

1 ***Impact: Loss, Injury, or Death from Wildland Fires.***

2 ***Threshold j: Project construction and implementation would not expose people or structures***
3 ***to a significant risk of loss, injury or death involving wild/and fires, including where***
4 ***wild/ands are adjacent to urbanized areas or where residences are intermixed with wild***
5 ***lands.***

6 7. Project Impact(s): The Project site is not subject to wildland fires. The only lands
7 abutting the site that are subject to wildland fire hazards are areas east of the Project
8 site, which have a “very high” potential for wildlife fire hazards. However, the
9 Project would be buffered from these areas by Leon Road, which would serve as a
10 fire break and reduce the potential for wildland fire hazards on site to less-than-
11 significant levels. (DEIR, p. 4.8-22.)

12 **G. Hydrology and Water Quality.**

13 ***Impact: Altered Drainage Patterns – Erosion/Siltation Impacts Resulting in Change to***
14 ***Course of Stream or River/Runoff Capacity in Drainage Systems/Additional Sources of***
15 ***Polluted Runoff***

16 ***Thresholds a and d: Project construction and implementation would not: substantially alter***
17 ***the existing drainage pattern of the site or area, including through the alteration of the***
18 ***course of a stream or river; create or contribute runoff water that would exceed the capacity***
19 ***of existing or planned stormwater drainage systems; or provide substantial additional***
20 ***sources of polluted runoff.***

21 1. Project Impact(s): The proposed Project has been designed to attenuate post-
22 development runoff rates and amounts in a manner that approximates what occurs
23 under existing conditions. The proposed Project would not substantially alter the
24 existing drainage pattern of the Project site, and would not result in the alteration of
25 the course of any streams or rivers in a manner that would result in substantial erosion
26 or siltation on- or off-site. The proposed Project also would not create or contribute
27 runoff water that would exceed the capacity of existing or planned stormwater
28 drainage systems, and the Project would not provide substantial additional sources

1 of polluted runoff. Impacts would be less than significant. (DEIR, p. 4.9-24 and 4.9-
2 25.)

3 ***Impact: Water Quality Standards and Waste Discharge Requirements/Otherwise Degrade***
4 ***Water Quality***

5 ***Thresholds b and g: Project construction and implementation would not violate any water***
6 ***quality standards or waste discharge requirements; or, otherwise substantially degrade***
7 ***water quality.***

8 2. **Project Impact(s)**: The proposed Project incorporates several water quality retention
9 basins and would be required to comply with the Project-specific WQMP. As a
10 result, the proposed Project would not violate any water quality standards or waste
11 discharge requirements, nor would the Project otherwise substantially degrade water
12 quality. (DEIR, p. 4.9-25.)

13 ***Impact: Groundwater Supplies/Groundwater Recharge/Changes in Absorption Rates or the***
14 ***Rate and Amount of Surface Runoff***

15 ***Thresholds c and j: Project construction and implementation would not substantially***
16 ***deplete groundwater supplies or interfere substantially with groundwater recharge such that***
17 ***there would be a net deficit in aquifer volume or a lowering of the local groundwater table***
18 ***level (e.g., the production rate of pre-existing nearby wells would drop to a level which***
19 ***would not support existing land uses or planned uses for which permits have been granted,***
20 ***and would not result in substantial changes in absorption rates or the rate and amount of***
21 ***surface runoff***

22 3. **Project Impact(s)**: The Project would not result in a substantial increase in demand
23 for groundwater resources, and would not substantially deplete groundwater
24 resources or interfere with groundwater recharge. Although the Project would
25 introduce impervious surfaces on-site, the total amount of water leaving the Project
26 site at each of the discharge points that occur under existing conditions would be
27 similar to existing conditions, as all runoff from the Project site would ultimately
28 discharge to the Santa Margarita River, and eventually, the Pacific Ocean. Thus, the

1 Project would have a less-than-significant impact due to interference with
2 groundwater recharge by reducing total flows, and a less-than-significant impact due
3 to substantial changes in the absorption rates or the amount of surface runoff. (DEIR,
4 p. 4.9-25.)

5 ***Impact: Housing or Structures Within a 100-Year Flood Hazard Area***

6 ***Thresholds e and f:*** Project construction and implementation would not place housing or
7 structures within a 100-year flood hazard area, as mapped on a federal Flood Hazard
8 Boundary or Flood Insurance Rate Map or other flood hazard delineation map; or, place
9 within a 100-year flood hazard area structures which would impede or redirect flood flows.

10 4. Project Impact(s): The proposed Project would not place structures or housing within
11 a 100-year flood hazard area, as all areas subject to potential flood hazards would be
12 within areas Planned for Open Space – Water (Water Quality Basin) uses. Impacts
13 would be less-than-significant. (DEIR, p. 4.9-25.)

14 ***Impact: Best Management Practices – Vectors/Odors, etc.***

15 ***Threshold h:*** Project construction and implementation would not include new or retrofitted
16 stormwater Treatment Control Best Management Practices (BMPs) (e.g. water quality
17 treatment basins, constructed treatment wetlands), the operation of which could result in
18 significant environmental effects (e.g. increased vectors and odors).

19 5. Project Impact(s): There are no components of the Project's BMPs that would result
20 in significant environmental effects, such as odors and vectors. On-site water quality
21 retention basins would be required to be designed to drain within 48 hours, pursuant
22 to the Santa Margarita Region Hydrology Model (SMRHM) requirements.
23 Therefore, any impacts would be less than significant. (DEIR, p. 4.9-25.)

24 ***Impact: Altered Drainage Patterns – Changes to Course of Stream or River or Increase***
25 ***Rate or Amount of Surface Runoff Resulting in Flooding On- or Off-Site.***

26 ***Threshold i:*** Project construction and operation would not substantially alter the existing
27 drainage pattern of the site or area, including through the alteration of the course of a
28 stream or river, or substantially increase the rate or amount of surface runoff, in a manner

1 that would result in flooding on- or off-site.

2 6. Project Impact(s): The proposed Project has been designed to retain the site's existing
3 drainage pattern to the extent possible, and proposed water quality retention basins
4 on-site would ensure that post-development flows are similar to those that occur
5 under existing conditions. As such, the Project would not result in on- or off-site
6 flooding impacts due to a substantial alteration to the existing drainage pattern of the
7 site or area, including due to the alteration of the course of a stream or a river. As
8 such, any impacts would remain less than significant. (DEIR, p. 4.9-25.)

9 ***Impact: Loss, Injury, or Death Involving Flooding, Including Flooding as a Result of the***
10 ***Failure of a Levee or Dam.***

11 ***Threshold k: Project construction and implementation would not expose people or***
12 ***structures to a significant risk of loss, injury, or death involving flooding, including flooding***
13 ***as a result of the failure of a levee or dam (Dam Inundation Area).***

14 7. Project Impact(s): The Project site has the potential to be exposed to dam inundation
15 from the Diamond Valley Lake. Compliance with the Applicable Regulatory
16 Requirements, and improvements proposed by the Project on-site would ensure that
17 the Project is not subject to inundation as a result of any potential flood hazards,
18 including from failure of a levee or dam. (DEIR, p. 4.9-25.)

19 ***Impact: Surface Water Amount Changes***

20 ***Threshold l: Project construction and implementation would not result in substantial***
21 ***changes in the amount of surface water in any water body.***

22 8. Project Impact(s): The proposed Project has been designed to ensure that post-
23 development flows are similar to those that occur under existing conditions. As such,
24 the Project would not result in a substantial change in the amount of water that
25 reaches the Santa Margarita River or any other water body. Impacts would be less
26 than significant. (DEIR, p. 4.9-25.)

27 **H. Land Use and Planning.**

28 ***Impact: Substantial Alterations to Present and Planned Land Use.***

1 **Threshold a:** *Project construction and implementation would result in a less-than-*
2 *significant impact regarding alternation of the present or planned land use of an area.*

3 1. Project Impact(s): Although the proposed Project would change the site's existing
4 land use designations, the proposed Project would not result in a substantial alteration
5 of the present or planned land uses in the Project area that could result in a significant
6 environmental effect associated with such changes to land use designations.
7 Additionally, proposed land uses are largely similar to those identified by the current
8 General Plan and adopted Specific Plan. (DEIR, p. 4.10-24.)

9 **Impact:** *Effects to Land Uses Within City Sphere of Influence and/or Within Adjacent City*
10 *or County Boundaries.*

11 **Threshold b:** *Project construction and implementation would have a less-than-significant*
12 *impact regarding effects to land uses within a city sphere of influence and/or within adjacent*
13 *city or county boundaries.*

14 2. Project Impact(s): The Project site is located within the sphere of influence of the
15 City of Murrieta, and is located to the adjacent south of the City of Menifee boundary.
16 The Project would not conflict with the surrounding land uses within the Murrieta
17 SOI and the City of Menifee in ways that would create significantly adverse
18 environmental effects to these surrounding communities. (DEIR, p. 4.10-24.)

19 **Impact:** *Inconsistency with Existing or Proposed Zoning Designations.*

20 **Threshold c:** *Project construction and implementation would not result in a significant*
21 *environmental effect due to an inconsistency with the site's existing or proposed zoning.*

22 3. Project Impact(s): Although the proposed Project would entail changing the site's
23 existing zoning classifications, the proposed Project would not result in a significant
24 environmental effect due to an inconsistency with the site's existing or proposed
25 zoning. (DEIR, p. 4.10-24.)

26 **Impact:** *Land Use Compatibility – Zoning*

27 **Threshold d:** *Project construction and implementation would have a less-than-significant*
28 *impact due to an incompatibility with existing surrounding zoning.*

1 4. Project Impact(s): Although the proposed Project would entail changing the site's
2 existing zoning classifications, the proposed Project would not result in a significant
3 environmental effect due to an inconsistency with existing surrounding zoning
4 classifications. (DEIR, p. 4.10-24.)

5 ***Impact: Land Use Compatibility – Existing and Planned Surrounding Land Uses***

6 ***Threshold e: Project construction and implementation would have a less-than-significant***
7 ***impact due to an incompatibility with existing and planned surrounding land uses.***

8 5. Project Impact(s): Although the proposed Project proposes to change the site's
9 existing land use designations, the proposed Project would not result in a significant
10 environmental effect due to an incompatibility with existing or planned surrounding
11 land uses. (DEIR, p. 4.10-24.)

12 ***Impact: Consistency with General Plan Land Use Designations and Policies.***

13 ***Threshold f: Project construction and implementation would be consistent with the land use***
14 ***designations and policies of the County's General Plan, including those of the adopted***
15 ***Specific Plan and proposed amendment thereto.***

16 6. Project Impact(s): The Project would be consistent with the SCAG RTP/SCS goals,
17 the policies of the adopted Specific Plan 312A1, as well as the General Plan and
18 Southwest Area Plan policies. (DEIR, p. 4.10-24.)

19 ***Impact: Disruptions or Divisions to Physical Arrangement of an Established Community***

20 ***Threshold g: Project construction and implementation would not disrupt or divide the***
21 ***physical arrangement of an established community (including a low-income or minority***
22 ***community).***

23 7. Project Impact(s): Existing and proposed residential communities surround the
24 Project site to the north, east, south, and west, as shown on Figure 2-3 of the Draft
25 EIR; however, there are no components of the proposed Project with the potential to
26 physically divide any of these existing communities. Upon completion of the
27 proposed Project, pedestrian pathways and vehicular roadways would be
28 accommodated throughout the development, which would ensure that access to and

1 between surrounding residential neighborhoods would not be affected. The proposed
2 Project would not physically disrupt or divide any established communities and
3 impacts would remain less than significant. (DEIR, p. 4.10-22 to 4.10-24.)

4 **I. Noise.**

5 ***Impact: Permanent Ambient Noise Increase***

6 ***Threshold f: Project implementation would not result in a substantial permanent increase***
7 ***in ambient noise levels in the Project vicinity above levels existing without the Project.***

- 8 1. **Project Impact(s):** As shown in Table 4.11-18 of the DEIR, hourly noise levels
9 associated with the park/school athletic field activities, basketball game activities,
10 and parking lot vehicle movements are expected to range from 23.2 to 53.9 dBA Leq
11 at the sensitive off-site and on-site receiver locations. As indicated in Table 4.11-19
12 of the DEIR, the Project would not contribute to a substantial operational noise level
13 increase that could expose sensitive receptors to excessive noise levels. The Project-
14 related operational noise levels are only evaluated under daytime conditions since
15 parks and schools are not typically open during the nighttime hours. Therefore, the
16 proposed Project would not result in a permanent increase in noise due to Project-
17 related operational noise, and impacts would be less than significant. (DEIR, p. 4.11-
18 50.)

19 ***Impact: Substantial Temporary or Periodic Increase in Ambient Noise Levels.***

20 ***Threshold g: Project construction and implementation would not result in a substantial***
21 ***temporary or periodic increase in ambient noise levels in the Project vicinity above levels***
22 ***existing without the Project.***

- 23 2. **Project Impact(s):** As shown in Table 4.11-20 of the DEIR, when the peak reference
24 noise level is operating at the closest point to the nearest the sensitive receiver
25 location noise levels would range from 45.0 to 82.9 dBA Leq at the sensitive receiver
26 locations in the County of Riverside and the City of Menifee. (DEIR, p. 4.11-50.)
27 As shown in Table 4.11-20 of the DEIR, Project-related construction noise would
28 not exceed the construction noise standard of 85 dBA CNEL (8-hour average) which

1 is applicable in the County of Riverside and the City of Menifee. Thus, construction
2 noise would be less than significant. Although construction noise would be less than
3 significant, is temporary, intermittent, and is of short duration, standard Mitigation
4 Measure MM 4.11-6 is nonetheless identified in Subsection 4.11.9 of the DEIR to
5 further reduce the potential for nuisance noise levels at the nearby noise-sensitive
6 residential uses to the maximum feasible extent. (DEIR, p. 4.11-43.)

7 **J. Population and Housing.**

8 *Impact: Exceedance of Regional and/or Local Population Projections*

9 *Threshold e: Project construction and implementation would not cumulatively exceed*
10 *official regional or local population projections.*

- 11 1. Project Impact(s): The proposed Project would exceed the Riverside County General
12 Plan's projection of residents for the site by approximately 477 residents. Although
13 the Project would exceed population projections for the site, the increased population
14 growth would represent a 0.2% population increase within the SWAP, and a 0.02%
15 population increase within Riverside County, which would represent a negligible
16 population increase. Thus, a less-than-significant impact would occur. (DEIR, p.
17 4.13-7.)

18 *Impact: Growth Inducement.*

19 *Threshold f: Project construction and implementation would not induce substantial*
20 *population growth in an area, either directly (for example, by proposing new homes and*
21 *businesses) or indirectly (for example, through extension of roads or other infrastructure).*

- 22 1. Project Impact(s): The proposed Project would develop residential and school uses
23 on the Project site which would induce population growth in the area. However, the
24 increase of 477 residents on the Project site represents a nominal increase of 8.9%
25 population increase within the entire Specific Plan area, 0.2% population increase
26 within the SWAP, and a 0.02% population increase within Riverside County. Thus,
27 population growth on-site would not be substantial within the overall scale of
28 Riverside County. Furthermore, construction of the proposed school site would not

1 indirectly induce population growth because roadway improvements along Keller
2 Road would not allow for an increased roadway capacity, and the ROW would
3 decrease with implementation of the proposed Project, thus allowing for fewer cars
4 to utilize the area. Therefore, the proposed Project would not induce substantial
5 population growth in the area directly or indirectly. A less-than-significant impact
6 would occur. (DEIR, p. 4.13-7 and 4.13-8.)

7 **K. Public Services.**

8 *Impact: Fire Services and Facilities.*

9 *Threshold a: Project construction and implementation would not result in substantial*
10 *adverse physical impacts associated with the provision of new or physically altered*
11 *government facilities or the need for new or physically altered fire protection facilities, the*
12 *construction of which could cause significant environmental impacts, in order to maintain*
13 *acceptable service ratios, response times or other performance objectives for fire services.*

14 2. Project Impact(s): With payment of mandatory DIF fees, the proposed Project's
15 potential direct and cumulatively-considerable impacts to the Riverside County Fire
16 Department would be reduced to less-than-significant levels, and the Project would
17 not result in or require the construction of new fire protection facilities that could
18 result in a significant impact to the environment. (DEIR, p. 4.14-15.)

19 *Impact: Police Services and Facilities.*

20 *Threshold b: Project construction and implementation would not result in substantial*
21 *adverse physical impacts associated with the provision of new or physically altered sheriff*
22 *facilities or the need for new or physically altered governmental facilities, the construction*
23 *of which could cause significant environmental impacts, in order to maintain acceptable*
24 *service ratios, response times or other performance objectives for sheriff services.*

25 3. Project Impact(s): With payment of mandatory DIF fees, the proposed Project's
26 potential direct and cumulatively-considerable impacts to the Riverside County
27 Sheriff's Depart would be reduced to less-than-significant levels, and the Project
28 would not result in or require the construction of new police protection facilities that

1 could result in a significant impact to the environment. (DEIR, p. 4.14-15.)

2 **Impact: Educational Services and Facilities.**

3 **Threshold c:** *Project construction and implementation would not result in substantial*
4 *adverse physical impacts associated with the provision of new or physically altered*
5 *educational facilities, need for new or physically altered governmental facilities, the*
6 *construction of which could cause significant environmental impacts, in order to maintain*
7 *acceptable service ratios, response times or other performance objectives for public schools.*

8 4. Project Impact(s): The Project would generate approximately 487 students.
9 Additionally, the proposed Project includes an 11.6-acre elementary school site
10 within Planning Area 42 that would accommodate all or a portion of the Project-
11 generated elementary and/or middle school students. A new high school is also being
12 planned in the unincorporated Winchester area that could accommodate the 97 high
13 school students that the Project would generate. Although the Project would result
14 in less-than-significant impacts associated with demand for school services, the
15 payment of mandatory school impact fees would further ensure that the proposed
16 Project would not result in significant direct or cumulative impacts to the ability of
17 the MUSD and PUHSD to provide for school services. The proposed Project would
18 not require the construction of new school facilities (beyond the elementary school
19 site in Planning Area 42) that could result in a significant impact to the environment.
20 (DEIR, p. 4.14-15.)

21 **Impact: Library Services and Facilities.**

22 **Threshold d:** *Project construction and implementation would not result in substantial*
23 *adverse physical impacts associated with the provision of new or physically altered library*
24 *facilities, the construction of which could cause significant environmental impacts, in order*
25 *to maintain acceptable service ratios, response times or other performance objectives for*
26 *libraries.*

27 5. Project Impact(s): Although the Project would contribute to a need for new or
28 expanded library facilities, it is not possible to identify environmental impacts that

1 may be associated with such new or expanded library facilities until a specific
2 proposal and design for such facilities are prepared by Riverside County.
3 Accordingly, impacts due to the construction of new or expanded library facilities
4 are too speculative for evaluation in this EIR (State CEQA Guidelines § 15145).
5 Environmental effects of such library facilities and associated mitigation would be
6 identified through a future CEQA process required in association with any future
7 proposals for new or expanded library facilities. Accordingly, Project impacts to
8 library services and facilities are evaluated as less than significant on both a direct
9 and cumulative basis. (DEIR, p. 4.14-15.)

10 *Impact: Health Services and Facilities.*

11 *Threshold e: Project construction and implementation would not result in substantial*
12 *adverse physical impacts associated with the provision of new or physically altered health*
13 *services facilities, the construction of which could cause significant environmental impacts,*
14 *in order to maintain acceptable service ratios, response times or other performance*
15 *objectives for health services.*

16 6. Project Impact(s): With payment of mandatory DIF fees, the proposed Project would
17 result in less-than-significant direct and cumulative impacts to health services
18 facilities, and the Project would not result in or require the construction of new health
19 services facilities that could result in a significant impact to the environment. (DEIR,
20 p. 4.14-15.)

21 **L. Recreation.**

22 *Impact: New or Expanded/Deterioration of Existing Recreational Facilities*

23 *Thresholds a and b: Project construction and implementation would not: include*
24 *recreational facilities or require the construction or expansion of recreational facilities*
25 *which might have an adverse physical effect on the environment; or result in the use of*
26 *existing neighborhood or regional parks or other recreational facilities such that substantial*
27 *physical deterioration of the facility would occur or be accelerated.*

28 1. Project Impact(s): With Project approval, the total parkland demand within the

1 French Valley Specific Plan boundaries would be 29.1 acres, while a total of 40.1
2 acres of parkland are planned. Additionally, and as concluded throughout this EIR,
3 the Project's direct and cumulative impacts associated with the construction of the
4 Project would be less than significant, or would be reduced to the maximum practical
5 extent with the application of mitigation measures. Due to the excess amount of
6 parkland within the Specific Plan area, the Project would not result in the
7 deterioration of existing neighborhood or regional parks. (DEIR, pp. 4.15-5 & 4.15-
8 7.)

