

along El Sobrante Road. An additional 24.4 cfs of offsite runoff from the south would be collected by an inlet structure with headwalls and would then be conveyed to the 66-inch mainline along El Sobrante Road via a 36-inch storm drain. A diversion structure is proposed at intersection of El Sobrante Road and Street 'A' in order to discharge low flows into the existing drainage channel. The higher flows would by-pass the diversion and the low flows would be conveyed into the channel by an 18-inch storm drain. The 66-inch storm drain continues west on El Sobrante Road making a right and turns north on McAllister Street. The 66-inch storm drain increases to a 72-inch, and eventually a 90-inch due to additional flows.

Additional offsite drainage areas would bypass the onsite storm drain system. Natural areas do not require water treatment and therefore are able to be discharged into the storm drain system downstream. Drainage area B15 (refer to Figure 3-11 for drainage area references) would be collected by a drop inlet and conveyed via an 18 inch storm drain to the 54 inch on-site storm drain at the intersection of McAllister Street and Street 'A'. The runoff from areas A8 and A9 would be collected and conveyed by a concrete swale that runs south-north and discharges downstream of Basin 'A'. The flows would be directed to a riprap energy dissipation structure that would reduce the velocities prior to discharging runoff into a natural drainage course.

An additional 6.8 acres located offsite and adjacent to the project's eastern boundary would be conveyed via concrete swales and would ultimately discharge into a natural drainage course located on the northeastern corner of the project site. (MDS, 2015a, p. 6, Plates 1 through 3).

On-Site Drainage and Water Quality Improvements

As shown on Figure 3-11, under post-developed conditions, the Project site would be separated into three separate watersheds (Watersheds A, B, and C) that largely correspond to the site's existing watersheds, with flows within Lot 'B' comprising a fourth watershed (Watershed D). The majority of first flush runoff within Watershed A, located in the northeastern portion of the Project site, would be collected by catch basins and storm drain pipes ranging in size from 18 to 36 inches. These flows would be conveyed to the proposed extended detention/water quality basin proposed in Lot 276, which would then be discharged following water quality treatment towards the north, where the natural drainage pattern ultimately conveys flows into the existing stream that traverses the northeastern corner of the Project site. Flows from the manufactured slopes within Lot 'M' would be collected by the concrete swale described above under the discussion of off-site drainage improvements, and would be discharged directly into the natural drainage course that traverses the northeastern corner of the Project site.

Most of the first flush runoff from Watershed B, which encompasses the northwest portions and southern +/- half of the Project site (excluding the natural drainage and areas southwest of the drainage) also would be collected by catch basins and storm drain pipes ranging in size from 18 to 54 inches. Street runoff from El Sobrante Road, west of Street 'A' to the eastern project boundary will be collected by a catch basin and diverted into the on-site storm drain system. The on-site first flush will be diverted into the extended detention/water quality basin (Basin 'B'), which is planned on Lot 274. The higher flows will by-pass the diversion and will be conveyed by a 54 inch storm drain that eventually joins with the existing 90 inch storm drain within Avocado Way. Street runoff from McAllister Street will be collected by modified catch basins with diversion structure that will divert the first flush into Basin 'B'. The higher flows will bypass the diversion and will be conveyed by an 18 inch storm drain and discharged into the 54 inch mainline. Following water treatment, the flows will be discharged by a 24 inch storm drain, which joins with the 72 inch at the junction structure located on McAllister Street. The junction structure joins the 24 inch outlet pipe, 72 inch mainline and the existing 90-inch storm drain.

Watershed C encompasses the portion of the Project site located south of the natural drainage in Lot 'B', a small strip along the southern boundary of the site and east of Street 'A', the portions of El Sobrante Road that abut the Project site, and portions of McAllister Street. The majority of flows within Watershed C would be conveyed to the proposed extended detention/water quality basin proposed within Lot 275. A diversion structure will convey the first flush into the basin and the higher flows will by-pass the diversion and discharge into the mainline within McAllister Street. The street runoff along El Sobrante Road, west of Street 'A' will be collected by a flow-by modified catch basin that also has a diversion structure to divert the first flush into Basin 'C'. An 18 inch storm drain will convey the first flush into the basin and the higher flows will by-pass the diversion and discharge into the mainline within McAllister Street. Following water treatment, the flows will be conveyed by a 24 inch storm drain and will discharge into the 72 inch mainline, which ultimately joins with the existing 90 inch storm drain.

On- and off-site flows that would be conveyed through Lot 'B' would be discharged into a proposed drop inlet structure that would abut McAllister Street and into a proposed extension of the existing 90-inch storm drain within McAllister Street and Avocado Way.

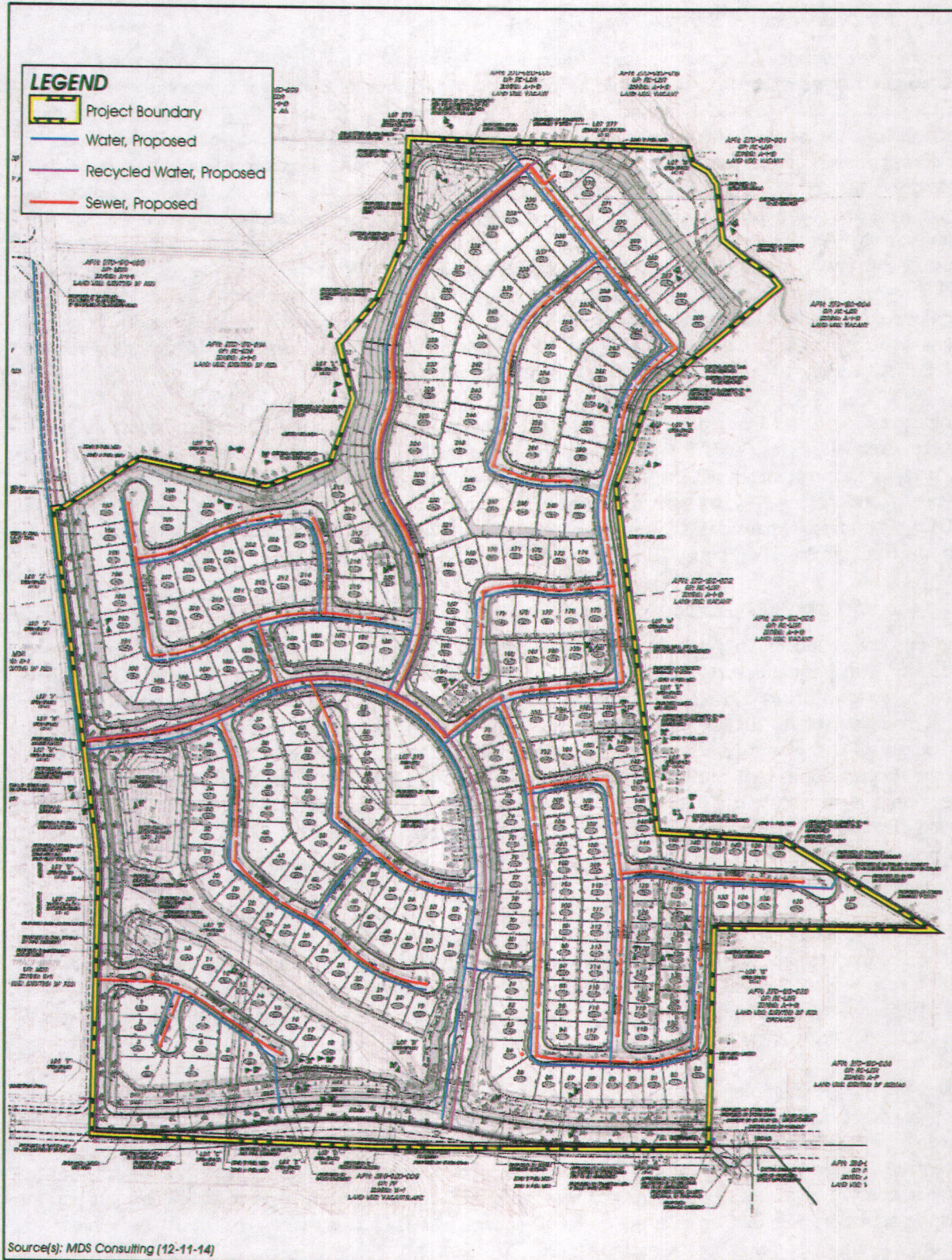
D. Proposed Water Service Improvements

Western Municipal Water District (WMWD) would provide domestic water service to the Project site. Domestic water would be provided via two existing points of connection located in Blackburn Road/McAllister Street and El Sobrante Road. The existing line within Blackburn Road/McAllister Street measures 12 inches in diameter, and is oriented in an easterly (Blackburn Road) and northerly (McAllister Street) alignment, with no existing water lines located in McAllister Street southerly of the intersection of Blackburn Road and McAllister Street. The existing water line in El Sobrante Road measures 18 inches in diameter and terminates at the Project's southwestern boundary. A 22-inch water line also occurs within El Sobrante along the frontage of the Project site, although this 22-inch water line would not serve the Project. Additionally, an existing water line measuring between 4-inches and 6-inches in diameter traverses the site and would be abandoned as part of the Project.

Figure 3-13, *Proposed Domestic Water, Recycled Water, and Sewer Improvements*, depicts the water infrastructure improvements planned as part of the Project. As part of the Project, and as depicted on Figure 3-13, a 12-inch water line is proposed to be constructed within the McAllister Street right-of-way between proposed Street 'A' and Blackburn Road. Within El Sobrante Road, the Project would construct an 18-inch water line between the existing point of connection and the eastern boundary of the site. Within the Project site, a 12-inch water line would be constructed within Street 'A' between McAllister Road and El Sobrante Road. 8-inch water lines would be constructed within all remaining on-site roadways to provide water service to individual lots.

E. Proposed Recycled Water Improvements

WMWD also would provide recycled water service to the Project site. Under existing conditions, a 20-inch recycled water line occurs within El Sobrante Road, while a 24-inch recycled water line occurs within McAllister Street. As shown on Figure 3-13, the Project would construct a recycled water line within Street 'A' between the existing 24-inch line in McAllister Street and the 20-inch line in El Sobrante Road. An additional recycled water line would be constructed in Street 'L' to provide recycled water service to the northern portions of the Project site. Recycled water would be utilized for irrigation of common landscaped areas (i.e., the park site, parkways, and slopes) and the landscaping within the public rights-of-way of McAllister Street and El Sobrante Road. Recycled water would not be utilized for irrigation of individual residential lots.



Source(s): MDS Consulting (12-11-14)

Figure 3-13

PROPOSED DOMESTIC WATER,
RECYCLED WATER, AND SEWER IMPROVEMENTS



NOT TO SCALE



F. Proposed Sewer Service Improvements

Sanitary sewer service for the proposed Project would be provided by WMWD. As shown on Figure 3-13, wastewater generated on-site would be conveyed via a series of 8-inch gravity sanitary sewer lines to be constructed within the on-site roadways (i.e., Streets 'A' through 'Y'). Within the northern portions of the site (i.e., northerly of proposed Street 'R'), sewer flows would be conveyed to the lift station proposed in the northern most corner of the property. The lift station would be required to provide sewer service to 79 lots at the northern end of the project site. The lift station would convey flows via a proposed 4-inch force main line within Street 'L' to the proposed 8-inch gravity sewer line within Street 'A'. To provide sewer service to the proposed project, a connection is proposed to an existing 8-in gravity main in Avocado Way at McAllister Street. Within the remainder of the site, eight-inch sewer lines would convey flows directly to the gravity sewer proposed within Street 'A', which in turn would convey flows to an existing 8-inch sewer main that extends from Avocado Way and terminates at McAllister Street. 1,134 linear feet of existing 8-inch sewer mains in Willow and Avocado will be replaced by 10-inch sewer mains. (Webb, 2015, pp. 3-6)

Sanitary sewer flows from the site would be conveyed to the Western Riverside County Regional Wastewater Authority (WRCRWA) Treatment Plant, located near the intersection of River Road and Baron Drive approximately 10.5 miles northwest of the Project site. The WRCRWA Treatment Plant is currently undergoing an expansion to increase the capacity from 8 million gallons a day (MGD) to 14 MGD. Proposed expansions to this facility commenced in fall 2014 and are anticipated to take 30 months to complete. (WMWD, 2014a)

G. Earthwork and Grading

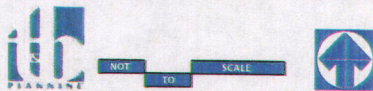
The Project proposes to grade a majority of the 103.62-acre site to facilitate development of the property with residential, recreational, and water quality/detention basin uses. A total of 1,027,830 cubic yards (c.y.) of cut and 1,210,707 c.y. of fill, resulting in a need to import approximately 182,877 c.y. of fill materials (MDS, 2014c). However, construction of the proposed 7.7-acre Off-Site Basin south of El Sobrante Road would result in the excavation of 80,000 c.y. of earth material, which would be used on the Project site as part of the proposed grading plan (MDS, 2014d). Thus, the Project would require the import of an additional 102,877 c.y. of earth material from an unknown off-site location that would be located within 10 roadway miles of the Project site (Urban Crossroads, 2015a, p. 50; MDS, 2014d). All proposed slopes would be constructed at a maximum gradient of 2:1 (horizontal:vertical). Within the northwestern portions of the site, cut slopes would be created at a maximum height of approximately 45 feet. In general, the northern portions of the site would be excavated to provide fill material for the southern portions of the site. The deepest area of fill occurs in the southwestern portion of the site adjacent to the drainage within Lot 'B', where pads would be raised by as much as eight feet in height. Several smaller manufactured slopes (i.e., up to approximately 15 feet in height) also are planned between several of the proposed residential lots. All slopes on-site would be constructed at a maximum slope angle of 2:1.

Based on the site's geologic conditions, blasting of bedrock material would be necessary as part of Project grading activities. As shown on Figure 3-14, *Hard Rock Blasting Area Locations*, areas subject to blasting are located along the northern/northwestern boundary of the site; in the area planned for the detention basin in Lot 274; and in the southeastern corner of the site, near the eastern boundary of the Project site. It is estimated that approximately 49,553 c.y. of material on-site would be subject to blasting activities, and that an average of 5,000 square feet (s.f.) of surface area would be subject to blasting on any given day (Urban Crossroads, 2015a, p. 24).



Figure 3-14

HARD ROCK BLASTING AREA LOCATIONS



3.1.4 Agricultural Preserve Cancellation and Disestablishment No. 01046

Agricultural preserves under the California Land Conservation Act of 1965 (Williamson Act) provide an incentive for land owners to conserve agricultural lands in exchange for reduced tax assessments. The Project site occurs within the El Sobrante No. 3 Agricultural Preserve (Map No. 528 A) and is subject to a Williamson Act Contract. Prior to the development of urban level uses on-site that are not compatible with agricultural uses, the site's existing Williamson Act Contract must be terminated through a petition of non-renewal, which would nullify the contract after a period of 10 years following the filing of a notice of non-renewal. However, the California Land Conservation Act of 1965 also includes a provision allowing for the cancellation of a Williamson Act Contract without completing the ten year process of term nonrenewal. Pursuant to California Government Code § 51282, land owners may petition the Riverside County Board of Supervisors for cancellation, subject to one of the following findings:

- That the cancellation is consistent with the purposes of [Government Code § 51280 et seq.]; or
- That the cancellation is in the public interest.

As part of the Project, an application has been filed by the Project Applicant to cancel the Williamson Act contract on the entirety of the El Sobrante No. 3 Agricultural Preserve and disestablish the El Sobrante No. 3 Agricultural Preserve which is coterminous with the Project site. Upon cancellation and disestablishment of the El Sobrante No. 3 Agricultural Preserve, urban-level development would be permitted, and the County would assess the land owner for the amount of fees that otherwise would have been imposed pursuant to Government Code § 51283.

3.2 SCOPE OF ENVIRONMENTAL ANALYSIS

3.2.1 Construction Characteristics

A. *Proposed Physical Disturbance*

Figure 3-15, *Proposed Physical Limits of Disturbance*, depicts the areas on- and off-site that are planned for physical improvement as part of the Project. As shown, approximately 98.99 acres of the 103.62-acre site would be subject to disturbance as part of the Project, along with an additional 7.9 acres that would be graded off-site in association with the proposed Off-Site Basin located south of El Sobrante Road (7.7 acres), the construction of an inlet structure to convey flows beneath El Sobrante Road (0.1 acre), and off-site improvements to El Sobrante Road (0.1 acre). (PCR, 2015a) As discussed in Sections 3.1.3.D through 3.1.3.F, off-site improvements within existing roadway alignments also would be necessary to provide domestic water, recycled water, and sewer service to the Project site.

B. *Anticipated Construction Schedule*

Implementation of the proposed Project would include the following phases of construction:

- Demolition;
- Grading and Import;
- Sewer, Water, Storm Drain;
- Building Construction;
- Street Improvements;
- Architectural Coatings;
- Common Area Landscaping; and
- Hard Rock Blasting and Crushing



Figure 3-15

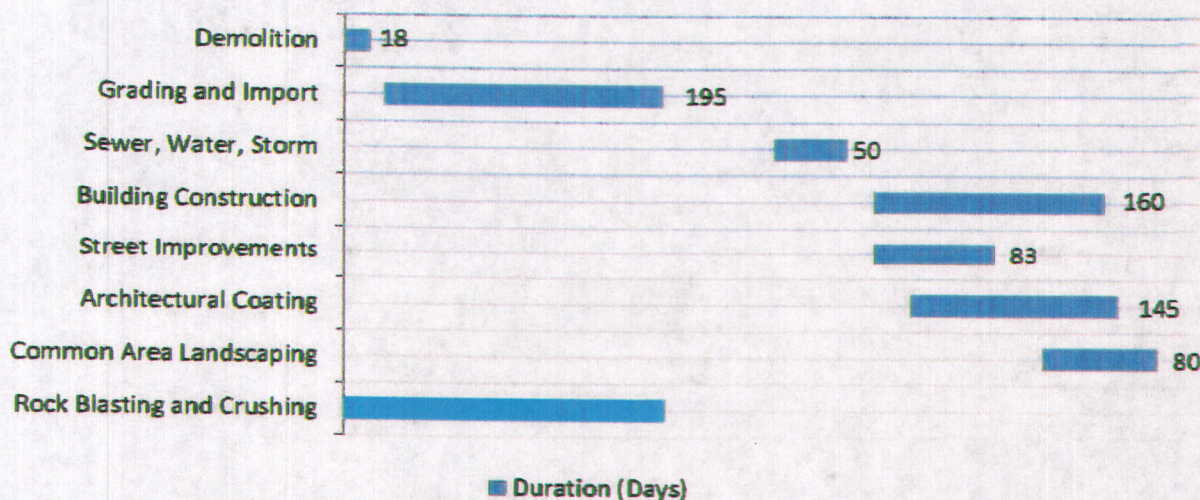


PROPOSED PHYSICAL LIMITS OF DISTURBANCE

Demolition is expected to occur over an approximate duration of 18 working days; grading and import activities would occur for a period of approximately 195 working days; sewer, water and storm drain construction is anticipated to last approximately 50 working days; building construction is anticipated to take approximately 160 working days; street improvements would require approximately 83 working days; architectural coatings would occur over a period of approximately 145 working days; and common area landscaping would take approximately 80 working days. Construction activities would occur over a total duration of approximately 20 months. (Urban Crossroads, 2015a, p. 24 and Table 3-2)

Additionally, the proposed Project is anticipated to be developed with overlapping phases of construction activity. As depicted in Table 3-3, *Schedule of Construction Activities*, soil import may overlap with grading activity. Additionally, construction activities associated with building construction, street improvements, and architectural coatings may overlap. Furthermore, it is expected that onsite hard rock blasting and crushing activities could occur at any point within demolition and grading activities. (Urban Crossroads, 2015a, p. 27)

Table 3-3 Schedule of Construction Activities



Note: Hard Rock Blasting and Crushing Activities have the potential to overlap with demolition and grading activity. It should be noted that blasting and crushing activities would occur for a duration of 10 working days. (Urban Crossroads, 2015a, Table 3-4)

C. Major Construction Equipment

Table 3-4, Anticipated Construction Equipment, indicates the major construction equipment that the Project Applicant anticipates construction contractor(s) would use during each phase of construction.

D. Construction Employees

Based on the California Emission Estimator Model (CalEEMod), up to 97 workers would be employed on site during the building construction phase, with substantially fewer employees on-site during other phases of construction, such as the demolition phase. (Urban Crossroads, 2015a)

3.2.2 Proposed Operational Characteristics

The proposed Project would be operated as a residential community. As such, typical operational characteristics include residents and visitors traveling to and from the site, leisure and maintenance activities occurring on individual residential lots and in the on-site park, and general maintenance of

common areas. Low levels of noise and a moderate level of artificial exterior lighting typical of a residential community is expected.

A. Future Population

Implementation of the proposed Project would result in the construction of 272 single-family homes. According to the Appendix E1 to the draft Riverside County General Plan Update, the average number of people per household within the LMWAP area is 3.34. Thus, the 272 dwelling units proposed by the Project would result in a future population of approximately 909 persons. (Riverside County, 2013, Appendix E-1, Table E-2)

B. Future Traffic

Traffic would be generated by the 272 homes planned for the site. As shown in Table 3-5, *Project Trip Generation Summary*, implementation of the proposed Project would result in the generation of approximately 2,589 daily vehicular trips, with 204 trips during the AM peak hour and 272 trips during the PM peak hour.

C. Maintenance Responsibilities

Under long-term operational conditions, all proposed slopes; common open space areas; open space within Lots 'C' through 'L' and 'N' through 'Q'; the water quality/detention basins within Lots 274, 275, and 276; the on-site MSHCP mitigation and avoidance areas planned within Lots 'A' and 'B'; and on-site private roadways (Streets 'A' through 'Y') would be maintained by a HOA. On- and off-site domestic water lines, recycled water lines, and sewer lines would be maintained by WMWD. Homeowners would be responsible for maintaining their own lots.

D. Fuel Modification

A Fire Behavior Report and Fuel Modification Design Guidelines has been prepared by Firesafe Planning Solutions for the proposed Project, and is included as IS/MND Appendix H1. Pursuant to Conditions of Approval 50.FIRE.005 and 60.FIRE.001, the Project would be required to comply with the fuel modification standards set forth in the report. Fuel modification features are depicted on Figure 3-16, *Proposed Fuel Modification Zones*. As shown, portions of the site would include a "Zone A" fuel modification zone, with other areas identified as "Zone B." Zone A fuel modification zones would comprise a 10- to 17-foot setback zone in which only non-combustible materials would be provided, with plant materials limited to those approved by the Riverside County Fire Department and excluding any prohibited plants. Zone B would consist of a 15- to 50-foot area that would be permanently irrigated and fully landscaped with approved drought tolerant, deep-rooted moisture material, and hydroseeded per the Riverside County Fire Department's approved plant list. Additionally, in locations where fuel modification zones are not possible without off-site improvements, a block wall/radiant heat wall would be constructed at the property line. These walls would be either block or tempered glass over block materials and constructed at a minimum height of six feet.

As conceptually depicted on Figure 3-16, along the northern edge of the Project site (at Lots 265 through 272 of TTM No. 36730) a minimum 60-foot total fuel modification zone would be provided, which would consist of a 10-foot Zone A fuel modification area within the rear yard of the private homeowner's yard and a 50-foot Zone B fuel modification area along HOA maintained slope, as well as a radiant heat wall at the rear property line. Along the eastern side yard of Lot 265, there would be a 15-foot Zone A fuel modification area on the private homeowner's lots, with the Zone B fuel modification extending to the v-ditch at the toe of slope or Project boundary, as well as a radiant heat wall at the property line. The landscaped areas between Street 'P' and the eastern project boundary

Table 3-4 Anticipated Construction Equipment

Activity	Equipment	Number	Hours Per Day
Demolition	End Dumps	3	8
	Excavators	2	8
	Loaders	1	8
Grading and Import	Bottom Dumps	8	8
	Dozers	3	8
	Scrapers	5	8
	Stomper	1	8
	Water Truck	1	8
Sewer Water Storm	Excavators	3	8
	Loaders	3	8
	Other Construction Equipment	3	8
Building Construction	Cranes	1	8
	Forklifts	3	8
	Generator Sets	1	8
	Tractors/Loaders/Backhoes	3	8
	Welders	1	8
Street Improvements	Blades	1	8
	Scrapers	2	8
	Skips	2	8
Architectural Coatings	Air Compressors	1	8
Common Area Landscaping	Tractors/Loaders/Backhoes	3	8
Hard Rock Blasting Activities	N/A	N/A	N/A

(Urban Crossroads, 2015a, Table 3-3)

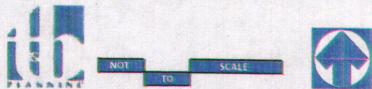
Table 3-5 Project Trip Generation Summary

Land Use	Quantity	Units ¹	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
Single Family Detached Residential	272	DU	51	152	204	171	100	272	2,589

(Urban Crossroads, 2014b, Table 4-2)



Figure 3-16



T&B PLANNING, INC.

PROPOSED FUEL MODIFICATION ZONES

would consist of a Zone B fuel modification area with a radiant heat wall running the length of the project. From lots 137 to 148 and lot 157 there would be a 15-foot Zone A fuel modification area, as well as a Radiant Heat wall. Lot 149 would have a minimum 20-foot Zone B fuel modification area along the manufactured slope behind the rear yard, with a radiant heat wall constructed at the property line. Along the northwestern edge of the Project site there would be a minimum 40-foot total fuel modification area. At lot 197 the 40-feet would be off-set from the project boundary, with a 12 to 17 foot Zone A on the private homeowner lot and a 23 to 28 foot Zone B along the HOA maintained area, as well as a radiant heat wall between the Zone A and B. Along lots 198, 200 and 215 there would be a 40-foot Zone B with a radiant heat wall at the top of slope at the limits of the fuel modification.

Finally, along the southern portions of the project along lots 10 through 31 and 84 through 93, where there will be an adjoining open space within the Project site, there would be a minimum 35-foot total fuel modification consisting of a 15-foot Zone A fuel modification area within the private homeowner lots, and a 10-foot Zone B fuel modification area within the HOA maintained areas, with a radiant heat wall at the rear par property line.

3.2.3 Related Environmental Review and Consultation Requirements

Subsequent to approval of GPA 01127, CZ 07844, TTM 36730, and AG 01046, additional discretionary and/or ministerial actions may be necessary to implement the proposed Project. These include, but are not limited to, grading permits, encroachment permits/road improvements, drainage infrastructure improvements, water and sewer infrastructure improvements, storm water permit(s) pursuant to the National Pollutant Discharge Elimination System (NPDES), and state and federal resource agency permits. Table 3-6, *Matrix of Project Approvals/Permits*, provides a summary of the agencies responsible for subsequent discretionary approvals associated with the Project. This IS/MND covers all federal, state and local government approvals which may be needed to construct or implement the Project, whether explicitly noted in Table 3-6 or not.

Table 3-6 Matrix of Project Approvals/Permits

Public Agency	Approvals and Decisions
Riverside County	
Proposed Project – Riverside County Discretionary Approvals	
Riverside County Planning Commission	<ul style="list-style-type: none"> • Provide recommendations to the Riverside County Board of Supervisors whether to approve General Plan Amendment No. 01127, Change of Zone No. 07844, Tentative Tract Map No. 36730, and Agricultural Preserve Disestablishment No. 01046. • Provide recommendations to the Riverside County Board of Supervisors regarding adoption of this IS/MND.
Riverside County Board of Supervisors	<ul style="list-style-type: none"> • Approve, conditionally approve, or deny General Plan Amendment No. 01127, Change of Zone No. 07844, Tentative Tract Map No. 36730, and Agricultural Preserve Disestablishment No. 01046. • Reject or adopt this IS/MND along with appropriate CEQA Findings.
Subsequent Riverside County Discretionary and Ministerial Approvals	
Riverside County Subsequent Implementing Approvals: Planning Department and/or Building & Safety	<ul style="list-style-type: none"> • Approve implementing Final Maps, Plot Plans, and/or Site Plans as may be appropriate. • Issue Grading Permits. • Issue Building Permits. • Approve Road Improvement Plans. • Issue Encroachment Permits. • Issue Conditional Use Permits, if required.
Other Agencies – Subsequent Approvals and Permits	
Regional Water Quality Control Board	<ul style="list-style-type: none"> • Issuance of a stormwater permit and a Section 401 Permit pursuant to the Clean Water Act.
California Department of Fish and Wildlife	<ul style="list-style-type: none"> • Issuance of a Section 1602 Streambed Alteration Agreement.
U.S. Army Corps of Engineers	<ul style="list-style-type: none"> • Issuance of a Section 404 Permit pursuant to the Clean Water Act.
Riverside County Flood Control and Water Conservation District	<ul style="list-style-type: none"> • Approval of planned drainage improvements.
Western Municipal Water District	<ul style="list-style-type: none"> • Issuance of permits/approvals for required water and sewer improvements.

APPENDIX A:

INITIAL STUDY/ENVIRONMENTAL ASSESSMENT NO. 42710

COUNTY OF RIVERSIDE

ENVIRONMENTAL ASSESSMENT FORM: INITIAL STUDY

Environmental Assessment (E.A.) Number: 42710
Project Case Type (s) and Number(s): General Plan Amendment (GPA01127), Change of Zone (CZ07844), Tentative Tract Map (TTM36730), and Agricultural Preserve Disestablishment (AG01046).

