monitor progress in implementing the General Plan and correct its direction where
10 necessary. GPA No. 960 meets the purpose of the General Plan Certainty System by implementing this
11 eight year periodic review and:

- 12 a. Assesses General Plan progress and issues related to its implementation.
- 13 b. Performs necessary changes amongst Foundation Components within the General Plan.
- 14 c. Develops policy, entitlement and technical amendments, as warranted.
- 15 d. Extends planning projections another five to ten years into the future and adjusts the
16 General Plan to accommodate previously unanticipated needs.
- 17 e. Reassesses the Vision and Planning Principles of the General Plan and recommits to
18 them.

19 2. GPA No. 960 is a comprehensive review of the County's General Plan that updates
20 existing General Plan policies, maps and implementing directions. It makes changes to the Vision
21 Statement, modifications to seven of the nine General Plan Elements and all 19 Area Plans, numerous
22 mapping and statistical updates, land use changes to more than 21,000 acres, modifications to seven
23 appendices and the addition of five new appendices. As such, GPA No. 960 includes Foundation
24 Component Amendments, Entitlement/Policy Amendments and Technical Amendments.

25 3. GPA No. 960 complies with the findings set forth in the General Plan Administration
26 Element and Sections 2.4 and 2.5 of Ordinance No. 348 for Foundation Component Amendments,
27 Entitlement/Policy Amendments and Technical Amendments. Specifically, the modifications made by
28 GPA No. 960 are needed to adjust to new and special conditions existing in Riverside County such as

1 changing growth patterns, implementation of the Riverside County Multiple Species Habitat Conservation
2 Plan (MSHCP) and the Coachella Valley MSHCP and water management; to comply with new laws
3 including Senate Bill No. 32, Assembly Bill No. 1881 and Assembly Bill No. 1358; to plan and
4 coordinate for more intense development, and to ensure that growth is balanced with appropriate public
5 services, infrastructure and basic necessities for healthy and livable communities.

6 4. Additionally, GPA No. 960 does not conflict with the Riverside County Vision or any
7 General Planning Principles. GPA No. 960 provides a clear and consistent set of directions for
8 implementing the Vision including but not limited to the following:

- 9 a. Adding policies to the General Plan that further implement the Vision including but
10 not limited to: adding Incidental Rural Commercial Policies, allowing quarterly
11 updates to Spheres of Influence and Flood Hazard information;
- 12 b. Evaluating and changing policies, maps and land use information where found
13 redundant or inconsistent with the Vision such as establishing the Meadowbrook
14 and Good Hope Rural Village Overlays and removal of the El Cariso Village, Anza
15 Valley and Aguanga Rural Village Overlay Study Areas;
- 16 c. Enhancing the Vision Statement by adding a Sustainability and Global
17 Environmental Stewardship component and expands the Vision to include all
18 ethnic communities;
- 19 d. Enhancing policies related to water conservation, management, water quality,
20 ground water recharge, and energy conservation; and
- 21 e. Improving non-motorized transportation components and policies.

22 5. GPA No. 960 also updates the General Plan to ensure internal consistency among the
23 General Plan elements, removes errors that become known during the comprehensive review of the
24 General Plan and clarifies language to more accurately express the General Plan's meaning or eliminate a
25 source of confusion.

26 6. GPA No. 960 improves consistency with the adopted Western Riverside County Multiple
27 Species Habitat Conservation Plan and the Coachella Valley Multiple Species Habitat Conservation Plan.

1 7. The Airport Land Use Commission found GPA No. 960 consistent with all the applicable
2 Airport Land Use Compatibility Plans.

3 8. GPA No. 960 is consistent with the Administration Element of the Riverside County
4 General Plan and serves as a guide for orderly growth and development, preservation and conservation of
5 open-space land and natural resources within Riverside County.

6 9. GPA No. 960 will not preclude reserve design for either the Western Riverside County
7 MSHCP or the Coachella Valley MSHCP or any other habitat conservation plan within Riverside County.

8 10. For the reasons set forth above and in the staff reports presented to the Planning
9 Commission and the Board of Supervisors, incorporated herein by reference, GPA No. 960 is consistent
10 with the Administration Element of the General Plan and Sections 2.4 and 2.5 of Ordinance No. 348.

11 11. GPA No. 960 will not be detrimental to public health, safety and general welfare.