9 **M. Transportation and Traffic.**

10 *Impact: Air Traffic- Patterns/Increase in Traffic Levels/Safety Risks*

11 *Threshold c: Project construction and implementation would not result in a change in air*
12 *traffic patterns, including either an increase in traffic levels or a change in location that*
13 *results in substantial safety risks.*

- 14 1. Project Impact(s): The Project does not propose an air travel component (e.g.,
15 runways, helipads, or any direct increase in air travel); thus, air traffic would not be
16 directly generated by the proposed Project. The maximum building height limit at
17 the Project site would be 40 feet. Thus, the Project would not include any vertical
18 component that would be of sufficient height to obstruct the flight path or change air
19 traffic patterns at any of the nearby airport facilities, including French Valley Airport
20 (approximately 2.0 miles to the south of the Project site). The Project site is located
21 within the Airport Influence Area (AIA) for the French Valley ALUCP. The Project
22 would not necessitate a change in air traffic patterns. The proposed Project would
23 generate a resident population at the Project site, which could result in a nominal
24 increase in demand for passenger airline service in the Southern California area.
25 However, the relatively small scale of the development in relation to the demand for
26 passenger air travel within the area would result in a small, immeasurable, increase
27 in air traffic levels and air traffic patterns and safety risks would not change.
28 Therefore, impacts associated air traffic would be less than significant. (DEIR, p.

1 4.16-28.)

2 ***Impact: Alter Waterborne, Rail, or Air Traffic.***

3 ***Threshold d: Project construction and implementation would not alter waterborne, rail, or***
4 ***air traffic.***

5 2. Project Impact(s): The Project site is located approximately 3.2 miles northwest of the
6 Skinner Reservoir, approximately 4.0 miles southwest of Diamond Valley Lake,
7 approximately 11.8 miles to the east of Lake Elsinore, and approximately 30 miles
8 east of the Pacific Ocean. No navigable bodies of water occur on the Project site, nor
9 are any of the Project components associated with waterborne traffic. Therefore, the
10 Project would have no potential to alter waterborne traffic, and would have no impact.
11 (DEIR, p. 4.16-28.) The nearest rail corridor to the Project site is located
12 approximately 6 miles (31,680 feet) to the north. The proposed Project does not entail
13 any activities related to rail traffic. Therefore, the Project would not alter rail traffic,
14 and no impacts would occur. The French Valley Airport is located approximately 2.0
15 miles to the south of the Project site, and the Project is located within the AIA of the
16 French Valley Airport ALUCP. The Project would not necessitate a change in air
17 traffic patterns. Accordingly, the Project would not alter air traffic patterns, and
18 would result in a less-than-significant impact on air traffic levels. (DEIR, p. 4.16-29.)

19 ***Impact: Design Feature Hazards/Incompatible Uses.***

20 ***Threshold e: Project construction and implementation would not substantially increase***
21 ***hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible***
22 ***uses (e.g. farm equipment).***

23 3. Project Impact(s): During the County's review process for the Project's proposed
24 Specific Plan and Tentative Tract Map, the County of Riverside reviewed the
25 proposed design plans to ensure that no hazardous roadway features would be
26 implemented. The proposed master-planned community would not include any
27 components that would result in incompatible uses on roadways, including heavy
28 equipment, etc. Accordingly, the proposed Project would not create or substantially

1 increase safety hazards due to a design feature or incompatible use. Impacts
2 associated with this issue would be less than significant. During the Project's
3 construction phase, no temporary hazards are reasonably foreseeable. Regardless,
4 all Project-related construction traffic would be required to comply with a temporary
5 traffic control plan that meets the applicable requirements of the California Manual
6 on Uniform Traffic Control Devices. Although impacts would be less than
7 significant, compliance with the traffic control plan would be assured by Mitigation
8 Measure MM 4.16-1. (DEIR, p. 4.16-29.)

9 ***Impact:*** *New or Altered Roadway Maintenance.*

10 ***Threshold f:*** *Project construction and implementation would not cause an effect upon, or a*
11 *need for new or altered maintenance of roads that would result in significant environmental*
12 *effects.*

13 4. **Project Impact(s):** All roadways within the proposed development would require
14 maintenance by the County of Riverside. Maintenance of the major roadways within
15 the proposed Project or the off-site improvements to Keller Road or Leon Road
16 would not result in significant impacts to the environment. Impacts associated with
17 the physical construction of these roadways already are evaluated in appropriate
18 sections of this EIR, and any identified impacts have been mitigated to the maximum
19 feasible extent. Accordingly, the Project would have a less-than-significant impact.
20 (DEIR, p. 4.16-43.)

21 **N. Utilities and Service Systems.**

22 ***Impact:*** *Water Treatment and Supplies*

23 ***Thresholds a and b:*** *Project construction and implementation would not: require or result*
24 *in the construction of new water treatment facilities or expansion of existing facilities, the*
25 *construction of which would cause significant environmental effects; or require new or*
26 *expanded entitlements for water service.*

27 1. **Project Impact(s):** EMWD would service the Project with potable and non-potable
28 water based on existing and planned water supplies as documented in its UWMP and

1 a water supply assessment prepared for the Project. Adequate water supplies are
2 available to service the site and no new or expanded water entitlements would be
3 needed to serve the Project. With the exception of local potable and non-potable
4 water conveyance lines, the Project would not require the installation of any
5 additional water facilities that could result in a significant impact other than what is
6 discussed throughout the respective issue areas of the EIR. The installation of local
7 water and non-potable water lines to service the Project would result in a less-than-
8 significant environmental impact. (DEIR, p. 4.17-20.)

9 ***Impact: Wastewater Facilities and Capacity***

10 ***Thresholds c and d:*** Project construction and implementation would not: require or result
11 in the construction of new wastewater treatment facilities, including septic systems, or
12 expansion of existing facilities, the construction of which would cause significant
13 environmental effects; or result in a determination by the wastewater treatment provider
14 that serves or may service the Project that it does not have adequate capacity to serve the
15 Project's projected demand in addition to the provider's existing commitments.

16 2. Project Impact(s): There is adequate capacity at the Temecula Valley Regional Water
17 Reclamation Facility (RWRF) to treat waste water that would be generated by the
18 proposed Project. Although the Project's incremental contribution to waste water
19 generation may contribute to an ultimate need for expansion of the Temecula Valley
20 RWRF and/or the need for construction of additional waste water treatment facilities,
21 such expanded capacity would not be directly attributable to the proposed Project
22 and impacts to the environment that may result from such expansion is too
23 speculative for evaluation. Therefore, the Project's impacts due to new expanded
24 waste water facilities would be less than significant. (DEIR, p. 4.17-20.)

25 ***Impact: Solid Waste Services and Facilities.***

26 ***Threshold e:*** Project construction and implementation would be served by a landfill with
27 sufficient permitted capacity to accommodate the Project's solid waste disposal needs.

28 3. Project Impact(s): Solid waste that would be generated by construction and operation

1 of the Project would represent only nominal proportions of the daily disposal
2 capacity at the potential transfer stations (Moreno Valley Transfer Station [MVTSS]
3 and/or Perris Transfer Station [PTS]) and landfills (El Sobrante Landfill, Lamb
4 Canyon Landfill, or Badlands Landfill) to be used by the Project. These transfer
5 stations and landfills are currently projected to remain open until as far into the future
6 as 2045 (El Sobrante Landfill) and have sufficient daily capacity to handle solid
7 waste generated by the Project and other cumulative developments both during
8 construction and long-term operation. Accordingly, the Project's impacts to solid
9 waste would be less than significant. (DEIR, p. 4.17-20 and 4.17-21.)

10 ***Impact: Compliance with Solid Waste Regulations.***

11 ***Threshold f: Project construction and implementation would comply with federal, state, and***
12 ***local statutes and regulations related to solid wastes (including the County Integrated Waste***
13 ***Management Plan [CIWMP]).***

14 4. Project Impact(s): The proposed Project would adhere to regulations set forth in the
15 CIWMP and other local and state regulations (including AB 341 and AB 939) during
16 both construction and long-term operations. As such, the Project would have less-
17 than-significant impacts with respect to compliance with federal, state, and local
18 statutes and regulations related to solid wastes, including the CIWMP. (DEIR, p.
19 4.17-21.)

20 ***Impact: Electricity Services and Facilities.***

21 ***Threshold g: Project construction and operation would not require or result in the***
22 ***construction of new electricity facilities that could result in significant environmental effects.***

23 5. Project Impact(s): Electrical service is currently available to the proposed Project
24 site through Southern California Edison, although existing facilities would need to
25 be expanded as necessary to provide service to the Project's planned 753 residential
26 dwelling units and 11.6-acre elementary school. However, several existing
27 transmission lines occur adjacent to the eastern boundary of the site (along Leon
28 Road); therefore, the construction of electricity facilities as necessary to serve the

1 proposed Project would occur within the on-site areas already planned for impact by
2 the Project. Therefore, the construction of electrical facilities necessary to serve the
3 proposed Project would not result in any significant impacts to the environment that
4 are not already addressed by this EIR. No additional mitigation would be required.
5 (DEIR, p. 4.17-17.)

6 ***Impact: Natural Gas Services and Facilities.***

7 ***Threshold g: Project construction and operation would not require or result in the***
8 ***construction of new natural gas facilities that could result in significant environmental***
9 ***effects.***

10 6. Project Impact(s): There are no anticipated capacity restrictions which could limit
11 the ability of SoCal Gas to provide service to the proposed Project. Points of
12 connection to SoCal Gas main lines would be resolved as the proposed Project and
13 other projects planned for the area commence their utility design and interconnection
14 plans. It is anticipated that construction of any off-site natural gas utility connections
15 would occur within existing disturbed public rights-of-way. As such, the
16 construction of these utility connections is evaluated under the appropriate subject
17 headings within this EIR. (DEIR, p. 4.17-17.) Due to long-range planning efforts
18 by the energy purveyors, Project implementation is not anticipated to result in the
19 need for the construction or expansion of off-site gas generation facilities, although
20 some new distribution lines would be necessary (as discussed above). Any future
21 need for regional energy facilities related to cumulative growth in the service areas
22 of SoCal Gas would be determined by the service agencies as part of their long-range
23 growth projections. Accordingly, provision of gas service to the proposed Project
24 site would not result in any significant environmental impacts not already addressed
25 under relevant sections of the Project's DEIR. Therefore, impacts would remain less
26 than significant. (DEIR, p. 4.17-17 & 4.17-18.)

27 ***Impact: Communications Systems.***

28 ***Threshold g: Project construction and operation would not require or result in the***

1 construction of new communication systems facilities that could result in significant
2 environmental effects.

3 7. Project Impact(s): Points of connection to Verizon communication facilities would
4 be resolved as the proposed Project and other projects planned for the area commence
5 their utility design and interconnection plans. It is anticipated that any off-site
6 construction of communication utility connections would occur within existing
7 disturbed public rights-of-way. As such, the construction of communication utility
8 connections is evaluated under the appropriate subject headings within this EIR.
9 Less than significant impacts would occur from the provision of these utilities, as all
10 lines would be installed within the disturbance areas of existing roadway rights-of-
11 way. (DEIR, p. 4.17-18.)

12 ***Impact: Storm Water Drainage Facilities.***

13 ***Threshold g: Project construction and operation would not require or result in the***
14 ***construction of new storm water drainage facilities that could result in significant***
15 ***environmental effects beyond those already evaluated and disclosed in the EIR.***

16 8. Project Impact(s): The Project proposes several on-site retention basins and drainage
17 facilities. Impacts associated with these improvements are evaluated throughout this
18 EIR, and mitigation is identified where necessary to reduce impacts to a level below
19 significance. Therefore, the construction of storm water drainage facilities needed
20 to serve the Project would not result in any impacts to the environment beyond what
21 is evaluated, disclosed, and mitigated by other sections of this EIR. Additional
22 mitigation would not be required. (DEIR, p. 4.17-18.)

23 ***Impact: Street Lighting Facilities.***

24 ***Threshold g: Project construction and operation would not require or result in the***
25 ***construction of new street lighting facilities that could result in significant environmental***
26 ***effects beyond those already evaluated and disclosed in the EIR.***

27 9. Project Impact(s): The Project would provide street lighting as required by the
28 County in accordance with Ordinance No. 461 (Roadway Standards) and Ordinance

1 No. 460 (Subdivision of the Land). All physical environmental impacts associated
2 with street lighting and maintenance would occur within the boundaries of the Project
3 site and off-site improvement areas (shown on Figure 3-17, *Proposed Physical*
4 *Disturbances*, of the DEIR), the impacts of which are described throughout the
5 Project's DEIR. Therefore, no new impacts to the environment would occur, and
6 additional mitigation would not be required. Impacts would remain less than
7 significant. (DEIR, p. 4.17-18.)

8 ***Impact: Maintenance of Public Facilities, Including Roads***

9 ***Threshold g: Project construction and operation would not require or result in a substantial***
10 ***increase in demand for maintenance of public facilities, including roads that could result in***
11 ***significant environmental effects beyond those already evaluated and disclosed in the EIR.***

12 10. Project Impact(s): Implementation of the proposed Project would result in the
13 establishment of new roadways within the Project site which would require
14 maintenance. Additionally, the Project would involve the following off-site roadway
15 improvements: half-width improvements along the Project's frontage with Leon
16 Road, half-width improvements along the segment of Keller Road that fronts
17 Planning Area 42, construction of a minimum of one lane of travel in each direction
18 along the segment of Keller Road located between the eastern Project boundary and
19 Leon Road, and construction of a minimum of one lane of travel in each direction
20 along the segment of Hilton Road between Leon Road and the eastern Project
21 boundary. All roadways within the development would require maintenance by the
22 County. Maintenance of the roadways within the proposed Project would not result
23 in any significant impacts to the environment. Impacts associated with the physical
24 construction of these roadways already are evaluated in appropriate sections of this
25 EIR, and any identified impacts have been mitigated to the maximum feasible extent.
26 Maintenance of the major roadway facilities within the Project site would be funded
27 through the Project developer's payment of Development Impact Fees (DIF) and
28 future Project residents' payment of property taxes. Therefore, the maintenance of

1 roadway proposed by the Project would not result in any new impacts to the
2 environment beyond that which is already disclosed and mitigated by this EIR, and
3 a less-than-significant impact would occur. (DEIR, p. 4.17-18.)

4 *Impact: Other Government Services.*

5 *Threshold g: Project construction and operation would not require or result in the*
6 *construction of other government facilities that could result in significant environmental*
7 *effects.*

8 11. Project Impact(s): No other known facilities would be required as a result of the
9 proposed Project. (DEIR, p. 4.17-18.) Impacts associated with the provision of
10 facilities for other governmental services are evaluated throughout the appropriate
11 issue areas in this EIR. Where cumulatively significant impacts associated with any
12 Project component are identified, mitigation measures have been imposed to reduce
13 such impacts to the maximum feasible extent. Thus, impacts associated with the
14 provision of facilities to the site would be less than significant. (DEIR, p. 4.17-21.)

15 *Impact: Energy Conservation Plan Consistency.*

16 *Threshold g: Project construction and operation would result in less-than-significant*
17 *conflicts with an adopted energy conservation plan.*

18 12. Project Impact(s): There are no adopted energy conservation plans that are applicable
19 to the proposed Project. Accordingly, the Project would have less-than-significant
20 impacts due to a conflict with an adopted energy conservation plan. (DEIR, p. 4.17-
21 19.)

22 **BE IT FURTHER RESOLVED** by the Board of Supervisors that the following environmental
23 impacts associated with the EIR No. 551 are potentially significant unless otherwise indicated, but each of
24 these impacts would be avoided or substantially lessened to a level of less than significant through existing
25 regulations, Project Design Features, and/or mitigation measures specified in Attachment A (Mitigation
26 Monitoring and Reporting Program) which is incorporated herein by this reference. Accordingly, the
27 County makes the following findings as to each of the following impacts pursuant to State CEQA
28 Guidelines section 15091 (a): "Changes or alterations have been required in, or incorporated into, the Project

1 which avoid or substantially lessen the significant environmental effect as identified in the final EIR."

2 **A. Air Quality.**

3 *Impact: Exposure of Sensitive Receptors Within One Mile of the Project Site to Substantial*
4 *Point Source Emissions.*

5 *Threshold d: Project construction and implementation would not expose sensitive receptors*
6 *which are located within one mile of the Project site to Project substantial point source*
7 *emissions, with the implementation of mitigation measures (refer to Project Resolution*
8 *Attachment "A", Mitigation Monitoring and Reporting Program).*

9 1. Project Impact(s): Construction activity is anticipated to disturb a maximum area of
10 approximately 10.0 acres on any given day (during peak rough grading activity);
11 thus, it was conservatively estimated that emissions would be concentrated over this
12 area. (DEIR, p. 4.3-24.) Without Best Available Control Measures (BACMs) and
13 mitigation, emissions during the Project's peak construction activity would exceed
14 the SCAQMD's localized significance thresholds for emissions of NO₂ and PM₁₀.
15 Accordingly, prior to mitigation, the Project's localized emissions of NO₂ and PM₁₀
16 would expose surrounding sensitive receptors to substantial pollutant concentrations;
17 this represents a near-term significant impact for which mitigation would be required.
18 (DEIR, p. 4.3-27.)

19 The Project proposes to develop the 221.5-acre Project site with 753 single-family
20 homes, a 600-student elementary school, and recreational uses. None of these uses
21 are considered "point source" emitters. According to SCAQMD LST methodology,
22 LSTs would apply to the operational phase of a proposed project, if the project
23 includes stationary sources, or attracts mobile sources that may spend long periods
24 queuing and idling at the site (e.g., transfer facilities and warehouse buildings). The
25 proposed Project does not include such uses, and thus, due to the lack of significant
26 stationary source emissions, no long-term LST analysis is needed. (Urban
27 Crossroads, 2016a, p. 37) Accordingly, operation of the Project would not have the
28 potential to expose nearby sensitive receptors to substantial pollutant concentrations;

1 thus, Project operational-related impacts would be less than significant. (DEIR, p.
2 4.3-27.)

3 The proposed Project considered herein would not produce the volume of traffic
4 required to generate a CO “hot spot” either in the context of the 2003 Los Angeles
5 hot spot study, or based on representative BAAQMD CO threshold considerations,
6 as shown on Table 4.3-11, *Project Traffic Peak Hour Traffic Volumes*, of the DEIR.
7 Therefore, CO “hot spots” are not an environmental impact of concern for the
8 proposed Project. Localized air quality impacts related to mobile-source emissions
9 would therefore be less than significant. (DEIR p. 4.3-29.)

10 2. Finding: The Mitigation Measure and County Regulations and Design Requirements
11 (RR) outlined below would reduce impacts due to near-term construction activities
12 to a less-than-significant level. The Mitigation Measure and RRs reflect changes or
13 alterations that the County has required or incorporated into the Project that would
14 avoid or substantially lessen the potentially significant impact as identified in the
15 DEIR. (CEQA Guidelines §15091(a)(1)).

16 3. Mitigation and/or County Regulations and Design Requirements (RR):

17 **Air Quality Regulatory Requirement RR-5 (10.BS GRADE 007) states:**

18 The Project is required to comply with the provisions of South Coast Air Quality
19 Management District Rule 403, “Fugitive Dust” by implementing the following dust
20 control measures during construction activities, such as earth moving activities,
21 grading, and equipment travel on unpaved roads. Prior to grading permit issuance,
22 the County shall verify that the following notes are included on the grading plan.
23 Project contractors shall be required to ensure compliance with the notes and permit
24 periodic inspection of the construction site by County of Riverside staff or its
25 designee to confirm compliance. These notes also shall be specified in bid
26 documents issued to prospective construction contractors.

- 27 • All clearing, grading, earth-moving, or excavation activities shall cease when
28 winds exceed 25 mph per SCAQMD guidelines in order to limit fugitive dust

1 emissions.

- 2 • The contractor shall ensure that all disturbed unpaved roads and disturbed
3 areas within the Project are watered at least three (3) times daily during dry
4 weather. Watering, with complete coverage of disturbed areas, shall occur at
5 least three times a day, preferably in the midmorning, afternoon, and after
6 work is done for the day.
- 7 • The contractor shall ensure that traffic speeds on unpaved roads and Project
8 site areas are reduced to 15 miles per hour or less.
- 9 • The contractor shall implement the applicable actions specified in Table 2 of
10 SCAQMD Rule 403 at all times, and shall implement the applicable actions
11 specified in Table 3 of SCAQMD Rule 403 when the applicable performance
12 standards cannot be met through use of Table 2 actions.
- 13 • The contractor shall submit a fully executed Large Operation Notification
14 (Form 403 N) to the SCAQMD within 7 days of qualifying as a Large
15 Operation.
- 16 • The contractor shall maintain daily records to document the specific dust
17 control actions taken, maintain such records for a period of not less than three
18 years; and make such records available to the SCAQMD upon request.
- 19 • The contractor shall install and maintain project signage with project contact
20 signage that meets the minimum standards of the Rule 403 Implementation
21 Handbook, prior to initiating any earthmoving activities.
- 22 • The contractor shall appoint a dust control supervisor that meets the
23 requirements under SCAQMD Rule 403 subpart (e) paragraph (1)(E).
- 24 • The contractor shall notify the SCAQMD in writing within 30 days after the
25 site no longer qualifies as a Large Operation as defined by paragraph (c)(21)
26 of SCAQMD Rule 403.
- 27 • The contractor shall resubmit the Large Operation Notification (Form 403 N)
28 on an annual basis at least 30 days prior to the expiration date, pursuant to

1 SCAQMD Rule 403 subpart (e) paragraph (2).

2 *Timing/Implementation:* Prior to grading permit issuance

3 *Enforcement Monitoring:* County of Riverside Building and Safety Department

4 **Air Quality Regulatory Requirement RR-6 states:**

5 he Project is required to comply with the provisions of South Coast Air Quality
6 Management District Rule 113, Table of Standards, by requiring that all architectural
7 coatings must consist of low VOCs (i.e., VOCs of less than 100 g/l) unless otherwise
8 specified in the SCAQMD Table of Standards.