Lead Agency Contact Person: Damaris Abraham
Telephone Number: (951) 955-5719
Lead Agency Name: County of Riverside Planning Department
Lead Agency Address: P.O. Box 1409, Riverside, CA 92505-1409
Applicant Contact Person: Bill Holman
Telephone Number: (949) 729-1221
Applicant's Name: CF/CDG Lake Ranch Venture, LLC
Applicant's Address: 23 Corporate Plaza Drive, Suite 246; Newport Beach, CA 92660
Engineer's Name: MDS Consulting
Engineer's Address: 17320 Redhill Avenue, Suite 350, Irvine, CA 92614

I. PROJECT INFORMATION

- A. Project Description:** The proposed Project consists of applications for a General Plan Amendment (GPA01127), Change of Zone (CZ07844), Tentative Tract Map (TTM 36730), and an Agricultural Preserve Disestablishment (AG01046). A summary of the entitlements sought by the Project Applicant associated with the proposed Project is provided below. Please refer to the introduction to this Initial Study/Mitigated Negative Declaration (IS/MND) for a detailed description of the proposed Project and its associated construction and operational characteristics.

General Plan Amendment No. 01127: General Plan Amendment No. 01127 (GPA01127) proposes to redesignate a portion of the Project site from "Community Development - Commercial Retail (CR)," to "Community Development - Medium Density Residential (MDR)," which would allow for development of the site with residential densities ranging from 2.0 to 3.0 dwelling units per acre (du/ac) pursuant to LMWAP El Sobrante Policy Area Policy 1.2.

Change of Zone No. 07844: Change of Zone No. 07844 (CZ070844) proposes to redesignate the entire 103.62-acre Project site from "Light Agriculture (A-1-10)" to "Planned Residential (R-4)" on the southern 76.75 acres of the site and "One-Family Dwellings (R-1)" on the northern approximately 26.87 acres. The R-1 zoning designation would allow for single-family residential development on minimum 7,200 s.f. lot sizes, while the R-4 zoning designation would allow for planned community residential uses in the southern portions of the site. The proposed zoning designations would implement and be fully consistent with the site's proposed MDR land use designation, which allows for single-family residential development at densities ranging from 2.0 to 3.0 du/ac (pursuant to LMWAP El Sobrante Policy Area Policy 1.2) and lot sizes ranging from 5,500 to 20,000 s.f. in size. It should be noted that although the MDR land use designation indicates lot sizes should not be smaller than 5,500 s.f., the General Plan encourages clustering in all residential designations, indicating that lot sizes smaller than 5,500 s.f. are allowed (Riverside County, 2003a, p. 18).

Tentative Tract Map No. 36730: Tentative Tract Map No. 36730 (TTM 36730) proposes to subdivide the 103.62-acre site into 272 residential lots on approximately 53.32 acres; a park site on 2.18 acres; water quality/detention basins on 3.11 acres; sewage lift station on 0.17 acre; MSHCP Riparian/Riverine Avoidance and Mitigation areas on 7.14 acres; MSHCP

Riparian/Riverine Mitigation Area on 1.19 acres; open space on 6.91 acres; and circulation facilities (including on-site portions of McAllister Street and El Sobrante Road) on 29.60 acres.. Off-site improvements also are proposed as part of TTM 36730 include 7.9 acres that would be graded off-site in association with the proposed Off-Site Basin located south of El Sobrante Road (7.7 acres); improvements to El Sobrante Road along the Project's frontage (0.1 acre); the construction of an inlet structure to convey flows beneath El Sobrante Road (0.1 acre), and off-site improvements within existing roadway alignments to provide domestic water and sewer service to the Project site (<0.1 acre). A detailed description of the various land uses that would result from the approval of TTM 36730 is provided in Section 3.0, *Project Description*, of this IS/MND.

Agricultural Preserve Cancellation and Disestablishment No. 01046: As part of the Project, an application has been filed to cancel the Williamson Act contract on the entirety of the El Sobrante No. 3 Agricultural Preserve and disestablish the El Sobrante No. 3 Agricultural Preserve which is coterminous with the Project site.. Upon cancellation and disestablishment of the El Sobrante 3 Agricultural Preserve, urban-level development would be permitted on-site, and the County would assess the land owner for the amount of fees that otherwise would have been imposed pursuant to Government Code § 51283.

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

C. Total Project Area: 103.62 acres

Residential Acres: 53.32	Lots: 272	Units: 272	Projected No. of Residents: 909
Commercial Acres:	Lots:	Sq. Ft. of Bldg. Area:	Est. No. of Employees:
Industrial Acres:	Lots:	Sq. Ft. of Bldg. Area:	Est. No. of Employees:
Other: Water Quality/ Detention Basin (2.97 acres); Park Site (2.18 acres); Sewage Lift Station (0.17 acre); MSHCP Riparian/Riverine Avoidance and Mitigation areas (7.14 acres); MSHCP Riparian/Riverine Mitigation Area (1.19 acres); Open Space (6.91 acres); Local Private Streets (24.21 acres); Proposed McAllister Street (1.56 acres); and Proposed El Sobrante Road (3.83 acres).	Lots: 22	Sq. Ft. of Bldg. Area: N/A	Est. No. of Employees: 0

D. Assessor's Parcel No(s): 270-060-010; 270-160-001; 270-170-(009, 010, 011); 270-180-010; and 285-020-006.

E. Street References: Northeast corner of El Sobrante Road and McAllister Street.

F. Section, Township & Range Description or reference/attach a Legal Description: Southeast portion of Section 31 and Southwest portion of Section 32, Township 3 South, Range 5 West, San Bernardo Baseline and Meridian.

G. Brief description of the existing environmental setting of the project site and its surroundings: The northern portions of the Project site are being used for agricultural production (citrus groves). In the northeastern portion of the site are two residences and three warehouses. The northernmost residence is currently occupied, and an outhouse, metal canopy, and garden are located adjacent to the residence. The southernmost residence is currently vacant, and a garage is located adjacent to the residence. Three warehouses (two metal and one wooden) are located in a locked, fenced area south of the residences. The site

also contains two (2) groundwater irrigation wells in the southeast and northwest portions of the Project site. All areas of the site are unpaved, with the exception of a concrete pad surrounding the three warehouses. A water-filled reservoir also is located in the east-central portion of the Project site. The remaining portions of the site generally consist of former agricultural lands that have become fallow. In the southernmost portions of the site is an existing ephemeral drainage that conveys water from an existing 18-inch storm drain under El Sobrante Road towards the western boundary of the site where the flows discharge to existing storm drainage facilities located in the existing residential development located west of the site. A drainage also occurs partially on-site in the extreme northeast corner of the site. (Environ, 2013, p. 8; Google Earth, 2015)

Existing surrounding land uses include three existing single-family homes located near the northwest corner of the Project site, to the north of which is a mixture of agricultural lands, greenhouses, and several single-family residences and ancillary structures. Remaining areas located north of the Project site consist of undeveloped lands that appear to be regularly disced and a north-south oriented natural drainage. To the west of the Project site is McAllister Street, beyond which is a medium density single-family residential community. To the south of the Project site is El Sobrante Road, beyond which is Lake Mathews. To the east of the Project site are fallow and active agricultural lands, with greenhouses, a single family residence, and multiple sheds occurring near the Project site's southeastern boundary.

II. APPLICABLE GENERAL PLAN AND ZONING REGULATIONS

A. General Plan Elements/Policies:

- 1. Land Use:** The proposed Project site and off-site impact areas are located within the Lake Mathews/Woodcrest (LMWAP) of the County of Riverside's General Plan. The Project site is currently designated for "Rural Community – Estate Density Residential (RC-EDR)" in the northwest portion of the site; "Rural Community – Low Density Residential (RC-LDR)" in the northeastern and easternmost portions of the site; "Community Development – Medium Density Residential (MDR)" in the south-central portions of the site; and "Community Development – Commercial Retail (CR)" in the southwest corner of the site. The Project site also is located within the El Sobrante Policy Area. Please refer to the discussion and analysis of Land Use and Planning under Issue 28 of this Initial Study for a discussion and analysis of the Project's consistency with the General Plan Land Use Element, the LMWAP, and associated policies.
- 2. Circulation:** The proposed Project was reviewed for conformance with County Ordinance 461 by the Riverside County Transportation Department. Adequate circulation facilities exist and or are proposed to serve the proposed Project. The proposed Project meets all applicable circulation policies of the General Plan.
- 3. Multipurpose Open Space:** No natural open space land is required to be preserved within the boundaries of this Project, although both natural drainages would be partially or wholly preserved on-site. The proposed Project meets all applicable Multipurpose Open Space Element Policies.
- 4. Safety:** The proposed Project allows for sufficient provision of emergency response services to the existing and future users of this Project through the Project's design. According to the General Plan Safety Element, the Project site is located within and adjacent to a high fire hazard area; the site is traverse by drainages that are subject to 100-year flood hazards; and the site is subject to inundation hazards associated with the Lake Mathews dam. The site is not located in areas containing slopes greater than 25%,

nor is the site subject to hazards associated with slope instability or subsidence. The proposed Project meets all other applicable Safety Element policies.

5. **Noise:** The proposed Project meets all applicable Noise Element policies. In addition, a Noise Study, dated December 11, 2014 and prepared by Urban Crossroads, Inc., shows that the proposed Project would meet Riverside County noise standards, assuming the implementation of mitigation measures that have been incorporated into the Project's design.
 6. **Housing:** The Project proposes to develop the site with 272 residential homes consistent with the site's proposed General Plan land use designation. Accordingly, the Project would not conflict with the General Plan Housing Element policies.
 7. **Air Quality:** The proposed Project is conditioned by Riverside County to control any fugitive dust during grading and construction activities. An Air Quality Impact Analysis prepared by Urban Crossroads and dated April 13, 2015 determined that the proposed Project: would not conflict with the South Coast Air Quality District's (SCAQMD) Air Quality Management Plan (AQMP); would not violate any air quality standard or contribute substantially to an existing or projected air quality violation; would not result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment; would not expose sensitive receptors to substantial pollutant concentrations; and would not create objectionable odors that affect a substantial number of people. The proposed Project meets all applicable Air Quality Element policies.
- B. General Plan Area Plan(s):** Lake Mathews/Woodcrest Area Plan
- C. Foundation Component(s):** Community Development and Rural Community
- D. Land Use Designation(s):** Rural Community – Estate Density Residential (RC-EDR); Rural Community – Low Density Residential (RC-LDR); Community Development - Medium Density Residential (MDR); Community Development – Commercial Retail (CR).
- E. Overlay(s), if any:** None
- F. Policy Area(s), if any:** El Sobrante Policy Area
- G. Adjacent and Surrounding Area Plan(s), Foundation Component(s), Land Use Designation(s), and Overlay(s) and Policy Area(s), if any:** General Plan land use designations surrounding the Project site include the following: RC-EDR, RC-LDR, and MDR to the north; MDR to the west; "Public Facilities (PF)" and "Open Space – Water" to the south; and RC-LDR and MDR to the east. Areas east and north of the site are located within the El Sobrante Policy Area. There are no land use overlays affecting surrounding areas.
- H. Adopted Specific Plan Information**
1. **Name and Number of Specific Plan, if any:** Not within a Specific Plan.
 2. **Specific Plan Planning Area, and Policies, if any:** None.
- I. Existing Zoning:** Residential Agriculture, 10-acre minimum lot size (R-A-10)
- J. Proposed Zoning, if any:** "One Family Dwellings (R-1)" and "Planned Residential (R-4)"

K. Adjacent and Surrounding Zoning: "Residential Agriculture, 5-acre minimum lot size (A-1-5)" and "Residential Agriculture, 5-acre minimum lot size (R-A-5)" to the north; "One-Family Dwellings (R-1)" and "Specific Plan Zone (SP Zone)" to the west; "Watercourse, Watershed and Conservation Areas (W-1)" to the south; and A-1-10 and "Light Agriculture with Poultry (A-P)" to the east.

III. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

- | | | |
|--|---|--|
| <input type="checkbox"/> Aesthetics | <input checked="" type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Agriculture & Forest Resources | <input type="checkbox"/> Hydrology / Water Quality | <input checked="" type="checkbox"/> Transportation / Traffic |
| <input checked="" type="checkbox"/> Air Quality | <input type="checkbox"/> Land Use / Planning | <input type="checkbox"/> Utilities / Service Systems |
| <input checked="" type="checkbox"/> Biological Resources | <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Other: |
| <input checked="" type="checkbox"/> Cultural Resources | <input checked="" type="checkbox"/> Noise | <input type="checkbox"/> Other: |
| <input checked="" type="checkbox"/> Geology / Soils | <input type="checkbox"/> Population / Housing | <input checked="" type="checkbox"/> Mandatory Findings of Significance |
| <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Public Services | |

IV. DETERMINATION

On the basis of this initial evaluation:

A PREVIOUS ENVIRONMENTAL IMPACT REPORT/NEGATIVE DECLARATION WAS NOT PREPARED

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

A PREVIOUS ENVIRONMENTAL IMPACT REPORT/NEGATIVE DECLARATION WAS PREPARED

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

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

Signature

Date

Damaris Abraham

Printed Name

For Steve Weiss, Planning Director

V. ENVIRONMENTAL ISSUES ASSESSMENT

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

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
AESTHETICS Would the project				
1. Scenic Resources				
a) Have a substantial effect upon a scenic highway corridor within which it is located?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings and unique or landmark features; obstruct any prominent scenic vista or view open to the public; or result in the creation of an aesthetically offensive site open to public view?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source: LMWAP Figure 9, "Lake Mathews/Woodcrest Area Plan Scenic Highways;" On-site Inspection.

Findings of Fact:

a) According to Figure 9 of the LMWAP, El Sobrante Road between Mockingbird Canyon and La Sierra Avenue, and La Sierra Avenue between Cajalco Road and approximately 1.25 miles north of El Sobrante Road, are identified as "County Eligible" scenic highways. Due to the Project site's distance from La Sierra Avenue (approximately 0.85 mile) and intervening topography, landscaping, and development, the Project has no potential to affect views from La Sierra Avenue. Although El Sobrante Road is not an officially designated scenic corridor, the Project nonetheless has the potential to result in adverse visual impacts to nearby segments of this roadway.

To help illustrate the existing aesthetic conditions of the Project site and its immediate surroundings, a photographic inventory was conducted on July 8, 2014 by T&B Planning. Figure EA-2, *Site Photos Key Map*, along with the four (4) site photographs shown on Figure EA-3 and Figure EA-4, depict the existing conditions of the Project site as viewed from the four distinct vantage points, and include views from the Project's southwestern, northwestern, northern, and southeastern boundaries. Provided below is a brief description of the various elements depicted in the photographs.

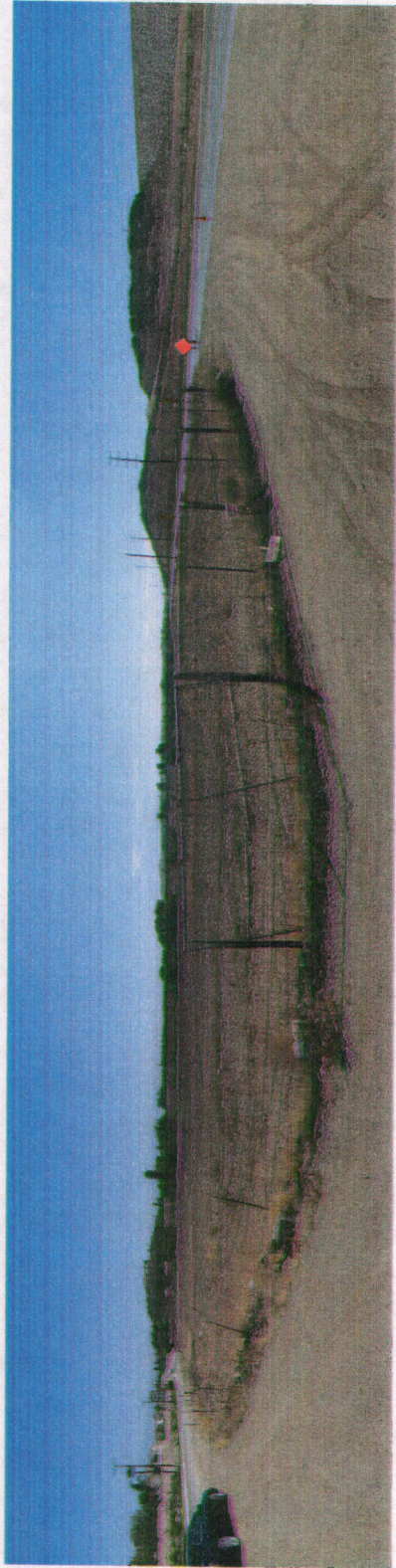
- *Site Photo 1, Figure EA-3:* Site photo 1 depicts the Project site from the southwest corner facing northeast. As seen in this view, the foreground consists of disturbed, non-vegetated ground beyond which is chain link and three wire fencing. Views within the Project site from this vantage are primarily that of disturbed fallow agricultural lands, with vegetation associated with the southern on-site ephemeral stream visible on the horizon. At the right-hand portion of this photo is El Sobrante Road, which is a partially improved roadway with several visible electrical poles along the edge of the roadway. South of El Sobrante Road are several small hillsides, with natural



Figure EA-1

SITE PHOTOS KEY MAP





Site Photo 1: From Southwest Corner of Project Site, at Intersection of McAllister St. and El Sobrante Rd., looking Northwest to Southeast



Site Photo 2: Northwest of Project Site along McAllister St., looking North to South



Site Photo 3: North of the Project Site looking East to West



Site Photo 4: From Southeast Corner of Project Site, along El Sobrante Rd., looking West to East

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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vegetation visible near the tops of the hill forms. At the extreme right hand side of the photo and south of El Sobrante Road is a rocky embankment associated with Lake Mathews. In the left hand portion of the photo, McAllister Road is visible. Along the western edge of McAllister Street is a landscaped parkway with power poles, a solid block wall, and existing single family residences.

- *Site Photo 2, Figure EA-3:* Site photo 2 depicts the Project site from the northwestern boundary of the site along McAllister Street. As can be seen at the extreme left and right hand portions of the photo, McAllister Road is only partially improved on the western alignment of the roadway, beyond which is a planned residential community surrounded by solid block theme walls. Also shown at the right and left hand portions of this photo, the eastern edge of McAllister Street is bordered by existing trees, with the trees in the foreground of this view comprising dead or dying trees. Beyond the three-wire fencing and wooden poles visible in the foreground is fallow agricultural land, beyond which is a natural hillside. In the distance in the right-center portion of the photograph, the existing on-site orchards are visible. Also visible are a number of power poles along the western edge of the McAllister Street.
- *Site Photo 3, Figure EA-4:* Site photo 3 depicts views towards the Project site from approximately 500 feet north of the north-central Project boundary, looking south. Although this vantage point is located easterly of McAllister Street, this view nonetheless represents distant views of the Project site as would be visible to southbound traffic on McAllister Street. From this vantage, an unimproved roadway dominates the center portion of the photo. To the left (east) of this roadway are fallow agricultural lands that appear to have been recently tilled. At the right hand portion of this photo (and west of the dirt roadway) is a graded and fully disturbed site surrounded by chain link fencing. In the central portion of the photo along the horizon, the existing on-site groves are visible, as are several existing rural residential homes located at the upper elevations of a natural hill form. Vegetation associated with the natural drainage that occurs in the northeastern portion of the Project site also is visible in the left hand portion of the photo.
- *Site Photo 4, Figure EA-4:* Site photo 4 depicts the Project site from the southeastern corner of the Project site looking northwest. As shown in this photo, a dirt roadway is visible in the foreground, beyond which is chain link fencing with an access gate that is covered with hub caps. Power poles are visible along the right side of the dirt road. To the right of the dirt road in the distance are a number of trees, with palm trees associated with an existing nursery site visible at the extreme right portion of the photo. In the left portion of the photo is natural vegetation associated with the on-site ephemeral stream located in the southern portion of the Project site. In the distance in the central portion of the photo, and left of the dirt access road, is fallow agricultural land that characterizes views of the southern portions of the site. In the center of the photo in the horizon is a small hill form with several existing rural residences located at the upper elevations of the hill.

The Project proposes to develop the Project site as a planned community consisting of 272 homes with on-site roadways, residential street lighting, a park site, water quality/detention basins, 14 open space lots, and roadway dedications (including portions of El Sobrante Road and McAllister Street). The on-site portions of the hillside located in the northwestern portion of the site would be contour graded to create 2:1 cut slopes at a maximum height of approximately 45 feet to facilitate residential development. The proposed Project would plant vegetation and landscaping along El Sobrante Road and proposes a buffer of landscaping between El Sobrante Road and the proposed development. Additionally a perimeter block wall would be located between the proposed landscaping along El Sobrante Road and Lot B, which generally would be retained in its natural state. Additionally, the

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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proposed Project has been designed to control the mass of the proposed homes via articulation of the building facades, attention to rooflines, and variation in vertical and horizontal planes, all of which effectively reduce the visual mass of the proposed homes. Proposed development on-site would be similar in character to the existing medium density residential neighborhood located immediately west of the Project site. Compliance with the Project's Development Plan (as described in IS/MND Section 3.1.2) would ensure that the proposed Project does not result in offensive views that would adversely affect views along El Sobrante Road. Based on the foregoing analysis, the proposed Project would result in a less than significant impact with regards to scenic highways, and no mitigation would be required.

b) The proposed Project calls for a planned residential community that consists of 272 single family residential lots; a park site; three water quality/detention basins; a sewage lift station; three MSHCP Mitigation/Avoidance lots; 14 open space lots; local streets; and improvements to McAllister Street and El Sobrante Road, none of which would be considered aesthetically offensive. As discussed in IS/MND Section 3.1.2, the proposed Project would be required to comply with the landscaping plan, wall and fence plan, and architectural design guidelines set forth in the Project's Development Plan. The standards set forth in the Development Plan would ensure that future development on-site does not create an aesthetically offensive site open to public view. Additionally, and as discussed in IS/MND Section 3.2.2.C, all common open space areas on-site would be maintained by the Project's HOA. With respect to the visual character of the surrounding area, the proposed Project would be compatible with the single family homes located to the west of the site. As such, impacts due to the creation of an aesthetically offensive site open to public view would be less than significant.

The topography of the Project site is generally flat with gently rolling hills along the northern boundary. Elevations on the Project site range from the lowest of approximately 1,225 feet above mean sea level (amsl) within an existing drainage (Drainage B) located in the northeastern corner of the Project site, to a high of approximately 1,343 feet amsl on the hillside in the northwestern portion of the project site. The majority of the Project site (i.e., within the central portions of the site) is relatively level and ranges in elevation from approximately 1,240 amsl to 1,300 feet amsl (PCR, 2015a, p. 1). The Project site consists primarily of agriculture fields dominated by agriculture (citrus groves), ruderal, and disturbed areas, with smaller patches of native vegetation including brittle bush scrub, black willow scrub, arroyo willow scrub and mulefat scrub. (PCR, 2015a, p. 17)

The Project site consists of mostly flat, dry dirt/rocky land, with some low lying vegetation scattered throughout. The site does not contain any substantial trees or rock outcroppings; therefore there is no potential for the Project to result in damage to such scenic resources. There are currently orchards on site; however, the removal of these trees would not result in a significant aesthetic impact because the orchards would be replaced by tree-lined streets within the Project site (as depicted in IS/MND Appendix M). The only potentially unique or landform feature in the on the Project site is the hill in the northwest portion of the site. Although the Project proposes to create manufactured slopes along this hillside at heights up to 45 feet, the proposed grading has been designed to contour to approximate the existing conditions of this hillform, while there would be no Project-related impacts to the upper elevations of this hillform. Furthermore, the upper elevations of this hillform already are developed with residential uses. Additionally, future residential development on-site would be limited to a maximum height of 40 feet, as required by Riverside County Zoning Ordinance Article IV 6.2.a. Moreover, due to the lack of improved roadways on-site, the Project site does not offer any public vantage points of this topographic landform under existing conditions. Views of this landform still would be afforded along McAllister Street and from other areas in the County located northerly of the

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Project site. Accordingly, impacts to scenic vistas resulting from Project implementation would be less than significant. Thus, with implementation of the proposed Project, the visual integrity of this hillform would remain intact and off-site views of this hillform would not be significantly affected. Based on these considerations, impacts to the existing hillform that partially occurs on-site would be less than significant.

As indicated in the above analysis, the Project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings and unique or landmark features; obstruct any prominent scenic vista or view open to the public; or result in the creation of an aesthetically offensive site open to public view; therefore, impacts would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

2. Mt. Palomar Observatory

a) Interfere with the nighttime use of the Mt. Palomar Observatory, as protected through Riverside County Ordinance No. 655?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Source: GIS database (Riverside County, 2013), Ord. No. 655 (Regulating Light Pollution); Ord. No. 915 (Ord. No. 915); LMWAP, Figure 6 (Mt. Palomar Nighttime Lighting Policy).

Findings of Fact: Riverside County Ordinance No. 655, as well as the LMWAP, identify portions of the County that have the potential to adversely affect the Mt. Palomar Observatory. Specifically, Ordinance No. 655 identifies Zone "A" as comprising lands within a 15-mile distance of the observatory, while Zone "B" comprises lands located greater than 15 miles, but less than 45 miles from the observatory. The Project site is located approximately 48 miles northwest of the Mt. Palomar Observatory, and is therefore not subject to the provisions of Ordinance No. 655. All lighting proposed as part of the Project would be required to comply with the Riverside County Ordinance No. 915 (Ord. No. 915) which regulates outdoor lighting and would serve to minimize impacts associated with Project lighting. Because the Project site is located more than 45 miles from the Mt. Palomar Observatory, and because the Project would be subject to the provisions of Ord. No. 915, Project lighting would not create or contribute to sky glow that could adversely affect operations at the Observatory, and no impact would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

3. Other Lighting Issues

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

Source: On-site Inspection, Project Application Materials, Ord. No. 915 (Regulating Outdoor Lighting); Ord. No. 461; Riverside County, 2003a.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Findings of Fact:

a & b) All lighting proposed as part of the Project would be required to comply with the Riverside County Ordinance No. 915 (Ord. No. 915) which regulates outdoor lighting. Compliance with Ord. No. 915 would be assured through future County review of building permit applications. As a proposed residential community, lighting elements that would be installed for the Project would be of low intensity and residential in character, and would not result in the exposure of on- or off-site residential property to unacceptable light levels. Street lights also would be required along the segment of El Sobrante Road and McAllister Street. All proposed street lighting on- and off-site would be required to comply with the provisions of the County's Public Road Standards, which implement the provisions of County Ordinance No. 461. The County's Public Road Standards require that all street lights installed within the public right-of-way must comply with the following requirement: "Luminaires shall be full cut off, high pressure sodium type..." The requirement to provide fully cut off high pressure sodium street lights would ensure that street lights constructed on- and off-site would not create a new source of substantial light or glare which would affect day or nighttime views, and further would ensure that street lights do not expose residential property to unacceptable light levels. Accordingly, and assuming mandatory compliance with Riverside County Ordinance No. 915 and the County's Public Road Standards, the proposed Project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area, nor would the Project expose residential property to unacceptable light levels. Impacts would be less than significant.

Mitigation: No mitigation is required

Monitoring: No monitoring is required.

AGRICULTURE & FOREST RESOURCES Would the project

4. Agriculture

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

Source: General Plan, Figure OS-2 (Agricultural Resources); California Department of Conservation Farmland Mapping and Monitoring Program; GIS database; United States Department of Agriculture Soils for Western Riverside County; Project Application Materials.

Findings of Fact:

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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a) According to the California Department of Conservation (CDC) Farmland Mapping and Monitoring Program (FMMP), the Project site includes approximately 0.41 acre classified by the FMMP as "Urban-Built Up Land," approximately 12.07 acres classified by the CDC as "Other Land," approximately 56.57 acres of Farmland of Local Importance, approximately 12.92 acres of Farmland of Statewide Importance, and approximately 12.63 acres of Unique Farmland. Additionally, the off-site area proposed for development with a detention basin contains Farmland of Local Importance and Other Land. Unique Farmland and Farmland of Statewide Importance are considered "Important Farmland" under CEQA. With implementation of the proposed Project, approximately 98.99 acres of the Project site, including areas containing Important Farmland types, would be permanently converted to non-agricultural use. Construction of the Off-Site Basin also would preclude agricultural activities on approximately 7.7 acres, although no Important Farmland types occur within areas subject to disturbance in association with the off-site detention basin.

Although the Project would result in the conversion of Important Farmland to a non-agricultural use, in 2003 Riverside County approved an update to its General Plan as part of the Riverside County Integrated Project (RCIP). The resulting conversion of farmland to non-agricultural use was addressed as part of the Program EIR for the RCIP General Plan (SCH No. 2002051143), which was approved by the Riverside County Board of Supervisors on October 7, 2003. The Program EIR identified several unmitigable significant impacts to the environment, including impacts to agricultural resources. Pursuant to CEQA, Riverside County was required to make certain findings and adopt a Statement of Overriding Considerations for these unmitigable impacts in order to certify the Program EIR. With respect to agriculture, Riverside County made the following finding:

While the implementation of proposed General Plan policies would help reduce the conversion of agricultural lands to urban uses, the potential loss of Prime, Unique, or Statewide Important farmland remains a significant unavoidable impact. The Board finds that there are no feasible mitigation measures or alternatives that the Board could adopt at this time which would reduce this impact to a less-than-significant level. This impact, therefore, remains significant and unmitigable. To the extent that this adverse impact will not be eliminated or lessened to an acceptable (less-than-significant) level, the Board finds that specific economic, legal, social, technological, or other considerations identified in the Statement of Overriding Considerations support approval of the Project, despite unavoidable residual impacts.