12 **BE IT FURTHER RESOLVED** by the Board of Supervisors that it **CERTIFIES** the
13 Environmental Impact Report No. 521 ("EIR") and finds that the EIR has been completed in compliance
14 with CEQA and that the EIR was presented to, reviewed and considered by the Board of Supervisors prior
15 to rendering its decision and that the EIR reflects the independent judgment and analysis of the Board of
16 Supervisors.

17 **BE IT FURTHER RESOLVED** by the Board of Supervisors that it **ADOPTS** the findings
18 required by Public Resources Code Section 21081 with respect to each of the significant environmental
19 impacts of the project identified in the EIR, including the Statement of Overriding Considerations which
20 are set forth in Resolution No. 2015-259 and incorporated herein by reference.

21 **BE IT FURTHER RESOLVED** by the Board of Supervisors, based on the evidence presented
22 on this matter, including EIR No. 521, that it **ADOPTS** General Plan Amendment No. 960 as described
23 herein, in the EIR Errata dated December 8, 2015 and in the GPA No. 960 text dated February 2015.

24 **BE IT FURTHER RESOLVED** by the Board of Supervisors that the custodians of the
25 documents upon which this decision is based are the Clerk of the Board of Supervisors and the County
26 Planning Department, and that such documents are located at 4080 Lemon Street, Riverside, California.

1 BOARD OF SUPERVISORS

COUNTY OF RIVERSIDE

2 RESOLUTION 2015-260

3 AMENDING THE RIVERSIDE COUNTY
4 GENERAL PLAN

(Third Cycle General Plan Amendments for 2015)

5 ADOPTED by Riverside County Board of Supervisors on December 8, 2015.

6
7 ROLL CALL:

8 Ayes: Jeffries, Tavaglione, Washington, Benoit and Ashley
9 Nays: None
Absent: None

10
11
12 The foregoing is certified to be a true copy of a resolution duly adopted by said Board of
13 Supervisors on the date therein set forth.

14 KECIA HARPER-IHEM, Clerk of said Board

15
16 By: 

Deputy

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23 12.08.15 3-54
24
25

ATTACHMENT D

**Notice of Determination (NOD) to be filed with the County Clerk and the State Office of
Planning and Research in accordance with CEQA**

Notice of Determination**Appendix D****To:**

☒ Office of Planning and Research
 U.S. Mail: _____ Street Address: _____
 P.O. Box 3044 1400 Tenth St., Rm 113
 Sacramento, CA 95812-3044 Sacramento, CA 95814

☒ County Clerk
 County of: Riverside
 Address: 2724 Gateway Drive
Riverside, CA 92507

From:

Public Agency: County of Riverside Planning Dept.
 Address: 4080 Lemon St. 12th Floor
Riverside, CA 92501
 Contact: Kristi Lovelady, Principal Planner
 Phone: (951)955-6892

Lead Agency (if different from above): _____

Address: _____

Contact: _____

Phone: _____

SUBJECT: Filing of Notice of Determination in compliance with Section 21108 or 21152 of the Public Resources Code.

State Clearinghouse Number (if submitted to State Clearinghouse): _____

Project Title: Riverside County General Plan Update GPA No. 960, Climate Action Plan and EIR No. 521

Project Applicant: County of Riverside

Project Location (include county): Riverside County

Project Description: _____

This is to advise that the _____ has approved the above
 (☒ Lead Agency or ☐ Responsible Agency)

described project on _____ and has made the following determinations regarding the above
 (date)
 described project.

1. The project ☒ will ☐ will not] have a significant effect on the environment.
2. ☒ An Environmental Impact Report was prepared for this project pursuant to the provisions of CEQA.
☐ A Negative Declaration was prepared for this project pursuant to the provisions of CEQA.
3. Mitigation measures ☒ were ☐ were not] made a condition of the approval of the project.
4. A mitigation reporting or monitoring plan ☒ was ☐ was not] adopted for this project.
5. A statement of Overriding Considerations ☒ was ☐ was not] adopted for this project.
6. Findings ☒ were ☐ were not] made pursuant to the provisions of CEQA.

This is to certify that the final EIR with comments and responses and record of project approval, or the negative Declaration, is available to the General Public at:

Riverside County Planning Department Office (Riverside) and online at www.planning.rctlma.org

Signature (Public Agency):  Title: Riverside County Planning Director

Date: 11/25/15 Date Received for filing at OPR: _____

ATTACHMENT A

**DVD with the December 8, 2015 Final Supplemental Response to Comments and
Complete Errata**

ATTACHMENT B

**Resolution No. 2015-259 Certifying Program EIR No. 521 and Approving the Riverside
County Climate Action Plan**