9 *Timing/Implementation:* Prior to grading permit issuance

10 *Enforcement Monitoring:* County of Riverside Building and Safety Department

11 **Air Quality Regulatory Requirement RR-7 states:**

12 The Project's Air Quality Impact Analysis (AQIA) identifies a number of Project
13 design features including energy-saving programs, sustainable design features, and
14 operational programs. These design features are specified in proposed Specific Plan
15 No. 312, Amendment No. 2, summarized in Subsection 1.4 of the Project's AQIA.
16 Compliance with these Project design features would be assured by the County's
17 future review of implementing building permits for compliance with the Specific
18 Plan and would reduce air pollutant emissions.

19 *Timing/Implementation:* Prior to final building inspection

20 *Enforcement Monitoring:* County of Riverside Building and Safety Department

21 **Air Quality Regulatory Requirement RR-8 states:**

22 The Project is required to comply with applicable SCAQMD rules for construction
23 activities on the Project site. SCAQMD Rules that are currently applicable during
24 construction activity for this Project include but are not limited to: Rule 1403
25 (Asbestos); Rule 1113 (Architectural Coatings); Rule 431.2 (Low Sulfur Fuel); Rule
26 403 (Fugitive Dust); and Rule 1186 / 1186.1 (Street Sweepers).

27 *Timing/Implementation:* Prior to grading permit issuance

28 *Enforcement Monitoring:* County of Riverside Building and Safety Department

1 **Air Quality Regulatory Requirement RR-9 states:**

2 The Project is required to comply with the provisions of SCAQMD Rule 402,
3 “Nuisance” which requires that a person shall not discharge air contaminants or other
4 materials that would cause health or safety hazards to any considerable number of
5 persons or the public.

6 *Timing/Implementation:* During construction and/or long-term operation

7 *Enforcement Monitoring:* County of Riverside Building and Safety Department

8 **Mitigation Measure 4.3-1 states:**

9 Prior to grading permit issuance, the County shall verify that the following note is
10 included on the grading plan. Project contractors shall be required to ensure
11 compliance with the notes and permit periodic inspection of the construction site by
12 County of Riverside staff or its designee to confirm compliance. This note also shall
13 be specified in bid documents issued to prospective construction contractors.

14 “During grading activity, all construction equipment (>150
15 horsepower) shall be California Air Resources Board (CARB) Tier
16 3 Certified or better. The construction contractor shall keep a log of
17 all construction equipment greater than 150 horsepower
18 demonstrating compliance with this requirement, and the log shall
19 be made available for inspection by Riverside County upon
20 request.”

21 *Timing/Implementation:* Prior to grading permit issuance

22 *Enforcement Monitoring:* County of Riverside Building and Safety Department

- 23 4. Rationale: Implementation of Regulatory Requirement RR-5 through RR-9 and
24 Mitigation Measure 4.3-1 would reduce significant impacts to less than significant
25 [DEIR p. 4.3-34]. The evidence supporting these conclusions includes the discussion
26 of these impacts in Subsections S.6.2 and 4.3.8 of the DEIR.

27 **B. Biological Resources.**

28 *Impact: Conflict With Conservation Plans?*

1 *Threshold a: Project construction and implementation would not conflict with the*
2 *provisions of an adopted Habitat Conservation Plan, Natural Conservation Community*
3 *Plan, or other approved local, regional, or state conservation plan, with the implementation*
4 *of mitigation measures (refer to Project Resolution Attachment "A", Mitigation Monitoring*
5 *and Reporting Program).*

6 1. Project Impact(s): Project implementation would result in direct impacts to 0.34 acre
7 of ephemeral streambed considered "riparian/riverine" habitat under the Western
8 Riverside County Multiple Species Habitat Conservation Plan (MSHCP), requiring
9 mitigation. Additionally, the Project site contains suitable habitat for burrowing owls
10 and an individual was detected on site in January 2016; this represents a significant
11 impact due to a conflict with MSHCP policies related to the burrowing owl, and
12 mitigation is required. Moreover, the Project would result in impacts to 0.34 acre of
13 riparian/riverine resources consisting of 6,459 linear feet; this represents a conflict
14 with the MSHCP's riparian/riverine requirements, and mitigation would be required
15 to ensure Project consistency with the MSHCP. Impacts due to a conflict with the
16 MSHCP's adjacency guidelines would be less than significant with the
17 implementation of the required Regulatory Requirements and Mitigation. (DEIR, p.
18 4.4-25.)

19 2. Finding: The Mitigation Measures and County Regulations and Design
20 Requirements (RR) outlined below would reduce impacts to a less-than-significant
21 level. The Mitigation Measures and RRs reflects changes or alterations that the
22 County has required, or incorporated into the Project that would avoid or
23 substantially lessen the potentially significant impact as identified in the DEIR.
24 (CEQA Guidelines §15091(a)(1)).

25 3. Mitigation and/or County Regulations and Design Requirements (RR):

26 **Biological Resources Regulatory Requirement RR-10 states:**

27 Prior to issuance of grading permits, the Project Applicant shall make payment of
28 Western Riverside County MSHCP fees pursuant to Riverside County Ordinance

1 No. 810.

2 *Timing/Implementation:* Prior to grading permit issuance

3 *Enforcement Monitoring:* County of Riverside Planning Department

4 **Biological Resources Regulatory Requirement RR-11 states:**

5 To ensure compliance with the Western Riverside County MSHCP, the following
6 shall be required:

- 7 • As part of its review of implementing discretionary applications (e.g.,
8 building permits), Riverside County shall assure that landscaping plans do
9 not include the use of invasive plant species listed in Volume I, Table 6-2 of
10 the MSHCP.
- 11 • Prior to approval of grading permits, the Project's construction contractor
12 shall develop and implement a Storm Water Pollution Prevention Program
13 (SWPPP) to address runoff and potential water quality degradation during
14 construction.
- 15 • All construction plans (i.e., grading permits, building permits, etc.) shall
16 include the following note, compliance with which shall be assured by the
17 construction contractor: "During any nighttime construction activities, all
18 lighting shall direct lighting away from the existing MSHCP conserved lands
19 adjacent to the northwest corner of the Project site."
- 20 • Prior to issuance of building permits, Riverside County shall review plans to
21 ensure that all lighting along the perimeter of the west boundary of the Project
22 site, particularly street lamps, shall be downcast luminaries and shall be
23 shielded and oriented in a manner that would prevent spillage or glare into
24 the MSHCP conserved lands.

25 *Timing/Implementation:* Prior to building and/or grading permit issuance

26 *Enforcement Monitoring:* County of Riverside Building and Safety Department

27 **Mitigation Measure 4.4-1 states:**

28 In accordance with MSHCP Objective 6, prior to issuance of grading permits, the

1 Project Applicant shall retain a qualified biologist to perform a burrowing owl survey
2 between 6 a.m. and 12 p.m. at all potentially suitable habitat sites within the Project's
3 limits of disturbance between two and four months prior to Project commencement
4 of any ground-disturbing activities at the Project site. Should no burrowing owls
5 and/or sign of burrowing owls be detected during the survey, then a pre-construction
6 survey shall be implemented by the Project Applicant per the following
7 requirements.

8 The pre-construction survey shall be performed by a qualified biologist that will
9 survey the site for the presence/absence of burrowing owls within 14 days prior to
10 commencement of ground-disturbing activities at the Project site. If burrowing owls
11 are detected on-site during the pre-construction survey, the owls shall be
12 relocated/excluded from the site outside of the breeding season following accepted
13 protocols, and subject to the approval of the RCA and wildlife agencies.

14 If during the initial survey (conducted two and four months prior to Project
15 commencement of any ground-disturbing activities) only burrowing owl sign is
16 detected, and it cannot be discerned whether the species is still occupying the site,
17 either: (1) additional visit(s) shall be performed until it can be determined whether
18 burrowing owl occupies the site, or (2) It shall be assumed burrowing owl still
19 occupies the Project site and a Burrowing Owl Management Plan shall be prepared
20 and implemented in coordination with the Western Riverside County Regional
21 Conservation Authority (RCA) and CDFW. If additional site visits determine the
22 species is absent, then the pre-construction survey (as discussed above) shall be
23 implemented.

24 A copy of the results of the pre-construction survey (and all additional surveys) shall
25 be provided to the County of Riverside Planning Department prior to any vegetation
26 clearing and ground disturbance activities.

27 *Timing/Implementation:* Prior to grading permit issuance

28 *Enforcement Monitoring:* County of Riverside Planning Department

1 **Mitigation Measure 4.4-3 states:**

2 The Project shall mitigate impacts to 0.34 acre of Riparian/Riverine areas (6,459
3 linear feet) at a 2:1 ratio (mitigation:impact) by purchasing credits through an
4 approved mitigation bank/in-lieu fee program, in accordance with the Project's
5 DBESP (October 2016, EIR Technical Appendix C2). Mitigation credits shall be
6 purchased following the issuance of permits from the regulatory agencies, but prior
7 to impacts occurring. The Riverside-Corona Resource Conservation District
8 (RCRCD) is the proposed in-lieu fee program (ILFP). The applicant proposes to
9 purchase Restoration credits at a 2:1 ratio for riverine impacts. In the event that
10 appropriate mitigation credits are unavailable from RCRCD, the applicant will
11 submit an addendum to the DBESP that proposes an alternate mitigation strategy.
12 The alternate mitigation strategy may include a different mitigation bank/in-lieu fee
13 program or applicant-responsible mitigation. The proposed alternate mitigation
14 would require Wildlife Agency concurrence before impacts to Riparian/Riverine
15 areas could occur.

16 *Timing/Implementation:* Prior to grading permit issuance

17 *Enforcement Monitoring:* County of Riverside Planning Department/Riverside-
18 Corona Resource Conservation District

19 **Mitigation Measure 4.4-4 states:**

20 Prior to the issuance of grading permits, the Project Applicant shall obtain a Section
21 404 Permit from the U.S. Army Corps of Engineers (Corps) and a Section 401 Permit
22 from the Regional Water Quality Control Board (RWQCB) for impacts to 0.34 acre
23 of Corps and RWQCB jurisdictional areas on-site. Mitigation may include the
24 purchase of habitat credits from an agency-approved mitigation bank at a
25 minimum 1:1 ratio or payment into an in-lieu fee agreement.

26 *Timing/Implementation:* Prior to grading permit issuance

27 *Enforcement Monitoring:* U.S. Army Corp of Engineers/Regional Water Quality
28 Control Board/Riverside County Building and Safety Department

1 **Mitigation Measure 4.4-5 states:**

2 Prior to the issuance of grading permits, the Project Applicant shall obtain a Section
3 1602 Streambed Alteration Agreement from the CDFW for impacts to 0.34 acre of
4 CDFW jurisdictional areas. Mitigation may include the purchase of habitat credits
5 from an agency-approved mitigation bank at a minimum 1:1 ratio or payment into an
6 in-lieu fee agreement.

7 *Timing/Implementation:* Prior to grading permit issuance

8 *Enforcement Monitoring:* California Department of Fish and Wildlife/ Riverside
9 County Building and Safety Department

- 10 4. Rationale: Implementation of Biological Resources Regulatory Requirement RR-10
11 and RR-11 and Mitigation Measures 4.4-1 through 4.4-5 would reduce significant
12 impacts due to a conflict with the MSHCP to less-than-significant levels [DEIR p.
13 4.4-28].

14 The evidence supporting these conclusions includes the discussion of these impacts
15 in sections S.6.2 and 4.4.7 of the DEIR.

16 ***Impact:*** Adverse Effect on Endangered or Threatened Species/Habitat Modifications –
17 Candidate, Sensitive, or Special Status Species.

18 ***Thresholds b and c:*** Project construction and implementation would not have a substantial
19 adverse effect, either directly or through habitat modifications, on any endangered, or
20 threatened species, as listed in Title 14 of the California Code of Regulations (Sections 670.2
21 or 670.5) or in Title 50, Code of Federal Regulations (Sections 17.11 or 17.12); or, have a
22 substantial adverse effect, either directly or through habitat modifications, on any species
23 identified as a candidate, sensitive, or special status species in local or regional plans,
24 policies, or regulations, or by the California Department of Fish and Game or US. Wildlife
25 Service, with the implementation of mitigation measures (refer to Project Resolution
26 Attachment “A”, Mitigation Monitoring and Reporting Program).

- 27 1. Project Impact(s): The Project would not result in substantial adverse effects to
28 endangered or threatened species, nor would it modify any habitat known to support

1 threatened or endangered species. Accordingly, the Project would have no impact
2 on such species. However, without implementation of the additional mitigation
3 measures required by the MSHCP, the Project would result in significant direct and
4 cumulatively-considerable impacts to biological resources. Specifically, the Project
5 would result in the removal of burrowing owl habitat, which requires mitigation to
6 ensure impacts do not occur to nesting burrowing owls. Additionally, the Project
7 also has the potential to impact active native bird nests protected by the MBTA if
8 vegetation is removed during the nesting season (January 15 to September 15).
9 (DEIR, p. 4.4-25.)

10 2. Finding: The Mitigation Measure and County Regulations and Design Requirements
11 (RR) outlined below would reduce impacts to a less-than-significant level. The
12 Mitigation Measure and RRs reflects changes or alterations that the County has
13 required, or incorporated into the Project that would avoid or substantially lessen the
14 potentially significant impact as identified in the DEIR. (CEQA Guidelines
15 §15091(a)(1)).

16 3. Mitigation and/or County Regulations and Design Requirements (RR):

17 **Regulatory Requirement RR-10 states:**

18 Prior to issuance of grading permits, the Project Applicant shall make payment of
19 Western Riverside County MSHCP fees pursuant to Riverside County Ordinance
20 No. 810.

21 *Timing/Implementation*: Prior to grading permit issuance

22 *Enforcement Monitoring*: County of Riverside Planning Department

23 **Mitigation Measure 4.4-1 states:**

24 In accordance with MSHCP Objective 6, prior to issuance of grading permits, the
25 Project Applicant shall retain a qualified biologist to perform a burrowing owl survey
26 between 6 a.m. and 12 p.m. at all potentially suitable habitat sites within the Project's
27 limits of disturbance between two and four months prior to Project commencement
28 of any ground-disturbing activities at the Project site. Should no burrowing owls

1 and/or sign of burrowing owls be detected during the survey, then a pre-construction
2 survey shall be implemented by the Project Applicant per the following
3 requirements.

4 The pre-construction survey shall be performed by a qualified biologist that will
5 survey the site for the presence/absence of burrowing owls within 14 days prior to
6 commencement of ground-disturbing activities at the Project site. If burrowing owls
7 are detected on-site during the pre-construction survey, the owls shall be
8 relocated/excluded from the site outside of the breeding season following accepted
9 protocols, and subject to the approval of the RCA and wildlife agencies.

10 If during the initial survey (conducted two and four months prior to Project
11 commencement of any ground-disturbing activities) only burrowing owl sign is
12 detected, and it cannot be discerned whether the species is still occupying the site,
13 either: (1) additional visit(s) shall be performed until it can be determined whether
14 burrowing owl occupies the site, or (2) It shall be assumed burrowing owl still
15 occupies the Project site and a Burrowing Owl Management Plan shall be prepared
16 and implemented in coordination with the Western Riverside County Regional
17 Conservation Authority (RCA) and CDFW. If additional site visits determine the
18 species is absent, then the pre-construction survey (as discussed above) shall be
19 implemented.

20 A copy of the results of the pre-construction survey (and all additional surveys) shall
21 be provided to the County of Riverside Planning Department prior to any vegetation
22 clearing and ground disturbance activities.

23 *Timing/Implementation:* Prior to grading permit issuance

24 *Enforcement Monitoring:* County of Riverside Planning Department

25 **Mitigation Measure 4.4-2 states:**

26 Vegetation clearing of each phase of Project construction shall be conducted outside
27 of the nesting season (January 15 through September 15). If avoidance of the nesting
28 season is not feasible, then a qualified biologist shall conduct a nesting bird survey

1 within three (3) days prior to any ground disturbance, including discing, demolition
2 activities, and grading. If active nests of native species are identified, the biologist
3 shall establish suitable buffers around the nests, and the buffer areas shall be avoided
4 until the nests are no longer occupied and the juvenile birds can survive
5 independently from the nests. Typically established buffers are greater for raptors
6 than songbirds and depend upon the species, the nesting stage, and type of
7 construction activity proposed. The buffer should be 300 feet for raptors and 150
8 feet for songbirds, unless specifically determined by a qualified biologist familiar
9 with the nesting phenology of the nesting species.

10 *Timing/Implementation:* Prior to ground disturbing activities

11 *Enforcement Monitoring:* Riverside County Planning Department

12 **Mitigation Measure 4.4-3 states:**

13 The Project shall mitigate impacts to 0.34 acre of Riparian/Riverine areas (6,459
14 linear feet) at a 2:1 ratio (mitigation:impact) by purchasing credits through an
15 approved mitigation bank/in-lieu fee program, in accordance with the Project's
16 DBESP (October 2016, EIR Technical Appendix C2). Mitigation credits shall be
17 purchased following the issuance of permits from the regulatory agencies, but prior
18 to impacts occurring. The Riverside-Corona Resource Conservation District
19 (RCRCD) is the proposed in-lieu fee program (ILFP). The applicant proposes to
20 purchase Restoration credits at a 2:1 ratio for riverine impacts. In the event that
21 appropriate mitigation credits are unavailable from RCRCD, the applicant will
22 submit an addendum to the DBESP that proposes an alternate mitigation strategy.
23 The alternate mitigation strategy may include a different mitigation bank/in-lieu fee
24 program or applicant-responsible mitigation. The proposed alternate mitigation
25 would require Wildlife Agency concurrence before impacts to Riparian/Riverine
26 areas could occur.

27 *Timing/Implementation:* Prior to regulatory permit issuance

28 *Enforcement Monitoring:* County of Riverside Planning Department/Riverside

1 Corona Resource Conservation District

2 **Mitigation Measure 4.4-4 states:**

3 Prior to the issuance of grading permits, the Project Applicant shall obtain a Section
4 404 Permit from the U.S. Army Corps of Engineers (Corps) and a Section 401 Permit
5 from the Regional Water Quality Control Board (RWQCB) for impacts to 0.34 acre
6 of Corps and RWQCB jurisdictional areas on-site. Mitigation may include the
7 purchase of habitat credits from an agency-approved mitigation bank at a
8 minimum 1:1 ratio or payment into an in-lieu fee agreement.

9 *Timing/Implementation:* Prior to grading permit issuance

10 *Enforcement Monitoring:* U.S. Army Corp of Engineers/Regional Water Quality
11 Board/Riverside County Building and Safety Department

12 **Mitigation Measure 4.4-5 states:**

13 Prior to the issuance of grading permits, the Project Applicant shall obtain a Section
14 1602 Streambed Alteration Agreement from the CDFW for impacts to 0.34 acre of
15 CDFW jurisdictional areas. Mitigation may include the purchase of habitat credits
16 from an agency-approved mitigation bank at a minimum 1:1 ratio or payment into an
17 in-lieu fee agreement.

18 *Timing/Implementation:* Prior to grading permit issuance

19 *Enforcement Monitoring:* California Department of Fish and Wildlife/ Riverside
20 County Building and Safety Department

21 4. Rationale: Implementation of Biological Resources Regulatory Requirements RR-
22 10 and RR-11 and Mitigation Measures 4.4-1 through 4.4-5 would reduce significant
23 impacts to less-than-significant levels [DEIR p. 4.4-28 and 4.4-29].

24 The evidence supporting these conclusions includes the discussion of these impacts
25 in sections S.6.2 and 4.4.7 of the DEIR.

26 ***Impact:*** Riparian and Sensitive Habitat/Other Sensitive Natural Community

27 ***Threshold e:*** Project construction and implementation would not have a substantial adverse
28 effect on any riparian habitat or other sensitive natural community identified in local or

1 regional plans, policies, regulations, or by the California Department of Fish and Game or
2 US Fish and Wildlife Service, with the implementation of mitigation measures (refer to
3 Project Resolution Attachment "A", Mitigation Monitoring and Reporting Program).

4 1. Project Impact(s): The Project would permanently remove 0.34 acre of
5 riparian/riverine resources consisting of 6,459 linear feet of shallow ephemeral
6 streambed features (Drainage Complex 1 Drainage 2, and Drainage Complex 3)
7 present on the northern portion of the Project site (refer to Figure 4.4-3, Jurisdictional
8 Delineation Map. These features do not support riparian vegetation (herbaceous or
9 woody) and would support water flow only during and shortly after rainfall. These
10 features do not provide habitat to plant or wildlife species beyond what the adjacent
11 uplands provide. Accordingly, the removal of these drainage features would be
12 considered a less-than-significant impact to water resources and biological resources.
13 (DEIR, p. 4.4-22.)