The Project site is identified by the adopted General Plan for development with Residential and Commercial Retail land uses, and impacts associated with the site's conversion from agriculture to residential and urban land uses were evaluated and disclosed as significant and unavoidable as part of the analysis contained in the 2003 General Plan EIR. While the proposed Project seeks to change the site's land use designation to allow for development of the site with residential, water quality/detention basin, park, sewage lift station, and open space land uses, the Project's proposed land uses would not result in an increase in impacts to Important Farmland types beyond the significant and unavoidable impacts identified as part of the 2003 General Plan EIR, for which the Board of Supervisors adopted a Statement of Overriding Considerations in accordance with CEQA Guidelines §15093. The County's land use designation of the site for non-agricultural (residential and commercial retail) development as part of the 2003 General Plan represents an explicit policy decision by the Board of Supervisors.

In addition, soils on the Project site are not considered to be highly productive for farming. The California Revised Storie Index is a soil rating based on soil properties that govern a soil's potential for

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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cultivated agriculture in California. The Storie Index assesses the productivity of a soil through the degree of soil profile development, texture of the surface layer, slope, and management features which include drainage, microrelief, fertility, acidity, erosion, and salt content. A score ranging from 0 to 100 is determined for each factor and the scores are multiplied together to derive an index rating. The Storie Index ratings were combined into six grade classes as follows: Grade 1 (excellent), Grade 2 (good), Grade 3 (fair), Grade 4 (poor), Grade 5 (very poor), and Grade 6 (non-agricultural). According to the Web Soil Survey data provided by the United States Department of Agriculture Natural Resources Conservation Service, approximately 4.6% of the Project site is not applicable for Storie Index rating. Approximately 20.7% of the Project site has a 'Grade 4-Poor' Storie Index. The remaining 74.7% of the Project site has a 'Grade 3-Fair' Storie Index. Although the proposed Project would convert important Farmland to non-agricultural uses, the Storie Index ratings demonstrate that the soil is not highly suitable for agricultural uses. (USDA, 1971) Moreover, lands to the west are currently developed with medium density residential homes and the Project site occurs at a fairly major intersection, further indicating that long-term agricultural use is not viable on the Project site.

Accordingly, although implementation of the proposed Project would permanently impact approximately 12.92 acres of Farmland of Statewide Importance and approximately 12.63 acres of Unique Farmland, the conversion of Important Farmland to non-agricultural land uses was fully accounted for in the County's 2003 General Plan EIR. Additionally, the Storie Index for the approximately 12.92 acres of Farmland of Statewide Importance and approximately 12.63 acres of Unique Farmland is "Grade 3-Fair," which implies the soils in these areas are not ideal for agricultural uses, and would therefore be less suitable to maintain agricultural uses in the long term as compared to other properties that are designated as Important Farmland. Because the Project would not result in any new or more severe impacts to Important Farmland beyond what was evaluated in the RCIP General Plan EIR, and because the USDA Storie soil ratings on-site demonstrate that the site is not highly productive with respect to agricultural resources, Project impacts to Important Farmland would be less than significant.

b) The Project site is currently zoned as "Light Agriculture (A-1-10)", which allows for residential development and limited agricultural uses (Riverside County, 2014, § 348.4773). The Project proposes to change the site's existing zoning designation to "Planned Residential (R-4)" on the southern 76.75 acres of the site and "One-Family Dwellings (R-1)" on the northern approximately 26.87 acres, which would preclude future use of the site for agricultural production. Although the conversion of the site from agricultural production to residential development represents a zoning change, environmental impacts associated with the conversion are evaluated throughout this Initial Study/Mitigated Negative Declaration (IS/MND) and impacts either would not occur, would be less than significant, or would be reduced to below a level of significance with mitigation. Accordingly, although the proposed Project would conflict with the site's existing agricultural use and zoning designation, there would be no additional impacts to the environment beyond what is already identified and mitigated for by this IS/MND.

According to the Department of Conservation Williamson Act mapping, lands on the project site are designated as Williamson Act Non-Prime Agricultural Land and Williamson Act Prime Agricultural Land, both of which are part of the El Sobrante Agricultural Preserve No. 3 (Map No. 528 A) (CDC, 2012). Riverside County recorded a Notice of Nonrenewal for the Project site on April 15, 2014 (County Case No. AGN00165). In addition, the Project Applicant has filed an application to cancel the Williamson Act contract on the entirety of the El Sobrante No. 3 Agricultural Preserve and disestablish the El Sobrante No. 3 Agricultural Preserve, which is coterminous with the Project site. Pursuant to

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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California Government Code § 51282, land owners may petition the Riverside County Board of Supervisors for cancellation, subject to one of the following findings:

- That the cancellation is consistent with the purposes of [Government Code § 51280 et seq.]; or
- That cancellation is in the public interest.

California Government Code § 51282(b) clarifies that a proposed cancellation would be consistent with the purposes of Government Code § 51280 et seq. if the certain findings can be made by the Riverside County Board of Supervisors. Provided below are the findings, along with the relevant discussion demonstrating Project consistency with each finding.

- Finding 1: That the cancellation is for land on which a notice of nonrenewal has been served pursuant to California Government Code § 51245.

As noted above, Riverside County approved a Notice of Nonrenewal for the Project site on April 15, 2014, consistent with Finding 1.

- Finding 2: That cancellation is not likely to result in the removal of adjacent lands from agricultural use.

There are no components of the proposed Project that would induce urban level development on any nearby properties currently being used for agricultural production. Additionally, many lands in the Project vicinity are subject to separate Williamson Act Contracts, which would discourage their conversion to non-agricultural use.

- Finding 3: That cancellation is for an alternative use which is consistent with the applicable provisions of the city or county general plan.

The cancellation proposed by the Project would facilitate the development of urban-level residential development on the property. Although the Project proposes to change a portion of the site's existing General Plan land use designations from "Community Development - Commercial Retail (CR)" to "Community Development - Medium Density Residential (MDR)," such a land use change is substantially conforming to the site's existing General Plan land use designations of "Rural Community - Estate Density Residential (RC-EDR)," "Rural Community - Low Density Residential (RC-LDR)," and "Community Development - Medium Density Residential (MDR)."

- Finding 4: That cancellation will not result in discontinuous patterns of urban development.

As shown on MND Figure 2-1, the Project site abuts existing medium density residential development located to the west; ~~thus, the Project would not result in discontinuous patterns of development.~~ In addition, there are planned residential developments to the north and east of the Project site. Development of the Project site would create a more contiguous pattern of urban development based on the existing and planned uses surrounding the Project site to the north, east, and west of the site. Thus, the Project would not result in discontinuous patterns of development.

- Finding 5: That there is no proximate non-contracted land which is both available and suitable for the use to which it is proposed the contracted land be put, or, that development of the contracted land would provide more contiguous patterns of urban development than development of proximate non-contracted land.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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The Project vicinity does not contain any non-contracted land which is both available and suitable for development with medium density residential land uses. This is because surrounding lands are not available for development (including areas immediately surrounding Lake Mathews), many existing properties east of the Project site are subject to Williamson Act Contracts, and lands to the northeast of the Project site contain sensitive drainages and steep hillsides that are not conducive to medium density residential uses. In addition, development of the contracted land would provide more contiguous patterns of urban development than development of proximate non-contracted land. Land to the west of the Project site is an existing residential development, and lands to the north and east of the Project site are also planned for residential uses. Thus, development of the contracted land would create a contiguous pattern of urban development in the area.

Accordingly, and based on the foregoing analysis, the Project's proposed cancellation would be consistent with the purposes of Government Code § 51280 et seq., and a conflict with the Williamson Act provisions would not occur. Furthermore, impacts to the environment associated with the cancellation of the existing agriculture preserve and development with medium density residential uses have been evaluated throughout this IS/MND, which concludes that such impacts either would not occur, would be less than significant, or would be reduced to below a level of significance with mitigation. Therefore, Project impacts due to a conflict with Williamson Act contracted lands would be less than significant.

c) Zoning designations surrounding the site include "Residential Agriculture, 5-acre minimum lot size (A-1-5)" and "Residential Agriculture, 5-acre minimum lot size (R-A-5)" to the north; "One-Family Dwellings (R-1)" and "Specific Plan Zone (SP Zone)" to the west; "Watercourse, Watershed and Conservation Areas (W-1)" to the south; and A-1-10 and "Light Agriculture with Poultry (A-P)" to the east. The A-1-5, R-A-5, A-1-10, and A-P zoning designations all allow for varying types and intensities of agricultural use. Land uses surrounding the site include single family residential to the west; vacant land, agriculture, single family residential, greenhouses and open space to the north; open space, fallow agriculture, greenhouses and single family residential to the east; and open space and Lake Mathews to the south.

The existing agricultural uses and zoning to the north and east of the Project site all occur within 300 feet of the Project site. Due to the proximity of existing agriculturally zoned property and agricultural uses, the Project has the potential to directly or indirectly conflict with agricultural operations. However, the proposed Project would be required to comply with Riverside County Ordinance No. 625.1. Ordinance No. 625.1 specifies that if any agricultural operation has been in place for at least three years and is not considered a nuisance operation at the time the operation began, no change in surrounding land uses may cause said operation to become a nuisance. Ordinance No. 625 also requires notification to future residents of the Project at the time homes are purchased that agricultural operations are on-going in the area and that such uses may not be the subject of nuisance complaints.

Mandatory compliance with Ordinance No. 625 would ensure that any potential conflicts between proposed residential uses on-site and existing agricultural operations within 300 feet of the site do not occur, thereby ensuring that impacts are less than significant. No mitigation beyond mandatory compliance with Ordinance No. 625 would be required.

d) Implementation of the proposed Project would replace the site's existing agricultural uses with residential development. According to Riverside County GIS, there are lands surrounding the Project site that are designated as Farmland of Local Importance, Unique Farmland, and Farmland of

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Statewide Importance (Farmland). It could be argued that placing a residential development near existing agricultural uses could result in the conversion of Farmland due to the conflict between the residential and agricultural land uses. However, and as discussed under the analysis of Threshold 4.c), mandatory compliance with Ordinance No. 625 would ensure that implementation of residential uses on-site does not result in conflict with existing agricultural uses. Thus, Ordinance No. 625 would prevent changes that could result in the conversion of Important Farmland to non-agricultural use because the existing agricultural uses could not be considered a nuisance. Accordingly, no impact would occur, and no mitigation would be required beyond mandatory compliance with Ordinance No. 625.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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

Source: General Plan, Figure OS-3 (Parks, Forests and Recreation Areas); Project Application Materials.

Findings of Fact:

a, b & c) No lands within the Project vicinity are zoned for forest land, timberland, or Timberland Production, nor are any lands within the Project vicinity used for timber production. The Project therefore would have no potential to conflict with timberland or forest land zoning designations, nor would the Project result in the loss of forest land or conversion of forest land to non-forest use. There are no components of the proposed Project that would result in changes to the existing environment which could result in the conversion of forest land to non-forest use. Therefore, no impact would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

AIR QUALITY Would the project

6. Air Quality Impacts	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors which are located within 1 mile of the project site to project substantial point source emissions?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Involve the construction of a sensitive receptor located within one mile of an existing substantial point source emitter?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source: *Lake Ranch (TTM No. 36730) Air Quality Impact Analysis*, Urban Crossroads, Inc., April 13, 2015; *Final 2012 Air Quality Management Plan*, South Coast Air Quality Management District, December 2012; California Air Resources Board, 2009; *SCAQMD Air Quality Significance Thresholds*. South Coast Air Quality Management District, March 2011; LMWAP Figure 3, *Lake Mathews/Woodcrest Area Plan Land Use Plan*.

Findings of Fact:

a) The Project site is located within the South Coast Air Basin (SCAB) and under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD is principally responsible for air pollution control and has adopted a series of Air Quality Management Plans (AQMPs) to reduce air emissions in the Basin. Most recently, the SCAQMD Governing Board adopted the Final 2012 AQMP for the SCAB, on December 7, 2012. The 2012 SCAQMD AQMP is based on motor vehicle projections provided by the California Air Resources Board (CARB) in their EMFAC 2011 model and demographics information provided by the Southern California Association of Governments (SCAG). (Urban Crossroads, 2015a, pp. 41-42)

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

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

Consistency Criterion No. 1 refers to violations of the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). CAAQS and NAAQS violations would occur if Localized Significance Thresholds (LSTs) were exceeded. As evaluated as part of the Project LST analysis under Thresholds 6.b) and 6.c), the Project's localized construction-source emissions would not exceed applicable LSTs. The Project regional analysis demonstrates that Project operational-source emissions would not exceed applicable thresholds, and would therefore not result in or cause violations of the CAAQS and NAAQS. On the basis of the preceding discussion, the Project is determined to be consistent with the first criterion. (Urban Crossroads, 2015a, p. 42)

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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- Consistency Criterion No. 2: *The proposed Project will not exceed the assumptions in the AQMP or increments based on the years of Project build-out phase.*

The 2012 AQMP demonstrates that the applicable ambient air quality standards can be achieved within the timeframes required under federal law. Growth projections from local general plans adopted by cities in the district are provided to the Southern California Association of Governments (SCAG), which develops regional growth forecasts, which are then used to develop future air quality forecasts for the AQMP. Development consistent with the growth projections in the County of Riverside General Plan is considered to be consistent with the AQMP. (Urban Crossroads, 2015a, p. 42)

Peak daily emissions generated by construction activities are largely independent of land use assignments, but rather are a function of development scope and maximum area of disturbance. Irrespective of the site's land use designation, development of the site to its maximum potential would likely occur, with disturbance of a majority of the site occurring during construction activities. Thus, construction activities would be consistent with the AQMP assumptions. (Urban Crossroads, 2015a, pp. 42-43)

A project would conflict with the AQMP if it will exceed the assumptions in the AQMP or increments based on the year of project buildout and phase. The AQMP indicates that key assumptions to use in this analysis are population number and location and a regional housing needs assessment. The parcel-based land use and growth assumptions and inputs used in the Regional Transportation Model run by the SCAG that generated the mobile inventory used by the SCAQMD for the AQMP are not available. However, the Project proposes to develop the site with up to 272 single family homes, resulting in an overall Project density of 2.6 dwelling units/acre.

Based on the assumptions utilized in the County's Draft 2013 General Plan Update (refer to Draft General Plan Appendix E-1), and utilizing the mid-point buildout projections, development of the Project site with its existing General Plan land use designations of Medium Density Residential (64.4 acres), Rural Community – Estate Density Residential (2.1 acres), and Rural Community – Low Density Residential (22.6), the Project site would be expected to support approximately 260 dwelling units. Additionally, buildout of 12.9 acres of Commercial Retail land uses at its probable floor area ratio (FAR) would yield approximately 194 employees. Based on the population and employment per housing unit specified in Table 6 of Appendix F-1 of the Draft General Plan Update for year 2010, the 194 jobs that would be generated on-site would result in a net increase in the County by 380 residents, which in the Lake Mathews/Woodcrest area would yield approximately 123 new housing units. Thus, development of the property in accordance with its existing General Plan land use designations would result in the equivalent of approximately 383 new homes in the County, which is far more than the 272 dwelling units proposed by the Project. (Riverside County, 2013, Tables E-1, E-3, E-4, E-5, and Appendix F-1, Table 6)

Because the General Plan identifies the location of future land uses throughout Riverside County, the General Plan serves to identify the future population number and demographic distribution for the County, and is therefore relied upon by SCAQMD for making long-term buildout assumptions. Additionally, and as discussed under the analysis of Threshold 6.b), the Project would not exceed regional thresholds for operational air quality emissions. Accordingly, the proposed Project would be consistent with the growth assumptions used by

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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the AQMP, and is therefore consistent with the second criterion. (Urban Crossroads, 2015a, p. 43)

As indicated in the above analysis, the Project would not result in or cause NAAQS or CAAQS violations. The Project's proposed land use designation for the subject site also would not increase the development intensities as reflected in the adopted General Plan. As such, the Project would be consistent with the AQMP. Therefore, because the proposed Project would not conflict with or obstruct implementation of the air quality plan established for this region, impacts associated with a conflict with applicable air quality plans would be less than significant. (Urban Crossroads, 2015a, p. 43)

b & c) The SCAQMD has developed regional and localized significance thresholds for regulated pollutants. Table EA-1, *SCAQMD Regional Thresholds*, summarizes the SCAQMD's regional and localized thresholds. The SCAQMD's CEQA Air Quality Significance Thresholds (March 2011) indicate that any project in the SCAB with daily emissions that exceed any of the indicated thresholds should be considered as having an individually and cumulatively significant air quality impact. The proposed Project has the potential to exceed the SCAQMD regional and/or localized emissions thresholds during both Project construction and long-term operation. Each is discussed below. (Urban Crossroads, 2015a, p. 21)

Construction Emissions – Regional Thresholds

Construction activities associated with the proposed Project would result in emissions of Carbon Monoxide (CO), Volatile Organic Compounds (VOCs), Oxides of Nitrogen (NO_x), Oxides Sulfur (SO_x), Particulate Matter ≤ 10 microns (PM₁₀), and Particulate Matter ≤ 2.5 microns (PM_{2.5}). Construction related emissions are expected from the following construction activities:

- Demolition
- Grading and Import
- Sewer, Water, and Storm Drain Construction
- Building Construction
- Street Improvements
- Architectural Coatings (Painting)
- Common Area Landscaping
- Hard Rock Blasting Activities
- Hard Rock Crushing Activities
- Construction Workers Commuting (Urban Crossroads, 2015a, p. 24)

For purposes of analysis, it is assumed that construction would commence in May 2015 and will last through December 2016. If construction activities occur at a later date, impacts would be less than disclosed herein due to fleet turnover and greater efficiencies and lower pollutants associated with modern vehicles. Construction duration by phase is shown on Table 3-2 of the Project's Air Quality Impact Analysis (IS/MND Appendix C). The construction schedule utilized in the analysis represents a "worst-case" analysis scenario because if construction were to occur any time after the assumed dates emissions would be lower than estimated, because emission factors for construction activities decrease as the analysis year increases. The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet as required per CEQA guidelines. The site-specific construction fleet may vary due to specific needs at the time of construction. The duration of construction activity and associated construction equipment was based on consultation with the Project Applicant. A detailed summary of construction equipment

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Table EA-1 SCAQMD Regional Thresholds

Pollutant	Construction	Operations
Regional Thresholds		
NOx	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM10	150 lbs/day	150 lbs/day
PM2.5	55 lbs/day	55 lbs/day
Sox	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Lead	3 lbs/day	3 lbs/day
Localized Thresholds		
CO	1,673.16 lbs/day	1,673.16 lbs/day
NO2	275.12 lbs/day	275.12 lbs/day
PM10	17.32 lbs/day	4.96 lbs/day
PM2.5	8.32 lbs/day	2.16 lbs/day

Note: lbs/day-pounds per day. Localized thresholds for construction and operational emissions are based on SCAQMD look-up tables for a 5-acre disturbance with the nearest sensitive receptors 29 meters away. (Urban Crossroads, 2015a, Table 3-1)

assumptions by phase is provided in the MND's Project Description in 3.2.1C. (Urban Crossroads, 2015a, p. 23)

The proposed Project is anticipated to be developed with overlapping phases of construction activity. As shown in MND Table 3-3, soil import may overlap with grading activity. Additionally, construction activities associated with building construction, street improvements, and architectural coatings may overlap. Furthermore, it is expected that on-site hard rock blasting and crushing activities could occur at any point during demolition and grading activities. Therefore, the maximum peak daily construction emissions for VOC's, NO_x, SO₂, PM₁₀, and PM_{2.5} in 2015 would be a result of the potential overlap of soil import and grading. In 2016, maximum peak daily construction emissions for VOCs would be due to the potential overlap of building construction, street improvements, and architectural coatings, while the maximum peak daily construction emissions in 2016 for NO_x, CO, SO₂, PM₁₀ and PM_{2.5} would be from the potential overlap of soil import and grading activities. As a conservative measure, because hard rock blasting and crushing could overlap with demolition and grading activities, emissions associated with hard rock blasting and crushing were added to the maximum daily emissions. On-site construction equipment from the overlapping construction phase area expected to haul crushed material within the Project site. The emissions associated with on-site hauling of material are thus adequately captured within the analysis due to the fact that scrapers, dozers, and loaders necessary to move blast/crushed material within the Project site are included in the CalEEMod and are reflective of the analysis. (Urban Crossroads, 2015a, p. 27)

Dust is typically a major concern during rough grading activities. Because such emissions are not amenable to collection and discharge through a controlled source, they are called "fugitive emissions." Fugitive dust emissions rates vary as a function of many parameters (soil silt, soil moisture, wind

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speed, area disturbed, number of vehicles, depth of disturbance or excavation, etc.). The CalEEMod model was utilized to calculate fugitive dust emissions resulting from this phase of activity. The Project site would require 102,877 cubic yards of soil import in order to balance¹. (Urban Crossroads, 2015a, p. 23)

It is estimated that the unsuitable rock (hard rock) requiring blasting during construction would comprise approximately 49,553 cubic yards and would generally occur over four distinct areas on the project site. An average of 5,000 s.f. surface area for blasting per day is a reasonable working estimate for analytical purposes. The hard rock/blasting area locations are illustrated on MND Figure 3-14. (Urban Crossroads, 2015a, p. 24)

Construction emissions for construction worker vehicles traveling to and from the Project site, as well as vendor trips (construction materials delivered to the Project site) were estimated based on information from CalEEMod model defaults. (Urban Crossroads, 2015a, p. 25)

SCAQMD Rules that are currently applicable during construction activity for this Project include but are not limited to: Rule 1113 (Architectural Coatings); Rule 431.2 (Low Sulfur Fuel); Rule 403 (Fugitive Dust); and Rule 1186 / 1186.1 (Street Sweepers). It should be noted that Best Available Control Measures (BACMs) are not mitigation as they are standard regulatory requirements. (Urban Crossroads, 2015a, p. 28)

The estimated maximum daily construction emissions without mitigation are summarized on Table EA-2, *Emissions Summary of Overall Construction (Without Mitigation)*. Construction emissions without mitigation were analyzed assuming model defaults for the hauling distance and the amount of assumed truck trips per day (20 mile two-way haul length / 142 two-way trips per day). Detailed construction model outputs are presented in Appendix 3.2 of the Project's Air Quality Impact Analysis (IS/MND Appendix C). Under the assumed scenario, emissions resulting from the Project construction would exceed criteria pollutant thresholds established by the SCAQMD for emissions of NO_x (before mitigation). This is evaluated as a significant impact of Project construction for which mitigation (in the form of special construction equipment, restricted horsepower-hours per day, and limited truck haul distances/total number of trips per day) would be required. As shown on Table EA-3 through Table EA-8, with implementation of Mitigation Measures M-AQ-2 and M-AQ-3, construction-related emissions would be below the SCAQMD Regional Threshold and would therefore be reduced to a level below significance. (Urban Crossroads, 2015a, p. 28)

¹ It should be noted that the analysis presented in the Project's Air Quality Impact Analysis (IS/MND Appendix C) assumes the net import of approximately 223,000 c.y of earthwork material. As such, impacts associated with the Project's construction phase represent a "worst-case" analysis of potential air quality impacts.

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Table EA-2 Emissions Summary of Overall Construction (Without Mitigation)

Year	Emissions (pounds per day)					
	VOC	NOx	CO	SOx	PM10	PM2.5
2015	16.27	202.92	137.26	0.23	20.16	11.96
2016	73.16	189.62	130.33	0.23	26.25	13.11
Blasting Emissions	--	--	--	--	1.29	0.27
Crushing Emissions	--	--	--	--	4.28	0.79
Maximum Daily Emissions	73.16	202.92	137.26	0.23	31.82	14.17
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	NO	YES	NO	NO	NO	NO

(Urban Crossroads, 2015a, Table 3-5)

Table EA-3 Mitigated Construction Emissions at One-Mile Haul Distance and 923 Two-Way Haul Trips per Day

Year	Emissions (pounds per day)					
	VOC	NOx	CO	SOx	PM10	PM2.5
2015	12.55	97.34	211.45	0.18	13.49	7.28
2016	69.01	93.59	202.77	0.18	15.50	7.69
Blasting Emissions	--	--	--	--	1.29	0.27
Crushing Emissions	--	--	--	--	4.28	0.79
Maximum Daily Emissions	69.01	97.34	211.45	0.18	21.07	8.75
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

(Urban Crossroads, 2015a, Table 3-6)

Potentially Significant Impact Less than Significant with Mitigation Incorporated Less Than Significant Impact No Impact

Table EA-4 Mitigated Construction Emissions at Three-Mile Haul Distance and 513 Two-Way Haul Trips per Day

Year	Emissions (pounds per day)					
	VOC	NOx	CO	SOx	PM10	PM2.5
2015	9.47	97.93	151.45	0.19	14.25	7.57
2016	69.01	93.52	146.08	0.19	17.66	8.31
Blasting Emissions	–	–	–	–	1.29	0.27
Crushing Emissions	–	–	–	–	4.28	0.79
Maximum Daily Emissions	69.01	97.93	151.45	0.19	23.23	9.37
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

(Urban Crossroads, 2015a, Table 3-7)

Table EA-5 Mitigated Construction Emissions at Five-Mile Haul Distance and 350 Two-Way Haul Trips per Day

Year	Emissions (pounds per day)					
	VOC	NOx	CO	SOx	PM10	PM2.5
2015	8.23	97.53	127.49	0.20	14.51	7.67
2016	69.01	93.07	123.45	0.20	18.40	8.52
Blasting Emissions	–	–	–	–	1.29	0.27
Crushing Emissions	–	–	–	–	4.28	0.79
Maximum Daily Emissions	69.01	97.53	127.49	0.20	23.97	9.58
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

(Urban Crossroads, 2015a, Table 3-8)

Table EA-6 Mitigated Construction Emissions at Ten-Mile Haul Distance and 204 Two-Way Haul Trips per Day

Year	Emissions (pounds per day)					
	VOC	NOx	CO	SOx	PM10	PM2.5
2015	7.18	98.77	106.44	0.20	14.87	7.81
2016	69.01	93.98	103.56	0.20	19.43	8.82
Blasting Emissions	–	–	–	–	1.29	0.27
Crushing Emissions	–	–	–	–	4.28	0.79
Maximum Daily Emissions	69.01	98.77	106.44	0.20	25.00	9.88
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

(Urban Crossroads, 2015a, Table 3-9)

Potentially Significant Impact Less than Significant with Mitigation Incorporated Less Than Significant Impact No Impact

Table EA-7 Mitigated Construction Emissions at 15-Mile Haul Distance and 138 Two-Way Haul Trips per Day

Year	Emissions (pounds per day)					
	VOC	NOx	CO	SOx	PM10	PM2.5
2015	6.65	97.92	96.60	0.20	14.92	7.82
2016	69.01	93.16	94.26	0.20	19.55	8.85
Blasting Emissions	--	--	--	--	1.29	0.27
Crushing Emissions	--	--	--	--	4.28	0.79
Maximum Daily Emissions	69.01	97.92	96.60	0.20	25.12	9.91
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

(Urban Crossroads, 2015a, Table 3-10)

Table EA-8 Mitigated Construction Emissions at 20-Mile Haul Distance and 102 Two-Way Haul Trips per Day

Year	Emissions (pounds per day)					
	VOC	NOx	CO	SOx	PM10	PM2.5
2015	6.34	96.77	91.01	0.20	14.88	7.80
2016	69.01	92.10	88.99	0.20	19.46	8.82
Blasting Emissions	--	--	--	--	1.29	0.27
Crushing Emissions	--	--	--	--	4.28	0.79
Maximum Daily Emissions	69.01	96.77	91.01	0.20	25.03	9.88
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

(Urban Crossroads, 2015a, Table 3-11)

Construction Emissions – Localized Significance Thresholds

As previously discussed, the SCAQMD has established that impacts to air quality are significant if there is a potential to contribute or cause localized exceedances of the federal and/or state ambient air quality standards (NAAQS/CAAQS). Collectively, these are referred to as Localized Significance Thresholds (LSTs). (Urban Crossroads, 2015a, p. 35) The analysis makes use of methodology included in the SCAQMD Final Localized Significance Threshold Methodology (Methodology) (SCAQMD, 2003).

The significance of localized emissions impacts depends on whether ambient levels in the vicinity of a project are above or below State standards. In the case of CO and NO₂, if ambient levels are below the standards, a project is considered to have a significant impact if project emissions result in an exceedance of one or more of these standards. For the nonattainment pollutants PM₁₀ and PM_{2.5}, background ambient concentrations already exceed state and/or federal standards. LSTs for PM₁₀ and PM_{2.5} are therefore based on SCAQMD Rules 403/1303 (construction-source/operational-source

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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emissions respectively) and are established as an allowable change in concentration. Background concentrations are irrelevant. (Urban Crossroads, 2015a, p. 34)

The SCAQMD established LSTs in response to the SCAQMD Governing Board's Environmental Justice Initiative I-4. LSTs represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard at the nearest residence or sensitive receptor. The SCAQMD states that lead agencies can use the LSTs as another indicator of significance in its air quality impact analyses. (Urban Crossroads, 2015a, p. 34) LSTs were developed in response to environmental justice and health concerns raised by the public regarding exposure of individuals to criteria pollutants in local communities. To address the issue of localized significance, the SCAQMD adopted LSTs that show whether a project would cause or contribute to localized air quality impacts and thereby cause or contribute to potential localized adverse health effects.