14 However, because the Project would receive coverage under the MSHCP for impacts
15 to other biological resources, it would also be subject to the MSHCP requirement to
16 consider alternatives providing for 100 percent avoidance of riparian/riverine areas.
17 If avoidance is infeasible, then the unavoidable impacts must be mitigated and a
18 DBESP is required. Avoidance of the riparian/riverine areas on-site was determined
19 to be infeasible for this Project because the existing and proposed land uses for the
20 riparian/riverine areas include residential land uses under the approved French
21 Valley Specific Plan and proposed Specific Plan Amendment. Because avoidance
22 of the riparian/riverine areas on-site was determined to be infeasible for this Project,
23 a DBESP was prepared which demonstrates consistency with MSHCP policies
24 related to riparian/riverine habitat. The DBESP identifies the Project's impact to
25 0.34 acre of riparian/riverine resources as a significant impact for which
26 compensatory mitigation at a 2:1 ratio would be required. Accordingly, a significant
27 impact to riparian/riverine resources would occur prior to mitigation. (DEIR, p. 4.4-
28 22.)

1 2. Finding: The Mitigation Measure outlined below would reduce impacts to a less-
2 than-significant level. The Mitigation Measure reflects changes or alterations that
3 the County has required, or incorporated into the Project that would avoid or
4 substantially lessen the potentially significant impact as identified in the DEIR.
5 (CEQA Guidelines § 15091(a)(1)).

6 3. Mitigation and/or County Regulations and Design Requirements (RR):

7 **Mitigation Measure 4.4-3 states:**

8 Prior to regulatory permit issuance, the Project Applicant shall mitigate impacts to
9 0.34 acre of Riparian/Riverine areas (6,459 linear feet) at a 2:1 ratio
10 (mitigation:impact) by purchasing credits through an approved mitigation bank/in-
11 lieu fee program, in accordance with the Project's DBESP (October 2016, EIR
12 Technical Appendix C2). Mitigation credits shall be purchased following the
13 issuance of permits from the regulatory agencies, but prior to impacts occurring. The
14 Riverside-Corona Resource Conservation District (RCRCD) is the proposed in-lieu
15 fee program (ILFP). The applicant proposes to purchase Restoration credits at a 2:1
16 ratio for riverine impacts. In the event that appropriate mitigation credits are
17 unavailable from RCRCD, the applicant will submit an addendum to the DBESP that
18 proposes an alternate mitigation strategy. The alternate mitigation strategy may
19 include a different mitigation bank/in-lieu fee program or applicant-responsible
20 mitigation. The proposed alternate mitigation would require Wildlife Agency
21 concurrence before impacts to Riparian/Riverine areas could occur.

22 *Timing/Implementation*: Prior to regulatory permit issuance

23 *Enforcement Monitoring*: County of Riverside Planning Department/Riverside
24 Corona Resource Conservation District

25 4. Rationale: Implementation of Mitigation Measure 4.4-3 would reduce significant
26 impacts to less than significant [DEIR p. 4.4-29].

27 The evidence supporting these conclusions includes the discussion of these impacts
28 in sections S.6.2 and 4.4.7 of the DEIR,

1 ***Impact: Adverse Effect of Federally Protected Wetlands***

2 ***Threshold f: Project construction and implementation would not have a substantial adverse***
3 ***effect on federally protected wetlands as defined by Section 404 of the Clean Water Act***
4 ***(including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal,***
5 ***filling, hydrological interruption, or other means, with the implementation of mitigation***
6 ***measures (refer to Project Resolution Attachment "A", Mitigation Monitoring and***
7 ***Reporting Program).***

- 8 1. Project Impact(s): A jurisdictional delineation was conducted within the Project's
9 study area, the results of which are detailed in "Jurisdictional Delineation of the
10 Spencer's Crossing Study Area, an Approximately 221-Acre Property Located in
11 Unincorporated Riverside County" prepared by GLA and dated October 13, 2016.
12 The results of the jurisdictional delineation concluded that there are no jurisdictional
13 wetland features occurring on-site or within the off-site improvement area; however,
14 0.34-acre of federally protected streambed, consisting of 6,459 linear feet of shallow
15 ephemeral streambed features (Drainage Complex 1 Drainage 2, and Drainage
16 Complex 3) subject to Section 404 of the Clean Water Act is present on the northern
17 portion of the Project site. Because avoidance of the federally protected streambeds
18 on-site were determined to be infeasible for this Project, a DBESP was prepared
19 which demonstrates consistency with MSHCP policies related to riparian/riverine
20 habitat, which includes the federally protected streambed. The DBESP identifies the
21 Project's impact to 0.34-acre of federally protected streambed resources as a
22 significant impact for which compensatory mitigation at a 2:1 ratio would be
23 required. Accordingly, a significant impact to federally protected streambeds on-site
24 as defined by Section 404 of the Clean Water Act through direct removal, filling,
25 hydrological interruption, or other means, would occur prior to mitigation. (DEIR,
26 p. 4.4-23.)
- 27 2. Finding: The Mitigation Measure outlined below would reduce impacts to a less-
28 than-significant level. The Mitigation Measure reflects changes or alterations that

1 the County has required, or incorporated into the Project that would avoid or
2 substantially lessen the potentially significant impact as identified in the DEIR.
3 (CEQA Guidelines §15091(a)(1)).

4 3. Mitigation and/or County Regulations and Design Requirements (RR):

5 **Mitigation Measure 4.4-3 states:**

6 The Project shall mitigate impacts to 0.34 acre of Riparian/Riverine areas (6,459
7 linear feet) at a 2:1 ratio (mitigation:impact) by purchasing credits through an
8 approved mitigation bank/in-lieu fee program, in accordance with the Project's
9 DBESP (October 2016, EIR Technical Appendix C2). Mitigation credits shall be
10 purchased following the issuance of permits from the regulatory agencies, but prior
11 to impacts occurring. The Riverside-Corona Resource Conservation District
12 (RCRCD) is the proposed in-lieu fee program (ILFP). The applicant proposes to
13 purchase Restoration credits at a 2:1 ratio for riverine impacts. In the event that
14 appropriate mitigation credits are unavailable from RCRCD, the applicant will
15 submit an addendum to the DBESP that proposes an alternate mitigation strategy.
16 The alternate mitigation strategy may include a different mitigation bank/in-lieu fee
17 program or applicant-responsible mitigation. The proposed alternate mitigation
18 would require Wildlife Agency concurrence before impacts to Riparian/Riverine
19 areas could occur.

20 *Timing/Implementation:* Prior to regulatory permit issuance

21 *Enforcement Monitoring:* County of Riverside Planning Department/Riverside
22 Corona Resource Conservation District

23 4. Rationale: Implementation of Mitigation Measure 4.4-3 would reduce significant
24 impacts to less than significant [DEIR p. 4.4-29].

25 The evidence supporting these conclusions includes the discussion of these impacts
26 in sections S.6.2 and 4.4.7 of the DEIR.

27 C. **Cultural Resources.**

28 ***Impact: Archaeological Sites and Resources***

1 *Thresholds c and d: Project construction and implementation would not alter or destroy an*
2 *archaeological site; or, cause a substantial adverse change in the significance of an*
3 *archaeological resource pursuant to California Code of Regulations, Section 15064.5, with*
4 *the implementation of mitigation measures (refer to Project Resolution Attachment "A",*
5 *Mitigation Monitoring and Reporting Program).*

6 1. Project Impact(s): The Project site contains three (3) archeological resources (Sites
7 RIV-6505, RIV-6506, and P-33-0112590). Of these resources, only one component
8 of Site RIV-6505 (pictographs) is significant under CEQA criteria, due to its
9 significance with respect to the religious beliefs of the Luiseño Indians, which meets
10 the CEQA criteria of significance for being "directly associated with a scientifically
11 recognized important prehistoric or historic event or person" (CA Public Resources
12 Code Section 21083.2). The Project is designed to avoid impacts to Site RIV-6505
13 through preserving it within an open space conservation area. Sites RIV-6506 and
14 P-33-0112590 are not considered significant archaeological resources, but are
15 considered TCRs and are discussed in the impact discussion below under Threshold
16 g. Accordingly, the Project would result in less-than-significant impacts to known
17 significant archaeological resources. Regardless, there is a potential that
18 archaeological resources may be buried beneath the surface of the site that meet the
19 CEQA definition of a significant resource which could be unearthed during the
20 Project's construction process. If such resources are unearthed and are not properly
21 identified and treated, the impact would be significant. Moreover, other development
22 projects in the traditional use area of the Luiseño Indians also have the potential to
23 adversely affect archaeological resources that are significant under CEQA; thus, the
24 Project's potential impacts to significant archaeological resources also would be
25 cumulatively considerable. Mitigation is required to address these potential impacts.
26 (DEIR, p. 4.5-14.)

27 2. Finding: The Mitigation Measures and County Regulation and Design Requirement
28 (RR) outlined below would reduce impacts to a less-than-significant level. The

1 Mitigation Measures and RR reflect changes or alterations that the County has
2 required, or incorporated into the Project that would avoid or substantially lessen the
3 potentially significant impact as identified in the DEIR. (CEQA Guidelines
4 §15091(a)(1)).

5 3. Mitigation and/or County Regulations and Design Requirements (RR):

6 **Cultural Resources Regulatory Requirement RR-12 states:**

7 In the event that human remains are discovered, pursuant to California Health and
8 Safety Code §7050.5, as well as the Public Resources Code §5097 et. seq., the Project
9 Archaeologist shall have the authority to divert or temporarily halt ground
10 disturbance operation within 100 feet the area of discovery to allow for the evaluation
11 of the human remains and the surrounding vicinity. If any human remains are
12 discovered, the County Coroner and lead agency shall be contacted. The County
13 Coroner shall determine that no investigation of the cause of death is required, and
14 determine if the remains are of Native American origin. In the event that the remains
15 are determined to be of Native American origin, the NAHC shall be contacted within
16 24 hours of the discovery. The Most Likely Descendant, as identified by the NAHC,
17 shall be contacted in order to determine proper treatment and disposition of the
18 remains. If the NAHC is unable to identify a Most Likely Descendant, or if the Most
19 Likely Descendant failed to make a recommendation within 48 hours after being
20 notified by the NAHC, or the Project Applicant rejects the recommendation of the
21 Most Likely Descendent; the Project Applicant shall rebury the Native American
22 human remains and associated grave goods on the property in a location not subject
23 to further ground disturbance. Evidence of compliance with this mitigation measure,
24 if human remains are found, shall be provided to Riverside County upon the
25 completion of a treatment plan and final report detailing the significance and
26 treatment finding.

27 *Timing/Implementation:* In the event human remains are discovered on-site

28 *Enforcement Monitoring:* Riverside County Planning Department

1 **Mitigation Measure 4.5-1 states:**

2 Prior to the issuance of grading permits, prehistoric milling features located within
3 the grading envelope, including prehistoric milling features located within Site RIV-
4 6506 and P-33-011259 shall be reviewed by the County of Riverside to identify
5 which features within the grading envelope can be relocated and preserved, if
6 possible. Relocation and preservation, if possible, shall occur in association with
7 grading activities, with resources relocated to one of the areas designated for open
8 space on the Project site. The specific placement of the relocated features shall be
9 determined through a discussion between the Project Applicant, Native American
10 representative, and County of Riverside representative at the time of the review of
11 the features. Once the features are relocated, the Project Archaeologist shall record
12 their locations and prepare an archaeological site update form to register these
13 features with the Eastern Information Center (EIC) at the University of California at
14 Riverside (UCR).

15 *Timing/Implementation:* Prior to grading permit issuance

16 *Enforcement Monitoring:* Riverside County Building and Safety Department

17 **Mitigation Measure 4.5-2 states:**

18 Prior the issuance of a grading permit, the developer shall retain and enter into a
19 monitoring and mitigation service contract with a qualified Archaeologist (“Project
20 Archaeologist) for mitigation monitoring services, and to implement a Cultural
21 Resource Monitoring Program. A Cultural Resource Monitoring Plan shall be
22 developed to address the details of all activities and provide procedures that must be
23 followed in order to reduce the impacts to cultural and historical resources to a level
24 that is less than significant as well as mitigate potential impacts to undiscovered and
25 buried archeological resources associated with this Project. The Project
26 Archaeologist shall manage and oversee monitoring for all initial ground disturbing
27 activities and exaction of each portion of the Project site including clearing,
28 grubbing, tree removals, grading, trenching, stockpiling of materials, rock crushing,

1 structure demolition, etc. The project archaeologist shall have the authority to
2 temporarily divert, redirect, or halt the ground disturbance activities to allow for
3 identification, evaluation, the facilitation of consultation, and the potential recovery
4 of cultural resources in coordination with any required tribal or special interest
5 monitors. The Project Applicant shall provide written verification that a County-
6 certified archaeologist has been retained to implement the monitoring program. This
7 verification shall be presented in a letter from the project archaeologist to the County
8 of Riverside. The Project Applicant shall also provide the Cultural Resource
9 Monitoring Program to the County Archeologist for review and approval.

10 *Timing/Implementation:* Prior to grading permit issuance

11 *Enforcement Monitoring:* Riverside County Building and Safety Department

12 **Mitigation Measure 4.5-3 states:**

13 Prior to the issuance of a grading permit, the Project Applicant or construction
14 contractor shall provide evidence to the County of Riverside that the construction
15 site supervisors and crew members involved with grading and trenching operations
16 are trained during a mandatory pre-grading meeting by the Project Archeologist to
17 recognize archaeological resources should such resources be unearthed during
18 ground-disturbing construction activities. Training shall include a brief review of
19 cultural sensitivity of the Project and surrounding area; what resources could
20 potentially be identified during earthmoving activities; the requirements of the
21 monitoring program; the protocols that apply in the event inadvertent discoveries of
22 cultural resources are identified, including who to contact and appropriate avoidance
23 measures until the find(s) can be properly evaluated; and any other appropriate
24 protocols. If a suspected archaeological resource is identified on the property, the
25 construction supervisor shall be required by his contract to immediately halt and
26 redirect grading operations in a 100-foot radius around the find and seek
27 identification and evaluation of the suspected resource by the Project Archaeologist.
28 This requirement shall be noted on all grading plans and the construction contractor

1 shall be obligated to comply with the note. The Project Archaeologist shall evaluate
2 the suspected resource and make a determination of significance pursuant to
3 California Public Resources Code Section 21083.2. Evidence of the mandatory pre-
4 grading training shall be presented in the Phase IV Monitoring Report and shall
5 include a sign-in sheet for attendees of the training.

6 *Timing/Implementation:* Prior to final map approval

7 *Enforcement Monitoring:* Riverside County Planning Department

8 **Mitigation Measure 4.5-4 states:**

9 Prior to final map approval, the Project Applicant shall provide evidence to the
10 Riverside County Planning Department that an Environmental Constraints Sheet has
11 been included in the grading plans. This sheet shall indicate the presence of
12 environmentally constrained area(s) and the requirement for avoidance of resource
13 Site RIV-6505. The specific location of Site RIV-6505 shall not be depicted on any
14 publicly-accessible plans or documents. Any map of Site RIV-6505 shall be marked
15 as “Confidential – Not for Public Review” and retained in the County’s confidential
16 files.

17 *Timing/Implementation:* Prior to issuance of grading permits

18 *Enforcement Monitoring:* Riverside County Building and Safety Department

19 **Mitigation Measure 4.5-5 states:**

20 The Project Applicant shall ensure that during the original cutting of previously
21 undisturbed deposits, the Project Archaeologist shall be on-site to perform periodic
22 inspections of the excavations. The frequency of inspections will depend upon the
23 rate of excavation, the materials excavated, and the presence and abundance of
24 artifacts and features. The Project Archaeologist shall have the authority to modify
25 the monitoring program if the potential for cultural resources appears to be less than
26 anticipated. Isolates and clearly non-significant deposits will be minimally
27 documented in the field and the monitored grading can proceed.

28 *Timing/Implementation:* In the event previously unidentified cultural resources are

1 discovered

2 *Enforcement Monitoring:* Riverside County Building and Safety Department

3 **Mitigation Measure 4.5-6 states:**

4 In the event that previously unidentified cultural resources are discovered, the Project
5 Archaeologist shall have the authority to divert or temporarily halt ground
6 disturbance operation within 100 feet the area of discovery to allow for the evaluation
7 of potentially significant cultural resources. The Project Archaeologist shall contact
8 the County archaeologist at the time of discovery. The Project Archaeologist, in
9 consultation with the County archaeologist, and Native American Tribal
10 Representative (or other appropriate ethnic/cultural group representative), shall
11 determine the significance and appropriate mitigation (documentation, recovery,
12 avoidance, etc.) of the discovered resources. For significant cultural resources, a
13 Research Design and Data Recovery Program to mitigate impacts shall be prepared
14 by the Project Archaeologist and approved by the County of Riverside, then carried
15 out using professional archaeological methods. Further ground disturbance shall not
16 resume within the area of the discovery until an agreement has been reached by all
17 parties as to the appropriate preservation or mitigation measures. Prior to resuming
18 construction activities in the affected area, the discovered cultural resources shall be
19 recovered and features recorded using professional archeological methods. The
20 Project Archeologist shall determine the amount of material to be recovered for an
21 adequate artifact sample for analysis. Isolates and clearly non-significant deposits
22 shall be minimally documented in the field and the monitored grading may proceed.
23 Evidence of compliance with this mitigation measure, if a significant archaeological
24 resource is found, shall be provided to Riverside County upon the completion of a
25 treatment plan and final report detailing the significance and treatment finding.

26 *Timing/Implementation:* If any cultural material is found on-site

27 *Enforcement Monitoring:* Riverside County Planning Department

1 **Mitigation Measure 4.5-7 states:**

2 If any cultural material is discovered on the property, all cultural material collected
3 during the grading monitoring program shall be processed and curated according to
4 the current professional repository standards and the Project Applicant shall
5 relinquish ownership of all cultural resources, (with the exception of sacred items,
6 burial goods, and Human Remains) including all archaeological artifacts and non-
7 human remains as part of the required mitigation for impacts to cultural resources.
8 The collections and associated records shall be transferred, including title, to the
9 Western Science Center, a Riverside County curation facility, to be accompanied by
10 payment of the fees necessary for permanent curation, or, the artifacts may be
11 delivered to the Native American representative if that is recommended by the lead
12 agency. Evidence of compliance with this mitigation measure shall be provided to
13 Riverside County in the form of a letter from the curation facility identifying that
14 archaeological materials have been received and that all fees have been paid.

15 *Timing/Implementation:* Prior to the issuance of certificate of occupancy

16 *Enforcement Monitoring:* Riverside County

17 **Mitigation Measure 4.5-8 states:**

18 Prior to the issuance of certificate of occupancy, a final archeological report
19 documenting the field and analysis results, and interpreting the artifact and research
20 data within the research context, shall be completed and submitted to the satisfaction
21 of the County of Riverside. The report will include (at a minimum) the following: a
22 discussion of the monitoring methods and techniques used; the results of the
23 monitoring program including any artifacts recovered; an inventory of any resources
24 recovered; updated Department of Parks and Recreation Primary and Archaeological
25 Site Forms for any new resources identified, and all sites affected by the
26 development; final disposition of the resources including GPS data; artifact catalog;
27 and any additional recommendations. A final copy shall be submitted of the County
28 of Riverside, the Project Applicant, the Eastern Information Center, and the Tribe.

1 *Timing/Implementation:* Prior to the issuance of certificate of occupancy

2 *Enforcement Monitoring:* Riverside County

- 3 4. Rationale: Implementation of Cultural Resources Regulatory Requirement RR-12
4 and Mitigation Measures 4.5-1 through 4.5-8 would reduce significant impacts to
5 less than significant [DEIR p. 4.5-18].

6 The evidence supporting these conclusions includes the discussion of these impacts
7 in sections S.6.2 and 4.5.7 of the DEIR.

8 ***Impact: Tribal Cultural Resources***

9 ***Threshold g:*** *Project construction and implementation would not cause a substantial*
10 *adverse change in the significance of a tribal cultural resource as defined in Public*
11 *Resources Code 21074, with the implementation of mitigation measures (refer to Project*
12 *Resolution Attachment "A," Mitigation Monitoring and Reporting Program).*

- 13 1. Project Impact(s): As required by AB 52 and SB 18, the results of the Native
14 American consult determined that cultural resources could be impacted as a result of
15 Project implementation, which may be considered TCRs by affected tribes.
16 Specifically, Project implementation would result in direct impacts to the bedrock
17 milling features located at Site RIV-6506 and P-33-011259. Additionally, there is
18 the potential for archaeological resources to be unearthed during the Project's
19 ground-disturbing construction activities which may qualify as tribal cultural
20 resources under the Public Resources Code definition. Other development projects
21 in the traditional use area of the Cahuilla Band of Indians and the Pechanga Tribe
22 also have the potential to adversely affect tribal cultural resources that are significant
23 under CEQA. Accordingly, the Project would result in significant direct and
24 cumulatively-considerable impacts to tribal cultural resources. (DEIR, p. 4.5-14.)
- 25 2. Finding: The Mitigation Measures outlined below would reduce impacts to a less-
26 than-significant level. The Mitigation Measures reflect changes or alterations that
27 the County has required, or incorporated into the Project that would avoid or
28 substantially lessen the potentially significant impact as identified in the DEIR.

1 (CEQA Guidelines §15091(a)(1)).