LSTs apply to CO, NO₂, PM₁₀, and PM_{2.5}. SCAQMD's Methodology clearly states that "off-site mobile emissions from the Project should not be included in the emissions compared to LSTs." Therefore, for purposes of the construction LST analysis, only emissions included in the CalEEMod "on-site" emissions outputs were considered. (Urban Crossroads, 2015a, p. 35)

Some people are especially sensitive to air pollution and are given special consideration when evaluating air quality impacts from projects. These groups of people include children, the elderly, people with preexisting respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise. Structures that house these persons or places where they gather to exercise are defined as "sensitive receptors." The nearest sensitive receptor land uses are the existing residential land uses to the west of the Project site, with the closest sensitive receptor occurring approximately 94 feet (29 meters) from the Project site. (Urban Crossroads, 2015a, p. 35)

Table EA-9, *Maximum Daily Disturbed Acreage*, is used to determine the maximum daily disturbed acreage for use in determining the applicability of the SCAQMD's LST look-up tables. As shown in Table EA-9, the Project could actively disturb approximately 6.5 acres per day during grading activity and thus would exceed the 5 acre per day limit established by the SCAQMD's LST look-up tables. P. (Urban Crossroads, 2015a, p. 38)

Table EA-9 Maximum Daily Disturbed Acreage

Construction Phase	Equipment Type	Equipment Quantity	Acres grader per 8 hour day	Operating Hours per Day	Acres graded per day
Grading	Dozers	3	0.5	8	1.5
	Scrapers	5	1	8	5.0
Total acres graded per day during Grading					6.5

(Urban Crossroads, 2015a, Table 3-15)

The SCAQMD has established that impacts to air quality are significant if there is a potential to contribute or cause localized exceedances of the Federal and/or State Ambient Air Quality Standards. Applicable localized thresholds are as follows (SCAQMD, 2015):

- California State 1-hour CO standard of 20.0 ppm;
- California State 8-hour CO standard of 9.0 ppm;

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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- California State 1-hour NO₂ standard of 0.18 ppm;
- SCAQMD 24-hour construction PM₁₀ LST of 10.4 µg/m³; or
- SCAQMD 24-hour construction PM_{2.5} LST of 10.4 µg/m³.

Without implementation of applicable mitigation measures, emissions during construction activity would exceed SCAQMD's localized significance thresholds for PM₁₀ and PM_{2.5}. Table EA-10, *Localized Significance Summary-Construction (without Mitigation)*, identifies the unmitigated construction emission levels.. (Urban Crossroads, 2015a, p. 38)

Table EA-10 Localized Significance Summary-Construction (without Mitigation)

On-Site Grading, Blasting, Crushing Emissions	Emissions (pounds per day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Grading Emissions	156.56	100.28	15.89	10.30
Blasting Emissions	–	–	1.29	0.27
Crushing Emissions	–	–	4.28	0.79
Maximum Daily Emissions	156.56	100.28	21.46	11.36
SCAQMD Localized Threshold	275.12	1,673.16	17.32	8.32
Threshold Exceeded?	NO	NO	YES	YES

(Urban Crossroads, 2015a, Table 3-16)

After implementation of Mitigation Measure M-AQ-2, emissions during construction activity would not exceed any of the SCAQMD's localized significance thresholds. Table EA-11, *Localized Significance Summary-Construction (with Mitigation)*, identifies the localized impacts at the nearest receptor location in the vicinity the Project site after implementation of Mitigation Measure M-AQ-2. (Urban Crossroads, 2015a, pp. 38-39)

Table EA-11 Localized Significance Summary-Construction (with Mitigation)

On-Site Grading, Blasting, Crushing Emissions	Emissions (pounds per day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Grading Emissions	63.42	63.63	11.66	6.57
Blasting Emissions	–	–	1.29	0.27
Crushing Emissions	–	–	4.28	0.79
Maximum Daily Emissions	63.42	63.63	17.23	7.63
SCAQMD Localized Threshold	275.12	1,673.16	17.32	8.32
Threshold Exceeded?	NO	NO	NO	NO

(Urban Crossroads, 2015a, Table 3-17)

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Operational Emissions – Regional Thresholds

Operational activities associated with the proposed Project would result in emissions of ROG, NO_x, CO, SO_x, PM₁₀, and PM_{2.5}. Operational emissions would be expected from the following primary sources (Urban Crossroads, 2015a, p. 31):

- Area Source Emissions
- Energy Source Emissions
- Mobile Source Emissions

Please refer to Section 3.5 of the Project’s Air Quality Impact Analysis (IS/MND Appendix C) for a description of the various inputs assumed in the study for each of the above-listed sources. (Urban Crossroads, 2015a, pp. 31-32)

The Project-related operations emissions burdens, along with a comparison of SCAQMD recommended significance thresholds, are shown on Table EA-12, *Summary of Peak Operational Emissions*. Results of the analysis indicate that operation of the Project would not exceed the regional criteria pollutant thresholds established by the SCAQMD, and impacts would therefore be less than significant. It should be noted that the values depicted in Table EA-12 are based on a minimum 10% increase in energy efficiencies beyond 2013 California Building Code Title 24 performance standards, as required by Mitigation Measure M-AQ-1. (Urban Crossroads, 2015a, p. 32)

Table EA-12 Summary of Peak Operational Emissions (With Project Design Features)

Operational Activities – Summer Scenario	Emissions (pounds per day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area Source	17.89	0.27	22.78	1.19e-3	0.49	0.48
Energy Source	0.24	2.02	0.86	0.01	0.16	0.16
Mobile	11.31	38.65	128.95	0.28	20.34	5.91
Maximum Daily Emissions	29.43	40.93	152.59	0.29	20.99	6.55
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

Operational Activities – Winter Scenario	Emissions (pounds per day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area Source	17.89	0.27	22.78	1.19e-3	0.49	0.48
Energy Source	0.24	2.02	0.86	0.01	0.16	0.16
Mobile	11.74	40.24	129.00	0.27	20.35	5.91
Maximum Daily Emissions	29.87	42.52	152.65	0.28	20.99	6.56
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

(Urban Crossroads, 2015a, Table 3-14)

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Operational Emissions – Localized Significance Thresholds

Table EA-13, *Localized Significance Summary – Operations (Without Mitigation)*, shows the calculated emissions for the Project’s operational activities compared with the applicable LSTs. The LST analysis includes on-site sources only; however, the CalEEMod™ model outputs do not separate on-site and off-site emissions from mobile sources. In an effort to establish a maximum potential impact scenario for analytic purposes, the emissions shown on Table EA-13 represent all on-site Project-related stationary (area) sources, all energy sources, and five percent (5%) of the Project-related mobile sources. Considering that the weighted trip length used in CalEEMod™ for the Project is approximately 16.6 miles, 5% of this total would represent an on-site travel distance for each car and truck of approximately one mile or 5,280 feet; thus, the 5% assumption is conservative and would tend to overstate the actual impact. Modeling based on these assumptions demonstrates that even within broad encompassing parameters, Project operational-source emissions would not exceed applicable LSTs. (Urban Crossroads, 2015a, p. 39) It should be noted that the values depicted in Table EA-13 are based on a minimum 10% increase in energy efficiencies beyond 2013 California Building Code Title 24 performance standards, as required by Mitigation Measure M-AQ-1.

Table EA-13 Localized Significance Summary – Operations (Without Mitigation)

Operational Activity	Emissions (pounds per day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Maximum Daily Emissions	4.47	30.16	1.69	0.96
SCAQMD Localized Threshold	275.12	1,673.16	4.96	2.16
Threshold Exceeded?	NO	NO	NO	NO

(Urban Crossroads, 2015a, Table 3-12)

The nearest sensitive receptor is located approximately 94 feet (29 meters) west of the Project site within SRA 23. If emissions exceed the LST for a 5-acre site, then dispersion modeling needs to be conducted. Use of the LSTs for a 5-acre site for operational activities is appropriate since this would result in more stringent LSTs because emissions would occur in a more concentrated area and closer to the nearest sensitive receptor than in reality. (Urban Crossroads, 2015a, p. 39)

As shown on Table EA-13, operational emissions would not exceed the LST thresholds for the nearest sensitive receptor. Therefore, the Project would have a less-than-significant localized impact during operational activity. (Urban Crossroads, 2015a, p. 40)

Conclusion

Assuming compliance with Mitigation Measure M-AQ-1, and as indicated in the above analysis, no impacts would occur based on the SCAQMD regional thresholds during long-term operation. Additionally, long-term operation of the proposed Project would not exceed the SCAQMD LSTs. Implementation of the proposed Project does, however, have the potential to exceed both the SCAQMD regional thresholds and localized significance thresholds for PM₁₀ and PM_{2.5} during construction activities. Mitigation Measures M-AQ-2 and M-AQ-3 have been imposed on the Project and would reduce the Project’s emissions of PM₁₀ and PM_{2.5} during construction to below the SCAQMD regional threshold for these pollutants. Accordingly, and as shown in Table EA-3 through Table EA-8, with implementation of the required mitigation, impacts would be reduced to a level below significant.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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d) The proposed Project has the potential to expose nearby sensitive receptors to substantial pollutant concentrations during Project construction and long-term operation. Sensitive receptors can include uses such as long term health care facilities, rehabilitation centers, and retirement homes. Residences, schools, playgrounds, child care centers, and athletic facilities can also be considered as sensitive receptors. Potential sensitive receptors in the Project vicinity include existing residences that may be located in close proximity to the Project site. Based on an aerial review, the nearest sensitive receptor is an existing residential unit located approximately 94 feet (29 meters) west of the Project site. (Urban Crossroads, 2015a, p. 35)

Construction and Operational LST Analysis

As indicated above under the discussion and analysis of Thresholds 6.b) and 6.c), and as indicated in Table EA-10 and Table EA-11, near-term construction would exceed the SCAQMD's LSTs for PM₁₀ and PM_{2.5}. After implementation of MM AQ-2, the emissions for near-term construction activity would not exceed the SCAQMD thresholds for PM₁₀ and PM_{2.5}. Long-term operational activities associated with the proposed Project would not exceed the SCAQMD LSTs for any criteria pollutant, and would be further reduced with implementation of Mitigation Measures M-AQ-2 and M-AQ-3. Accordingly, impacts to nearby sensitive receptors that could occur during construction of the proposed Project would be less than significant. (Urban Crossroads, 2015a, p. 51)

CO "Hot Spot" Analysis

It has long been recognized that CO exceedances are caused by vehicular emissions, primarily when idling at intersections. Vehicle emissions standards have become increasingly more stringent in the last twenty years. Currently, the CO standard in California is a maximum of 3.4 grams/mile for passenger cars (there are requirements for certain vehicles that are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities, CO concentrations in the Project vicinity have steadily declined, as shown based on historical data presented in Table 2-3 of the Project's Air Quality Impact Analysis (IS/MND Appendix C). (Urban Crossroads, 2015a, p. 40)

A CO "hotspot" would occur if an exceedance of the state one-hour standard of 20 ppm or the eight-hour standard of 9 ppm were to occur. At the time of the SCAQMD's 1993 CEQA Air Quality Handbook, the SCAB was designated nonattainment under the California AAQS and National AAQS for CO. As identified within SCAQMD's 2003 AQMP and the 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan), peak carbon monoxide concentrations in the SCAB were a result of unusual meteorological and topographical conditions and not a result of congestion at a particular intersection. To establish a more accurate record of baseline CO concentrations affecting the SCAB, a CO "hot spot" analysis was conducted in 2003 for four busy intersections in Los Angeles at the peak morning and afternoon time periods. This hot spot analysis did not predict any violation of CO standards. It can therefore be reasonably concluded that projects (such as the proposed Project) that are not subject to the extremes in vehicle volumes and vehicle congestion that was evidenced in the 2003 Los Angeles hot spot analysis would similarly not create or result in CO hot spots. Similar considerations are also employed by other Air Districts when evaluating potential CO concentration impacts. More specifically, the Bay Area Air Quality Management District (BAAQMD) concludes that under existing and future vehicle emission rates, a given project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal air does not mix—in order to generate a significant CO impact. The proposed Project would not produce the volume of traffic required to generate a CO hotspot either in the context of the 2003 Los Angeles hot spot study, or based on representative BAAQMD CO

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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threshold considerations (see Table 3-19 of the Project's air quality impact analysis, IS/MND Appendix C). Therefore, CO hotspots are not an environmental impact of concern for the proposed Project. Localized air quality impacts related to mobile-source emissions would therefore be less than significant. (Urban Crossroads, 2015a, pp. 40-41)

Conclusion

Based on the analysis presented above, the proposed Project would not expose sensitive receptors which are located within one mile of the Project site to substantial point source emissions, and impacts would be less than significant.

e) Under existing conditions, land uses within one mile of the Project site largely consist of residential homes, undeveloped lands, agricultural uses, rural residential uses, and public facilities (including Metropolitan Water District facilities associated with Lake Mathews). There are no uses within one mile of the Project site that comprise a "substantial point source emitter." In addition, according to LMWAP Figure 3, there are no lands within one mile of the Project site that are designated for Industrial land uses. Accordingly, implementation of the proposed Project would not involve the construction of a sensitive receptor located within one mile of an existing substantial point source emitter, and no impact would occur.

f) Land uses generally associated with odor complaints include: agricultural uses (livestock and farming); wastewater treatment plants; food processing plants; chemical plants; composting operations; refineries; landfills; dairies; and fiberglass molding facilities (Urban Crossroads, 2015a, p. 44).

The Project does not contain land uses typically associated with emitting objectionable odors. Potential odor sources associated with the proposed Project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities and the temporary storage of typical solid waste (refuse) associated with the proposed Project's long-term operational uses. Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction; as such, impacts during construction would be less than significant. Additionally, Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the County's solid waste regulations. The proposed Project would also be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. (Urban Crossroads, 2015a, p. 44) Therefore, odors associated with the proposed Project's construction and long-term operation would be less than significant and no mitigation is required.

Mitigation:

M-AQ-1 (Condition of Approval 80.Planning.019) Prior to the issuance of building permits, the Project Applicant shall submit energy demand calculations to the County Planning Department demonstrating that the increment of the Project for which building permits are being requested would achieve a minimum 10% increase in energy efficiencies beyond 2013 California Building Code Title 24 performance standards. Representative energy efficiency/energy conservation measures to be incorporated in the Project would include, but would not be not limited to, those listed below (it being understood that the items listed below are not all required and merely present examples; the list is

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not all-inclusive and other features that would reduce energy consumption and promote energy conservation would also be acceptable):

- Increase in insulation such that heat transfer and thermal bridging is minimized.
- Limit air leakage through the structure and/or within the heating and cooling distribution system.
- Use of energy-efficient space heating and cooling equipment.
- Installation of electrical hook-ups at loading dock areas.
- Installation of dual-paned or other energy efficient windows.
- Use of interior and exterior energy efficient lighting that exceeds the incumbent California Title 24 Energy Efficiency performance standards.
- Installation of automatic devices to turn off lights where they are not needed.
- Application of a paint and surface color palette that emphasizes light and off-white colors that reflect heat away from buildings.
- Design of buildings with "cool roofs" using products certified by the Cool Roof Rating Council, and/or exposed roof surfaces using light and off-white colors.
- Design of buildings to accommodate photo-voltaic solar electricity systems or the installation of photo-voltaic solar electricity systems.
- Installation of ENERGY STAR-qualified energy-efficient appliances, heating and cooling systems, office equipment, and/or lighting products.

M-AQ-2

(Condition of Approval 60.Planning.025) The Project is required to comply with the provisions of South Coast Air Quality Management District Rule 403, "Fugitive Dust" by implementing the following dust control measures during construction activities. ~~Rule 403 requires implementation of best available dust control measures during construction activities that generate fugitive dust, such as earth moving activities, grading, and equipment travel on unpaved roads. Prior to grading permit issuance, the County shall verify that the following notes are included on the grading plan. Project contractors shall be required to ensure compliance with the notes and permit periodic inspection of the construction site by County of Riverside staff or its designee to confirm compliance. These notes also shall be specified in bid documents issued to prospective construction contractors.~~

- During grading activity, all construction equipment (>150 horsepower) shall be California Air Resources Board (CARB) Tier 3 Certified or better. The construction contractor shall keep a log of all construction equipment greater than 150 horsepower demonstrating compliance with this requirement, and the log shall be made available for inspection by Riverside County upon request.
- During construction activity, total horsepower-hours per day for all equipment shall not exceed 24,464 horsepower-hours per day. The construction contractor shall keep a log of all gas-powered equipment used during each day of construction, the number of hours each piece of equipment was used, and the total horsepower of all construction equipment used. These logs shall be made available for inspection by Riverside County upon request.
- During grading and ground-disturbing construction activities, the construction contractor shall ensure that all unpaved roads, active soil stockpiles, and areas undergoing active ground disturbance within the Project site are watered at least three (3) times daily during dry weather. Watering, with complete

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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coverage of disturbed areas by water truck, sprinkler system or other comparable means, shall occur in the mid-morning, afternoon, and after work has been completed for the day.

- Temporary signs shall be installed on the construction site along all unpaved roads and/or unpaved haul routes indicating a maximum speed limit of 15 miles per hour (MPH). The signs shall be installed before construction activities commence and remain in place during the duration of vehicle activities on all unpaved roads unpaved haul routes.

M-AQ-3

(Condition of Approval 60.Planning.026) Prior to issuance of grading permits, the Project Applicant shall identify a location for the importation of soil material. The County shall verify that a note is included on the grading plans indicating that two-way haul trips associated with any soil import activity shall be limited to the following:

- If the haul site location is one mile or less from the Project site, then daily haul trips shall be limited to 923 two-way trips.
- If the haul site location is three miles or less from the Project site, then daily haul trips shall be limited to 513 two-way trips.
- If the haul site location is five miles or less from the Project site, then daily haul trips shall be limited to 350 two-way trips.
- If the haul site location is ten miles or less from the Project site, then daily haul trips shall be limited to 204 two-way trips.
- If the haul site location is 15 miles or less from the Project site, then daily haul trips shall be limited to 138 two-way trips.
- If the haul site location is 20 miles or less from the Project site, then daily haul trips shall be limited to 102 two-way trips.

These notes also shall be specified in bid documents issued to prospective construction contractors. The construction contractor shall keep daily logs of all soil import-related haul trips to and from the Project site, and shall make these logs available to County staff for inspection upon request.

M-AQ-4

(Condition of Approval 10.Planning.023) Prior to issuance of building permits, the Project Applicant shall submit Project design features to the County Planning Department demonstrating that Project design features would satisfy the following:

- Reduce outdoor water use by 30%, consistent with Riverside County Ordinance No. 859.
- Reduce indoor water use by 20% consistent with Division 4.3 of the 2013 CalGreen Residential Mandatory Measures.

Monitoring:

M-AQ-1

Prior to building permit issuance, the County Planning Department shall review the energy demand calculations to verify that the Project achieves a minimum 10% increase in energy efficiencies beyond 2013 California Building Code Title 24 performance standards.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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M-AQ-2 Prior to grading or building permit issuance, the County shall verify that the required notes are included on grading plans. During construction activities, the construction contractor shall be responsible for compliance with the idling restriction. The construction contractor also shall allow for inspection by Riverside County staff or its designee to verify compliance.

M-AQ-3 Prior to grading permit issuance, the Project Applicant shall identify a location for the importation of material. The Riverside County Planning Department shall verify that the appropriate note(s) are included on the grading plans based on the distance between the Project site and the haul site. During construction activities, the construction contractor shall be responsible for compliance with the two-way trip restriction. The construction contractor also shall allow for inspection by Riverside County staff or its designee to verify compliance.

M-AQ-4 Prior to building permit issuance, the County Planning Department shall review the Project design features to verify that design features reduce outdoor water use by 30%, consistent with Riverside County Ordinance No. 859 and reduce indoor water use by 20% consistent with Division 4.3 of the 2013 CalGreen Residential Mandatory Measures.

BIOLOGICAL RESOURCES Would the project

7. Wildlife & Vegetation

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

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

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

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

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

f) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological

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interruption, or other means?

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

Source: GIS database (Riverside County, 2014); MSHCP (WRCRCA, 2003); On-site Inspection; *Biological Resources Assessment*, PCR Services Corporation, July 2015; *Results of Focused Burrowing Owl Surveys for the Lake Ranch Project*, PCR Services Corporation, May 21, 2014; *Determination of Biologically Equivalent or Superior Preservation*, PCR Services Corporation, January 2015; *Results of the Special-Status Plant Surveys for the Lake Ranch Off-Site Basin Area*, PCR Services Corporation, July 15, 2015; *Results of the Burrowing Owl Surveys for the Lake Ranch Basin Area*, PCR Services Corporation, June 8, 2015.

Findings of Fact:

a) The Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) is the applicable habitat conservation/planning program for Western Riverside County. The Project site and off-site areas occur within the Lake Mathews/Woodcrest Area Plan portion of the MSHCP but are not within a Criteria Cell, a designated Cell Group, or a subunit within the Lake Mathews/Woodcrest Area Plan that requires conservation of land for inclusion in the MSHCP Conservation Area. The Project site also is not within any cores or linkages (i.e., Special Linkage Areas) as identified on MSHCP Figure 3-2. (PCR, 2015a, p. 56) As such, the Project would only be required to contribute MSHCP Mitigation Fees pursuant to County Ordinance No. 810 (and as enforced by Mitigation Measure M-BR-6).

Although habitat conservation is not required on the Project site pursuant to the MSHCP, all projects must demonstrate compliance with applicable MSHCP requirements pursuant to the following sections of the MSHCP: Section 6.1.2, "Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools;" Section 6.1.3, "Protection of Narrow Endemic Plant Species;" Section 6.1.4, "Guidelines Pertaining to the Urban/Wildland Interface;" and Section 6.3.2, "Additional Survey Needs and Procedures."

Project Compliance with MSHCP Section 6.1.2

Riparian/Riverine Areas

Section 6.1.2, *Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools*, of the MSHCP provides for the protection of Riparian/Riverine Areas within the MSHCP Plan Area. Riparian/Riverine areas are defined in the MSHCP as "lands which contain habitat dominated by trees, shrubs, persistent emergents, or emergent mosses and lichens, which occur close to or which depend upon soil moisture from a nearby fresh water source; or areas with fresh water flow during all or a portion of the year." (PCR, 2015a, p. 56)

The Project site and off-site drainage easement support 2.93 acres of MSHCP Riparian/Riverine Areas associated with Drainages A and B that is equivalent to the CDFW jurisdiction for these drainages. Both of the on-site drainages meet the definition of a Riparian Area because they support habitat dominated by trees and shrubs, mostly consisting of mule fat, black willow, and arroyo willow. The off-site portion of Drainage A (0.01 acre) also meets the definition of a Riverine Area due to the ephemeral flow and limited vegetation that consists of weedy, non-native dominated species typical of ruderal areas. (PCR, 2015a, p. 56) To address impacts to the

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Riparian/Riverine habitat that would be affected by the Project, a Determination of Biologically Equivalent or Superior Preservation (DBESP) Report was prepared and is included as IS/MND Appendix D3. The DBESP Report discusses the unavoidable impacts to riparian/riverine areas and recommends mitigation to replace lost functions and values as it pertains to the MSHCP Covered Species.

According to the DBESP, the Project would result in permanent direct impacts to 1.16 acres of the MSHCP Riparian/Riverine Areas, including 1.15 acres of on-site Riparian Areas in Drainage A and 0.01 acre of off-site Riverine Areas associated with Drainage A (PCR, 2015b, p. 47). The DBESP identified one mitigation measure, included herein as Mitigation Measure M-BR-8, to reduce impacts to the on-site Riparian and off-site Riverine habitats. The mitigation requires the enhancement and creation of 2.58 acres of riparian, riparian transition, and upland areas within both Drainages A and B. Furthermore, within Drainage A, the Project has designated 4.84 acres as a "MSHCP Riparian/Riverine Avoidance/Mitigation Area." With implementation of required mitigation, and in conformance with MSHCP Volume 1, Section 6.1.2, the Project would achieve equivalent or superior preservation as compared to what would occur if the riparian/riverine resources on- and off-site were to be avoided. As such, the Project would result in a less-than-significant impact. (PCR, 2015b, p. 53).

Riparian/Riverine Plant Species

A habitat assessment was conducted for species listed in Section 6.1.2, *Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools*, of the MSHCP. The results are presented in Table 4 of the Project's biological resources assessment (IS/MND Appendix D1). The results of the habitat assessment indicate that no Riparian/Riverine plant species are expected to occur within the Project site, the Off-Site Basin, or off site inlet structure due to the lack of suitable habitat, the location of these areas outside of the species range, or based on the negative results of focused surveys conducted for the site in April and July 2014, while surveys of the Off-Site Basin were conducted in March through July, 2015.(PCR, 2015a, pp. 48-49 and 59-61) Accordingly, the Project has no potential to conflict with Section 6.1.2 as it pertains to riparian/riverine plant species.

Riparian/Riverine Wildlife Species

Habitat assessments were conducted for wildlife species listed in MSHCP Section 6.1.2, *Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools*. Two species have the potential to occur within the Project site, namely the American peregrine falcon and least Bell's vireo, as indicated in Table 5 of the Project's Biological Resources Assessment (see IS/MND Appendix D1). The American peregrine falcon has a very low potential to forage only within the Project site; no suitable breeding habitat (cliffs or tall buildings) occur on-site. This species can be found foraging in nearly any open habitat, but most likely near areas such as lake edges and mountain chains. The nearest of these areas is Lake Mathews approximately 0.30 mile to the south of the Project site. The off-site inlet structure site is limited in size, disturbed and with limited vegetation, and is not suitable for foraging. No Riparian/Riverine habitat occurs within the Off-Site Basin area. (PCR, 2015a, p. 61 and Figure 11)

Despite the presence of willow scrub habitat on the Project site, least Bell's vireo was determined to only have the potential to occur in the northern drainage (Drainage B) and has no potential to occur within the willow scrub habitat in the drainage located in the southern portion (Drainage A) of the Project site based on the extent and composition of the vegetation community. The

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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vegetation in Drainage A is not contiguous as it is broken up by ruderal vegetation and lacks an understory. Moreover, the willow scrub habitat in Drainage A was not considered suitable for nesting least Bell's vireo due to the ambient noise levels (the habitat is adjacent to El Sobrante Road, which is a busy and well-traveled road) and structure of the vegetation. Least Bell's vireos are known to require a dense, stratified canopy for foraging with a typical territory size of between 0.5 and 7.5 acres. In consideration of these factors, this species was considered to have no potential to occur within the willow scrub associated with Drainage A. (PCR, 2015a, pp. 61-62)

Due to the presence of suitable habitat on the Project site, focused surveys for the least Bell's vireo were conducted during which a pair of this species was observed foraging within the on-site portion of Drainage B on two occasions. No nesting least Bell's vireo, or signs of nesting, was observed. Based on observation made during the surveys, the least Bell's vireo appear to only utilize Drainage B on-site for foraging. (PCR, 2015a, pp. 62-63) Because residential lots nearest Drainage B would be set back from the riparian habitat by between 68 feet and 140 feet, there would be no direct impacts to the least Bell's vireo (PCR, 2015a, p. 81). However, the Project has the potential to indirectly impact the least Bell's vireo, and this is evaluated as a significant indirect impact for which mitigation would be required. Implementation of Mitigation Measure M-BR-1 would reduce indirect impacts to least Bell's vireo to below a level of significance. (PCR, 2015a, pp. 89-90)

No other riparian/riverine wildlife species are expected to occur due to the lack of suitable habitat on-site and in the off-site areas. (PCR, 2015a, p. 63) With implementation of the required mitigation, the Project would be consistent with MSHCP Section 6.1.2 as it pertains to riparian/riverine wildlife species.

Vernal Pools

Section 6.1.2, *Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools*, of the MSHCP provides for the protection of vernal pools within the MSHCP Plan Area. Vernal pools are defined in the MSHCP as "seasonal wetlands that occur in depression areas that have wetlands indicators of all three parameters (soils, vegetation, and hydrology) during the wetter portion of the growing season but normally lack wetlands indicators of hydrology and/or vegetation during the drier portion of the growing season" (PCR, 2015a, p. 56). Vernal pools are not present within the Project site or off-site areas (PCR, 2015a, p. 59). Accordingly, the Project has no potential to conflict with MSHCP Section 6.1.2 as it pertains to vernal pools.

Fairy Shrimp

The Project site and off-site areas do not exhibit aquatic features that could provide suitable habitat for fairy shrimp (i.e., vernal pools, swales, vernal pool-like ephemeral ponds, seasonal ponds, stock ponds, or other human-modified depressions such as tire ruts, etc.) (PCR, 2015a, p. 59). Accordingly, the Project has no potential to conflict with MSHCP Section 6.1.2 as it pertains to fairy shrimp.