2 3. Mitigation and/or County Regulations and Design Requirements (RR):

3 **Mitigation Measure 4.5-1 states:**

4 Prior to the issuance of grading permits, prehistoric milling features located within
5 the grading envelope, including prehistoric milling features located within Site RIV-
6 6506 and P-33-011259 shall be reviewed by the County of Riverside to identify
7 which features within the grading envelope can be relocated and preserved, if
8 possible. Relocation and preservation, if possible, shall occur in association with
9 grading activities, with resources relocated to one of the areas designated for open
10 space on the Project site. The specific placement of the relocated features shall be
11 determined through a discussion between the Project Applicant, Native American
12 representative, and County of Riverside representative at the time of the review of
13 the features. Once the features are relocated, the Project Archaeologist shall record
14 their locations and prepare an archaeological site update form to register these
15 features with the Eastern Information Center (EIC) at the University of California at
16 Riverside (UCR).

17 *Timing/Implementation:* Prior to grading permit issuance

18 *Enforcement Monitoring:* Riverside County Building and Safety Department

19 **Mitigation Measure 4.5-2 states:**

20 Prior the issuance of a grading permit, the developer shall retain and enter into a
21 monitoring and mitigation service contract with a qualified Archaeologist (“Project
22 Archaeologist) for mitigation monitoring services, and to implement a Cultural
23 Resource Monitoring Program. A Cultural Resource Monitoring Plan shall be
24 developed to address the details of all activities and provide procedures that must be
25 followed in order to reduce the impacts to cultural and historical resources to a level
26 that is less than significant as well as mitigate potential impacts to undiscovered and
27 buried archeological resources associated with this Project. The Project
28 Archaeologist shall manage and oversee monitoring for all initial ground disturbing

1 activities and exaction of each portion of the Project site including clearing,
2 grubbing, tree removals, grading, trenching, stockpiling of materials, rock crushing,
3 structure demolition, etc. The project archaeologist shall have the authority to
4 temporarily divert, redirect, or halt the ground disturbance activities to allow for
5 identification, evaluation, the facilitation of consultation, and the potential recovery
6 of cultural resources in coordination with any required tribal or special interest
7 monitors. The Project Applicant shall provide written verification that a County-
8 certified archaeologist has been retained to implement the monitoring program. This
9 verification shall be presented in a letter from the project archaeologist to the County
10 of Riverside. The Project Applicant shall also provide the Cultural Resource
11 Monitoring Program to the County Archeologist for review and approval.

12 *Timing/Implementation:* Prior to grading permit issuance

13 *Enforcement Monitoring:* Riverside County Building and Safety Department

- 14 4. Rationale: Implementation of Mitigation Measures 4.5-1 and 4.5-2 would reduce
15 significant impacts to less than significant [DEIR p. 4.5-18].

16 The evidence supporting these conclusions includes the discussion of these impacts
17 in sections S.6.2 and 4.5.7 of the DEIR.

18 **D. Geology and Soils.**

19 *Impact: Seismic-Related Ground Failure, Including Liquefaction*

20 *Threshold c:* Project construction and implementation would not expose people or structures
21 to seismic-related ground failure, including liquefaction, *with the implementation of*
22 *mitigation measures (refer to Project Resolution Attachment "A", Mitigation Monitoring*
23 *and Reporting Program).*

- 24 1. Project Impact(s): Based on the data obtained by the Project's geologist (Leighton)
25 from the subsurface exploration at the Project site, as well as a review of relevant
26 literature, there is a potential for liquefaction on-site. The site contains limited
27 deposits of relatively loose surficial soils overlying dense older alluvium or bedrock.
28 Groundwater was locally encountered perched at the contact between surficial soils

1 and weathered bedrock in an adjacent tract south of Baxter Road, and also reported
2 approximately 360 feet west of the southernmost portion of the site in the deeper
3 older alluvium, at a depth of 40 feet (approximate elevation 1358 amsl). The Project
4 would be required to comply with the applicable requirements of the CBC and the
5 Riverside County Building Code, which would help reduce liquefaction hazards, but
6 would not reduce impacts to below a level of significance. The Project has the
7 potential for liquefaction to occur on-site, and a significant impact would occur.
8 (DEIR, p. 4.6-10.)

9 2. Finding: The Mitigation Measure and County Regulations and Design Requirements
10 (RR) outlined below would reduce impacts to a less-than-significant level. The
11 Mitigation Measure and RRs reflect changes or alterations that the County has
12 required, or incorporated into the Project that would avoid or substantially lessen the
13 potentially significant impact as identified in the DEIR. (CEQA Guidelines
14 §15091(a)(1)).

15 3. Mitigation and/or County Regulations and Design Requirements (RR):

16 **Geology and Soils Regulatory Requirement RR-13 states:**

17 The Project is required to comply with the provisions of International Building Code
18 (IBC) for Seismic Zone 4, by following the appropriate building design and
19 construction standards for the Project site.

20 *Timing/Implementation:* Prior to the issuance of building permits

21 *Enforcement Monitoring:* County of Riverside Building and Safety Department

22 **Geology and Soils Regulatory Requirement RR-14 states:**

23 The Project is required to comply with the provisions of County Ordinance Nos. 457
24 and 547. Ordinance No. 457 requires that all projects comply with California
25 Building Codes and the International Building Codes. These codes establish site-
26 specific investigation requirements, construction standards, and inspection
27 procedures to ensure that development does not pose a threat to the health, safety,
28 and welfare of the public. In addition, Ordinance No. 547 requires that cases where

1 a proposed project falls within an earthquake fault zone as shown on the maps
2 prepared by the State Geologist, this Ordinance requires compliance with all of the
3 provisions of the Alquist-Priolo Act and the adopted policies and criteria of
4 Ordinance No. 547.

5 *Timing/Implementation:* Prior to the issuance of building permits

6 *Enforcement Monitoring:* Riverside County Building and Safety Department

7 **Mitigation Measure 4.6-1 states:**

8 Prior to issuance of building permits, the Director of the Riverside County Building
9 and Safety Division (or his/her designee) shall verify that all of the recommendations
10 given in the Project's May 26, 2016 "Preliminary Geotechnical/Geologic
11 Investigation Report (Update) Tentative Tract Map (TTM) No. 37053 Spencer's
12 Crossing – Northwest of Leon Road and Baxter Road Riverside County, California"
13 by Leighton and Associates, Inc., are incorporated into the construction and grading
14 plans. The recommendations shall include, but not be limited to the following:

- 15 • Perform earthwork in accordance with the General Earthwork and Grading
16 Specifications in Appendix C of Technical Appendix E. The
17 recommendations contained in Appendix C of Technical Appendix E, are
18 general grading specifications provided for typical grading projects and some
19 of the recommendations may not be strictly applicable to the proposed
20 Project. The specific recommendations contained in the text of this report
21 shall supersede the general recommendations in Appendix C of Technical
22 Appendix E.

23 The contract between the Project Applicant and earthwork contractor shall be
24 worded such that it is the responsibility of the contractor to place fill properly
25 in accordance with the recommendations of the Geotechnical Report, the
26 specifications in Appendix C of the Geotechnical Report, applicable County
27 Grading Ordinances, notwithstanding the testing and observation of the
28 geotechnical consultant during construction.

1 • Prior to grading, the proposed structural improvement areas (i.e. all structural
2 fill areas, pavement areas, buildings, etc.) of the site shall be cleared of
3 surface and subsurface obstructions, heavy vegetation, and boulders. Roots
4 and debris shall be disposed of off-site. Wells, septic tanks or seepage pits,
5 if encountered, shall be abandoned in accordance with the County of
6 Riverside Department of Health Services guidelines.

7 The near surface soils (including topsoil/colluvium, artificial fill, Younger
8 alluvium, and upper 2 -3 feet of older alluvium) are potentially compressible
9 in their present state and may settle under the surcharge of fills or foundation
10 loading. As such, these materials shall be removed in all settlement-sensitive
11 areas including building pads, pavement, and slopes. The depth of removal
12 shall extend into underlying dense older alluvium or bedrock, but not
13 expected to exceed a depth of 5 to 10 feet (except previous deep dozer pits
14 backfill T-6 and T-7). Dense competent older alluvium shall possess a
15 minimum of 85 percent relative compaction (based on ASTM D1557).
16 Acceptability of all removal bottoms shall be reviewed by an engineering
17 geologist or geotechnical engineer and documented in the as-graded
18 geotechnical report. The removal limit shall be established by a 1:1
19 (horizontal:vertical) projection from the edge of fill soils supporting
20 settlement-sensitive structures downward and outward to competent material
21 identified by the geotechnical consultant. This may require remedial grading
22 that extends beyond the limits of design grading. Removal will also include
23 benching into competent material as the fills rise. Areas adjacent to existing
24 property limits or protected habitat areas may require special considerations
25 and monitoring. Steeper temporary slopes in these areas may be considered.

26 • Conduct overexcavation of the cut portion of transition lots in order to
27 mitigate the impact of underlying cut/fill transition conditions, during Project
28 grading. Overexcavation shall extend to a minimum depth of 3 feet below

1 finish pad elevation or one-half of the maximum fill thickness on the lot,
2 whichever is deeper. The overexcavation need not exceed 10 feet in depth.
3 This overexcavation does not include scarification or preprocessing prior to
4 placement of fill. Overexcavation shall encompass the entire lot or extend
5 laterally beyond the building limits a horizontal distance equal to the depth
6 of overexcavation or to a minimum distance of 5 feet, whichever is greater.
7 Overexcavation bottoms shall be sloped as needed to reduce the accumulation
8 of subsurface water.

- 9 • Conduct overexcavation in the cut lots s to a depth of 3 feet below finish
10 grades and then capped with compacted fill (EI<91) in order to facilitate
11 excavation of footings and trenches in bedrock and older alluvium. Streets
12 located in the dense bedrock shall be overexcavated to a depth of 2 feet below
13 the deepest utility and then brought back up to design grades with compacted
14 fill. Lot overexcavation shall be sloped to the street a minimum of 1 percent
15 to reduce the accumulation of water.
- 16 • Remove debris and organic matter from on-site soils being re-used as
17 compacted fill. Fills placed within 10 feet of finish pad grades or slope faces
18 shall contain no rocks over 12 inches in maximum dimension. In addition,
19 encountered clayey soils layers (EI>91), if any, shall be placed at a depth
20 greater than 5 feet below finished grades.

21 Areas to receive structural fill and/or other surface improvements shall be
22 scarified to a minimum depth of 8 inches, conditioned to at least optimum
23 moisture content, and recompacted. Fill soils shall be placed at a minimum
24 of 90 percent relative compaction (based on ASTM D1557) at or above
25 optimum moisture content. Placement and compaction of fill shall be
26 performed in accordance with local grading ordinances under the observation
27 and testing of the geotechnical consultant. The optimum lift thickness to
28 produce a uniformly compacted fill will depend on the type and size of

1 compaction equipment used. In general, fill shall be placed in uniform lifts
2 not exceeding 8 inches in thickness.

3 Fill slope keyways will be necessary at the toe of all fill slopes and at fill-
4 over-cut contacts. Keyway schematics, including dimensions and subdrain
5 recommendations, are provided in Appendix C of Technical Appendix E. All
6 keyways shall be excavated into dense bedrock or dense older alluvium as
7 determined by the geotechnical engineer. The cut portions of all slope and
8 keyway excavations shall be geologically mapped and approved by a
9 geologist prior to fill placement.

10 Fills placed on slopes steeper than 5:1 (horizontal:vertical) shall be benched
11 into dense soils (see Appendix C of Technical Appendix E for benching
12 detail). Benching shall be of sufficient depth to remove all loose material. A
13 minimum bench height of 2 feet into approved material shall be maintained
14 at all times.

- 15 • Remove all oversized rock (greater than 12 inches in maximum dimension)
16 produced during Project grading. No rock in excess of 12 inches in maximum
17 dimension may be placed in any fill within 10 feet of finish grade. Oversized
18 rock may be placed in the deeper fill portions of the site, if placed in
19 accordance with the following guidelines and the specifications contained in
20 Appendix C of Technical Appendix E.

21 Within the upper 5 feet of finish grade, fill soils shall not contain rock greater
22 than 6 inches in maximum dimension in order to facilitate foundation and
23 utility trench excavation. For fill soils between 5 and 10 feet below finish
24 grade, the fill may contain rock up to 12 inches in maximum dimension and
25 shall be mixed with sufficient soil to eliminate voids. Below a depth of 10
26 feet, rocks up to a maximum dimension of 36 inches may be incorporated
27 into the fill provided adequate fines to fill all voids are present. Rocks greater
28 than 36 inches in diameter may be placed on a case-by-case basis. It is

1 anticipated that a minimum of approximately 35 to 40 percent coarse grained
2 material will be necessary to adequately fill all voids. Soil used to fill voids
3 in rock fills shall be flooded during placement with a sufficient amount of
4 water to wash soil into all voids. Material filling voids shall be compacted to
5 a minimum of 90 percent of the soil's maximum dry density. The outer 20
6 feet (10 feet vertically) of all fill slopes shall not contain rocks greater than
7 12 inches. Subdrains shall be provided at the base of all rock fills to minimize
8 the potential for a build-up of hydrostatic pressure. The grading contractor
9 shall consider the volume of possible rock disposal afforded by the design.
10 Rock disposal strategies shall be reviewed by the geotechnical consultant
11 prior to implementation.

- 12 • Implement shrinkage/bulking factors to the excavated on-site materials. The
13 volume change of excavated on-site materials upon compaction is expected
14 to vary with depth of excavation, location, material type, and compaction
15 effort during grading. As such, the in-place and compacted densities of
16 soil/bedrock materials vary and accurate determination of shrinkage and
17 bulking for any specific area cannot be made, especially in the case of this
18 project where bedrock and overburden soils vary considerably from one area
19 to another. For preliminary planning purposes the following
20 shrinkage/bulking factors shall be applied.

21 For a depth between zero and five feet, topsoil/colluvium and alluvium shall
22 have a 10% to 15% shrinkage factor applied, older alluvium shall have a 5%
23 to 15% shrinkage factor applied, and weathered granitic or metamorphic rock
24 shall have a 0% to 10% shrinkage factor applied. For a depth between five
25 and ten feet, topsoil/colluvium and alluvium shall have a 5% to 10%
26 shrinkage factor applied, older alluvium shall have a 10% shrinkage factor to
27 a 5% bulking factor applied, and weathered granitic or metamorphic rock
28 shall have a 0% to 5% bulking factor applied. For a depth greater than 10

1 feet, topsoil/colluvium and alluvium shall have no factor applied, older
2 alluvium shall have no factor applied, and weathered granitic or metamorphic
3 rock shall have a 5% to 15% bulkage factor applied with a less than five foot
4 overburden soils and heavy ripping.

5 In addition, a surface subsidence value of 0.1-foot shall be applied to
6 topographic elevations in most areas underlain by bedrock. In alluvial areas
7 subjected to agricultural disking, a subsidence value of 0.2 feet shall be
8 applied.

9 • Consult the geotechnical consultant prior to importing soils, if import
10 soils/borrow sites are needed. Import soils shall be uncontaminated, granular
11 in nature, free of organic material (loss on ignition less-than 2 percent), have
12 a very low expansion potential ($EI < 21$) and have a low corrosion impact to
13 the proposed improvements.

14 • Backfill utility trenches with compacted fill in accordance with the Standard
15 Specifications for Public Works Construction, ("Greenbook"), 2015 Edition.
16 Fill material above the pipe zone shall be placed in lifts not exceeding 8
17 inches in uncompacted thickness and shall be compacted to at least 90 percent
18 relative compaction (ASTM D 1557) by mechanical means only. Site soils
19 may generally be suitable as trench backfill provided these soils are screened
20 of rocks over 1½ inches in diameter and organic matter. If imported sand is
21 used as backfill, the upper 3 feet in building and pavement areas shall be
22 compacted to 95 percent. The upper 6 inches of backfill in all pavement areas
23 shall be compacted to at least 95 percent relative compaction.

24 Where granular backfill is used in utility trenches adjacent to moisture
25 sensitive subgrades and foundation soils, a cut-off "plug" of impermeable
26 material shall be placed in these trenches at the perimeter of buildings, and at
27 pavement edges adjacent to irrigated landscaped areas. A "plug" may consist
28 of a 5-foot long section of clayey soils with more than 35-percent passing the

1 No. 200 sieve, or a Controlled Low Strength Material (CLSM) consisting of
2 one sack of Portland-cement plus one sack of bentonite per cubic-yard of
3 sand. CLSM shall generally conform to Section 201-6 of the "Greenbook."
4 This is intended to reduce the likelihood of water permeating trenches from
5 landscaped areas, then seeping along permeable trench backfill into the
6 building and pavement subgrades, resulting in wetting of moisture sensitive
7 subgrade materials under buildings and pavements.

8 Excavation of utility trenches shall be performed in accordance with the
9 Project plans, Project specifications, and the California Construction Safety
10 Orders (most current Edition). The Project contractor shall be responsible for
11 providing a "competent person" as defined in Article 6 of the California
12 Construction Safety Orders. The Project contractors shall be advised that
13 sandy soils (such as fills generated from the on-site alluvium) could make
14 excavations particularly unsafe if all safety precautions are not properly
15 implemented. In addition, excavations at or near the toe of slopes and/or
16 parallel to slopes may be highly unstable due to the increased driving force
17 and load on the trench wall. Spoil piles from the excavation(s) and
18 construction equipment shall be kept away from the sides of the trenches.

- 19 • Direct all drainage away from slopes, structures, and pavements by means of
20 approved permanent/temporary drainage devices. Adequate storm drainage
21 of any proposed pad shall be provided to avoid wetting of foundation soils.
22 Irrigation adjacent to buildings shall be avoided when possible. As an option,
23 sealed-bottom planter boxes and/or drought resistant vegetation can be used
24 within 5-feet of buildings.
- 25 • Construct subdrains, which will be necessary in fill over cut keyways and
26 deepened overexcavations made to bury oversize rock. Subdrains may be
27 necessary in canyon fills if sufficient cover is maintained, 10 feet measured
28 from top of finished grade to top of subdrain. Fills generally saturate near

1 geologic contacts and the subdrains shall outlet this excess water to suitable
2 discharge areas. Contacts on fill over cut slopes which daylight cut material
3 can present seepage problems once irrigation of the slopes and upper pads
4 begins. The subdrains within the fill over cut keyways shall mitigate this
5 seepage problem. Subdrain details are provided in Appendix C of Technical
6 Appendix E. Canyon subdrains up to 500 lineal feet shall consist of 6-inch
7 diameter perforated pipe. Canyon subdrains greater than 500 feet shall
8 consist of 8-inch pipe and greater than 1,000 feet shall consist of 12-inch pipe.
9 A 20-foot section of non-perforated pipe shall be placed at the outlet location.
10 The connection between the perforated and non-perforated pipe shall be
11 sealed with a minimum 6-inch thick, concrete cut-off wall placed a minimum
12 of 2 feet beyond the perimeter of the gravel "burrito." All outlets shall be
13 protected with a concrete apron and cover. Subdrain pipe may be schedule
14 40 PVC (or equal) placed in accordance with Appendix C of Technical
15 Appendix E.

16 • Ensure cut slopes are observed by an engineering geologist during grading to
17 verify jointing or fracture patterns and recommend remedial measures, if
18 needed. All fill and cut slopes on the Project site would be designed and
19 constructed at 2:1 (horizontal:vertical) or flatter with a maximum height of
20 approximately 20 feet. These slopes are considered grossly stable for static
21 and pseudostatic conditions.

22 Keys shall be constructed at the toe of all fill slopes located on existing or cut
23 grade as depicted in Appendix C of Technical Appendix E. Compaction of
24 each fill lift shall extend out to the face of fill slope. The outer portion of fill
25 slopes shall be either overbuilt by 2 feet (minimum) and trimmed back to the
26 finished slope configuration or compacted in vertical increments of 5 feet
27 (maximum) by a weighted sheeps foot roller as the fill is placed. The slope
28 face shall then be track-walked by dozers of appropriate weight to achieve

1 the final slope configuration and compaction to the slope face.

2 Slope faces are inherently subject to erosion, particularly if exposed to
3 rainfall and irrigation. Landscaping and slope maintenance shall be
4 conducted as soon as possible in order to increase long-term surficial
5 stability. Berms shall be provided at the top of fill slopes. Drainage shall be
6 directed such that surface runoff on the slope face is minimized

- 7 • Design proposed foundations and slabs in accordance with the structural
8 consultants' design, the minimum geotechnical recommendations presented
9 herein, and the applicable CBC. The proposed single-family residential
10 structures may be founded on conventional or Post-tensioned slab on-grade
11 foundation systems based on a Plasticity Index of 15 and the design
12 parameters provided below. In utilizing the minimum geotechnical
13 foundation recommendations, the structural consultant shall be required to
14 design the foundation system to acceptable deflection criteria as determined
15 by the architect. Foundation footings may be designed with the following
16 geotechnical design parameters:

17 *Allowable Bearing Capacity:* 2,000 psf at a minimum depth of embedment
18 of 12 inches (minimum width of 12 inches). This bearing capacity may be
19 increased by $\frac{1}{3}$ for short-term loading conditions (e.g., wind, seismic).

20 *Sliding Coefficient:* 0.35

21 *Differential Settlement:* 0.5 inch in 40 feet horizontal distance

22 The footing width, depth, reinforcement, slab reinforcement, and the slab-
23 ongrade thickness shall be designed by the structural consultant based on
24 recommendations and soil characteristics indicated herein. If exterior
25 footings are within 5 feet horizontally of side yard swales, the footing shall
26 be embedded sufficiently to ensure embedment below the swale bottom is
27 maintained.

- 28 • Ensure post-tensioned design parameters are applied in accordance with

1 Table 3 of Technical Appendix E. The post-tensioned design parameters are
2 prepared in accordance with the Post-Tensioning Institute (PTI) Method (3rd
3 Edition).

- 4 • Consult with a qualified person/firm to evaluate the general and specific
5 moisture vapor transmission paths and any impact on the proposed
6 construction. It has been a standard of care to install a moisture retarder
7 underneath all slabs where moisture condensation is undesirable. Moisture
8 vapor retarders may retard but not totally eliminate moisture vapor movement
9 from the underlying soils up through the slabs. Moisture vapor transmission
10 may be additionally reduced by use of concrete additives. This person/firm
11 shall provide recommendations for mitigation of potential adverse impact of
12 moisture vapor transmission on various components of the structure as
13 deemed appropriate. The slab subgrade soils also shall be well wetted prior
14 to placing concrete.

- 15 • Design retaining walls on the Project site with the following
16 recommendations. Retaining wall earth pressures are a function of the
17 amount of wall yielding horizontally under load. If the wall can yield enough
18 to mobilize full shear strength of backfill soils, then the wall can be designed
19 for "active" pressure. If the wall cannot yield under the applied load, the
20 shear strength of the soil cannot be mobilized and the earth pressure will be
21 higher. Such walls shall be designed for "at rest" conditions. If a structure
22 moves toward the soils, the resulting resistance developed by the soil is the
23 "passive" resistance. Retaining walls backfilled with non-expansive soils
24 shall be designed using the equivalent fluid pressures as shown in Table 3 of
25 Technical Appendix E:

26 Unrestrained (yielding) cantilever walls shall be designed for the active
27 equivalent fluid weight value provided above for very low to low expansive
28 soils that are free draining. In the design of walls restrained from movement

1 at the top (non-yielding) such as basement or elevator pit/utility vaults, the
2 at-rest equivalent fluid weight value shall be used. Total depth of retained
3 earth for design of cantilever walls shall be measured as the vertical distance
4 below the ground surface measured at the wall face for stem design, or
5 measured at the heel of the footing for overturning and sliding calculations.
6 Should a sloping backfill other than a 2:1 (horizontal:vertical) be constructed
7 above the wall (or a backfill is loaded by an adjacent surcharge load), the
8 equivalent fluid weight values provided above shall be re-evaluated on an
9 individual case basis by Leighton and Associates, Inc. Non-standard wall
10 designs shall also be reviewed by Leighton and Associates, Inc. prior to
11 construction to check that the proper soil parameters have been incorporated
12 into the wall design.

13 All retaining walls shall be provided with appropriate drainage. The outlet
14 pipe shall be sloped to drain to a suitable outlet. Typical wall drainage design
15 is illustrated in Appendix C, Retaining Wall Backfill and Subdrain Detail of
16 Technical Appendix E. Wall backfill shall be non-expansive (EI less than or
17 equal to 21) sands compacted by mechanical methods to a minimum of 90
18 percent relative compaction (ASTM D 1557). Clayey site soils shall not be
19 used as wall backfill. Walls shall not be backfilled until wall concrete attains
20 the 28-day compressive strength and/or as determined by the Structural
21 Engineer that the wall is structurally capable of supporting backfill.
22 Lightweight compaction equipment shall be used, unless otherwise approved
23 by the Structural Engineer.

24 • Implement a minimum horizontal setback distance from the face of slopes for
25 all structural footings (retaining and decorative walls, building footings, etc.).
26 This distance shall be measured from the outside bottom edge of the footing
27 horizontally to the slope face (or to the face of a retaining wall) and shall be
28 a minimum of $H/2$, where H is the slope height (in feet).

1 Slopes with a height of less than five feet shall have a five foot minimum
2 setback. Slopes with heights between five feet to 15 feet shall have a seven
3 foot minimum setback. Slopes greater than 15 feet shall have a setback of
4 $H/2$, where H is the slope height, not to exceed 10 feet to 2:1 slope face.

5 Please note that the soils within the structural setback area possess poor
6 lateral stability and improvements (such as retaining walls, sidewalks, fences,
7 pavements, pools, etc.) constructed within this setback area may be subject
8 to lateral movement and/or differential settlement. Potential distress to such
9 improvements may be mitigated by providing a deepened footing or a pier
10 and grade-beam foundation system to support the improvement. The
11 deepened footing shall meet the setback as described above. Modifications
12 of slope inclinations near foundations may increase the setback and shall be
13 reviewed by the design team prior to completion of design or implementation.

14 • Perform additional corrosion testing on representative finish grade soil at the
15 completion of rough grading. Limited laboratory testing indicated a
16 negligible concentration of soluble sulfates in on-site soils for representative
17 samples. The laboratory test results are presented in Appendix B of
18 Technical Appendix E. Concrete foundations in contact with site soils shall
19 be designed in accordance with applicable codes. A qualified corrosion
20 engineer shall be consulted to review the results of laboratory tests and
21 coordinate additional testing if corrosion sensitive materials are to be used.

22 • Adhere to preliminary recommendations for pavement design on the Project
23 site. The preliminary pavement sections provided are meant as a minimum,
24 if thinner or highly variable pavement sections are constructed, increased
25 maintenance and repair may be needed. In order to provide the following
26 preliminary recommendations, an R-value of 35 is assumed for preliminary
27 design purposes. These recommendations are intended for planning purposes
28 only and shall not supersede minimum County requirements. For the final

1 pavement design, appropriate traffic indices shall be selected by the project
2 civil engineer or traffic engineering consultant and representative samples of
3 actual subgrade materials shall be tested for R-value. Table 6 of Technical
4 Appendix E provides guidelines for the preliminary pavement design.

5 The subgrade soils in the upper 6 inches shall be properly compacted to at
6 least 95 percent relative compaction (ASTM D1557) and shall be moisture-
7 conditioned to near optimum and kept in this condition until the pavement
8 section is constructed. Proof-rolling subgrade to identify localized areas of
9 yielding subgrade (if any) shall be performed prior to placement of aggregate
10 base and under the observation of the geotechnical consultant. Minimum
11 relative compaction requirements for aggregate base shall be 95 percent of
12 the maximum laboratory density as determined by ASTM D1557. Base rock
13 shall conform to County Standards Ordinance No. 461 or Caltrans Class 2
14 aggregate base having a minimum R-value of 78. Asphaltic concrete shall be
15 placed on compacted aggregate base and compacted to a minimum 95 percent
16 relative compaction based on the laboratory standards ASTM D1561 and
17 D2726.

18 • Conduct additional site subsurface evaluation if needed, when basin sizing is
19 better known to further characterize the subsurface profile of alluvial soils or
20 highly weathered granitic bedrock materials that may influence infiltration
21 results. A preliminary infiltration study was previously performed in
22 designated areas and results presented in the previously referenced Leighton
23 report (Leighton, 2015). The obtained infiltration rates varied from a low of
24 0.1 Inch/hour to a high of 1.45 inch/hour. Due to the highly variable
25 infiltration rates and locally shallow bedrock; additional site subsurface
26 evaluation may be considered when basin sizing is better known to further
27 characterize the subsurface profile of alluvial soils or highly weathered
28 granitic bedrock materials that may influence infiltration results.

1 • Provide Leighton and Associates, Inc. the grading plan and foundation
2 plan(s) for review prior to bid. Additionally, reasonably-continuous
3 construction observation and review during site grading and foundation
4 installation shall be required to allow for evaluation of the actual soil
5 conditions and the ability to provide appropriate revisions where required
6 during construction. Geotechnical conclusions and preliminary
7 recommendations shall also be reviewed and verified by Leighton during
8 construction, and revised accordingly if geotechnical conditions encountered
9 vary from Leighton's original findings and interpretations. Geotechnical
10 observation and testing shall be provided at the following times during
11 construction:

- 12 ○ After completion of site demolition and clearing,
- 13 ○ During preparation and overexcavation of surface soils as described
14 herein,
- 15 ○ During compaction of all fill materials,
- 16 ○ After excavation of all footings, and prior to placement of concrete,
- 17 ○ During utility trench backfilling and compaction, and
- 18 ○ When any unusual conditions are encountered.

19 Additional geotechnical exploration and analysis may be required based on
20 final development plans, for reasons such as significant changes in proposed
21 structure locations/footprints. Leighton shall review grading (civil) and
22 foundation (structural) plans, and comment further on geotechnical aspects
23 of the Project.

24 *Timing/Implementation:* Prior to the issuance of building permits

25 *Enforcement Monitoring:* Riverside County Building and Safety Department

26 4. Rationale: Implementation of Regulatory Requirements RR-13 and RR-14, and
27 Mitigation Measure 4.6-1 would reduce significant impacts to less than significant
28 [DEIR p. 4.6-24].

1 The evidence supporting these conclusions includes the discussion of these impacts
2 in sections S.6.2 and 4.6.8 of the DEIR.

3 ***Impact: On- or Off-Site Landslide, Lateral Spreading, Collapse, or Rockfall Hazards.***

4 ***Threshold e: Project construction and implementation would not be located on a geologic***
5 ***unit or soil that is unstable, or that would become unstable as a result of the Project, and***
6 ***potentially result in on- or off-site landslide, lateral spreading, collapse, or rockfall hazards,***
7 ***with the implementation of mitigation measures (refer to Project Resolution Attachment***
8 ***“A”, Mitigation Monitoring and Reporting Program).***

9 1. Project Impact(s): The Project site is relatively flat under existing conditions and
10 does not contain any unique topographic features or rock outcroppings that could
11 become unstable and subject to a landslide or rockfall. The thick deposits of surficial
12 soils typically associated with landsliding or debris flows are present only in the
13 relatively flat, low-lying portions of the site, and are not considered prone to
14 landsliding. In addition, there are no prominent slopes in the vicinity of the Project
15 site. (DEIR, p. 4.6-10.)

16 Implementation of the proposed Project would allow for one prominent rock outcrop
17 to remain on-site in the open space Lot U located in the northwestern portion of the
18 site. As a result of the planned grading on-site, the distance of planned residences
19 from the rock outcrop, and the gentle natural slope between rocks and future
20 residences, the rockfall hazard would be very low. The potential for rockfall due to
21 either erosion or seismic ground shaking is considered very low. (DEIR, p. 4.6-10
22 and 4.6-11.)

23 The Project site is underlain by loose, near-surface soils including topsoil, colluvium,
24 and alluvium. The presence of these near-surface soils would result in the potential
25 for lateral spreading to occur on-site. Accordingly, impacts associated with lateral
26 spreading would have the potential to occur, and impacts would be significant.
27 (DEIR, p. 4.6-11.)

28 Laboratory testing conducted by Leighton indicates that the alluvium and older

1 alluvium soils on-site are expected to possess a slight collapse potential. Thus,
2 impacts associated with collapse would have the potential to occur, and impacts
3 would be significant. (DEIR, p. 4.6-11.)

4 2. Finding: The Mitigation Measure outlined below would reduce impacts to a less-
5 than-significant level. The Mitigation Measure reflects changes or alterations that
6 the County has required, or incorporated into the Project that would avoid or
7 substantially lessen the potentially significant impact as identified in the DEIR.
8 (CEQA Guidelines §15091(a)(1)).

9 3. Mitigation and/or County Regulations and Design Requirements (RR):

10 **Mitigation Measure 4.6-1 applies (refer to language above under Geology and Soils**
11 **Threshold c).**

12 4. Rationale: Implementation of Mitigation Measure 4.6-1 would reduce significant
13 impacts to less than significant [DEIR p. 4.6-24 and 4.6-25].

14 The evidence supporting these conclusions includes the discussion of these impacts
15 in sections S.6.2 and 4.6.8 of the DEIR.

16 ***Impact: Geologic Unit/Soil Stability – Ground Subsidence.***

17 ***Threshold f: Project construction and implementation would not be located on a geologic***
18 ***unit or soil that is unstable, or that would become unstable as a result of the Project, and***
19 ***potentially result in ground subsidence, with the implementation of mitigation measures***
20 ***(refer to Project Resolution Attachment “A”, Mitigation Monitoring and Reporting***
21 ***Program).***

22 1. Project Impact(s): The Project would be located on geologic units and soils that were
23 found to be potentially unstable including the site’s near-surface fill soils.
24 Accordingly, ground subsidence would have the potential to occur, and impacts
25 would be significant. (DEIR, p. 4.6-11.)

26 2. Finding: The Mitigation Measure outlined below would reduce impacts to a less-
27 than-significant level. The Mitigation Measure reflects changes or alterations that
28 the County has required, or incorporated into the Project that would avoid or

1 substantially lessen the potentially significant impact as identified in the DEIR.
2 (CEQA Guidelines §15091(a)(1)).

3 3. Mitigation and/or County Regulations and Design Requirements (RR):

4 **Mitigation Measure 4.6-1 applies (refer to language above under Geology and Soils**
5 **Threshold c).**

6 4. Rationale: Implementation of Mitigation Measure 4.6-1 would reduce significant
7 impacts to less than significant [DEIR p. 4.6-25].

8 The evidence supporting these conclusions includes the discussion of these impacts
9 in sections S.6.2 and 4.6.8 of the DEIR.

10 ***Impact: Cut or Fill Slopes Greater than 10-Feet in Height or Greater than 2:1.***

11 ***Threshold i: Impacts associated with cut or fill slopes higher than 10 feet or greater than***
12 ***2:1 would be less than significant with the implementation of mitigation (refer to Project***
13 ***Resolution Attachment "A", Mitigation Monitoring and Reporting Program).***

14 1. Project Impact(s): The Project proposes 2:1 (horizontal to vertical) cut slopes with
15 maximum heights between 5 to 15 feet. The proposed 2:1 cut slopes in the weathered
16 granitic rock on-site would be grossly stable under static and seismic conditions.
17 Slope faces in the highly weathered granitic rock would be subject to erosion,
18 particularly if exposed to rainfall and irrigation. Landscaping and slope maintenance
19 would be conducted in a timely fashion upon Project implementation to increase
20 long-term surficial stability. Cut slopes within the metamorphic bedrock may expose
21 localized unstable zones due to its structure and highly fractured condition. Leighton
22 indicated that if unstable conditions were to be encountered during grading as
23 identified by the geotechnical consultant, a stabilization fill may be considered, and
24 is depicted in Appendix C of Technical Appendix E. Accordingly, the Project
25 proposes cut slopes higher than 10 feet, and a significant impact would occur.
26 (DEIR, p. 4.6-11 and 4.6-12.) Therefore, because the Project proposes fill slopes
27 that would be higher than 10 feet, a potentially significant impact would occur.
28 (DEIR, p. 4.6-12)

1 2. Finding: The Mitigation Measure outlined below would reduce impacts to a less-
2 than-significant level. The Mitigation Measure reflects changes or alterations that
3 the County has required, or incorporated into the Project that would avoid or
4 substantially lessen the potentially significant impact as identified in the DEIR.
5 (CEQA Guidelines §15091(a)(1)).

6 3. Mitigation and/or County Regulations and Design Requirements (RR):

7 **Mitigation Measure 4.6-1 applies (refer to language above under Geology and Soils**
8 **Threshold c).**

9 4. Rationale: Implementation of Mitigation Measure 4.6-1 would reduce significant
10 impacts to less than significant [DEIR p. 4.6-25].

11 The evidence supporting these conclusions includes the discussion of these impacts
12 in sections S.6.2 and 4.6.8 of the DEIR.

13 ***Impact: Expansive Soils Creating Risks to Life or Property.***

14 ***Threshold I: Impacts due to expansive soil, as defined in Section 1802.3.2 of the California***
15 ***Building Code (2007), which would create substantial risks to life or property, would be less***
16 ***than significant with the implementation of mitigation measures (refer to Project Resolution***
17 ***Attachment "A", Mitigation Monitoring and Reporting Program).***

18 1. Project Impact(s): Based on testing of soil samples taken from the Project site by
19 Leighton, it was determined that the site's soils vary in expansion potential from low
20 to medium. However, localized deposits of high to very high expansive soils could
21 be encountered during grading, particularly in the colluvium, older alluvium, Pauba
22 Formation, and highly weathered bedrock. The Project site would be located on
23 expansive soils. Accordingly, implementation of the proposed Project would locate
24 structures on expansive soil, and would create substantial risks to life or property,
25 and impacts would be significant. (DEIR, p. 4.6-13.)

26 2. Finding: The Mitigation Measure outlined below would reduce impacts to a less-
27 than-significant level. The Mitigation Measure reflects changes or alterations that
28 the County has required, or incorporated into the Project that would avoid or

1 substantially lessen the potentially significant impact as identified in the DEIR.
2 (CEQA Guidelines §15091(a)(1)).

3 3. Mitigation and/or County Regulations and Design Requirements (RR):

4 **Mitigation Measure 4.6-1 applies (refer to language above under Geology and Soils**
5 **Threshold c).**

6 4. Rationale: Implementation of Mitigation Measure 4.6-1 would reduce significant
7 impacts to less than significant [DEIR p. 4.6-25].

8 The evidence supporting these conclusions includes the discussion of these impacts
9 in sections S.6.2 and 4.6.8 of the DEIR.

10 **E. Greenhouse Gas Emissions.**

11 ***Impact:** Generation of Greenhouse Gas Emissions (GHGs).*

12 ***Threshold a:** Project construction and implementation would not generate greenhouse gas*
13 *emissions ("GHGs"), either directly or indirectly, that may have a significant impact on the*
14 *environment, with the implementation of mitigation measures (refer to Project Resolution*
15 *Attachment "A", Mitigation Monitoring and Reporting Program).*

16 1. Project Impact(s): The Riverside County Climate Action Plan (CAP) specifies a two-
17 step approach in quantifying GHG emissions. First, a screening threshold of 3,000
18 Metric Tons of Carbon Dioxide Equivalent (MTCO_{2e}) per year is used to determine
19 if additional analysis is required. Projects that would produce GHG emissions that
20 exceed 3,000 MTCO_{2e} per year are required to either achieve a minimum 100 points
21 per the Screening Tables set forth in the CAP, or achieve a minimum 25 percent
22 reduction of GHG emissions from a 2011-year level of efficiency compared to the
23 mitigated Project buildout year. For projects that cannot attain 100 points, the CAP
24 indicates that additional analysis would be required. (DEIR, p. 4.7-22.)

25 A summary of the proposed Project's calculated annual operational GHG emissions
26 at buildout year (2019), including the amortized construction emissions, is provided
27 in Table 4.7-5, 2019 Total Project Greenhouse Gas Emissions (Annual), of the DEIR.
28 The total Project emissions for the Project buildout year (2019) are calculated to be

1 11,655.80 MTCO₂e per year, which would exceed the CAP's initial screening
2 threshold of 3,000 MTCO₂e. Accordingly, the Project's level of GHG emissions
3 represent a cumulatively-considerable impact requiring mitigation. (DEIR, p. 4.7-
4 22.)

5 2. Finding: The Mitigation Measure and County Regulations and Design Requirements
6 (RR) outlined below would reduce impacts to a less-than-significant level. The
7 Mitigation Measure and RRs reflect changes or alterations that the County has
8 required, or incorporated into the Project that would avoid or substantially lessen the
9 potentially significant impact as identified in the DEIR. (CEQA Guidelines
10 §15091(a)(1)).

11 3. Mitigation and/or County Regulations and Design Requirements (RR):

12 **Greenhouse Gas Regulatory Requirement RR-17 states:**

13 The Project's construction activities are required to comply with Title 24 California
14 Code of Regulations (California Building Standards Code) and Title 20 California
15 Code of Regulations (Appliance Energy Efficiency Standards). These regulations
16 establish energy efficiency requirements for new (and altered) buildings and
17 appliances.

18 *Timing/Implementation*: Prior to the issuance of building permits

19 *Enforcement Monitoring*: County of Riverside Planning Department

20 **Greenhouse Gas Regulatory Requirement RR-18 states:**

21 The Project is required to comply with Riverside County Ordinance No. 859, which
22 is known as the Water Efficient Landscape Requirements Ordinance. Ordinance No.
23 859 mandates requirements for ensuring efficient landscapes in new development
24 and reduced water waste in existing landscapes.

25 *Timing/Implementation*: Prior to the issuance of building permits

26 *Enforcement Monitoring*: County of Riverside Planning Department

27 **Mitigation Measure 4.7-1 states:**

28 Prior to issuance of each building permit, the Project Applicant shall provide

1 documentation to the County of Riverside Building Department demonstrating that
2 the improvements and/or buildings subject to each building permit application
3 include the following measures from the County of Riverside Climate Action Plan
4 (December 2015) Greenhouse Gas Emissions Screening Tables (Appendix F to the
5 Climate Action Plan), as needed to achieve the required 100 points:

- 6 • Measure E1.A.1: Modestly Enhanced Insulation (walls R-13, roof/attic R-38)
7 – 12 points
- 8 • Measure E1.A.2: Modestly Enhanced Window (0.4 U-Factor, 0.32 SHGC) –
9 7 points
- 10 • Measure E1.A.3: Modest cool roof (CRC Rated 0.15 aged solar reflectance,
11 0.75 thermal emittance) –10 points
- 12 • Measure E1.A.4: Air barrier applied to exterior walls, caulking, and visual
13 inspection such as the HERS Verified Quality Insulation Installation (QII or
14 equivalent) – 10 points
- 15 • Measure E1.A.4: Blower Door HERS Verified Envelop Leakage or
16 equivalent) – 8 points
- 17 • Measure E1.B.1: Modest Duct Insulation (R-6) – 7 points
- 18 • Measure E1.B.1: Distribution loss reduction with Inspection (HERS Verified
19 Duct Leakage or equivalent) – 12 points
- 20 • Measure E1.B.2: Very High Efficiency HVAC (SEER 16/80% AFUE or 9
21 HSPF) – 9 points
- 22 • Measure E1.B.3: High Efficiency Water Heater (0.72 Energy Factor) – 15
23 points
- 24 • Measure E1.B.4: All rooms daylighted – 2 points
- 25 • Measure E1.B.5: Very High Efficiency Lights (100% of in-unit fixtures are
26 high efficacy) – 2 points
- 27 • Measure E1.B.6: Energy Star Dish Washer (new) – 1 point
- 28 • Measure E2.A.1: Solar Ready Homes (sturdy roof and electric hookups) – 1

1 point.