Based on the foregoing analysis, and assuming the incorporation of Mitigation Measures M-BR-1 and M-BR-8, the proposed Project would result in less-than-significant impacts to MSHCP riparian/riverine areas, sensitive riparian/riverine plant and animal species, and vernal pools; therefore, the proposed Project would not conflict with MSHCP Section 6.1.2 and impacts would be less than significant.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Project Compliance with MSHCP Section 6.1.3

Volume I, Section 6.1.3 of the MSHCP requires that within identified Narrow Endemic Plant Species Survey Areas (NEPSSA), site-specific focused surveys for Narrow Endemic Plants Species are required for all public and private projects where appropriate soils and habitat are present. The Project site and off-site areas are not within the Narrow Endemic Plant Species Survey Area; therefore, no surveys were required for Narrow Endemic plant species. As such, the Project has no potential to conflict with MSHCP Section 6.1.3. (PCR, 2015a, p. 63)

Project Compliance with MSHCP Section 6.1.4

Section 6.1.4, *Guidelines Pertaining to the Urban/Wildlands Interface*, of the MSHCP presents a number of guidelines that are intended to address indirect effects associated with locating developments in proximity to a Western Riverside County MSHCP Conservation Area. These guidelines address the quantity and quality of any runoff generated by the development (i.e., drainage and toxics), night lighting, noise, non-native invasive plant species, barriers to humans and animal predators, and grading/land development encroachment. The Project site and off-site areas are not within or in the vicinity of any Criteria Cells and, as such, development of the site is not expected to result in indirect effects to MSHCP Conservation Areas related to night lighting, noise, and grading/land development, and barriers would not be necessary. (PCR, 2015a, p. 64)

Both on-site drainages, Drainage A and Drainage B, ultimately drain to the Santa Ana River where Criteria Cells are located. Runoff from the site therefore has the potential to affect the quantity and quality of water downstream, in addition to the transport of plant seeds. Since the Project would be required to comply with flood and water quality standards, no indirect effects from the quantity and quality of run-off would occur to downstream areas. At minimum, no invasive, non-native plant species listed in Table 6-2 of the MSHCP, *Plants That Should Be Avoided Adjacent to the MSHCP Conservation Area*, would be utilized in the landscape plans (as required pursuant to Mitigation Measure M-BR-7). (PCR, 2015a, p. 64) This would avoid dispersal of invasive plant seeds in the watershed. Although the Project site is not within any Criteria Cells or adjacent to any MSHCP Conservation Areas, it does support the two MSHCP Riparian Areas associated with Drainages A and B. The above measures would avoid indirect impacts to these drainages from runoff and invasive species. Furthermore, measures would be implemented to avoid any indirect impacts to the least Bell's vireo foraging habitat associated with the Riverine Area, Drainage B (refer to Mitigation Measure M-BR-1), including the designation of 3.49 acres within Drainage B as an "MSHCP Riparian/Riverine Avoidance and Mitigation Area". Based on the preceding analysis, and assuming implementation of the required mitigation, the Project would be consistent with MSHCP Section 6.1.4.

Project Compliance with MSHCP Section 6.3.2

MSHCP Section 6.3.2 requires special surveys for certain plant species for lands located within the Criteria Area Plant Species Survey Areas (CAPSSA). MSHCP Section 6.3.2 also identifies lands requiring surveys for certain animal species (burrowing owl, mammals, and amphibians). The Project site and off-site areas occur within the burrowing owl survey area, but do not occur within the amphibian or mammal survey areas, or within the CAPSSA. (PCR, 2015a, p. 63)

Focused burrowing owl surveys were conducted for the Project site, and no burrowing owls were detected. Focused burrowing owl surveys also were conducted for the Off-Site Basin area and no burrowing owls were detected. (PCR, 2015c, p. 4) However, there is a potential that the Project site and Off-Site Basin area could be occupied by burrowing owl individuals prior to the

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commencement of grading or ground disturbing activities. If present, impacts to the burrowing owl would represent a significant impact due to a conflict with the MSHCP and mitigation would be required in the form of pre-construction surveys. This is evaluated as a potentially significant impact for which mitigation would be required. Implementation of Mitigation Measure M-BR-2, which enforces the requirement to conduct pre-construction burrowing owl surveys, would reduce potential impacts to the burrowing owl to a level below significant. (PCR, 2015a, pp. 81-82)

Based on the analysis provided above, and with the incorporation of mitigation, the proposed Project would not conflict with MSHCP Section 6.3.2.

As indicated in the above analysis, and assuming the incorporation of mitigation measures, the proposed Project would be consistent with, or otherwise would not conflict with, all applicable provisions of the MSHCP. Accordingly, the Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state conservation plan, and impacts would be less than significant with the incorporation of mitigation measures.

b & c) Implementation of the proposed Project has the potential to directly or indirectly impact endangered or threatened plant and animal species, if such species occur within areas planned for impact by the Project. Each is discussed below.

Impacts to Sensitive Plant Species

Development of the Project would result in the direct removal of numerous common plant species. A list of plant species observed within the Project site and off-site improvement areas is included in Appendix A to the Project's Biological Resources Assessment (IS/MND Appendix D1). Common plant species present within the Project site occur in large numbers throughout the region and their removal would not be considered a substantial adverse effect on sensitive plant species. Therefore, impacts to common plant species would be less than significant and no mitigation measures would be required. (PCR, 2015a, p. 69)

A total of 34 sensitive plant species are identified as occurring in the Project vicinity in available databases. Of these, 20 sensitive plant species are not expected to occur within the Project site of the off-site areas due to the lack of suitable habitat or because the site is outside the known distribution or elevation range for the species. These species are listed in Appendix C to the Project's Biological Resources Assessment (IS/MND Appendix D1). The remaining 14 sensitive plant species were determined to have a potential to occur on-site and, as such, focused sensitive plant surveys were conducted in April and July 2015 by PCR to determine the presence/absence of these sensitive species. No sensitive plant species were found to occur on-site. Focused special-status plant surveys were conducted by the Project biologists (PCR) on April 21, 2015 and July 13, 2015 on the Off-Site Basin area to determine the presence or absence of 15 special-status plants species having the potential to occur within the Off-Site Basin area (PCR, 2015d). These species are listed in Appendix A of the Project's Special Status Plants Survey (refer to MND Appendix D5). Results of the focused surveys conducted within the Off-Site Basin area did not identify any special-status plants species (PCR, 2015d, p. 4).

Therefore, no impacts to sensitive plant species would occur as a result of Project development and no mitigation measures would be required. (PCR, 2015a, p. 69)

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Impacts to Sensitive Animal Species

Development of the Project site and off-site areas would result in the disruption and removal of habitat and the loss and displacement of non-sensitive common wildlife species. A list of wildlife species observed within the Project site is included in Appendix A to the Project's Biological Resources Assessment (IS/MND Appendix D1). Due to the limited amount of native habitat to be removed and the level of existing disturbance from human activity within the vicinity (e.g., nearby development), these impacts would not be expected to reduce the general wildlife populations below self-sustaining levels within the region and impacts. Therefore, impacts to common wildlife species would be less than significant and no mitigation measures are required. (PCR, 2015a, p. 69)

A total of 43 species are identified as occurring in the Project vicinity in available databases. Of these, 25 sensitive wildlife species are not expected to occur within the Project site or off-site areas due to the lack of suitable habitat or because the site is outside the known distribution range for the species. These species are listed in Appendix D to the Project's Biological Resources Assessment (see IS/MND Appendix D1). Since these species are not expected to be present on the Project site or off-site areas, no impacts would occur as a result of Project development and no mitigation measures are required. (PCR, 2015a, p. 70)

The remaining 17 sensitive wildlife species were determined to have a potential to occur on-site and also off-site for a few species. Of these species one, the least Bell's vireo, was observed on-site and is discussed in further detail below. Other sensitive wildlife species with potential to occur on-site and/or off-site include western spade foot toad, coast horned lizard, orangethroat whiptail, northern harrier, white-tailed kite, burrowing owl (with the potential to also occur within the Off-Site Basin area), long-eared owl, loggerhead shrike, yellow warbler, yellow breasted chat, tricolored blackbird, Stephan's kangaroo rat, San Diego, San Diego desert woodrat, southern grasshopper mouse, American badger, western mastiff bat, and pocketed free-tailed bat. The Project site and off-site areas also have the potential to support migratory birds and raptors that are discussed further below. (PCR, 2015a, p. 70)

Ten of the 17 species are covered by the MSHCP with no survey requirements, including western spade foot, coast horned lizard, orangethroat whiptail, northern harrier, white-tailed kite, loggerhead shrike, yellow warbler, yellow breasted chat, Stephan's kangaroo rat, and San Diego blacktailed jackrabbit. Therefore, assuming payment of the MSHCP Local Development Mitigation Fee (as required by Mitigation Measure M-BR-6), no additional mitigation is required for these species. Least Bell's vireo and burrowing owl are conditionally covered by the MSHCP with additional surveys and mitigation required, as discussed in further detail below. (PCR, 2015a, p. 70)

The remaining five species, the western mastiff bat, long-eared owl, southern grasshopper mouse, San Diego desert woodrat, and American badger, are not covered by the MSHCP. These species are listed as species of special concern by the CDFW and do not carry a federal or state listing as threatened or endangered. These species are considered to have a low to very low potential to occur on the Project site based on the limited habitat and/or quality of the habitat, and impacts to these species would be less than significant as follows: (PCR, 2015a, pp. 70-71)

- **Western Mastiff Bat:** Impacts to western mastiff bat foraging habitat would be less than significant due to the limited, isolated open scrub areas and disturbed nature of the Project site from agricultural and ongoing maintenance activities that would not be expected to

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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support a large food source for foraging. As such, any impacts to foraging habitat for this species, if present, would be less than significant and no mitigation measures are required. (PCR, 2015a, p. 70)

- **Long-Eared Owl:** Impacts to long-eared owl would be less than significant due to the low suitability of the riparian habitat on the Project site. In addition, a large proportion of riparian habitat would be avoided on the project site and mitigation is proposed as compensation for impacted habitat (refer to Mitigation Measure M-BR-3). Measures to avoid impacts to migratory birds would also be expected to avoid impacts to this species, if present (see Mitigation Measure M-BR-5). (PCR, 2015a, p. 71)
- **Southern Grasshopper Mouse, San Diego Desert Woodrat, and American Badger:** Impacts to southern grasshopper mouse, San Diego desert woodrat, and American badger would be less than significant based on the limited and isolated nature of the habitat within the Project's boundaries and disturbance on the Project site from agricultural and ongoing maintenance activities that would not be expected to support large populations of these species, if present. Furthermore, no records of southern grasshopper mouse and American badger occur within 10 and 20 miles of the Project site, respectively, since 1908. Potentially suitable habitat adjacent to Drainage B would be avoided as part of the project. (PCR, 2015a, p. 71)

The above five species were not considered for coverage under the MSHCP, indicating that regionally significant populations of these species do not exist within the MSHCP boundaries. Based on the above discussion, the Project site is not capable of supporting large populations of these species and a loss of a few individuals, if present, would not expect to reduce regional population numbers. Therefore, any impacts to these species would be less than significant and no mitigation measures would be required. (PCR, 2015a, p. 71)

Impacts to the following sensitive wildlife species would be considered potentially significant prior to mitigation, as follows:

- **Least Bell's Vireo.** One sensitive wildlife species, the least Bell's Vireo (Federally Endangered, State Endangered), was observed foraging on-site in Drainage B during two surveys; no nesting birds were observed or are expected based on observations made during the surveys. Drainage B would be avoided as part of the Project including a setback of between 68 feet and 140 feet that is proposed as open space between the drainage and the development. As such, no direct impacts to least Bell's vireo birds or their nests would occur. There is a potential for indirect noise impacts if construction occurs during the breeding season and post-construction from human influences (breeding season starts April 10, depending on their arrival from wintering areas, and continues until they leave around July 31). This is considered a potentially significant indirect impact of the proposed Project requiring mitigation, in the form of avoidance and minimization measures (refer to Mitigation Measure M-BR-1). With implementation of the required mitigation, indirect impacts to this species would be reduced to below a level of significance. (PCR, 2015a, p. 71)
- **Burrowing Owl.** The Project site and off-site areas support potentially suitable burrowing owl (Species of Special Concern) habitat, but no burrowing owl burrows, signs, or individuals were found on-site during the Step I and Step II surveys conducted by PCR.

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Although the Project site does not currently support burrowing owls, a pre-construction survey would be required in compliance with the MSHCP. Specifically, in accordance with the County requirements, a pre-construction survey for burrowing owl would be required within 30 days prior to ground disturbance to avoid potential direct take of burrowing owls in the future. Accordingly, impacts to the burrowing owl are considered potentially significant requiring pre-construction surveys and additional avoidance measures as mitigation to avoid impacts to this species (refer to Mitigation Measure M-BR-2). With implementation of the required mitigation, impacts to the burrowing owl would be reduced to less-than-significant levels. (PCR, 2015a, p. 72)

- **Impacts to Nesting Birds:** In addition to the above-listed wildlife species, the Project site and off-site areas support potential nesting and foraging habitat for migratory birds, in addition to potential foraging habitat for raptors. Based on the disturbed nature of the site from agriculture and ongoing maintenance activities, the quality of foraging habitat is considered to be low. Higher quality foraging habitat is considered to occur associated with Lake Mathews to the south of the Project site. The loss of foraging habitat as a result of the Project would not be expected to impact the foraging of these species. Therefore, impacts to foraging habitat would be considered less than significant and no mitigation measures would be required. (PCR, 2015a, p. 80)

However, the Project site and off-site areas have the potential to support songbird and raptor nests due to the presence of shrubs, ground cover, and limited trees. Nesting activity typically occurs from February 15 to August 31. Disturbing or destroying active nests is a violation of the Migratory Bird Treaty Act (MBTA, 16 U.S.C. 703 et seq.). In addition, nests and eggs are protected under Fish and Wildlife Code Section 3503. As such direct impacts to breeding birds (e.g. through nest removal) or indirect impacts (e.g. by noise causing abandonment of the nest) is considered a potentially significant impact for which mitigation, in the form of construction timing restrictions and/or avoidance, would be required (refer to Mitigation Measure M-BR-5). Implementation of the required mitigation would reduce impacts to nesting birds to a level below significance. (PCR, 2015a, p. 80)

d) The Project site and off-site areas support potential live-in and movement habitat for species on a local scale (i.e., some limited live-in and at least marginal movement habitat for reptile, bird, and mammal species), but it likely provides little to no function to facilitate wildlife movement for wildlife species on a regional scale, and is not identified as a regionally important dispersal or seasonal migration corridor (PCR, 2015a, pp. 79-80). Movement on a local scale likely occurs with species adapted to urban environments due to the development and disturbances in the vicinity of the Project site and off-site areas. Although implementation of the Project would result in disturbances to local wildlife movement within the Project site and off-site areas, those species adapted to urban areas would be expected to persist on-site following construction, particularly within the open space areas. The Project also would avoid the entirety of Drainage B and a portion of Drainage A through designation of 8.33 acres of land within the drainages as "MSHCP Riparian/Riverine Avoidance/Mitigation Areas", which would allow the continuation of any local scale wildlife movement that may currently occur (PCR, 2015a, pp. 79-80). Additionally, as discussed and analyzed under Threshold 7.b & c), the Project would be required to comply with all of the provisions of the MSHCP, including payment of the MSHCP Local Development Mitigation Fee and compliance with MSHCP Section 6.1.2 pertaining to Riparian/Riverine Areas; thus, the potential impacts to movement on a local scale would be reduced to less-than-significant levels (refer to Mitigation Measures M-BR-1

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through M-BR-8). In addition, the MSCHP does not identify any existing or proposed linkages or constrained linkages within the vicinity of the Project site or off-site impact areas (WRCRCA, 2003, Figure 3-2). Therefore, assuming implementation of the required mitigation, impacts associated with the movement of wildlife species would be less than significant.

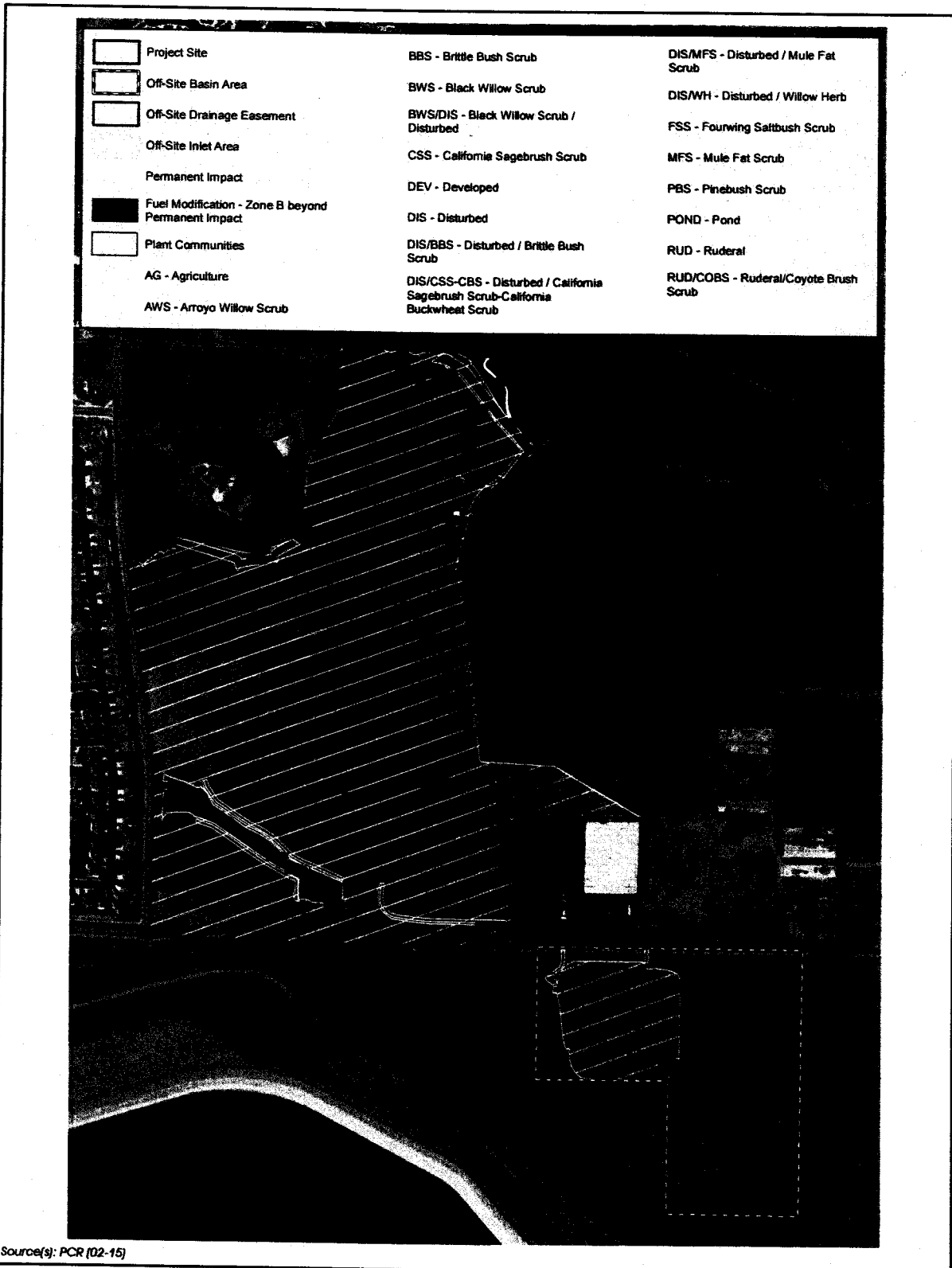
e) Figure EA-5, *Impacts to Plant Communities*, depicts the Project's anticipated impacts to all on-site plant communities, including riparian habitats, while Figure EA-6, *Impacts to Sensitive Plant Communities*, depicts the Project's impacts to sensitive plant communities. The Project's impacts to sensitive plant communities and riparian habitat are discussed below.

Impacts to Sensitive Plant Communities

The Project site supports eight native plant communities totaling 4.40 acres, including arroyo willow scrub (0.97 acre), brittle bush scrub (1.06 acres), black willow scrub (1 acre), black willow scrub/disturbed (0.32 acre), California sagebrush scrub (0.02 acre), fourwing saltbush scrub (0.14 acre), mule fat scrub (0.76 acre), and pinebush scrub (0.13 acre). The remainder of the Project site supports non-native communities including agriculture, developed, disturbed, disturbed/brittlebush scrub, disturbed/California sagebrush scrub-California buckwheat scrub, disturbed/mule fat scrub, disturbed/willow herb, pond, and ruderal areas. Three of the plant communities on-site are considered sensitive pursuant to CDFW, namely arroyo willow scrub, black willow scrub, and black willow scrub/disturbed. A total of 0.57 acre of sensitive native communities would be impacted by the proposed Project (25 percent of the total 2.29 acres of sensitive communities on-site). These impacts include 0.48 acre of arroyo willow scrub (49.5 percent of the total 0.97 acre on-site) and 0.09 acre of black willow scrub (9 percent of the total one acre on-site). No impacts are proposed to the black willow scrub/disturbed community totaling 0.32 acre of avoidance. Acreages of impacts are summarized in Table EA-14, *Existing and Permanent Impacts to Plant Communities*. Following impacts, a total of 1.72 acres of sensitive communities would be avoided (75 percent of the total 2.29 acres of sensitive communities on-site), including 0.49 acre of arroyo willow scrub, 0.91 acre of black willow scrub, and 0.32 of black willow scrub/disturbed. (PCR, 2015a, p. 72)

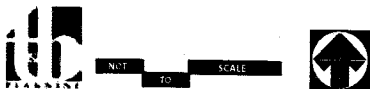
The Off-Site Basin area consists primarily of large ruderal areas (PCR, 2015d, p. 3). Specifically, the Off-Site Basin area contains three (3) non-native vegetation communities as mapped by the Project biologist (PCR) as Disturbed/Coyote Brush Scrub, Ruderal, and Disturbed. (PCR, 2015d, pp. 3-4)

The riparian plant communities that would be impacted by the Project (arroyo willow scrub and black willow scrub) are associated with Drainage A in the southern portion of the site and are not considered high quality due to the disturbed/non-contiguous composition and the lack of a native understory. These riparian communities do not support or have the potential to support any protected plant or animal species. As a result, impacts to the arroyo willow scrub and black willow scrub communities would not threaten the existence of high quality stands of this vegetation community. Nevertheless impacts to these vegetation communities would be considered potentially significant since they are identified as sensitive plant communities by CDFW, and are also CDFW, USACE, and RWQCB jurisdictional and are considered MSHCP Riparian/Riverine areas. Mitigation would be required through compensatory mitigation at a 2:1 ratio through creation, restoration, and/or enhancement of riparian habitat on- and off-site (refer to Mitigation Measures M-BR-3 and M-BR-8). The higher quality riparian vegetation associated with Drainage B in the northeastern portion of the site that supports foraging habitat for least Bell's vireo would be avoided by the Project through designation as a "MSHCP Riparian/Riverine Avoidance and Mitigation Area". With implementation of the required mitigation, impacts to sensitive plant communities would be reduced to less-than-significant levels. (PCR, 2015a, p. 72 and p. 75)

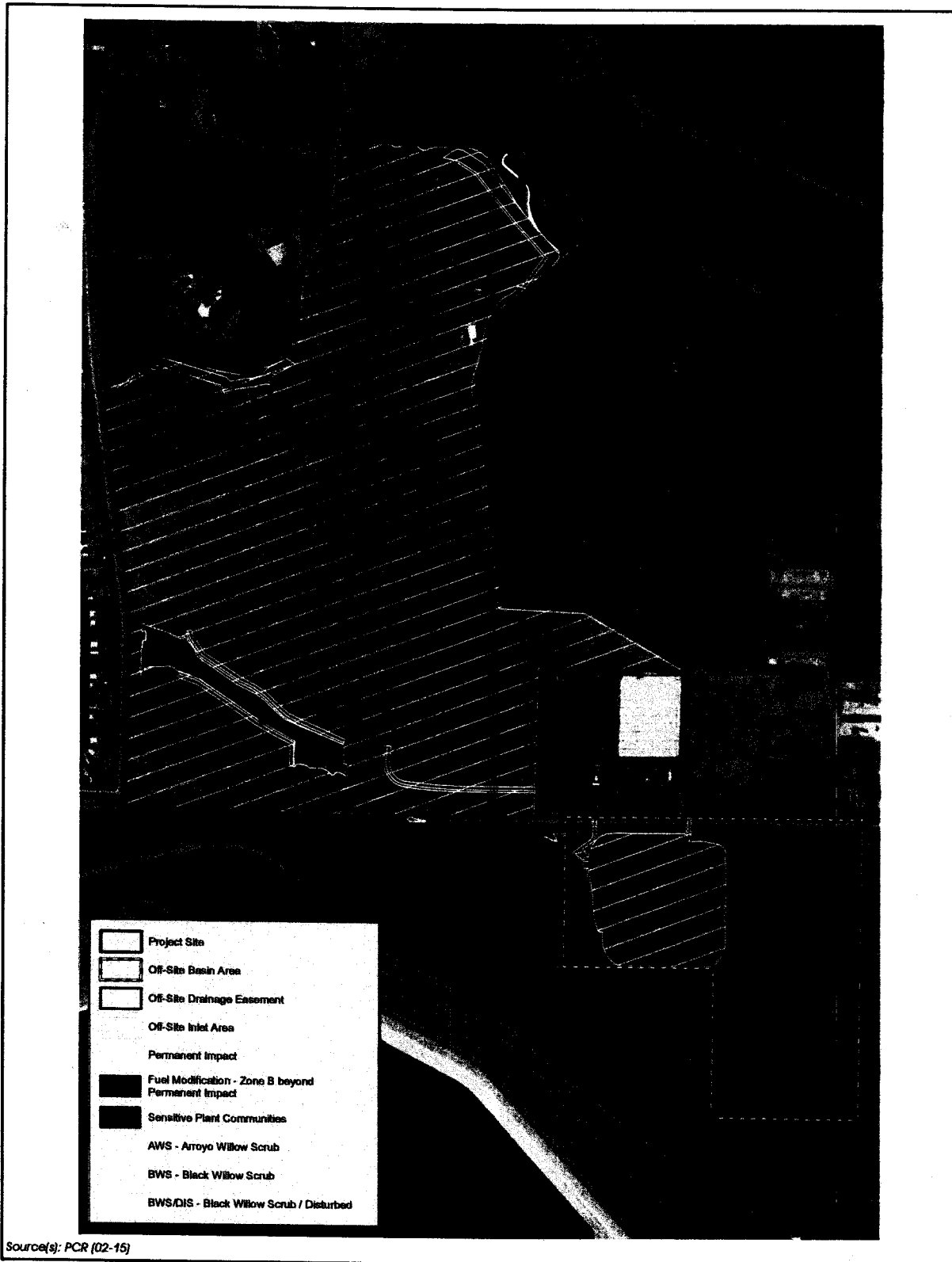


Source(s): PCR [02-15]

Figure EA-4



IMPACTS TO PLANT COMMUNITIES



Source(s): PCR (02-15)

Figure EA-5



NOT TO SCALE



Potentially Significant Impact Less than Significant with Mitigation Incorporated Less Than Significant Impact No Impact

Table EA-14 Existing and Permanent Impacts to Plant Communities

Plant Community	Existing (acres)		Impacts (acres)	
	Project Site	Off-Site	Project Site	Off-Site
California Sagebrush Scrub	0.02	-	-	-
Brittle Bush Scrub	1.06	-	0.96	-
Arroyo Willow Scrub	0.97	-	0.48	-
Black Willow Scrub	1.00	-	0.09	-
Mule Fat Scrub	0.76	-	0.66	-
Pinebush Scrub	0.13	-	0.02	-
Fourwing Saltbush Scrub	0.14	-	-	-
Black Willow Scrub/Disturbed	0.32	-	-	-
Disturbed/Brittle Bush Scrub	0.34	-	0.34	-
Disturbed/Mule Fat Scrub	0.51	-	0.50	-
Disturbed/California Sagebrush-California Buckwheat Scrub	1.86	-	1.80	-
Disturbed/Willow Herb	0.01	-	0.01	-
Agriculture	34.49	-	34.22	-
Pond	1.58	-	1.58	-
Ruderal	5.78	29.70	4.39	7.72
Ruderal/Coyote Bush Scrub	-	0.03	-	-
Disturbed	50.31	0.52	49.47	0.02
Developed	4.34	-	4.34	-
Total	103.62	30.25	98.86	7.74

(PCR, 2015a, Table 6)

Impacts to CDFW Jurisdictional Areas

The Project site and off-site drainage easement supports drainages that are considered jurisdictional streambed pursuant to Section 1602 of the California Fish and Game Code, as regulated by CDFW. This includes Drainage A and Drainage B, of which impacts are only proposed to Drainage A totaling 1.15 acres on-site (39.4percent of the total 2.92 acres of CDFW jurisdiction on-site within Drainages A and B), and 0.01 acre off-site, as shown in Figure EA-7, *Impacts to Jurisdictional Features*. Existing and impact acreages are summarized in Table EA-15, *Existing and Permanent Impacts to CDFW Jurisdictional Features*. A total of 1.77 acres of CDFW jurisdiction would be avoided by the Project (60.6 percent of the total 2.92 acres of CDFW jurisdiction on-site within Drainages A and B). Impacts to CDFW jurisdictional drainages therefore total 1.16 acres. (PCR, 2015a, p. 75 - p. 76)

Impacts to CDFW jurisdictional features are evaluated as a potentially significant impact of the proposed Project, requiring a permit from the CDFW and compensatory mitigation in conformance with Section 1602 of the California Fish and Game Code (refer to Mitigation Measure M-BR-4). Compliance with Section 1602 of the California Fish and Game Code would reduce impacts to a less-than-significant level. (PCR, 2015a, p. 76)

The pumping of water into the isolated man-made pond and use of the water for irrigation was terminated in July 2014 and the pond has since dried out (PCR, 2015a, p. 17). As such, the pond no longer exists and no longer supports jurisdictional indicators. Accordingly, impacts to the former pond would be less than significant requiring no mitigation. (PCR, 2015a, p. 27)



Source(s): PCR (02-15)

Figure EA-6



NOT TO SCALE



IMPACTS TO JURISDICTIONAL FEATURES

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Table EA-15 Existing and Permanent Impacts to CDFW Jurisdictional Features

Feature	Existing (acres)	Impacts (acres)
Drainage A (On-site)	2.65	1.15
Drainage A (Off-site)	0.01	0.01
Subtotal	2.66	1.16
Drainage B	0.27	-
Total	2.93	1.16

(PCR, 2015a, Table 7)

f) Drainage B supports USACE/RWQCB federally protected wetlands and Drainage A supports USACE/RWQCB non-wetland jurisdiction, both of which are regulated under Sections 404/401 of the Clean Water Act (CWA). Impacts are proposed to 0.06 acre of USACE/RWQCB non-wetland jurisdiction in Drainage A only (30 percent of the total USACE/RWQCB jurisdiction on-site in Drainages A and B' off-site acreages are negligible), as shown on Figure EA-7. Existing and impact acreages are summarized in Table EA-16, *Existing and Permanent Impacts to USACE/RWQCB Jurisdictional Drainages*. A total of 0.14 acre of on-site wetland and non-wetland USACE/RWQCB jurisdiction would be avoided by the project (60 percent of the total 0.20 acre of USACE/RWQCB jurisdiction on-site within Drainages A and B, including all of the 0.06-acre of wetlands in Drainage B). Impacts to USACE/RWQCB jurisdictional drainages total 0.06 acre; thus, impacts to jurisdictional areas regulated by the USACE and/or RWQCB represent significant impacts of the Project requiring mitigation. (PCR, 2015a, p. 76 and p. 79)

Table EA-16 Existing and Permanent Impacts to USACE/RWQCB Jurisdictional Drainages

Feature	Length (ft)	Area (acres) ^a		Flow
		Existing	USACE/RWQCB Impacts ^c	
Drainage A (On-Site, non-wetland)	1,968	0.14	0.06	Ephemeral
Drainage A (Off-Site, non-wetland)	70	0.00 ^b	0.00 ^b	Ephemeral
Drainage B (wetland)	241	0.06	-	Perennial
Total	2,279	0.20	0.06	

^a Jurisdictional acreages overlap and are not additive (e.g. USACE/RWQCB acreages are included in the total CDFW jurisdictional acreages provided in Table EA-15).