2 Alternatively, the Project Applicant may demonstrate that other Implementation
3 Measures from Appendix F of the County's CAP have been incorporated into the
4 building permit application and/or plans to achieve the required minimum of 100
5 points.

6 *Timing/Implementation:* Prior to the issuance of building permits

7 *Enforcement Monitoring:* County of Riverside Building and Safety Department

- 8 4. Rationale: Implementation of Greenhouse Gas Regulatory Requirements RR-17 and
9 RR-18 and Mitigation Measure 4.7-1 would reduce significant impacts to less than
10 significant [DEIR p. 4.7-27].

11 The evidence supporting these conclusions includes the discussion of these impacts
12 in sections S.6.2 and 4.7.9 of the DEIR.

13 *Impact: Conflict with applicable plans, policies, and regulations related to Generation of*
14 *GHGs.*

15 *Threshold b: Project construction and implementation would not conflict with applicable*
16 *plans, policies, and regulations related to GHGs, with the implementation of mitigation*
17 *measures (refer to Project Resolution Attachment "A", Mitigation Monitoring and*
18 *Reporting Program).*

- 19 1. Project Impact(s): AB 32 and SB 32 are the primary plans for reducing GHG
20 emissions in the State of California. Through its consistency with the CARB Scoping
21 Plan GHG emissions reduction measures (as detailed in Table 4.7-6 of the DEIR), in
22 addition to the Project-specific mitigation requirements specified in Mitigation
23 Measure MM 4.7-1, the Project would be consistent with the GHG reduction
24 mandates of AB 32 and SB 32. The Project also would be consistent with all other
25 applicable plans, policies, and regulations related to the reduction of GHGs.
26 Accordingly, the Project would result in a less-than-significant impact with respect
27 to threshold b). (DEIR, p. 4.7-26)
- 28 2. Finding: The Mitigation Measure County Regulations and Design Requirements

1 (RR) outlined below would reduce impacts to a less-than-significant level. The
2 Mitigation Measure and RRs reflect changes or alterations that the County has
3 required, or incorporated into the Project that would avoid or substantially lessen the
4 potentially significant impact as identified in the DEIR. (CEQA Guidelines
5 §15091(a)(1)).

6 3. Mitigation and/or County Regulations and Design Requirements (RR):

7 **Greenhouse Gas Regulatory Requirement RR-17 states:**

8 The Project's construction activities are required to comply with Title 24 California
9 Code of Regulations (California Building Standards Code) and Title 20 California
10 Code of Regulations (Appliance Energy Efficiency Standards). These regulations
11 establish energy efficiency requirements for new (and altered) buildings and
12 appliances.

13 *Timing/Implementation:* Prior to the issuance of building permits

14 *Enforcement Monitoring:* County of Riverside Planning Department

15 **Greenhouse Gas Regulatory Requirement RR-18 states:**

16 The Project is required to comply with Riverside County Ordinance No. 859, which
17 is known as the Water Efficient Landscape Requirements Ordinance. Ordinance No.
18 859 mandates requirements for ensuring efficient landscapes in new development
19 and reduced water waste in existing landscapes.

20 *Timing/Implementation:* Prior to the issuance of building permits

21 *Enforcement Monitoring:* County of Riverside Planning Department

22 **Mitigation Measure 4.7-1 states:**

23 Prior to issuance of each building permit, the Project Applicant shall provide
24 documentation to the County of Riverside Building Department demonstrating that
25 the improvements and/or buildings subject to each building permit application
26 include the following measures from the County of Riverside Climate Action Plan
27 (December 2015) Greenhouse Gas Emissions Screening Tables (Appendix F to the
28 Climate Action Plan), as needed to achieve the required 100 points:

- 1 • Measure E1.A.1: Modestly Enhanced Insulation (walls R-13, roof/attic R-38)
- 2 – 12 points
- 3 • Measure E1.A.2: Modestly Enhanced Window (0.4 U-Factor, 0.32 SHGC) –
- 4 7 points
- 5 • Measure E1.A.3: Modest cool roof (CRC Rated 0.15 aged solar reflectance,
- 6 0.75 thermal emittance) –10 points
- 7 • Measure E1.A.4: Air barrier applied to exterior walls, caulking, and visual
- 8 inspection such as the HERS Verified Quality Insulation Installation (QII or
- 9 equivalent) – 10 points
- 10 • Measure E1.A.4: Blower Door HERS Verified Envelop Leakage or
- 11 equivalent) – 8 points
- 12 • Measure E1.B.1: Modest Duct Insulation (R-6) – 7 points
- 13 • Measure E1.B.1: Distribution loss reduction with Inspection (HERS Verified
- 14 Duct Leakage or equivalent) – 12 points
- 15 • Measure E1.B.2: Very High Efficiency HVAC (SEER 16/80% AFUE or 9
- 16 HSPF) – 9 points
- 17 • Measure E1.B.3: High Efficiency Water Heater (0.72 Energy Factor) – 15
- 18 points
- 19 • Measure E1.B.4: All rooms daylighted – 2 points
- 20 • Measure E1.B.5: Very High Efficiency Lights (100% of in-unit fixtures are
- 21 high efficacy) – 2 points
- 22 • Measure E1.B.6: Energy Star Dish Washer (new) – 1 point
- 23 • Measure E2.A.1: Solar Ready Homes (sturdy roof and electric hookups) – 1
- 24 point.

25 Alternatively, the Project Applicant may demonstrate that other Implementation
 26 Measures from Appendix F of the County’s CAP have been incorporated into the
 27 building permit application and/or plans to achieve the required minimum of 100
 28 points.

1 *Timing/Implementation:* Prior to the issuance of building permits

2 *Enforcement Monitoring:* County of Riverside Building and Safety Department

- 3 4. Rationale: Implementation of Greenhouse Gas Regulatory Requirements RR-17 and
4 RR-18 and Mitigation Measure 4.7-1 would further reduce the Project's less-than-
5 significant impacts with respect to applicable plans, policies, and regulations related
6 to GHGs [DEIR p. 4.7-26].

7 The evidence supporting these conclusions includes the discussion of these impacts in
8 subsection 4.7.7 of the DEIR.

9 F. Noise.

10 *Impact: Excessive Noise Levels – Highway Noise.*

11 *Threshold d: Project construction and implementation would not expose people residing or*
12 *working in the project area to excessive noise levels associated with highway noise, with the*
13 *implementation of mitigation measures (refer to Project Resolution Attachment "A",*
14 *Mitigation Monitoring and Reporting Program).*

- 15 1. Project Impact(s): Project-related traffic noise to off-site roadways would not exceed
16 the standards of significance listed in Table 4.11-5 of the DEIR, and impacts would
17 therefore be less than significant. However, future on-site residences would be
18 exposed to interior and exterior highway-related noise that exceeds the County's
19 standards. Specifically, unmitigated noise levels would exceed the 65 dBA CNEL
20 exterior noise level standard for all of the onsite residential lots that abut Leon Road,
21 Spencer's Crossing Parkway (with the exception of Lot 505), "VV" Street, and
22 "DDDD" Street.

- 23 2. Finding: The Mitigation Measures outlined below would reduce impacts to a less-
24 than-significant level. The Mitigation Measures reflect changes or alterations that
25 the County has required, or incorporated into the Project that would avoid or
26 substantially lessen the potentially significant impact as identified in the DEIR.
27 (CEQA Guidelines §15091(a)(1)).

1 3. Mitigation and/or County Regulations and Design Requirements (RR):

2 **Mitigation Measure 4.11-1 states:**

3 Prior to issuance of any grading and building permits, the County of Riverside shall
4 verify that final building plans require the construction of the following sound
5 barriers

- 6 a) A minimum 8-foot high noise barrier for the outdoor living areas (backyards) of
7 all homes abutting Leon Road;
- 8 b) A minimum 6-foot high noise barrier for the outdoor living areas (backyards) of
9 all homes abutting Spencer's Crossing Parkway;
- 10 c) A minimum 6-foot high noise barrier for all homes abutting "VV" Street; and
11 d) A minimum 6-foot high noise barrier for all homes abutting "DDDD" Street.

12 During the final building inspection, the County of Riverside Building Inspector shall
13 ensure that the sound barriers were constructed to adhere to the requirements stated
14 herein, as well as the design specifications shown on the final approved building
15 plans.

16 *Timing/Implementation:* Prior to grading and building permit issuance

17 *Enforcement Monitoring:* County of Riverside Building and Safety Department

18 **Mitigation Measure 4.11-2 states:**

19 Prior to issuance of any grading and building permits, the County of Riverside shall
20 verify that final building plans require the construction of sound barriers with the
21 following requirements. Barriers shall be constructed so the top of the wall extends
22 the recommended height above the pad elevation of the lot it is shielding. If the road
23 at this point is elevated above the pad, the barrier shall extend the recommended
24 height above the highest point between the home and the road.

25 The barrier shall provide a weight of at least four (4) pounds per square foot with no
26 decorative cutouts of line-of-sight openings between shielded areas and the
27 roadways. The barrier must present a solid face from top to bottom. All gaps (except
28 weep holes) shall be filled with grout or caulking.

1 Barriers shall be constructed using one of the following materials:

- 2 I) Masonry Block;
- 3 II) Stucco veneer over wood framing (or foam core), or one inch thick tongue
- 4 and groove wood of sufficient weight per square foot;
- 5 III) Glass (1/4 inch thick), or other transparent material with sufficient weight per
- 6 square foot;
- 7 IV) Earth berm; and/or
- 8 IV) Any combination of these materials.

9 During the final building inspection, the County of Riverside Building Inspector shall
10 ensure that the sound barriers were constructed to adhere to the requirements stated
11 herein, as well as the design specifications shown on the final approved building
12 plans.

13 *Timing/Implementation:* Prior to grading and building permit issuance

14 *Enforcement Monitoring:* County of Riverside Building and Safety Department

15 **Mitigation Measure 4.11-3 states:**

16 Prior to issuance of building permits, the County of Riverside shall verify that final
17 building plans require second-story windows with a minimum STC rating of 34 be
18 installed at all homes abutting Leon Road. During the final building inspection, the
19 County of Riverside Building Inspector shall ensure that the windows were installed
20 in adherence with the requirements stated herein, as well as the design specifications
21 shown on the final approved building plans.

22 *Timing/Implementation:* Prior to the issuance of building permits

23 *Enforcement Monitoring:* County of Riverside Building and Safety Department

24 **Mitigation Measure 4.11-4 states:**

25 Prior to issuance of building permits, the County of Riverside shall verify that final
26 building plans require second-story windows with a minimum STC rating of 27 be
27 installed at all homes adjacent to Leon Road, Spencer's Crossing Parkway, Keller
28 Road, VV Street, and DDDD Street. During the final building inspection, the County

1 of Riverside Building Inspector shall ensure that the windows were installed in
2 adherence with the requirements stated herein, as well as the design specifications
3 shown on the final approved building plans.

4 *Timing/Implementation:* Prior to the issuance of building permits

5 *Enforcement Monitoring:* County of Riverside Building and Safety Department

6 **Mitigation Measure 4.11-5 states:**

7 Prior to the issuance of building permits, the County of Riverside shall verify that
8 final building plans require the following construction requirements:

- 9 a) Roof sheathing of wood construction shall be well fitted or caulked plywood
10 of at least one-half inch thick. Ceilings shall be well fitted, well-sealed
11 gypsum board of at least one-half inch thick. Insulation with at least a rating
12 of R-19 shall be used in the attic space.
- 13 b) All exterior doors, for all lots, shall be well weather-stripped solid core
14 assemblies at least one and three-fourths-inch thick.
- 15 c) At any penetrations of exterior walls by pipes, ducts, or conduits, the space
16 between the wall and penetrating object shall be caulked or filled with mortar
17 to form and airtight seal.
- 18 d) Attic vents shall be oriented away from Leon Road when possible. If such
19 an orientation cannot be avoided, then acoustical baffles shall be placed in
20 the attic space behind the vents.
- 21 e) Arrangements for any habitable room shall be such that any exterior door or
22 window can be kept closed when the room is in use and still receive circulated
23 air. A forced air circulation system (e.g. air-conditioning system) or active
24 ventilation (e.g. fresh air supply) shall be provided which satisfies the
25 requirements of the Uniform Mechanical Code.

26 *Timing/Implementation:* Prior to the issuance of building permits

27 *Enforcement Monitoring:* County of Riverside Building and Safety Department

- 28 4. Rationale: Implementation of Mitigation Measures 4.11-1 through 4.11-5 would

1 reduce significant impacts to less than significant [DEIR p. 4.11-53].

2 The evidence supporting these conclusions includes the discussion of these impacts
3 in sections S.6.2 and 4.11.10 of the DEIR.

4 ***Impact: Noise in Excess of Standards***

5 ***Threshold h: Project construction and implementation would not expose persons to or***
6 ***generate noise levels in excess of standards established in the local general plan or noise***
7 ***ordinance, or applicable standards of other agencies, with the implementation of mitigation***
8 ***measures (refer to Project Resolution Attachment "A", Mitigation Monitoring and***
9 ***Reporting Program).***

10 1. **Project Impact(s):** The Project would not result in a substantial temporary/periodic,
11 or substantial permanent increase in ambient noise levels in the Project vicinity above
12 levels existing without the Project. However, the Project would expose future on-
13 site residences to excessive noise, as described below, which would require
14 mitigation: (DEIR, p. 4.11-45 and p. 4.11-46.)

15 • On-Site Traffic Noise (Exterior Noise): As shown in Table 4.11-15 of the
16 DEIR, on-site traffic noise level impacts indicate that the lots facing Leon
17 Road, Spencer's Crossing Parkway, Keller Road, "VV" Street, and "DDDD"
18 Street would experience unmitigated exterior noise levels that would exceed
19 the exterior noise level standard of 65 dBA CNEL for residential land uses
20 established by Policy N 1.3 of the County of Riverside General Plan Noise
21 Element. However, implementation of Mitigation Measure MM 4.11-1
22 would require the construction of noise barriers to reduce noise impacts to
23 levels that are less than significant. (DEIR, p. 4.11-46.)

24 • On-Site Traffic Noise (Interior Noise): As shown in Table 4.11-16 and Table
25 4.11-17 of the DEIR, future unmitigated noise levels would exceed the
26 County of Riverside 45 dBA CNEL interior noise level standard at the second
27 floor building façade of the residences on lots located adjacent to Leon Road.
28 (DEIR, p. 4.11-46.)

1 Based on the foregoing analysis, the Project would result in significant noise impacts
2 due to exposure of on-site residents to interior and exterior noise levels generated by
3 on-site traffic which exceed the respective standards established by the County of
4 Riverside General Plan Noise Element. (DEIR, p. 4.11-46.)

5 2. Finding: The Mitigation Measures outlined below would reduce impacts to a less-
6 than-significant level. The Mitigation Measures reflect changes or alterations that
7 the County has required, or incorporated into the Project that would avoid or
8 substantially lessen the potentially significant impact as identified in the DEIR.
9 (CEQA Guidelines §15091(a)(1)).

10 3. Mitigation and/or County Regulations and Design Requirements (RR):

11 **Mitigation Measure 4.11-1 applies (refer to language under Threshold d).**

12 **Mitigation Measure 4.11-2 states:**

13 Prior to issuance of any grading and building permits, the County of Riverside shall
14 verify that final building plans require the construction of sound barriers with the
15 following requirements. Barriers shall be constructed so the top of the wall extends
16 the recommended height above the pad elevation of the lot it is shielding. If the road
17 at this point is elevated above the pad, the barrier shall extend the recommended
18 height above the highest point between the home and the road.

19 The barrier shall provide a weight of at least four (4) pounds per square foot with no
20 decorative cutouts of line-of-sight openings between shielded areas and the
21 roadways. The barrier must present a solid face from top to bottom. All gaps (except
22 weep holes) shall be filled with grout or caulking.

23 Barriers shall be constructed using one of the following materials:

- 24 I) Masonry Block;
- 25 II) Stucco veneer over wood framing (or foam core), or one inch thick tongue
26 and groove wood of sufficient weight per square foot;
- 27 III) Glass (1/4 inch thick), or other transparent material with sufficient weight per
28 square foot;

1 IV) Earth berm; and/or

2 IV) Any combination of these materials.

3 During the final building inspection, the County of Riverside Building Inspector shall
4 ensure that the sound barriers were constructed to adhere to the requirements stated
5 herein, as well as the design specifications shown on the final approved building
6 plans.

7 *Timing/Implementation:* Prior to grading and building permit issuance

8 *Enforcement Monitoring:* County of Riverside Building and Safety Department

9 **Mitigation Measure 4.11-3 states:**

10 Prior to issuance of building permits, the County of Riverside shall verify that final
11 building plans require second-story windows with a minimum STC rating of 34 be
12 installed at all homes abutting Leon Road. During the final building inspection, the
13 County of Riverside Building Inspector shall ensure that the windows were installed
14 in adherence with the requirements stated herein, as well as the design specifications
15 shown on the final approved building plans.

16 *Timing/Implementation:* Prior to the issuance of building permits

17 *Enforcement Monitoring:* County of Riverside Building and Safety Department

18 **Mitigation Measure 4.11-4 states:**

19 Prior to issuance of building permits, the County of Riverside shall verify that final
20 building plans require second-story windows with a minimum STC rating of 27 be
21 installed at all homes adjacent to Leon Road, Spencer's Crossing Parkway, Keller
22 Road, VV Street, and DDDD Street. During the final building inspection, the County
23 of Riverside Building Inspector shall ensure that the windows were installed in
24 adherence with the requirements stated herein, as well as the design specifications
25 shown on the final approved building plans.

26 *Timing/Implementation:* Prior to the issuance of building permits

27 *Enforcement Monitoring:* County of Riverside Building and Safety Department

28

1 **Mitigation Measure 4.11-5 states:**

2 Prior to the issuance of building permits, the County of Riverside shall verify that
3 final building plans require the following construction requirements:

- 4 a) Roof sheathing of wood construction shall be well fitted or caulked plywood
5 of at least one-half inch thick. Ceilings shall be well fitted, well-sealed
6 gypsum board of at least one-half inch thick. Insulation with at least a rating
7 of R-19 shall be used in the attic space.
- 8 b) All exterior doors, for all lots, shall be well weather-stripped solid core
9 assemblies at least one and three-fourths-inch thick.
- 10 c) At any penetrations of exterior walls by pipes, ducts, or conduits, the space
11 between the wall and penetrating object shall be caulked or filled with mortar
12 to form and airtight seal.
- 13 d) Attic vents shall be oriented away from Leon Road when possible. If such
14 an orientation cannot be avoided, then acoustical baffles shall be placed in
15 the attic space behind the vents.
- 16 e) Arrangements for any habitable room shall be such that any exterior door or
17 window can be kept closed when the room is in use and still receive circulated
18 air. A forced air circulation system (e.g. air-conditioning system) or active
19 ventilation (e.g. fresh air supply) shall be provided which satisfies the
20 requirements of the Uniform Mechanical Code.

21 *Timing/Implementation:* Prior to the issuance of building permits

22 *Enforcement Monitoring:* County of Riverside Building and Safety Department

23 4. Rationale: Implementation of Mitigation Measures 4.11-1 through 4.11-5 would
24 reduce significant impacts to less than significant [DEIR p. 4.11-53 and 4.11-54].

25 The evidence supporting these conclusions includes the discussion of these impacts
26 in sections S.6.2 and 4.11.10 of the DEIR.

27 *Impact:* Excessive Ground-Borne Vibration or Ground-Borne Noise Levels.

28 *Threshold i:* Project construction and implementation would not expose persons to or

1 *generate, excessive ground-borne vibration or ground-borne noise levels with the*
2 *implementation of mitigation measures (refer to Project Resolution Attachment "A",*
3 *Mitigation Monitoring and Reporting Program).*

4 1. Project Impact(s): As shown on Table 4.11-21 of the DEIR, based on the reference
5 vibration levels provided by the FTA, a large bulldozer represents the peak source of
6 vibration with a reference velocity of 0.089 in/sec (PPV) at a distance of 25 feet. In
7 order to assess the human perception of vibration levels in PPV, the velocities are
8 converted to RMS vibration levels based on the Caltrans Transportation and
9 Construction Vibration Guidance Manual conversion factor of 0.71. At distances
10 ranging from 34 to 2,677 feet from Project construction activities, construction
11 vibration velocity levels are expected to approach 0.056 in/sec RMS, as shown on
12 Table 4.11-21 of the DEIR. Based on the County of Riverside vibration standard of
13 0.01 in/sec RMS, the proposed Project construction activities would exceed the
14 County of Riverside vibration standard of 0.01 in/sec RMS at receiver location R9
15 since the Project's Noise Impact Analysis assumed the off-site single-family
16 residences at this location (approximately west of the Project site, south of Pat Road)
17 would be fully constructed and occupied during Project construction activities.
18 Therefore, the Project-related vibration impacts at location R9 represent a temporary
19 significant impact during construction activities. (DEIR, p. 4.11-47.)