^b The acreages are negligible with 0.000422 acre of existing and 0.000422 acres of impacts.

^c Impacts to linear feet include 920 feet within the on-site portion of Drainage A and 60 feet within the off-site portion of Drainage A, for a total of 980 linear feet. (PCR, 2015a, Table 8)

Impacts to USACE and/or RWQCB jurisdictional features would be required to comply with Sections 404 and 401 of the CWA, respectively, including applying for a permit and mitigation subject to approval by USACE and/or RWQCB. Compensatory mitigation comprising creation, enhancement, and/or restoration of jurisdictional habitat would be required pursuant to Sections 404 and 401 of the CWA (refer to Mitigation Measure M-BR-4). The compensatory mitigation also would be subject to approval by the USACE and RWQCB. Implementation of the required mitigation would reduce impacts to a less-than-significant level. (PCR, 2015a, p. 79)

The pumping of water into the isolated man-made pond and use of the water for irrigation was terminated in July 2014. As such the pond is anticipated to dry out and may not exist and/or may

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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cease to support jurisdictional field indicators at the time of regulatory permitting. If at the time of regulatory permitting it is determined the pond no longer exists and/or does not support jurisdictional indicators, and pursuant to Sections 404 and 401 of the CWA and USACE and RWQCB requirements, the compensatory mitigation would not be required for impacts to the man-made pond. (PCR, 2015a, p. 79)

g) Aside from the MSHCP (which is addressed above under Threshold 7.a), the County of Riverside also has tree ordinances and codes in place that require permits prior to removing or severely trimming any trees planted in the right of way of any County highway (Ordinance No. 499); prior to removing any living native tree on any parcel or property greater than one-half acre in size and above 5,000 feet in elevation (Ordinance No. 559.7); or prior to removing certain native desert species (Food and Agricultural Code Section 80071-80075). An oak tree management guidelines report has also been prepared by the County of Riverside and was approved by the Board of Supervisors on March 2, 1993. (PCR, 2015a, p. 48)

Under existing conditions, there are no trees located within the rights-of-way of any County highway; as such, the Project has no potential to conflict with Ordinance No. 499. Additionally, the Project site does not occur at elevations above 5,000 feet above mean seal level (amsl); accordingly, the Project has no potential to conflict with Ordinance No. 559.7. The Project site also does not contain any native desert species; thus, there would be no potential to conflict with Food and Agricultural Code Section 80071-80075.

The Riverside County Oak Tree Management Guidelines requires surveys of individual trees and the minimization and/or avoidance of oak trees, where feasible. Based on the results of the site-specific Biological Resources Assessment (see IS/MND Appendix D1), the Project site and off-site impact areas do not contain any oak trees or oak woodland habitat.

Accordingly, and based on the foregoing analysis, the proposed Project has no potential to conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, and no impact would occur. (PCR, 2015a, p. 81)

Mitigation:

M-BR-1 (Condition of Approval 60.EPD.007, 80.EPD.001, 50.EPD.004) Due to the presence of least Bell's vireo in the avoided drainage located in the northeastern portions of the Project site (Drainage B), the following avoidance and minimization measures shall be adopted to avoid impacts to the species during construction and following completion of construction during the breeding season (approximately April 10 until July 31, depending on when the birds arrive from and depart to wintering areas):

Mitigation Prior to and During Construction

- A. Prior to the issuance of grading or building permits during the breeding season, a survey to determine the presence of potential nesting least Bell's vireo on-site shall be conducted by a qualified biologist three (3) days before any grading or ground disturbance activity commences in the vicinity of Drainage B during the breeding season, and all results shall be forwarded to the USFWS, CDFW, and the Riverside County Environmental Programs Department.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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- B. The qualified biologist shall identify a 300-foot avoidance buffer from the habitat in Drainage B for construction occurring during the breeding season. If work is required within 300-feet during the breeding season, the biologist shall monitor all work to ensure no impacts occur to the least Bell's vireo. Written documentation shall be prepared and submitted to CDFW, USFWS, and Riverside County Environmental Programs Department on completion of construction during the breeding season to outline any monitoring activities.
- C. Construction limits in and around least Bell's vireo habitat associated with Drainage B shall be delineated with flags and/or fencing prior to the initiation of any grading or construction activities to clearly identify the limits of the habitat and/or the 300-foot avoidance buffer during the breeding season.
- D. Prior to grading and construction, a training program shall be developed and implemented by the qualified biologist to inform all workers on the project about the listed species, its habitat, and the importance of complying with avoidance and minimization measures. A copy of the training materials shall be included in bid documents issued to prospective construction contractors.
- E. Prior to the issuance of grading or building permits, the County of Riverside Building and Safety Department shall ensure the following note is included on the grading and/or building plans: "All construction work shall occur during daylight hours. The construction contractor shall limit all construction-related activities that would result in high noise levels to between the hours of 6:00 a.m. and 6:00 p.m., during the months of June through September, and 7:00 a.m. and 6:00 p.m., during the months of October through May." This note also shall be specified in bid documents issued to prospective construction contractors.
- F. During any excavation and grading within or immediately adjacent to the 300-foot avoidance buffer for Drainage B, the construction contractors shall install properly operating and maintained mufflers on all construction equipment, fixed or mobile, to reduce construction equipment noise to the maximum extent possible. The mufflers shall be installed consistent with manufacturers' standards. The construction contractor shall also place all stationary construction equipment so that emitted noise is directed away from the least Bell's vireo habitat within Drainage B. The construction contractor shall keep logs demonstrating that all construction equipment utilizes properly maintained mufflers, and shall make these logs available to County staff for inspection upon request.
- G. The construction contractor shall stage equipment in areas that will create the greatest distance between construction-related noise sources and Drainage B during all Project construction occurring during the breeding season. To ensure this requirement is enforced, the construction contractor shall provide a map to the Riverside County Environmental Programs Department depicting the location of staging areas in relation to Drainage B. The construction contractor also shall permit inspection by Riverside County staff upon request to verify compliance with this requirement.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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- H. If the monitoring biologist determines that noise from the construction activities may be affecting the normal expected breeding behavior of the birds, the construction supervisor shall be informed and work within no less than 300 feet of construction areas shall be ceased until appropriate measures are implemented. This may include monitoring by a qualified acoustician to verify noise levels are below 60 decibels (dBA) within the least Bell's vireo habitat. If the 60 dBA requirement is exceeded the acoustician shall make operational changes, utilize technology to reduce construction noise such as mufflers, and/or install a barrier to alleviate noise levels during the breeding season. Installation of noise barriers and any other corrective actions taken to mitigate noise during the construction period shall be communicated to the USFWS, CDFW, and Riverside County Environmental Programs Department.
- I. If after all corrective actions are implemented the monitoring biologists determines that the normal expected breeding behavior of the birds is being affected, work within no less than 300 feet shall be ceased and the USFWS, CDFW, and Riverside County Environmental Programs Department shall be contacted to discuss the appropriate course of action.

Mitigation for Post-Construction Impacts

- J. Prior to building permit final inspection, the Project Applicant shall demonstrate that cat-proof fencing has been installed at the perimeter of development adjacent to the open space for Drainage B.
- K. Access to the Drainage B open space area shall be restricted to conservation activities only. Prior to building permit final inspection, signs shall be installed prohibiting public access, including dogs.
- L. Prior to building permit final inspection, the Riverside County Building and Safety Department shall ensure that all night lighting within development areas are directed away from the open space area associated with Drainage B (Lot 'M'). The Riverside County Building and Safety Department shall also verify that Project has been designed to minimize exterior night lighting while remaining compliant with local ordinances related to street lighting. Any necessary lighting (e.g., to light up equipment for security measures) shall be shielded or directed away from the habitat area in Drainage B and are not to exceed 0.5 foot-candles. Monitoring by a qualified lighting engineer (attained by the Project Applicant and subject to spot checking by Riverside County staff) shall be conducted as needed to verify light levels are below 0.5 foot-candles required within identified occupied least Bell's vireo habitat following construction. If the 0.5 foot-candles requirement is exceeded, the lighting engineer shall make operational changes and/or install a barrier to alleviate light levels during the breeding season.
- M. An awareness program shall be implemented to educate residents about the conservation values associated with the Drainage B open space. A copy of the awareness program shall be provided to the Riverside County Environmental Programs Department for review and approval. The approved awareness

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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program literature shall be included in sales documentation for individual units and provided to each homeowner within the proposed development.

M-BR-2

(Condition of Approval 60.EPD.004) Pursuant to Objective 6 and Objective 7 of the Species Account for the Burrowing Owl included in the Western Riverside County Multiple Species Habitat Conservation Plan, within 30 days prior to initial grading or clearing activities, a qualified biologist shall conduct a survey of the Project site and off-site area and make a determination regarding the presence or absence of the burrowing owl. The determination shall be documented in a report that shall be reviewed and approved by the County of Riverside prior to the issuance of a grading permit, subject to the following provisions:

- a) In the event that the pre-construction survey identifies no burrowing owls on the property or within the off-site area, a grading permit may be issued without restriction.
- b) In the event that the pre-construction survey identifies the presence of at least one individual but less than three (3) mating pairs of burrowing owl, then grading permits shall be conditioned to avoid occupied burrows to the greatest extent feasible, following the guidelines in the Staff Report on Burrowing Owl Mitigation published by Department of Fish and Wildlife (March 7, 2012) including, but not limited to, conducting pre-construction surveys; avoiding occupied burrows during the nesting and non-breeding seasons; implementing a worker awareness program; biological monitoring; establishing avoidance buffers; and flagging burrows for avoidance with visible markers. If occupied burrows cannot be avoided, acceptable methods may be used to exclude burrowing owl either temporarily or permanently, pursuant to a Burrowing Owl Exclusion Plan that shall be prepared and approved by the County of Riverside Environmental Programs Department (EPD), in coordination with the CDFW. The Burrowing Owl Exclusion Plan shall be prepared in accordance with the guidelines in the Staff Report on Burrowing Owl Mitigation and the MSHCP. In accordance with the MSHCP, take of active nests shall be avoided. Passive relocation (i.e., the scoping of the burrows by a burrowing owl biologist and collapsing burrows free of young) shall occur when owls are present outside the nesting season. Passive relocation shall follow CDFW relocation protocol and shall only occur between September 15 and February 1. The EPD may require translocation sites for the burrowing owl to be created in the MSHCP reserve for the establishment of new colonies pursuant to MSHCP objectives for the species. Translocation sites, if required, shall be identified in consultation with EPD and/or CDFW taking into consideration unoccupied habitat areas, presence of burrowing mammals, existing colonies, and effects to other MSHCP Covered Species. If proximate alternate habitat is not present as determined by the biologist, active relocation shall follow CDFW relocation protocol. The biologist shall confirm in writing that the species has fledged the site or been relocated prior to the issuance of a grading permit.
- c) In the event that the pre-construction survey identifies the presence of three (3) or more mating pairs of burrowing owl, the requirements of MSCHP Species-Specific Conservation Objectives 5 for the burrowing owl shall be followed.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Objective 5 states that if the site (including adjacent areas and the off-site area) supports three (3) or more pairs of burrowing owls and supports greater than 35 acres of suitable Habitat, at least 90 percent of the area with long-term conservation value and burrowing owl pairs will be conserved onsite until it is demonstrated that Objectives 1-4 have been met. A grading permit shall only be issued, either:

- Upon approval and implementation of a property-specific Determination of Biologically Superior Preservation (DBESP) report for the burrowing owl by the CDFW; or
- A determination by the biologist that the Project site and off-site area is part of an area supporting less than 35 acres of suitable Habitat, and upon passive or active relocation of the species following CDFW protocols. Passive relocation, including the required use of one-way doors to exclude owls from the site and the collapsing of burrows, will occur if the biologist determines that the proximity and availability of alternate habitat is suitable for successful passive relocation. Passive relocation shall follow CDFW relocation protocol and shall only occur between September 15 and February 1. If proximate alternate habitat is not present as determined by the biologist, active relocation shall follow CDFW relocation protocol. The biologist shall confirm in writing that the species has fledged the site or been relocated prior to the issuance of a grading permit.

M-BR-3

(Condition of Approval 60.EPD.006) Prior to the issuance of a grading permit, a habitat mitigation and monitoring plan (HMMP) for impacts to two sensitive native communities (arroyo willow scrub and black willow scrub) shall be prepared. The HMMP shall offset impacts to these habitats by focusing on the creation, enhancement, and/or restoration of riparian habitats within disturbed habitat areas of the Project site and/or off-site. The functions and values of the mitigation areas shall be equivalent or superior to the impacted habitat. The HMMP shall provide details as to the implementation of the mitigation, performance standards, maintenance, and future monitoring. Prior to grading permit final inspection, compensatory mitigation for impacts to the three sensitive native communities shall be provided at a 2:1 ratio for impacts to arroyo willow scrub and black willow scrub by creating, enhancing and/or restoring riparian habitat. Mitigation is proposed both on-site and off-site at an agency approved mitigation bank or land acquired for the purpose of mitigation. The riparian mitigation shall also satisfy compensatory mitigation required pursuant to regulatory permits (as required by Mitigation Measure M-BR-4) and Section 6.1.2 of the MSHCP (as required by Mitigation Measure M-BR-8). Mitigation for impacts shall occur in one or more of the following ways:

1. Transplantation of arroyo willow scrub and black willow scrub habitat species from impact areas, if feasible;
2. Seeding of arroyo willow scrub and black willow scrub species, in addition to species associated with these habitat types;

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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3. Planting of container plants and/or stakes of arroyo willow and black willow species and/or other species associated with these habitat types; or
4. Salvage of duff and topsoil from impact areas and subsequent dispersal into the mitigation areas.

M-BR-4

(Condition of Approval 60.EPD.006) Prior to the issuance of any grading permit for permanent impacts in the areas designated as jurisdictional features, the Project applicant shall obtain regulatory permits from the USACE, RWQCB, and CDFW. The following shall be incorporated into the permitting, subject to approval by the regulatory agencies:

1. On-site and off-site creation, enhancement, and/or restoration of USACE/RWQCB jurisdictional "waters of the U.S.," "waters of the State" within the Santa Ana Watershed at a ratio no less than 1:1 or within an adjacent watershed at a ratio no less than 2:1 for permanent impacts, and for any temporary impacts to restore the impact area to pre-Project conditions (i.e., pre-Project contours and revegetate where applicable). Off-site mitigation may occur on land acquired for the purpose of in-perpetuity preservation, or through the purchase of mitigation credits at an agency-approved off-site mitigation bank.
2. Off-site replacement and/or restoration of CDFW jurisdictional streambed and associated riparian habitat within the Santa Ana Watershed at a ratio no less than 2:1 or within an adjacent watershed at a ratio no less than 3:1 for permanent impacts, and for any temporary impacts to restore the impact area to pre-Project conditions (i.e., pre-Project contours and revegetate where applicable). Off-site mitigation may occur on land acquired for the purpose of in-perpetuity preservation, or through the purchase of mitigation credits at an agency-approved off-site mitigation bank.

Purchase of mitigation credits through an agency-approved mitigation bank or in-lieu fee program shall occur prior to any impacts to jurisdictional drainages. Mitigation proposed on land acquired for the purpose of in-perpetuity mitigation that is not part of an agency-approved mitigation bank or in-lieu fee program shall include the preservation, creation, restoration, and/or enhancement of similar habitat pursuant to a Habitat Mitigation and Monitoring Plan (HMMP). The HMMP shall be prepared prior to any impacts to jurisdictional features, and shall provide details as to the implementation of the mitigation, maintenance, and future monitoring. The goal of the mitigation shall be to preserve, create, restore, and/or enhance similar habitat with equal or greater function and value than the impacted habitat.

M-BR-5

(Condition of Approval 60.EPD.005) Prior to the issuance of any grading permit that would remove potentially suitable nesting habitat for raptors or songbirds, the Project applicant shall demonstrate to the satisfaction of the County of Riverside that either of the following have been or will be accomplished.

1. Vegetation removal activities shall be scheduled outside the nesting season (September 1 to February 14 for songbirds; September 1 to January 14 for raptors) to avoid potential impacts to nesting birds.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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2. Any construction activities that occur during the nesting season (February 15 to August 31 for songbirds; January 15 to August 31 for raptors) will require that all suitable habitat be thoroughly surveyed for the presence of nesting birds by a qualified biologist before commencement of clearing. If any active nests are detected a buffer of 300 feet (500 feet for raptors) around the nest adjacent to construction will be delineated, flagged, and avoided until the nesting cycle is complete. The buffer may be modified and/or other recommendations proposed as determined appropriate by the biological monitor to minimize impacts.

M-BR-6 (Condition of Approval 10.Planning.010) Prior to building permit final inspection, the Project applicant shall demonstrate that payment of the MSHCP Local Development Mitigation Fee has occurred pursuant to Riverside County Ordinance No. 810.

M-BR-7 (Condition of Approval 10.EPD.001) Prior to issuance of building permits, a final landscaping plan shall be submitted to the Riverside County Environmental Programs Department (EPD) for review. The EPD shall review the list of plant species to verify that none of the plant species listed in Table 6-2 of the MSHCP, *Plants That Should Be Avoided Adjacent to the MSHCP Conservation Area*, are identified in the landscape plans.

M-BR-8 (Condition of Approval 60.EPD.006) Prior to issuance of grading permits, a habitat mitigation and monitoring plan (HMMP) shall be prepared to address mitigation for MSHCP Riparian/Riverine resources. The HMMP shall provide details as to the implementation of the mitigation, performance standards, maintenance, and future monitoring of the proposed Riparian/Riverine habitat restoration and enhancement. Prior to grading permit final inspection, compensatory mitigation for impacts to 1.16 acres of the MSHCP Riparian/Riverine Areas in on-site and off-site portions of Drainage A shall be provided at a minimum 2:1 ratio by creating and enhancing habitat, as set forth in the Project's Determination of Biologically Equivalent or Superior Preservation (DBESP) prepared by PCR Services Corporation and dated November 2015. The riparian mitigation shall satisfy compensatory mitigation required pursuant to regulatory permits (as required by Mitigation Measure M-BR-4) and Section 6.1.2 of the MSHCP (as required by Mitigation Measure M-BR-1). As summarized in IS/MND Table EA-17, *Acres of Proposed Mitigation Type and Habitat Per Drainage*, Project compensatory mitigation shall consist of the following:

- enhancement to 0.27 acre of riparian habitat in Drainage A;
- enhancement to 0.43 acre of riparian transition in Drainage A and enhancement to 0.29 acre of riparian transition in Drainage B (for a total of 0.72 acre of riparian transition enhancements);
- enhancement to 0.09 acre of upland habitat within Drainage A and 0.71 acre of upland habitat in Drainage B (for a total of 0.80 acre of upland habitat enhancements);
- creation of 0.07 acre of riparian habitat in Drainage A and creation of 0.05 acre of riparian habitat in Drainage B (for a total of 0.12 acre of riparian habitat creations); and

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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- creation of 0.64 acre of riparian transition in Drainage A and creation of 0.03 acre of riparian transition in Drainage B (for a total of 0.67 acre of riparian transition creations).

Table EA-17 Acres of Proposed Mitigation Type and Habitat Per Drainage

Mitigation Type	Habitat Type	Area (acres)		
		Drainage A	Drainage B	Total
Enhancement	Riparian	0.27	-	0.27
	Riparian-transition	0.43	0.29	0.72
	Upland	0.09	0.71	0.80
Subtotal		0.79	1.00	1.79
Creation	Riparian	0.07	0.05	0.12
	Riparian Transition	0.64	0.03	0.67
	Upland	-	-	-
Subtotal		0.71	0.08	0.79
Total		1.50	1.08	2.58

(PCR, 2015b, Table 7)

Monitoring:

- M-BR-1 Prior to issuance of grading permits and building permit final inspection, the Riverside County Environmental Programs Department and Building and Safety Department shall ensure that all requirements related to construction or post-construction impacts have been fulfilled.
- M-BR-2 Prior to commencement of grading activities, the Riverside County Environmental Programs Department shall ensure that a pre-construction burrowing owl survey is completed within 30 days prior to initial grading or clearing activities, and shall enforce the identified requirements should any burrowing owl(s) be identified on-site.
- M-BR-3 Prior to issuance of grading permits, the County Building and Safety Department shall verify that the required habitat mitigation and monitoring plan (HMMP) has been approved by the Riverside County Environmental Programs Department. Prior to grading permit final inspection, the Project Applicant shall provide evidence to the Riverside County Environmental Programs Department demonstrating that the required compensatory mitigation has been achieved per the required HMMP.
- M-BR-4 Prior to issuance of grading permits, the Project Applicant shall provide evidence to the Riverside County Environmental Programs Department demonstrating that the required regulatory permits have been obtained from the USACE, RWQCB, and CDFW.
- M-BR-5 Prior to issuance of grading permits, the Riverside County Environmental Programs Department shall verify that either construction activities have been scheduled outside the nesting season, or that a pre-construction survey during the nesting season has taken place and that appropriate buffers have been established from any occupied nests.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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- M-BR-6 Prior to building permit final inspection, the Riverside County Building and Safety Department shall verify payment of the MSHCP Local Development Mitigation Fee.
- M-BR-7 Prior to issuance of building permits, the Riverside County Environmental Programs Department shall verify that the landscape plans do not contain any plant species listed in Table 6-2 of the MSHCP.
- M-BR-8 Prior to issuance of grading permits, the County Building and Safety Department shall verify that the required habitat mitigation and monitoring plan (HMMP) has been approved by the Riverside County Environmental Programs Department. Prior to grading permit final inspection, the Project Applicant shall provide evidence to the Riverside County Environmental Programs Department demonstrating that the required compensatory mitigation has been achieved.

CULTURAL RESOURCES Would the project

8. Historic Resources

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

Source: Site Inspection; *Phase I and II Cultural Resources Report for the Lake Ranch Project*, Brian F. Smith and Associates, Inc., February 10, 2015.

Findings of Fact:

a & b) A collection of structures in the northeast corner of the property includes some buildings that meet the minimum age threshold under CEQA to be historic. As part of the investigation of the property, a focused historic research effort was conducted to provide information concerning the ownership and age of the structures. Within the compound of structures that were inventoried during the field survey, two structures, a residence and a bunkhouse, appear to date to the 1920s and 1940s, and are therefore considered to be historic. Although the residence was originally built in 1926 and meets the age threshold for possible significance, none of the property owners could be definitively named as ever having resided in the home. Because of the lack of an apparent link to any significant persons, architects, builders, historical events, or specific architectural style, the structure has been evaluated as not significant under CEQA criteria. (BFSA, 2015a, p. 4.0-12)

Only the residence, the garage with attached washroom, and the bunkhouse and sleeping quarters were determined to be old enough for historic consideration. After being evaluated by BFSA, none of the structures were determined to be architecturally unique or significant, and all three were determined to be in an advanced stage of disrepair and near collapse. (BFSA, 2015a, p. 4.0-17)

Based on the information provided in the Phase I and Phase II Cultural Resources Report, the Project site does not contain any historic sites or historical resources as defined in California Code of Regulations, Section 15063.5. Accordingly, there would be no impact to historic resources as a result of the proposed Project.

Mitigation: No mitigation is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Monitoring: No monitoring is required.

9. Archaeological Resources				
a) Alter or destroy an archaeological site.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to California Code of Regulations, Section 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Restrict existing religious or sacred uses within the potential impact area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source: *Phase I and II Cultural Resources Report for the Lake Ranch Project*, Brian F. Smith and Associates, Inc., February 10, 2015 (PDA 04857R3)

Findings of Fact:

a & b) A Phase I and II Cultural Resources Report was prepared for the proposed Project by Brian F. Smith & Associates, the results of which are contained in Appendix E1 to this IS/MND. The Phase I and II Cultural Resources Report includes the results of the cultural resources survey and significance testing program conducted by BFSA for the proposed Project. BFSA conducted the assessment to locate and record any cultural resources present within the Project area in compliance with CEQA, and following County of Riverside Cultural Resource Guidelines.

During the survey, one previously unrecorded prehistoric bedrock milling site (RIV-11,737) was identified and two recorded prehistoric bedrock milling sites (RIV-4,442 and RIV-4,443) were relocated. Significance testing was conducted at each of the three bedrock milling sites. The subsurface excavations at all three prehistoric sites were negative, providing data that confirmed that these sites were temporary use sites for food gathering and processing (BFSA, 2015a, p. 1.0-1)

Because Site RIV-11,737 did not contain any artifacts, it was evaluated as not significant under CEQA criteria due to a lack of both a subsurface deposit and the ability to provide any further research potential. Because Site RIV-4,442 did not produce any artifacts or evidence of subsurface cultural deposits, it was evaluated as not significant under CEQA criteria due to a lack of both a subsurface deposit and the ability to provide any further research potential. Because Site RIV-4,443 did not contain any artifacts, it also was evaluated as not significant under CEQA criteria due to a lack of both a subsurface deposit and the ability to provide any further research potential. (BFSA, 2015a, p. 1.0-2)

Although these sites were evaluated as not CEQA-significant, the potential still exists for buried cultural resources to be impacted during construction activities. When land is cleared, disked, or otherwise disturbed, evidence of surface artifact scatters is typically lost, especially with regards to prehistoric sites. The current status of the Project site appears to have affected the potential to discover any additional scatters of surface artifacts. Additional cultural materials that may have been on-site could have been masked by clearing, orchard operations, diskings, and the construction of the dirt roads. Given the prior disturbance within the project that might mask archaeological deposits and the moderate frequency of cultural resources within the property, there is a potential that buried

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archaeological materials may be present. This is evaluated as a potentially significant impact for which mitigation, in the form of preparation and implementation of a Cultural Resources Mitigation Monitoring and Reporting Program (CRMMRP), would be required. To ensure that the CRMMRP is implemented, Mitigation Measure M-CR-1 has been imposed on the Project. (BFSA, 2015a, pp. 1.0-3, 6.0-2, and 6.0-3)

c) The Project site does not contain a cemetery and no known formal cemeteries are located within the immediate site vicinity. Field surveys conducted on the Project site did not identify the presence of any human remains and no human remains are known to exist beneath the surface of the site. Nevertheless, the remote potential exists that human remains may be unearthed during grading and excavation activities associated with Project construction. In the event that human remains are discovered during Project grading or other ground disturbing activities, the Project would be required to comply with the applicable provisions of California Health and Safety Code §7050.5 as well as Public Resources Code §5097 et. seq. California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin. Pursuant to California Public Resources Code Section 5097.98(b), remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made by the Coroner. If the Coroner determines the remains to be Native American, the California Native American Heritage Commission (NAHC) must be contacted and the NAHC must then immediately notify the "most likely descendant(s)" of receiving notification of the discovery. The most likely descendant(s) shall then make recommendations within 48 hours, and engage in consultations concerning the treatment of the remains as provided in Public Resources Code Section 5097.98. Mandatory compliance with these requirements would ensure that potential impacts associated with the discovery of human remains would be less than significant and mitigation is not required.

d) There are no religious or sacred uses occurring within the proposed Project site or off-site impact areas. The Project area has largely been disturbed by agricultural activities since at least the 1930s. Accordingly, no impact to religious or sacred uses would occur.

e) The provisions of Public Resources Code § 21074 were established pursuant to California Assembly Bill 52 (AB 52) and the provisions of AB 52 apply to projects, such as the proposed Project, that have a notice of preparation (NOP) or notice of negative declaration or mitigated negative declaration filed on or after July 1, 2015. Pursuant to AB 52 as well as the provision of Senate Bill 18 (SB 18), Riverside County as Lead Agency is required to conducted consultation with any interested Tribes regarding the Project's potential impacts to tribal cultural resources, including tribal cultural resources as defined in Public Resources Code § 21074. The proposed Project complies with both Senate Bill 18 (SB 18) and Assembly Bill 52 (AB 52) requirements for notification and consultation with Native American tribes. A list of 10 tribes as provided by the Native American Heritage Commission were initially sent requests for consultation on March 24, 2014 pursuant to SB 18 requirements. Subsequently requests for notification were sent to 4 tribes on July 13, 2015 pursuant to AB 52 requirements for tribes requesting consultation requests for this geographic area. Both the Pechanga Band of Luiseno Indians and Soboba Band of Luiseno Indians requested consultation with Riverside County. In person meetings with Pechanga representatives were held on April 18, 2013 and May 14, 2014 and in person meetings with Soboba representatives were held on January 27, 2014, May 1, 2014, July 28, 2014. The Project Cultural Resource Report and applicable mitigation and conditions of approval was provided to both tribes. No response has been received from either tribe with comments or concerns on the report, mitigation measures, or conditions of approval. A letter confirming conclusion of consultation was sent on February 18, 2016. Thus, potential impacts

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associated with causing a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code § 21074 would be less than significant.

Mitigation:

M-CR-1 (Condition of Approval 60.PLANNING.023) Prior to issuance of a grading permit, the Project Applicant shall prepare and submit to the County Archaeologist for review and approval a Cultural Resources Mitigation Monitoring and Reporting Program (CRMMRP). The CRMMRP shall include, but not necessarily be limited to, the following actions:

- 1) Prior to issuance of a grading permit, the Project Applicant shall provide written verification that a certified archaeologist has been retained to implement the monitoring program. This verification shall be presented in a letter from the Project archaeologist to the Riverside County Planning Department.
- 2) The Project Applicant shall enter into an agreement with the Pechanga Tribe to provide Native American monitoring during grading. The Native American monitor shall work in concert with the archaeological monitor to observe ground disturbances and search for cultural materials.
- 3) The certified archaeologist shall attend the pre-grading meeting with the contractors to explain and coordinate the requirements of the monitoring program.
- 4) During the original cutting of previously undisturbed deposits, the archaeological monitor(s) and tribal representative shall be on-site, as determined by the consulting archaeologist, to perform periodic inspections of the excavations. The frequency of inspections will depend on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The consulting archaeologist shall have the authority to modify the monitoring program if the potential for cultural resources appears to be less than anticipated.
- 5) Isolates and clearly non-significant deposits will be minimally documented in the field so the monitored grading can proceed.
- 6) In the event that previously unidentified cultural resources are discovered, the archaeologist shall have the authority to divert or temporarily halt ground disturbance operation in the area of discovery to allow for the evaluation of potentially significant cultural resources. The archaeologist shall contact the lead agency at the time of discovery. The archaeologist, in consultation with the lead agency, shall determine the significance of the discovered resources. The lead agency must concur with the evaluation before construction activities will be allowed to resume in the affected area. For significant cultural resources, a Research Design and Data Recovery Program to mitigate impacts shall be prepared by the consulting archaeologist and approved by the lead agency before being carried out using professional archaeological methods. If any human bones are discovered, the county coroner and lead agency shall be

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contacted. In the event that the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), as identified by the NAHC, shall be contacted in order to determine proper treatment and disposition of the remains.

- 7) Before construction activities are allowed to resume in the affected area, the artifacts shall be recovered and features recorded using professional archaeological methods. The archaeological monitor(s) shall determine the amount of material to be recovered for an adequate artifact sample for analysis.
- 8) All cultural material collected during the grading monitoring program shall be processed and curated according to the current professional repository standards. The collections and associated records shall be transferred, including title, to an appropriate curation facility, to be accompanied by payment of the fees necessary for permanent curation.
- 9) A report documenting the field and analysis results and interpreting the artifact and research data within the research context shall be completed and submitted to the satisfaction of the lead agency prior to the issuance of any building permits. The report will include DPR Primary and Archaeological Site Forms.

Monitoring:

M-CR-1 Prior to issuance of any grading permits, the CRMMRP shall be reviewed and approved by the County Archaeologist. During ground-disturbing activities, the provisions of the CRMMRP shall be implemented. Prior to grading permit final inspection, the report documenting the field and analysis results shall be provided to the Riverside County Planning Department.

10. Paleontological Resources

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

Source: General Plan, Figure OS-8 (Paleontological Sensitivity); Riverside County GIS (Riverside County, 2013); *Paleontological Resource Impact Assessment for the Lake Ranch Project site*, Brian F. Smith and Associates, January 22, 2015; (PDP01465).

Findings of Fact: According to Riverside County General Plan Figure OS-8, the proposed Project site is determined to have a "Low" potential for uncovering paleontological resources (Riverside County, 2003a) In addition, and partly due to past disturbance associated with agricultural activities, there are no unique geologic features within the proposed Project site or off-site impact areas. Nonetheless, there is a potential that during grading of the property, unique paleontological resources or sites could be uncovered.

In order to address the site's potential for containing paleontological resources, a paleontological resources assessment was conducted by Brian F. Smith and Associates, the results of which are contained in IS/MND Appendix E2. As noted in the paleontological resources impact assessment, the Project site comprises surface exposures of Lower Cretaceous (~ 110 ± million year old) granitic rocks

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of the Cajalco pluton in the very northeast corner, gabbroic rocks of the Peninsular Ranges batholith across most of the northern half of the property, and associated metamorphic rocks and Quaternary very old alluvial fan deposits across the southern portion of the property. The mapped granitic and gabbroic exposures consist entirely of mixed and undifferentiated granodiorite and hornblende gabbro. These rocks do not have any possibility of ever yielding fossils of any sort. (BFSA, 2015b, pp. 1-2) Thus, no impact to paleontological resources would occur with development of the northern one-half to two-thirds of the site.

The southern one-third to one-half of the Project site is mapped as lower Pleistocene (~ 1 to ~ 2 million year old) very old alluvial fan sediments that are capped by moderate to well-developed pedogenic soils with subsoil horizons as much as six to 10 feet thick. The deep pedogenic soils developed on the proximal fanhead exposures of the relic alluvial fan sediments found there are also regarded as having a low paleontological resource potential and resource sensitivity by Riverside County GIS (Riverside County, 2015; BFSA, 2015b, p. 2). Thin patches of unmapped Quaternary alluvium of late Holocene age may also be present, but are too limited to be mapped on-site and are too young to have any paleontological resource potential. A pedestrian field survey of the entire property conducted by personnel of Brian F. Smith and Associates, Inc. on March 4, 2014 did not reveal any materials that could be considered fossiliferous.

According to BFSA, a museum collections and records search would not yield any paleontological resource information contrary to the information presented above. BFSA concludes that a paleontological mitigation and monitoring program is not required for any portion of the Project site prior to development because impacts to paleontological resources would not occur. (BFSA, 2015b, p. 2) Accordingly, no impacts to paleontological resources would occur as a result of the Project, and no mitigation would be required.

Mitigation: No mitigation is required

Monitoring: No monitoring is required.

GEOLOGY AND SOILS Would the project

11. Alquist-Priolo Earthquake Fault Zone or County Fault Hazard Zones	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Be subject to rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source: General Plan, Figure S-2 (Earthquake Fault Study Zones); GIS database (Riverside County, 2013); *Geotechnical EIR-Level Assessment, Tentative Tract 36730, Lake Ranch Project*, Petra Geotechnical, Inc., October 27, 2014; *Tentative Map Review, Tentative Tract 36730, Lake Ranch Project*, Petra Geotechnical, Inc., September 18, 2015.

Findings of Fact:

a & b) As is the case with most locations in Southern California, the subject site is located in a region that is characterized by moderate to high seismic activity. The Project site and vicinity have

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experienced strong ground shaking due to earthquakes on a number of occasions in historic time. The Project site is not located within an "Alquist-Priolo" Special Studies Zone, nor is the site identified within a County fault hazard zone. The nearest active fault zone to the Project site that is identified as an Alquist-Priolo Earthquake Fault Zone is the Elsinore fault, located approximately 7.5 miles southwest of the Project site. The last major rupture along the Elsinore fault was a magnitude 6 event in 1910. No surface rupture was associated with this event. The last surface rupture event likely occurred in the 18th century. (Petra, 2014, pp. 6-9; Riverside County, 2003a, Figure S-2; Petra, 2015, pp. 4-5) Additionally, Petra Geotechnical indicates that the nearest fault that would generate the most severe site ground motions is the Oak Ridge fault (Onshore segment), located approximately 3.9 miles from the site; however, the Oak Ridge fault is not mapped as an Alquist-Priolo Special Studies Zone.

Ground shaking hazards caused by earthquakes along nearby fault zones and other active regional faults do exist. However, Section 1613 of the 2013 California Building Code (CBC) identifies design features required to be implemented to resist the effects of seismic ground motions. With mandatory compliance to the 2013 California Building Code requirements, or applicable building code at the time of Project construction, future Project residents and structures would not be exposed to substantial adverse ground-shaking effects associated with Alquist-Priolo Earthquake Fault Zones or County Fault Hazard Zones. Accordingly, impacts would be less than significant. (Petra, 2014, pp. 14-15; Petra, 2015, pp. 16-17)

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

12. Liquefaction Potential Zone

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

Source: General Plan, Figure S-3 (Generalized Liquefaction); Riverside County GIS (Riverside County, 2013); *Geotechnical EIR-Level Assessment, Tentative Tract 36730, Lake Ranch Project*, Petra Geotechnical, Inc., October 27, 2014; *Tentative Map Review, Tentative Tract 36730, Lake Ranch Project*, Petra Geotechnical, Inc., September 18, 2015.

Findings of Fact: Seismic agitation of relatively loose saturated sands, silty sands, and some silts can result in a buildup of pore pressure. If the pore pressure exceeds the overburden stresses, a temporary quick condition known as liquefaction can occur. Liquefaction effects can manifest in several ways including: 1) loss of bearing; 2) lateral spread; 3) dynamic settlement; and 4) flow failure. Lateral spreading has typically been the most damaging mode of failure. In general, the more recent that sediment has been deposited, the more likely it will be susceptible to liquefaction. Other factors that must be considered are: groundwater, confining stresses, relative density, and the intensity and duration of seismically-induced ground shaking.

Riverside County GIS shows that only the southern portions of the Project site have a "low" liquefaction potential, with no potential for liquefaction identified in the northern portions of the site. (Riverside County, 2015). Based on a review of the site conducted by Petra Geotechnical, the southern portions of the site are identified as having a low potential for liquefaction, requiring no special design requirements beyond mandatory compliance with the 2013 CBC. (Petra, 2015, pp. F-1 and F-2)

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Accordingly, and based on information available from Riverside County GIS and a site-specific analysis conducted by the Project geologist (Petra Geotechnical), the proposed Project would not be subject to seismic-related ground failure, including liquefaction, and impacts would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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

Source: General Plan, Figure S-4 (Earthquake-Induced Slope Instability Map); General Plan Figures S-12 through S-21 (showing General Ground Shaking Risk); *Geotechnical EIR-Level Assessment, Tentative Tract 36730, Lake Ranch Project*, Petra Geotechnical, Inc., October 27, 2014; *Tentative Map Review, Tentative Tract 36730, Lake Ranch Project*, Petra Geotechnical, Inc., September 18, 2015.

Findings of Fact: According to information contained in the Project-specific geotechnical evaluations (IS/MND Appendices F1 and F2), the closest known fault considered capable of causing strong ground motion at the subject site is the Elsinore fault. Located approximately 7.5 miles southwest of the Project site, the Elsinore fault is a series of right-lateral strike slip faults which trend to the northwest from the Salton Sea to the Santa Ana river basin. Published investigations reveal that this fault offsets Holocene stratigraphy. For this reason, this fault is considered active and is included within the boundaries of an Alquist-Priolo Earthquake Fault zone. The last major rupture was a magnitude 6.0 event in 1910. No surface rupture was associated with this event. The last surface rupture event likely occurred in the 18th century. Two additional faults, Whittier and San Jacinto, are considered to be significant seismogenic sources are located in relatively close proximity to the subject site. (Petra, 2014, pp. 7-9; Petra, 2015, pp. 4-5)

As discussed above under the analysis of Threshold 11.a), ground shaking hazards caused by earthquakes along the Elsinore, Whittier, and San Jacinto Fault Zones and other active regional faults do exist. However, Section 1613 of the 2013 California Building Code (CBC) identifies design features required to be implemented to resist the effects of seismic ground motions. With mandatory compliance to the 2013 California Building Code requirements, or the applicable building code at the time of Project construction, impacts due to strong seismic ground shaking would be less than significant, and no mitigation would be required. (Petra, 2014, p. 14; Petra, 2015, pp. 16-17)

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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

Source: General Plan, Figure S-4 (Earthquake-Induced Slope Instability Map); *Geotechnical EIR-Level Assessment, Tentative Tract 36730, Lake Ranch Project*, Petra Geotechnical, Inc., October 27,

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2014; *Tentative Map Review, Tentative Tract 36730, Lake Ranch Project*, Petra Geotechnical, Inc., September 18, 2015.

Findings of Fact:

The Project site does not lie within a designated seismically-induced landslide hazard zone. Proposed slopes are planned at 2:1 slope ratios to heights of 25 to 45 feet. Provided that remedial and design grading within the site are performed in accordance with local grading ordinances, current standards of practice in the area, and mandatory compliance with the site-specific recommendations to be provided by the Project's geotechnical evaluations (IS/MND Appendices F1 and F2), the potential for gross or surficial slope instability will be reduced to a less than significant level. (Petra, 2014, pp. 17-18; Petra, 2015, pp. 8-10)

Secondary effects of seismic activity that are typically considered as possible hazards to a particular site include several types of ground failure as well as induced flooding. The general types of ground failure that can occur as a consequence of severe ground shaking include landsliding, ground subsidence, ground lurching, shallow ground rupture, lateral spreading, liquefaction, and soil strength loss. The probability of occurrence of each type of ground failure depends on the severity of the earthquake, distance from the causative fault, topography, soil, and groundwater conditions, in addition to other factors. (Petra, 2014, p. 17) Given that the site does not contain significant thicknesses of loose compressible soils and that the Project's geotechnical reports recommend that these soils be removed and replaced with engineered fill, lateral spreading, and soil strength loss (collapse) are not considered potential hazards. (Petra, 2015, p. 5)

Additionally, and as indicated under Threshold 12, the Project is not subject to significant hazards associated with liquefaction.

Accordingly, and assuming mandatory compliance with the recommendations of the Project's geotechnical evaluation (IS/MND Appendices F1 and F2) and the 2013 CBC requirements, impacts due to geologic units or soils that are unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, collapse, or rockfall hazards, would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

15. Ground Subsidence

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

Source: General Plan, Figure S-7 (Documented Subsidence Areas); *Geotechnical EIR-Level Assessment, Tentative Tract 36730, Lake Ranch Project*, Petra Geotechnical, Inc., October 27, 2014; *Tentative Map Review, Tentative Tract 36730, Lake Ranch Project*, Petra Geotechnical, Inc., September 18, 2015.

Findings of Fact: Riverside County General Plan Figure S-7 indicates that the proposed Project site is not susceptible to ground subsidence and that no documented subsidence has occurred on the Project site. There are no components of the Project or the Project site's geotechnical characteristics

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that could lead to unstable geologic conditions that could result in ground subsidence. As such, impacts due to ground subsidence would be less than significant requiring no mitigation. (Riverside County, 2003a; Petra, 2015, p. 5)

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

16. Other Geologic Hazards

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

Source: On-site Inspection; Project Application Materials; General Plan, Figure S-10 (Dam Failure Inundation Zones). Petra Geotechnical Inc, *Geotechnical EIR-Level Assessment Tentative Tract 36730 Lake Ranch Project*, October 27, 2014; *Tentative Map Review, Tentative Tract 36730, Lake Ranch Project*, Petra Geotechnical, Inc., September 18, 2015.

Findings of Fact: There are no active or dormant volcanoes within Riverside County; thus, no impacts resulting from volcano-related hazards would occur. Although the Project site contains a steep hillside in the northwestern corner of the site, a site-specific geotechnical evaluation conducted by Petra Geotechnical (IS/MND Appendix F1) concluded that the hillform consists of exposed bedrock; as such, this hillform has no potential to expose future structures or residences to hazards associated with mudflow (Petra, 2014, p. 6). There are no other hillforms abutting the Project site with the potential to result in mudflow that could pose a threat to future residents or structures.

According to Riverside County General Plan Figure S-10, the Project site would be subject to water inundation in the event that there is a structural failure of the Lake Mathews Dam, including dam failures that could occur from seismically-induced seiches. The Lake Mathews Dam and spillway are located approximately 0.20 kilometers south of the southern boundary of the Project site. If a seismically-induced seiche were to occur within Lake Mathews when the dam basin is filled to capacity, water could breach and/or physically damage the dam and cause flooding through a majority of the southern portions of the project. In recognition of this possibility, the Lake Mathews/Woodcrest Area Plan includes three policies intended to attenuate the risk of dam failure to persons or property. Specifically, Policy LMWAP 14.2 requires adherence to the flood proofing, flood protection requirements, and flood management review requirements of Riverside County Ordinance No. 458, which regulates flood hazards. Additionally, Policy LMWAP 14.3 requires proposed development projects (such as the proposed Project) to undergo review by the Riverside County Flood Control and Water Conservation District. Moreover, County Ordinance No. 457 establishes building standards and codes that apply to development that is subject to inundation. Compliance with the above-reference regulations and policies would ensure that any potential dam inundation hazards associated with future development would be less than significant. Nonetheless, the potential for inundation due to seismically-induced seiches at the Lake Mathews Dam represents a significant impact for which mitigation would be required. With implementation of the required mitigation, which requires review of implementing building permits to ensure flood hazards are attenuated and education of future homeowners, impacts due to seismically-induced seiches that may pose a threat to future residents and/or structures would be reduced to a level below significance. M-GEO-1 requires the homeowner be informed about their home being located within a dam inundation area through several disclosure mechanisms. M-GEO-1 would ensure that all future residents on the Project site are aware of their home being located in a dam inundation hazard area, the risks associated with the home being

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located in an inundation zone, and the public service resources in place to help address dam inundation effects in the event the Lake Mathews Dam fails. Therefore, with mandatory compliance to LMWAP policies, and mitigation measure M-GEO-1, the Project's impacts due to seismically-induced seiche hazards would be less than significant.

Mitigation:

~~M-GEO-1 (Condition of Approval XX.XX.XX) Prior to the issuance of building permits, the County of Riverside Building and Safety Department shall review the construction drawings and verify that the structural foundations of every habitable structure are designed to withstand flooding events associated with potential failure of the Lake Mathews Dam.~~

M-GEO-12 (Condition of Approval 80.Planning.022) Prior to building permit final inspection, evidence shall be provided to the Riverside County Building and Safety Department that all home deeds include a disclosure about the Project site's location within a dam inundation hazard area. Additionally, as part of future home sale documentation, the Project Applicant shall provide each new homeowner a copy of the Federal Emergency Management Agency's informational brochure, entitled "Living with Dams: Know Your Risks (FEMA P-956)." Additionally, each new homeowner shall be provided with informational materials from the Riverside County Fire Department's Community Emergency Response Team (CERT), including information about CERT's role in helping communities address potential impacts due to natural and man-made hazards, and information relating to how future residents can become involved and undergo CERT training to assist the future residents of the community in the event of failure of the Lake Mathews Dam.

Monitoring:

~~M-GEO-1 Prior to the issuance of a building permit, the County of Riverside Building and Safety Department shall verify that all structures on site have been designed to ensure that dam-related hazards would not result in the loss of or substantial damage to any future home on site.~~

M-GEO-12 Prior to building permit final inspection, the Project Applicant shall provide evidence to Riverside County demonstrating that the disclosure has been provided on all deeds, and that the sales documentation includes the FEMA and CERT informational materials.

17. Slopes

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

Source: Project Application Materials; Petra Geotechnical Inc, *Geotechnical EIR-Level Assessment Tentative Tract 36730 Lake Ranch Project*, October 27, 2014; *Tentative Map Review, Tentative Tract 36730, Lake Ranch Project*, Petra Geotechnical, Inc., September 18, 2015.

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Findings of Fact:

a) Under existing conditions, elevations on-site generally decrease from northwest to southeast. Implementation of the proposed Project would require grading activities involving the lowering of the northwestern portions of the site and the raising of the southern, southeastern, and eastern portions of the site as necessary to accommodate residential development. As part of the Project's grading plan, the hillside in the northwestern portion of the site would be graded at a maximum 2:1 gradient to increase areas suitable for residential development while providing fill material to facilitate the construction of residential pads in other portions of the site. Although the Project would result in a change to the site's existing topography, there would be no adverse effects to the environment resulting from site grading beyond what is already evaluated and disclosed throughout this IS/MND. Accordingly, impacts due to changes to the site's topography and ground surface relief features are a less-than-significant impact.

b) As shown on TTM 36730, all slopes proposed as part of the Project would be constructed at a maximum slope angle of 2:1. The only slopes that would be constructed at a height exceeding ten feet occurs in the northwestern portion of the site and between the residential development and the MSHCP Riparian/Riverine Area in Lot 'A.' Along the slope in the northwestern portion of the site, grading would lower the elevation of the southeastern face of the hillside. The Project's geologist (Petra Geotechnical) evaluated these slopes and determined that the slopes are expected to be grossly stable as designed (Petra, 2014, pp. 17-18; Petra, 2015, pp. 9-10). The slope proposed northerly of Lot 'A' would be constructed at a gradient of 2:1 and would measure up to approximately 17 feet in height. This slope would be constructed with hardened slope protection (of a type to be determined with future implementing grading permits) along the first two feet of the base of the slope, which would assure that this slope is grossly stable. Accordingly, although the Project would result in the creation of slopes exceeding 10 feet in height, based on the analysis conducted by the Petra Geotechnical, such slopes would not result in any adverse impacts to the environment. Accordingly, impacts associated with the creation of cut or fill slopes greater than 2:1 or higher than 10 feet in height would be less than significant.

c) There are no subsurface sewage disposal systems within the areas that would be permitted for physical disturbance as part of the proposed Project. Therefore, no impact would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

18. Soils

a) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Be located on expansive soil, as defined in Section 1802.3.2 of the California Building Code (2007), creating substantial risks to life or property?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have soils incapable of adequately supporting use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Source: Project Application Materials; Riverside County Municipal Code Chapter 15.12; *Hydrology Report*, MDS Consulting, July 31, 2015; *Project Specific Water Quality Management Plan*, MDS Consulting, August 3, 2015; *Tentative Map Review, Tentative Tract 36730, Lake Ranch Project*, Petra Geotechnical, Inc., September 18, 2015.

Findings of Fact:

a) Proposed grading activities associated with the Project would temporarily expose underlying soils to water and air, which would increase erosion susceptibility while the soils are exposed. Exposed soils would be subject to erosion during rainfall events or high winds due to the removal of stabilizing vegetation and exposure of these erodible materials to wind and water. Erosion by water would be greatest during the first rainy season after grading and before the Project's structure foundations are established and paving and landscaping occur. Erosion by wind would be highest during periods of high wind speeds when soils are exposed.

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

Following construction, wind and water erosion on the Project site would be minimized, as the areas disturbed during construction would be landscaped or covered with impervious surfaces. Only nominal areas of exposed soil, if any, would occur in the site's landscaped areas. The only potential for erosion effects to occur during Project operation would be indirect effects from storm water discharged from the property. As detailed in the Hydrology Report prepared for the proposed Project, the proposed detention basin to be located southeast of the Project site (south of El Sobrante Road) would provide the necessary runoff detention in order to mitigate for urban flows generated by the proposed development. Based on the analysis presented in the Project's Hydrology Report (IS/MND Appendix 11), post development runoff from the site would decrease during the 100 year (Q100) storm events (i.e., from 535.7 CFS under pre-development conditions to 421.1 CFS under post-development conditions). Accordingly, total runoff from the site would not substantially increase with Project implementation, thereby demonstrating that the Project would not substantially increase erosion hazards as compared to the existing condition. Since the drainage associated with the Project would be fully controlled via the on-site drainage plan and/or would be similar to existing conditions, soil erosion and the loss of topsoil would not increase substantially as compared to existing conditions.

In addition, the Project Applicant is required to prepare and submit to the County for approval of a Project-specific Storm Water Pollution Prevention Plan (SWPPP) and Water Quality Management Plan (WQMP). The SWPPP and WQMP must identify and implement an effective combination of

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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erosion control and sediment control measures (i.e., Best Management Practices, or BMPs) to reduce or eliminate discharge to surface water from storm water and non-storm water discharges. Adherence to the requirements noted in the Project's required WQMP (refer to IS/MND Appendix I2) and site-specific SWPPP would further ensure that potential erosion and sedimentation effects would be less than significant.

b) Expansive soils are soils that experience volumetric changes in response increases or decreases in moisture content. Relatively thin, rigid structural elements such as building floor slabs and exterior concrete flatwork may experience uplift, shifting, or cracking as a result of swelling or contraction of expansive soils. In recognition of these issues, Section 1808 of the California Building Code contains provisions for design of building foundations and floor slabs to mitigate the potential detrimental effects of expansive soils. Based on the analysis included in the Project's geotechnical reports, (IS/MND Appendices F1 and F2) most onsite soil and bedrock material will typically possess "very low" to "medium" expansion potential (Petra, 2015, p. 19). Furthermore, based on the preliminary grading plan, imported soil material may be required to establish the planned finished grade elevations. Depending on the source of the imported soil, it is possible that expansive soils may be incorporated into onsite fills and ultimately be exposed at finished grades within proposed building pad areas. This is evaluated as a potentially significant impact for which mitigation would be required.

c) No septic tanks or alternative waste water disposal systems are proposed to be constructed or expanded as part of the Project. Accordingly, no impact would occur.

Mitigation:

M-GEO-23 (Condition of Approval 60.Planning.003) In the event that imported soil material is required to establish the design finished grades within the site, adequate control shall be provided prior to and during import operations to ensure that the imported soil material is compatible with onsite soils in terms of expansion potential. If, after completion of grading, it is determined that near-surface soils within building pad areas exhibit an elevated expansion potential, then grading plans shall demonstrate that the proper design of building foundations, floor slabs and exterior improvements are designed to alleviate the potential uplift forces that can develop in expansive soils..

Monitoring:

M-GEO-23 A qualified geotechnical consultant shall be responsible for monitoring imported soils materials for their expansive potential. If soils are determined to contain expansive properties, then the Project's geologist shall ensure appropriate measures are incorporated to protect building foundations, floor slabs, and other exterior improvements.

19. Erosion	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a) Change deposition, siltation, or erosion that may modify the channel of a river or stream or the bed of a lake?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in any increase in water erosion either on or off site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Source: Project Application Materials; On-site Inspection; *Hydrology Report*, MDS Consulting, July 31, 2015; *Project Specific Water Quality Management Plan*, MDS Consulting, August 3, 2015

Findings of Fact:

a & b) As indicated under the discussion and analysis of Threshold 18.a), above, proposed grading activities associated with the Project would temporarily expose underlying soils to water and air, which would increase erosion susceptibility while the soils are exposed. Exposed soils would be subject to erosion during rainfall events or high winds due to the removal of stabilizing vegetation and exposure of these erodible materials to wind and water. Erosion by water would be greatest during the first rainy season after grading and before the Project's structure foundations are established and paving and landscaping occur. Erosion by wind would be highest during periods of high wind speeds when soils are exposed.

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

Following construction, erosion on the Project site would be minimized, as the areas disturbed during construction would be landscaped or covered with impervious surfaces. Only nominal areas of exposed soil, if any, would occur in the site's landscaped areas. The only potential for erosion effects to occur during Project operation would be indirect effects from storm water discharged from the property. As detailed in the Hydrology Report prepared for the proposed Project (IS/MND Appendix 11), the proposed detention basin to be located southeast of El Sobrante Road would provide the necessary runoff detention in order to mitigate for urban flows generated by the proposed development. Based on the analysis presented in the Project's Hydrology Report, post development runoff from the site would decrease during the 100 year (Q100) storm events (i.e., from 535.7 CFS under pre-development conditions to 421.1 CFS under post-development conditions). Accordingly, total runoff from the site would not substantially increase with Project implementation, thereby demonstrating that the Project would not substantially increase erosion hazards as compared to the existing condition. Since the drainage associated with the Project would be fully controlled via the on-site drainage plan and/or would be similar to existing conditions, the rate and amount of erosion would not increase substantially as compared to existing conditions; thus, impacts due to water erosion would be less than significant under long-term conditions. Furthermore, because the Project would not substantially alter the drainage patterns of the site as compared to the existing condition, there would be no impact due to changes in the deposition, siltation, or erosion that may modify the channel of a river or stream or the bed of a lake, and no impact would occur.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Mitigation: No mitigation is required beyond mandatory compliance with the BMPs specified in the site-specific WQMP, which would be enforced as part of the Project's conditions of approval.

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

20. Wind Erosion and Blowsand from project either on or off site.

a) Be impacted by or result in an increase in wind erosion and blowsand, either on or off site?

Source: General Plan, Figure S-8 (Wind Erosion Susceptibility Map); Ord. 460, Sec. 14.2; Ord. 484

Findings of Fact:

Proposed grading activities would expose underlying soils at the Project site, which would increase erosion susceptibility during grading and construction activities. Exposed soils would be subject to erosion due to the removal of stabilizing vegetation and exposure of these erodible materials to wind. Erosion by wind would be highest during periods of high wind speeds.

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

Following construction, wind erosion on the Project site would be negligible, as the disturbed areas would be landscaped or covered with impervious surfaces. Therefore, implementation of the proposed Project would not significantly increase the risk of long-term wind erosion on- or off-site, and impacts would be less than significant.

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

Monitoring: Construction contractors shall ensure compliance with the BMPs specified in the site-specific WQMP. The Riverside County Building and Safety Department shall verify that the various BMPs have been adhered to during both construction and prior to final grading inspection.

GREENHOUSE GAS EMISSIONS Would the project

21. Greenhouse Gas Emissions

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

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

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Source: *Lake Ranch (TTM No. 36730) Greenhouse Gas Analysis*, Urban Crossroads, Inc., April 13, 2015;

Findings of Fact: Background

Global Climate Change (GCC) refers to the change in average meteorological conditions on the Earth with respect to temperature, wind patterns, precipitation, and storms. Global temperatures are regulated by naturally occurring atmospheric gases such as water vapor, CO₂ (Carbon Dioxide), NO₂ (Nitrous Oxide), CH₄ (Methane), hydrofluorocarbons, perfluorocarbons and sulfur hexafluoride. These particular gases are important due to their residence time (duration they stay) in the atmosphere, which ranges from 10 years to more than 100 years. These gases allow solar radiation into the Earth's atmosphere, but prevent radioactive heat from escaping, thus warming the Earth's atmosphere. GCC can occur naturally as it has in the past with the previous ice ages. According to the California Air Resources Board (CARB), the climate change since the industrial revolution differs from previous climate changes in both rate and magnitude. (Urban Crossroads, 2015b, p. 10).

Gases that trap heat in the atmosphere are often referred to as GHG's. GHG's are released into the atmosphere by both natural and anthropogenic (human) activity. Without the natural greenhouse gas effect, the Earth's average temperature would be approximately 61° Fahrenheit cooler than it is currently. The cumulative accumulation of these gases in the Earth's atmosphere is considered to be the cause for the observed increase in the Earth's temperature. (Urban Crossroads, 2015b, pp. 10-11).

Although California's rate of growth of GHG emissions is slowing, the state is still a substantial contributor to the U.S. emissions inventory total. In 2004, California is estimated to have produced 492 million gross metric tons of carbon dioxide equivalent (CO₂e) GHG emissions. Despite a population increase of 16 percent between 1990 and 2004, California has substantially slowed the rate of growth of GHG emissions due to the implementation of energy efficiency programs as well as adoption of strict emission controls (Urban Crossroads, 2015b, p. 11).

An individual project like the proposed Project cannot generate enough GHG emissions to effect a discernible change in global climate. However, the proposed Project may participate in the potential for GCC by its incremental contribution of GHG combined with the world-wide increase of all other sources of GHG, which when taken together constitute potential influences on GCC (Urban Crossroads, 2015b, p. 9).

Methodology

CEQA Guidelines Section 15064.4 (b) (1) states that a lead agency may use a model or methodology to quantify GHG emissions associated with a project. On October 2, 2013, the SCAQMD in conjunction with the California Air Pollution Control Officers Association (CAPCOA) released the latest version of the California Emissions Estimator Model™ (CALEEMOD™) v2013.2.2. The purpose of this model is to more accurately calculate construction-source and operational-source criteria pollutants (NO_x, VOC, PM₁₀, PM_{2.5}, SO_x, and CO) and greenhouse gas (GHG) emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved from mitigation measures. As such, the latest version of CALEEMOD™ was used for this Project to determine construction and operational air quality impacts. (Urban Crossroads, 2015b, pp. 33-34).

Thresholds for Determining Significance

In order to assess the significance of a proposed project's environmental impacts it is necessary to

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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identify quantitative or qualitative thresholds which, if exceeded, would constitute a finding of significance. While Project-related GHG emissions can be estimated, the direct impacts of such emissions on climate change and global warming cannot be determined on the basis of available science. There is no evidence at this time that would indicate that the emissions from a project the size of the proposed Project would directly affect global climate change. The CEQA Guideline amendments do not identify a threshold of significance for greenhouse gas emissions, nor do they prescribe assessment methodologies or specific mitigation measures. Instead, they call for a "good faith effort, based on available information, to describe, calculate, or estimate the amount of greenhouse gas emissions resulting from a project." The amendments encourage lead agencies to consider many factors in performing a CEQA analysis and preserve lead agencies' discretion to make their own determinations based upon substantial evidence. (Urban Crossroads, 2015b, pp. 27-28).

The CEQA Guidelines indicate that a project would potentially result in a significant impact on climate change if a project were to: a) generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment, or b) conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. (Urban Crossroads, 2015b, p. 27).

A 30% reduction from BAU conditions is utilized as the significance threshold for GHG impacts, based on the Riverside County Planning Department's Standard Operating Procedure. The "Standard Operating Procedure" released in May 2010 by the County of Riverside Planning Department states that, "until such time as a binding regulatory guidance or a more specific threshold is adopted by a regulatory agency, a demonstration by the project applicant that the project has reduced GHG emission by 30% or more below a business-as-usual standard shall suffice for demonstrating the project has a less than significant impact." The SOP later states that "for purposes of this Standard Operating Procedure, "business-as-usual" shall mean those emissions that would occur in 2020 if the average baseline emissions during the 2002-2004 period were grown to 2020 levels without control" (Urban Crossroads, 2015b, p. 31) Based on discussion within the Riverside County Planning Department's Standard Operating Procedure, the analysis approach applied herein is appropriate and applicable in answering the two CEQA questions related to GHG emissions for the proposed Project (Urban Crossroads, 2015b, p. 33).

Project-Related Greenhouse Gas Emissions

In order to assess the Project's potential to result in significant impacts due to GHG emissions, a Project-specific greenhouse gas analysis was conducted for the Project. A copy of the greenhouse gas analysis is provided as Appendix G to this IS/MND. Provided below is a summary of the findings from the Project's GHG analysis.

Project-Related Greenhouse Gas Emissions

On October 2, 2013, the SCAQMD in conjunction with the California Air Pollution Control Officers Association (CAPCOA) released the latest version of the California Emissions Estimator Model™ (CalEEMod™) v2013.2.2. The purpose of this model is to more accurately calculate construction-source and operational-source criteria pollutant (NO_x, VOC, PM₁₀, PM_{2.5}, SO_x, and CO) and greenhouse gas (GHG) emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved from mitigation measures. Accordingly, the latest version of CalEEMod™ has been used for this Project to determine construction and operational air quality impacts. Output from the model runs for both construction and operational activity are provided in Appendix 3.1 of the Project's Greenhouse Gas Analysis (IS/MND Appendix G). (Urban Crossroads, 2015b, pp. 33-34)

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Construction Emissions

Construction activities associated with the proposed Project will result in emissions of CO₂ and CH₄ from construction activities. The types of construction equipment and material use would be very similar for buildout of the currently adopted zoning and the proposed Project. As such, GHG emissions related to construction activity identified in the report, *Lake Ranch (TTM No. 36730) Air Quality Impact Analysis Report*, prepared by Urban Crossroads, Inc., would represent construction activity for both the business as usual (BAU) and Project scenarios. For the construction phase Project emissions, GHGs are quantified and amortized over the life of the Project. To amortize the emissions over the life of the Project, the SCAQMD recommends calculating the total greenhouse gas emissions for the construction activities, dividing it by the a 30 year project life then adding that number to the annual operational phase GHG emissions. As such, construction emissions were amortized over a 30 year period and added to the annual operational phase GHG emissions (Urban Crossroads, 2015b, p. 34).

Operational Emissions

Operational activities associated with the proposed Project would result in emissions of CO₂, CH₄, and N₂O from the following primary sources (Urban Crossroads, 2015b, p. 34):

- Area Source Emissions
- Energy Source Emissions
- Mobile Source Emissions
- Solid Waste
- Water Supply, Treatment and Distribution

Please refer to Section 3.5 of the Project’s greenhouse gas analysis (IS/MND Appendix G) for a detailed description of the various sources of GHGs associated with the above operational characteristics. (Urban Crossroads, 2015b, pp. 35-36)

Emissions Summary

The total amount of Project-related GHG emissions for BAU scenario would total 6,501.69 MTCO_{2e}, as shown on Table EA-18, *Total Annual Project Greenhouse Gas Emissions (BAU Year 2005)*. The total amount of Project-related GHG emissions for the year 2020, which accounts for compliance with regulations adopted to reduce GHGs as well as project design features that would be imposed by Mitigation Measures M-GG-1 and M-GG-2, would total 4,519.46 MTCO_{2e} as shown on Table EA-19, *Total Annual Project Greenhouse Gas Emissions (BAU Year 2005)* (Urban Crossroads, 2015b, pp. 36-37). Regulations that would apply to the proposed Project and that would serve to reduce GHG emissions include the following (Urban Crossroads, 2015b, p. 6):

- Global Warming Solutions Act of 2006 (AB 32)
- Regional GHG Emissions Reduction Targets/Sustainable Communities Strategies (SB 375)
- Pavely Fuel Efficiency Standards (AB 1493). Establishes fuel efficiency ratings for new vehicles.
- Title 24 California Code of Regulations (California Building Code). Establishes energy efficiency requirements for new construction.
- Title 20 California Code of Regulations (Appliance Energy Efficiency Standards). Establishes energy efficiency requirements for appliances.
- Title 17 California Code of Regulations (Low Carbon Fuel Standard). Requires carbon content of fuel sold in California to be 10% less by 2020.
- Statewide Retail Provider Emissions Performance Standards (SB 1368). Requires energy generators to achieve performance standards for GHG emissions.

Potentially Significant Impact Less than Significant with Mitigation Incorporated Less Than Significant Impact No Impact

Table EA-18 Total Annual Project Greenhouse Gas Emissions (BAU Year 2005)

Emission Source	Emissions (metric tons per year)			
	CO ₂	CH ₄	N ₂ O	Total CO ₂ E
Construction Emissions (amortized over 30 years)	100.38	0.017	—	100.74
Area	69.90	8.59e-3	1.20e-3	70.45
Energy	1,155.17	0.04	0.02	1,160.86
Mobile Sources	4,891.83	0.42	—	4,900.60
Waste	64.75	3.83	—	145.11
Water Usage	107.18	0.58	0.01	123.93
Total CO₂E (All Sources)	6,501.69			

Source: CalEEMod™ model output, See Appendix 3.1 of the Greenhouse Gas Analysis for detailed model outputs.
 Notes: Totals obtained from CalEEMod™ and may not total 100% due to rounding. Table results include scientific notation. e is used to represent times ten to the power (which would be written as 10ⁿ) and is followed by the value of the exponent. (Urban Crossroads, 2015b, Table 3-2)

Table EA-19 Year 2020 Greenhouse Gas Emissions Summary (With Project Design Features)

Emission Source	Emissions (metric tons per year)			
	CO ₂	CH ₄	N ₂ O	Total CO ₂ E
Construction Emissions (amortized over 30 years)	100.38	0.017	—	100.74
Area	69.90	5.72e-3	1.20e-3	70.39
Energy	844.36	0.03	0.01	849.16
Mobile Sources	3,277.73	0.11	—	3,280.04
Waste	64.75	3.83	—	145.11
Water Usage	60.64	0.47	0.01	74.02
Total CO₂E (All Sources)	4,519.46			

Source: CalEEMod™ model output, See Appendix 3.1 of the Greenhouse Gas Analysis for detailed model outputs.
 Notes: Totals obtained from CalEEMod™ and may not total 100% due to rounding. Table results include scientific notation. e is used to represent times ten to the power (which would be written as 10ⁿ) and is followed by the value of the exponent. (Urban Crossroads, 2015b, Table 3-3)

- California Water Conservation in Landscaping Act of 2006 (AB1881). Requires local agencies to adopt the Department of Water Resources updated Water Efficient Landscape Ordinance or equivalent by January 1, 2010 to ensure efficient landscapes in new development and reduced water waste in existing landscapes.
- Renewable Portfolio Standards (SB 1078). Requires electric corporations to increase the amount of energy obtained from eligible renewable energy resources to 20 percent by 2010 and 33 percent by 2020.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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As shown in Table EA-20, *Summary of GHG Emissions for BAU vs Project*, with implementation of Mitigation Measures M-GG-1 and M-GG-2 and mandatory compliance with the above-listed regulations, the Project would achieve an emissions reduction of 30.49% when compared to the BAU scenario. This reduction meets the target reduction percentage of 30% based on the Riverside County Planning Department's SOP. (Urban Crossroads, 2015b, p. 36)

Would the Project:

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

As shown in Table EA-20, with implementation of Mitigation Measures M-GG-1 and M-GG-2 and compliance with standard regulatory requirements, the Project would achieve a GHG reduction of approximately 30.49% below BAU, which exceeds the County's threshold of significance of 30%

below BAU. Accordingly, the Project's GHG emissions would be less than significant on both a direct and cumulative basis, and additional mitigation (beyond M-GG-1 and M-GG-2) would not be required.

Table EA-20 Summary of GHG Emissions for BAU vs Project

Category	CO2e Emissions	
	BAU, Year 2005 Without Project Design Features	Project, Year 2020 With Project Design Features
	Metric Tons per Year	
Construction	100.74	100.74
Area	70.45	70.39
Energy Use	1,160.86	849.16
Mobile Sources	4,900.60	3,280.04
Waste Disposed	145.11	114.11
Water Use	123.93	74.02
Total	6,501.69	4,519.46
Project Improvement over BAU	30.49%	

b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?

As indicated above, the Project would be subject to the following regulatory requirements related to GHG emissions:

- Global Warming Solutions Act of 2006 (AB 32)
- Regional GHG Emissions Reduction Targets/Sustainable Communities Strategies (SB 375)
- Pavely Fuel Efficiency Standards (AB1493). Establishes fuel efficiency ratings for new vehicles.
- Title 24 California Code of Regulations (California Building Code). Establishes energy efficiency requirements for new construction.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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- Title 20 California Code of Regulations (Appliance Energy Efficiency Standards). Establishes energy efficiency requirements for appliances.
- Title 17 California Code of Regulations (Low Carbon Fuel Standard). Requires carbon content of fuel sold in California to be 10% less by 2020.
- California Water Conservation in Landscaping Act of 2006 (AB 1881). Requires local agencies to adopt the Department of Water Resources updated Water Efficient Landscape Ordinance or equivalent by January 1, 2010 to ensure efficient landscapes in new development and reduced water waste in existing landscapes.
- Renewable Portfolio Standards (SB 1078). Requires electric corporations to increase the amount of energy obtained from eligible renewable energy resources to 20 percent by 2010 and 33 percent by 2020.

Assuming mandatory compliance with the above-listed regulatory measures, the following provides a discussion and analysis of the Project's consistency with the provisions of AB 32 and SB 375.

Project Consistency with AB 32

AB 32 requires California to reduce its GHG emissions to 1990 levels by 2020. CARB identified reduction measures to achieve this goal as set forth in the CARB Scoping Plan. To evaluate the Project's GHG impacts the proposed Project's emissions are compared with the BAU scenario to determine if the development is likely to be consistent with the Scoping Plan designed to implement AB 32 in California, which calls for an approximate 30% reduction from BAU. (Urban Crossroads, 2015b, p. 1)

On February 10, 2014, CARB released a Draft Proposed First Update of the Scoping Plan. The draft recalculates 1990 GHG emissions using new global warming potentials identified in the IPCC Fourth Assessment Report released in 2007. Based on the revised 2020 emissions level projection identified in the 2011 Final Supplement and the updated 1990 emissions levels identified in the discussion draft of the First Update, achieving the 1990 emissions level in 2020 would require a reduction of 78 MTCO_{2e} (down from 509 MTCO_{2e}), or approximately 15.3 percent (down from 30 percent), from the BAU condition. (Urban Crossroads, 2015b, pp. 1-2)

Although CARB has released an update to the Scoping Plan and reduction targets from BAU, it is still appropriate to utilize the previous 30% reduction from BAU since the modeling tools available are not able to easily segregate the inclusion of the renewable portfolio standards, and Pavley requirements that are now included in the revised BAU scenario. The proposed Project would generate GHG emissions from a variety of sources which would all emit CO₂, CH₄, and N₂O. GHGs could also be indirectly generated by incremental electricity consumption and waste generation from the proposed Project. (Urban Crossroads, 2015b, p. 2)

As stated previously, the Scoping Plan recommends strategies for implementation at the statewide level to meet the goals of AB 32. The Scoping Plan recommendations serve as statewide strategies to reduce the state's existing GHG emissions and contributions from proposed projects. Table EA-21, *Project Consistency With Scoping Plan Greenhouse Gas Emission Reduction Strategies*, highlights measures that have or will be developed under the Scoping Plan and that would be applicable to the Project. Therefore, the Project would not conflict with or obstruct implementation of AB 32. (Urban Crossroads, 2015b, p. 2)

Project Consistency with SB 375

Senate Bill 375 (SB 375) creates a formal process that builds on the experience of voluntary regional

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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visioning initiatives in California, often referred to as "Regional Blueprints." Furthering the goals of AB 32, SB 375 relies on the regional collaboration by local officials to address California's goals for reducing the portion of the emissions of greenhouse gases that stems from automobile travel (light duty auto and light duty trucks only). SB 375 requires local metropolitan planning agencies to prepare a Sustainable Communities Strategy (SCS) that demonstrates how the region will meet its GHG reduction targets through integrated land use, housing, and transportation planning. More specifically, SB 375 provides CEQA relief for residential and mixed-use projects that are consistent with an approved SCS or Alternative Planning Strategy (APS). (Urban Crossroads, 2015b, p. 2)

The Southern California Association of Governments (SCAG) is the metropolitan planning agency for the project area. The SCS for the southern California region, including Riverside, Los Angeles, Orange, and San Bernardino counties was prepared by SCAG and approved on April 4, 2012. The SCS incorporates goals to concentrate future development and provide residential and mixed use developments in proximity to transit hubs in order to reduce vehicle miles traveled and, thereby, reduce GHG emissions from light duty auto and light duty trucks. (Urban Crossroads, 2015b, p. 2)

The Governor's Office of Planning and Research published the guidance document Senate Bill 375 CEQA Provision Flow Charts to assist in understanding SB 375's CEQA options. Based on Chart 1, since the Project is not consistent with general plan land use designations, density, and building intensity, the Project does not qualify for SB 375 CEQA provisions and the lead agency should use the standard CEQA process. (Urban Crossroads, 2015b, p. 2)

Inconsistency with SB 375 does not in itself constitute a significant impact to GHGs, largely because SB 375 targets a very specific sector for GHG reductions (passenger cars and light-duty trucks). Thus, if a Project's emissions overall (when considering all sectors) are less than an applicable threshold, then a finding of less than significant can also be made. As such, a Project's GHG emissions may be found to be less than the identified threshold despite being inconsistent with the land use designations or densities found in a SCS. (Urban Crossroads, 2015b, p. 3)

For purposes of analysis, the applicable threshold utilized for determining significance is whether or not the Project can reduce emissions by 30% from BAU consistent with the County of Riverside's SOP. This reduction target is also consistent with the overall AB 32 reduction target of approximately 30 percent. It should be noted that SB 375 is a small piece of the State's overall reduction target pursuant to AB 32. For this Project, although the SB 375-specific targets are not met, an evaluation of the Project's overall GHG emissions including all emission sectors (including light duty auto and light duty trucks only and other sectors of vehicles) indicates that the Project is consistent with the applicable threshold adopted by the lead agency, and consistent with the overall reduction targets set forth by AB 32. Consequently the Project would result in a less than significant GHG impact. (Urban Crossroads, 2015b, p. 3)

Conclusion

As indicated in the above analysis, the proposed Project would be consistent with, or otherwise would not conflict with, the provisions of AB 32 and SB 375. Additionally, and as demonstrated under the analysis of Threshold 21.a), with the implementation of Mitigation Measures M-GG-1 and M-GG-2 and mandatory compliance with applicable regulations to reduce GHG emissions, the Project would achieve an emissions reduction of 30.49% when compared to the BAU scenario. This reduction meets the target reduction percentage of 30% based on Riverside County Planning Department's SOP. Other than the provisions of AB 32, SB 375, and the County's SOP, there are no other plans, policies, or regulations adopted for the purpose of reducing GHG emissions that are applicable to the

Potentially Significant Impact Less than Significant with Mitigation Incorporated Less Than Significant Impact No Impact

Project. Accordingly, with implementation of Mitigation Measures M-GG-1 and M-GG-2 the Project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases, and a less-than-significant impact would occur.

Table EA-21 Project Consistency With Scoping Plan Greenhouse Gas Emission Reduction Strategies

Scoping Plan Measure	Measure Number	Project Consistency
Pavley Motor Vehicle Standards (AB 1493)	T-1	The project's residents would purchase vehicles in compliance with CARB vehicle standards that are in effect at the time of vehicle purchase.
Limit High GWP Use in Consumer Products	H-4	The project's residents would use consumer products that would comply with the regulations that are in effect at the time of manufacture.
Motor Vehicle Air Conditioning Systems – Reduction from Non-Professional Servicing	H-1	The project's residents would be prohibited from performing air conditioning repairs and required to use professional servicing.
Tire Pressure Program	T-4	Motor vehicles driven by the project's residents would maintain proper tire pressure when their vehicles are serviced.
Low Carbon Fuel Standard	T-2	Motor vehicles driven by project's residents would use compliant fuels in the future.
Water Use Efficiency	W-1	The project includes measures to minimize water use and maximize efficiency.
Green Buildings	GB-1	The project will be required to be constructed in compliance with state or local green building standards in effect at the time of building construction.
Air Conditioning Refrigerant Leak Test During Vehicle Smog Check	H-5	Motor vehicles driven by the project's residents would comply with the leak test requirements during smog checks.
Renewable Portfolios Standard (33% by 2020)	E-3	The electricity used by residents in the proposed project will benefit from reduced GHG emissions resulting from increased use of renewable energy sources.
Energy Efficiency Measures (Electricity)	E-1	The project will comply with energy efficiency standards for electrical appliances and other devices at the time of building construction.
Energy Efficiency (Natural Gas)	CR-1	The project will comply with energy efficiency standards for natural gas appliances and other devices at the time of building construction through compliance of the 2013 Title 24 and CalGreen code.
Greening New Residential and Commercial Construction	GB-1	The project's buildings would meet green building standards that are in effect at the time of design and construction.

(Urban Crossroads, 2015b, Table 1-2)

Mitigation:

M-GG-1 (Condition of Approval 80.Planning.019): Prior to the issuance of building permits, the Project Applicant shall submit energy demand calculations to the County demonstrating that the increment of the Project for which building permits are being requested would achieve a minimum 10% increase in energy efficiencies beyond 2013

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California Building Code Title 24 performance standards. Representative energy efficiency/energy conservation measures to be incorporated in the Project would include, but would not be not limited to, those listed below (it being understood that the items listed below are not all required and merely present examples; the list is not all-inclusive and other features that would reduce energy consumption and promote energy conservation would also be acceptable):

- Increase in insulation such that heat transfer and thermal bridging is minimized;
- Limit air leakage through the structure and/or within the heating and cooling distribution system;
- Use of energy-efficient space heating and cooling equipment;
- Installation of electrical hook-ups at loading dock areas;
- Installation of dual-paned or other energy efficient windows;
- Use of interior and exterior energy efficient lighting that exceeds then incumbent California Title 24 Energy Efficiency performance standards;
- Installation of automatic devices to turn off lights where they are not needed;
- Application of a paint and surface color palette that emphasizes light and off-white colors that reflect heat away from buildings;
- Design of buildings with "cool roofs" using products certified by the Cool Roof Rating Council, and/or exposed roof surfaces using light and off-white colors;
- Design of buildings to accommodate photo-voltaic solar electricity systems or the installation of photo-voltaic solar electricity systems;
- Installation of ENERGY STAR-qualified energy-efficient appliances, heating and cooling systems, office equipment, and/or lighting products.

M-GG-2 (Condition of Approval 10.Planning.023): To reduce water consumption and the associated energy-usage, the Project will be designed to:

- Reduce outdoor water use by 30%, consistent with Riverside County Ordinance No. 859.
- Reduce indoor water use by 20% consistent with Division 4.3 of the 2013 CalGreen Residential Mandatory Measures.

Monitoring:

M-GG-1 Prior to the issuance of building permits, the energy calculations showing the required energy use reduction shall be submitted to the Riverside County Planning Department for review and approval. Compliance with the energy reduction measures assumed in the calculations shall be verified by Riverside County prior to building permit final inspection.

M-GG-2 Prior to the issuance of building permits, the Project Applicant shall demonstrate that the target reduction in outdoor water demand has been accommodated by the Project's plans.

HAZARDS AND HAZARDOUS MATERIALS Would the project

22. Hazards and Hazardous Materials

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
of hazardous materials?				
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source: Project Application Materials; Riverside County GIS; *Phase I Environmental Site Assessment and Limited Phase II Subsurface Investigation, Lake Ranch, Environ, September 2013.*

Findings of Fact:

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

Impact Analysis for Existing Conditions

An environmental site assessment was conducted for the property by Environ to assess existing conditions (refer to IS/MND Appendix H2). Based on the results of this analysis, Environ identified one "recognized environmental condition" (REC) in connection with the site. Specifically, the Project site has been used for agriculture, including orchards and row crops, since at least the 1930s. While agricultural use has ceased on the southern portions of the site, the northern portions of the site have been used continuously for agriculture since that time. Details regarding the historical use of agricultural chemicals such as pesticides and herbicides are limited. Facility personnel indicated that although only "Round Up" brand weed killer is currently used at the site, insecticides (possibly including sabadilla and another chemical known only as "Saigon") were formerly applied over the growing areas of the site from the air. Less is known about applications of agricultural chemicals early in the site's history. (Environ, 2013, p. 1)

Based on the information reviewed, and the extended agricultural history of the site, Environ performed a limited subsurface investigation of the site concurrent with the Phase I ESA, to assess the potential presence of agricultural chemicals in soil at the site. During the limited Phase II subsurface investigation conducted in August and September 2013, 40 soil borings were drilled and soil samples were collected and selectively analyzed for pesticides, metals, and other compounds (including volatile organic compounds [VOCs] and total petroleum hydrocarbons [TPH]). (Environ, 2013, p. 1)

With the exception of arsenic, all detected metals concentrations were below applicable residential scenario California Human Health Screening Levels (CHHSLs). Arsenic was detected at similarly low

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concentrations in analyzed samples; the presence of arsenic in the samples is attributed to naturally occurring background concentrations of arsenic in California soils. (Environ, 2013, p. 1)

A number of pesticides were detected in at least one soil sample collected at the site; however, of the pesticides detected, only 4,4-DDE and toxaphene exceeded their respective health based screening levels in at least one sample. Such exceedances were limited to soil samples obtained from 0.5 feet below ground surface (bgs). 4,4-DDE exceeded its residential soil CHHSL (1,600 micrograms per kilogram [$\mu\text{g}/\text{kg}$]) in four soil samples. However, detections of 4,4-DDE appear to correspond to a cancer risk of approximately 1×10^{-6} , at the conservative end of the acceptable United States Environmental Protection Agency (EPA) cancer risk range of 10^{-4} to 10^{-6} . Toxaphene exceeded its residential soil CHHSL (460 $\mu\text{g}/\text{kg}$) in two soil samples. Detections of toxaphene appear to correspond to a cancer risk of approximately 5×10^{-6} ; again at the conservative end of the acceptable US EPA risk range of 10^{-4} to 10^{-6} . (Environ, 2013, pp. 1-2)

The sample locations where 4,4-DDE and toxaphene were detected in soil at elevated concentrations at 0.5 feet bgs are located in the southwestern portion of the site, an area historically used for lettuce production. It appears that there was pesticide use related to the vegetable growing operations and that residual concentrations of pesticides remain in surface soil in this area. For sampling locations where deeper soil samples were collected at 2 feet bgs and laboratory-analyzed, concentrations of 4,4-DDE and toxaphene decline significantly with increasing depth, indicating that the pesticide residues are limited to surface soils.

Based on the results of the soil samples collected, and because the detections of both compounds are within the acceptable USEPA risk range, it is Environ's opinion that further assessment and/or remediation of the soils is not warranted. However, the presence of residual agricultural chemicals, such as pesticides, may be a potential concern with respect to worker exposure during such activities as grading and foundation excavation work. This is evaluated as a potentially significant impact for which mitigation, in the form of dust control during construction, is required. With appropriate dust control measures during construction (as required by Mitigation Measure M-AQ-2), impacts would be reduced to below a level of significance. (Environ, 2013, p. 2)

There are no other existing site conditions that have the potential to create a significant hazard to the public or environment.

Impact Analysis for Project Construction Activities

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

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

Impact Analysis for Long-Term Operational Activities

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

b) Accidents involving hazardous materials that could pose a significant hazard to the public or the environment would be highly unlikely during the construction and long-term operation of the Project and are not reasonably foreseeable. As discussed above under Threshold 22.a), the transport, use and handling of hazardous materials on the Project site during construction is a standard risk on all construction sites, and there would be no greater risk for upset and accidents than would occur on any other similar construction site. Upon buildout, the Project site would operate as a residential community, which is a land use type not typically associated with the transport, use, or disposal of hazardous materials that could be subject to upset or accident involving the release of hazardous materials into the environment. Accordingly, impacts associated with the accidental release of hazardous materials would be less than significant during both construction and long-term operation of the Project.

c) The Project site does not contain any emergency facilities nor does it serve as an emergency evacuation route. During construction of the proposed Project, improvements are planned along the Project frontage with McAllister Street and El Sobrante Road, both of which are Circulation Element roadways that likely serve as emergency access for emergency service providers. Both of these roadways would be improved as part of the Project (as explained in MND Section 0.B). During construction of the improvements to these roadways, there is a potential that emergency response times in the local area could be adversely affected. This is evaluated as a potentially significant impact for which mitigation, in the form of a traffic control plan during construction, is required. Implementation of a traffic control plan would ensure that the Project's improvements to these roadways do not significantly affect emergency service response times, thereby reducing impacts to a level below significant.

Under long-term operational conditions, the proposed Project would be required to maintain adequate emergency access for emergency vehicles via El Sobrante Road, McAllister Street, and connecting on-site roadways as required by the County. Furthermore, the Project would not result in a substantial alteration to the design or capacity of any existing public road that would impair or interfere with the implementation of evacuation procedures. Because the Project would not interfere with an adopted emergency response or evacuation plan during long-term operation, no impact would occur.