20 Furthermore, vibration levels at the site of the closest receiver are unlikely to be
21 sustained during the entire construction period, but would occur rather only during
22 times that heavy construction equipment is operating adjacent to the Project site
23 perimeter. In addition, construction at the Project site would be restricted to daytime
24 hours consistent with County of Riverside requirements, thereby eliminating
25 potential vibration impacts during the sensitive nighttime hours. (DEIR, p. 4.11-47
26 and 4.11-48.)

27 2. Finding: The Mitigation Measure outlined below would reduce impacts to a less-
28 than-significant level. The Mitigation Measure reflects changes or alterations that

1 the County has required, or incorporated into the Project that would avoid or
2 substantially lessen the potentially significant impact as identified in the DEIR.
3 (CEQA Guidelines §15091(a)(1)).

4 3. Mitigation and/or County Regulations and Design Requirements (RR):

5 **Mitigation Measure 4.11-7 states:**

6 Prior to issuance of any grading and building permits, the County of Riverside shall
7 review grading and building plans to ensure the following notes are included on the
8 plans. Project contractors shall be required to comply with these notes and maintain
9 written records of such compliance that can be inspected by the County of Riverside
10 upon request.

- 11 a) During Project construction, the construction contractor shall ensure that the
12 operation of construction equipment that generates high levels of vibration,
13 such as large bulldozers, jack hammers, and loaded trucks, are prohibited
14 within 100 feet of the off-site single-family residences at the western Project
15 site boundary (south of Pat Road). Instead, small rubber-tired bulldozers
16 shall be used within the 100-foot boundary during grading operations at the
17 western site boundary.

18 *Timing/Implementation:* Prior to grading and building permit issuance

19 *Enforcement Monitoring:* County of Riverside Building and Safety Department

- 20 4. Rationale: Implementation of Mitigation Measure 4.11-7 would reduce significant
21 impacts to less than significant [DEIR p. 4.11-54].

22 The evidence supporting these conclusions includes the discussion of these impacts
23 in sections S.6.2 and 4.11.10 of the DEIR.

24 **G. Paleontological Resources.**

25 *Impact: Unique Paleontological Resource, Site, or Geologic Feature.*

26 *Threshold a: Project construction and implementation would not directly or indirectly*
27 *destroy a unique paleontological resource, site, or unique geologic feature, with the*
28 *implementation of mitigation measures (refer to Project Resolution Attachment "A",*

Mitigation Monitoring and Reporting Program).

1
2 1. Project Impact(s): According to the Project's Paleontological Resource and
3 Monitoring Assessment, although the Project site does not contain any known
4 paleontological resources or sites, the approximate eastern half of the Project site is
5 underlain with Quaternary (middle to early Pleistocene) very old alluvial valley
6 deposits (Qvova), which are typically assigned a "High" paleontological resource
7 sensitivity within Riverside County (BFSA, 2016b, p. 2). The remainder of the
8 Project site is underlain by undifferentiated Mesozoic metamorphic rocks along the
9 western half of the Project Area, and Cretaceous granitic rocks (foliated
10 biotitehornblende tonalite) of the Paloma Valley Ring Complex (Kpvt) at the
11 northern end of the Project site, both of which have low paleontological resource
12 sensitivity. This is based on the fact that fossils are rarely found in metamorphic
13 rocks and are never found in granitic rocks. (DEIR, p. 4.12-3.)

14 Excavations associated with the Project's construction would encroach into the
15 potentially fossil-bearing soil within the Quaternary older alluvial fan sediments
16 located on the eastern half of the Project site. Therefore, the Project has the potential
17 to impact paleontological resources that may exist below the ground surface. The
18 Project's potential to directly or indirectly destroy unique paleontological resources
19 buried beneath the ground surface is a significant impact for which mitigation would
20 be required. (DEIR, p. 4.12-3.)

21 2. Finding: The Mitigation Measures outlined below would reduce impacts to a less-
22 than-significant level. The Mitigation Measure reflects changes or alterations that
23 the County has required, or incorporated into the Project that would avoid or
24 substantially lessen the potentially significant impact as identified in the DEIR.
25 (CEQA Guidelines §15091(a)(1)).

26 3. Mitigation and/or County Regulations and Design Requirements (RR):

27 **Mitigation Measure 4.12-1 states:**

28 Prior to the issuance of grading permits, the Project Applicant shall provide a

1 Paleontological Resources Impact Mitigation Program (PRIMP) to Riverside County
2 Geologist. The following information shall be provided at a minimum in the PRIMP,
3 in addition to other industry standards and Society of Vertebrate Paleontology
4 standards:

- 5 I) Description of the proposed site and planned grading operations;
- 6 II) Description of the level of monitoring required for all earth-moving activities;
- 7 III) Identification and qualifications of the qualified paleontological monitor to
8 be employed for grading operations monitoring;
- 9 IV) Identification of personnel with authority and responsibility to temporarily
10 halt or diver grading equipment to allow for recovery of large specimens;
- 11 V) Direction for any fossil discoveries to be immediately reported to the property
12 owner who in turn will immediately notify the County Geologist of the
13 discovery;
- 14 VI) Means and methods to be employed by the paleontological monitor to quickly
15 salvage fossils as they are unearthed to avoid construction delays;
- 16 VII) Sampling of sediments that are likely to contain the remains of small fossil
17 invertebrates and vertebrates;
- 18 VIII) Procedures and protocol for collecting and processing of samples and
19 specimens;
- 20 IX) Fossil identification and curation procedures to be employed;
- 21 X) Identification of the permanent repository to receive any recovered fossil
22 material. *Pursuant the County of Riverside "SABER Policy,"
23 paleontological fossils found in the County of Riverside should, by
24 preference, be directed to the Western Science Center in the City of Hemet.
25 A written agreement between the property owner/developer and the
26 repository must be in place prior to site grading;
- 27 XI) All pertinent exhibits, maps and references;
- 28 XII) Procedures for reporting of findings; and

1 XIII) Identification and acknowledgement of the developer for the content of the
2 PRIMP as well as acceptance of financial responsibility for monitoring,
3 reporting and curation fees. The property owner and/or applicant on whose
4 land the paleontological fossils are discovered shall provide appropriate
5 funding for monitoring, reporting, delivery and curating the fossils at the
6 institution where the fossils will be placed, and will provide confirmation to
7 the County that such funding has been paid to the institution.

8 All reports shall be signed by the Project Paleontologist and all other professionals
9 responsible for the report's content (e.g. Professional Geologist), as appropriate. One
10 original signed copy of the report(s) shall be submitted to the office of the County
11 Geologist along with a copy of this Mitigation Measure and the grading plan for
12 appropriate case processing and tracking. These documents shall not be submitted
13 to the Project Planner, the Plan Check staff, the Land Use Counter or any other
14 County office.

15 *Timing/Implementation:* Prior to grading permit issuance

16 *Enforcement Monitoring:* Riverside County Planning Department

17 **Mitigation Measure 4.12-2 states:**

18 Prior to the issuance of grading permits, the Project Applicant shall provide evidence
19 to Riverside County that during mass grading and excavation activities in areas
20 identified as likely to contain paleontological resources monitoring by a qualified
21 paleontologist or paleontological monitor shall occur. Monitoring will be conducted
22 full-time in areas of grading or excavation in undisturbed surficial exposures of
23 Quaternary (early to middle Pleistocene) very old valley alluvial sediments, as shown
24 on Attachment 3a (Geologic Map) of the Project's Paleontological Resource and
25 Monitoring Assessment (Technical Appendix K). Paleontological monitors will be
26 equipped to salvage fossils as they are unearthed to minimize construction delays
27 and to remove samples of sediment that are likely to contain the remains of small
28 fossil invertebrates and vertebrates. The monitor must be empowered to temporarily

1 halt or divert equipment to allow for the removal of abundant or large specimens in
2 a timely manner. Monitoring may be reduced if the potentially fossiliferous units are
3 not present in the subsurface, or if present, are determined upon exposure and
4 examination by qualified paleontological personnel to have low potential to contain
5 fossil resources. Evidence of compliance with this mitigation measure shall be
6 provided to Riverside County prior to the issuance of any grading permits.

7 *Timing/Implementation:* Prior to grading permit issuance

8 *Enforcement Monitoring:* Riverside County Building and Safety Department

9 **Mitigation Measure 4.12-3 states:**

10 If a paleontological resource is discovered on the property, discovered fossils or
11 samples of such fossils shall be collected and identified by a qualified paleontologist.
12 Preparation of recovered specimens to a point of identification and permanent
13 preservation, including screen-washing of sediments to recover small invertebrates
14 and vertebrates, if indicated by the results of test sampling. Preparation of individual
15 vertebrate fossils is often more time-consuming than for accumulations of
16 invertebrate fossils. Any and all fossils encountered during Project grading activities
17 will be deposited at the Western Science Center Museum on Searl Parkway in Hemet,
18 Riverside County, California. All costs of the paleontological monitoring and
19 mitigation program, including any one-time charges by the receiving institution, are
20 the responsibility of the Project Applicant. The Project Applicant shall provide
21 evidence of compliance with this mitigation measure to Riverside County prior the
22 issuance of any certificate of occupancy if such resources are found on-site.

23 *Timing/Implementation:* If a paleontological resource is discovered on the property
24 (prior to certificate of occupancy permits)

25 *Enforcement Monitoring:* Riverside County Building and Safety Department

26 **Mitigation Measure 4.12-4 states:**

27 Prior to the issuance of the first certificate of occupancy, the Project Applicant shall
28 prepare a final monitoring and mitigation report of findings and significance,

1 including lists of all fossils recovered and necessary maps and graphics to accurately
2 record their original location. A letter documenting receipt and acceptance of all
3 fossil collections by the receiving institution must be included in the final report. The
4 report, when submitted to (and accepted by) the appropriate lead agency (Attn:
5 Riverside County Transportation and Land Management Agency, Planning
6 Department, 4080 Lemon Street, Riverside, California 92502), will signify
7 satisfactory completion of the Project's monitoring and mitigation program with
8 respect to nonrenewable paleontological resources.

9 *Timing/Implementation:* Prior to the first certificate of occupancy issuance

10 *Enforcement Monitoring:* Riverside County Planning Department

- 11 4. Rationale: Implementation of Mitigation Measure 4.12-1 through 4.12-4 would reduce
12 significant impacts to less than significant [DEIR p. 4.12-6].

13 The evidence supporting these conclusions includes the discussion of these impacts in
14 sections S.6.2 and 4.12.7 of the DEIR.

15 **H. Transportation and Traffic.**

16 *Impact: Effect Upon Circulation During Project Construction.*

17 *Threshold g: Project construction and implementation would not cause an effect upon*
18 *circulation during the project's construction, with the implementation of mitigation*
19 *measures (refer to Project Resolution Attachment "A", Mitigation Monitoring and*
20 *Reporting Program).*

- 21 1. Project Impact(s): During the Project's construction phase and based on the Project's
22 construction characteristics, the volume of construction-related traffic would result
23 in fewer peak hour and daily trips than would result from operation of the Project, as
24 traffic only would be associated with construction workers arriving and leaving, and
25 construction materials delivery. The Project would not require import or export of
26 earthwork materials during construction activities, so no haul trip activities would be
27 needed to/from the Project site during construction. Additionally, there are no
28 improved roadways on the Project site under existing conditions, although Leon

1 Road is partially improved along the eastern Project boundary. The Project would
2 implement frontage improvements to Leon Road, which could temporarily disrupt
3 traffic; however, any construction-related traffic impacts resulting from the Project
4 would be addressed through the requirement to comply with a temporary traffic
5 control plan that meets the applicable requirements of the California Manual on
6 Uniform Traffic Control Devices. Although impacts during construction are
7 anticipated to be less than significant, Mitigation Measure MM 4.16-1 has
8 nonetheless been identified to ensure Project compliance with the requirement to
9 prepare and follow a traffic control plan during construction activities. (DEIR, p.
10 4.16-30.)

11 2. Finding: The Mitigation Measure outlined below would reduce impacts to a less-
12 than-significant level. The Mitigation Measure reflects changes or alterations that
13 the County has required, or incorporated into the Project that would avoid or
14 substantially lessen the potentially significant impact as identified in the DEIR.
15 (CEQA Guidelines §15091(a)(1)).

16 3. Mitigation and/or County Regulations and Design Requirements (RR):

17 **Mitigation Measure 4.16-1 states:**

18 Prior to the issuance of grading permits or improvement plans affecting Leon Road,
19 the Project Applicant shall prepare and the County of Riverside shall approve a
20 temporary traffic control plan. The temporary traffic control plan shall comply with
21 the applicable requirements of the California Manual on Uniform Traffic Control
22 Devices. A requirement to comply with the temporary traffic control plan shall be
23 noted on all grading and building plans and also shall be specified in bid documents
24 issued to prospective construction contractors.

25 *Timing/Implementation*: Prior to approval of improvement plans affecting Leon
26 Road

27 *Enforcement Monitoring*: Riverside County Building and Safety Department
28

1 4. Rationale: Implementation of Mitigation Measure 4.16-1 would reduce significant
2 impacts to less than significant [DEIR p. 4.16-64].

3 The evidence supporting these conclusions includes the discussion of these impacts
4 in sections S.6.2 and 4.16.12 of the DEIR.

5 ***Impact: Inadequate Emergency Access or Access to Nearby Uses.***

6 ***Threshold h: Project construction and operation would not result in inadequate emergency***
7 ***access or access to nearby uses, with the implementation of mitigation measures (refer to***
8 ***Project Resolution Attachment "A", Mitigation Monitoring and Reporting Program).***

9 1. Project Impact(s): The Project proposes a network of internal roadways that would
10 be constructed within the Project site. During Riverside County's review of the
11 Project's proposed Specific Plan and Tentative Tract Map, the County reviewed the
12 proposed design plans to ensure that adequate emergency access would be available
13 at the site. Accordingly, the proposed Project would not result in inadequate
14 emergency access during long-term operation of the Project. Impacts associated with
15 this issue would be less than significant. (DEIR, p. 4.16-30.)

16 Due to temporary street closures that may occur during the Project's construction
17 phase, Project-related construction activities may conflict with emergency access
18 routes and access to nearby uses during frontage improvements to Leon Road.
19 However, through implementation of Mitigation Measure MM 4.16-1, Project-
20 related construction traffic would be required to comply with a temporary traffic
21 control plan that meets the applicable requirements of the California Manual on
22 Uniform Traffic Control Devices. Accordingly, impacts would be reduced to levels
23 that are less than significant with implementation of Mitigation Measure MM 4.16-
24 1. (DEIR, p. 4.16-30.)

25 2. Finding: The Mitigation Measure outlined below would reduce impacts to a less-
26 than-significant level. The Mitigation Measure reflects changes or alterations that
27 the County has required, or incorporated into the Project that would avoid or
28 substantially lessen the potentially significant impact as identified in the DEIR.

1 (CEQA Guidelines §15091(a)(1)).

2 3. Mitigation and/or County Regulations and Design Requirements (RR):

3 **Mitigation Measure 4.16-1 states:**

4 Prior to the issuance of grading permits or improvement plans affecting Leon Road,
5 the Project Applicant shall prepare and the County of Riverside shall approve a
6 temporary traffic control plan. The temporary traffic control plan shall comply with
7 the applicable requirements of the California Manual on Uniform Traffic Control
8 Devices. A requirement to comply with the temporary traffic control plan shall be
9 noted on all grading and building plans and also shall be specified in bid documents
10 issued to prospective construction contractors.

11 *Timing/Implementation:* Prior to grading permit issuance or improvement plans
12 affecting Leon Road

13 *Enforcement Monitoring:* Riverside County Building and Safety Department

14 4. Rationale: Implementation of Mitigation Measure 4.16-1 would reduce impacts to
15 less-than-significant levels [DEIR p. 4.16-64].

16 The evidence supporting these conclusions includes the discussion of these impacts
17 in sections S.6.2 and 4.16.12 of the DEIR.

18 **BE IT FURTHER RESOLVED** by the Board of Supervisors that the following impacts potentially
19 resulting from the adoption of the EIR No. 551 cannot be fully mitigated and would be only partially
20 avoided or lessened in consideration of existing regulations, Project Design Features, or mitigation
21 measures specified in Attachment A (Mitigation Monitoring and Reporting Program, incorporated by
22 reference into this document). Accordingly, and as further explained below, the County makes the
23 following findings as to each of the following impacts as allowed by State CEQA Guidelines
24 section 15091(a): "Changes or alterations [that might further reduce Project impacts] are within the
25 responsibility and jurisdiction of another public agency and not the [County]. Such changes have been
26 adopted by such other agency"; or "Specific economic, legal, social, technological, or other considerations,
27 make infeasible the mitigation measures or project alternatives identified in the final EIR." Therefore, a
28 statement of overriding considerations consistent with State CEQA Guidelines sections 15092(b)(2)(B) and

1 15093 is required and included herein:

2 **A. Air Quality.**

3 ***Impact:** Consistency with Applicable Air Quality Plan(s).*

4 ***Threshold a:** Project implementation would conflict with or obstruct implementation of an*
5 *applicable air quality plan due to operational emissions of Volatile Organic Compounds*
6 *(VOCs) and Nitrogen Oxides (NO_x) and the planned exceedance of Air Quality Management*
7 *Plan (AQMP) growth assumptions for the site.*

8 1. Project Impact(s): The Project would have the potential to result in or cause NAAQS
9 or CAAQS violations under long-term operating conditions. The Project's
10 development intensity also is greater than the development intensities allowed based
11 on the site's existing General Plan and Specific Plan land use designations. The
12 Project is therefore considered to potentially conflict with the AQMP prior to
13 mitigation. (DEIR, p. 4.3-31).

14 2. Finding: Implementation of Mitigation MM 4.3-1 and Air Quality Regulatory
15 Requirements RR-5 through RR-7 would not reduce the Project's significant direct
16 and cumulatively considerable impacts to less-than-significant levels. The
17 Mitigation Measure and Regulatory Requirement reflect changes or alternations that
18 the County has required, or incorporated into the Project that would lessen the
19 potentially significant impact as defined in the EIR (CEQA Guidelines §
20 15091(a)(1)); however, impacts would remain significant and unavoidable

21 3. Mitigation and/or County Regulations and Design Requirements (RR):

22 **Air Quality Regulatory Requirement RR-5 states:**

23 The Project is required to comply with the provisions of South Coast Air Quality
24 Management District Rule 403, "Fugitive Dust" by implementing the following dust
25 control measures during construction activities, such as earth moving activities,
26 grading, and equipment travel on unpaved roads. Prior to grading permit issuance,
27 the County shall verify that the following notes are included on the grading plan.
28 Project contractors shall be required to ensure compliance with the notes and permit

1 periodic inspection of the construction site by County of Riverside staff or its
2 designee to confirm compliance. These notes also shall be specified in bid
3 documents issued to prospective construction contractors.

- 4 • All clearing, grading, earth-moving, or excavation activities shall cease when
5 winds exceed 25 miles per hour (mph) per SCAQMD guidelines in order to
6 limit fugitive dust emissions.
- 7 • The contractor shall ensure that all disturbed unpaved roads and disturbed
8 areas within the Project are watered at least three (3) times daily during dry
9 weather. Watering, with complete coverage of disturbed areas, shall occur at
10 least three times a day, preferably in the midmorning, afternoon, and after
11 work is done for the day.
- 12 • The contractor shall ensure that traffic speeds on unpaved roads and Project
13 site areas are reduced to 15 mph or less.
- 14 • The contractor shall implement the applicable actions specified in Table 2 of
15 SCAQMD Rule 403 at all times, and shall implement the applicable actions
16 specified in Table 3 of SCAQMD Rule 403 when the applicable performance
17 standards cannot be met through use of Table 2 actions.
- 18 • The contractor shall submit a fully executed Large Operation Notification
19 (Form 403 N) to the SCAQMD within 7 days of qualifying as a Large
20 Operation.
- 21 • The contractor shall maintain daily records to document the specific dust
22 control actions taken, maintain such records for a period of not less than three
23 years; and make such records available to the SCAQMD upon request.
- 24 • The contractor shall install and maintain project signage with project contact
25 signage that meets the minimum standards of the Rule 403 Implementation
26 Handbook, prior to initiating any earthmoving activities.
- 27 • The contractor shall appoint a dust control supervisor that meets the
28 requirements under SCAQMD Rule 403 subpart (e) paragraph (1)(E).

- The contractor shall notify the SCAQMD in writing within 30 days after the site no longer qualifies as a Large Operation as defined by paragraph (c)(21) of SCAQMD Rule 403.
- The contractor shall resubmit the Large Operation Notification (Form 403 N) on an annual basis at least 30 days prior to the expiration date, pursuant to SCAQMD Rule 403 subpart (e) paragraph (2).

Timing/Implementation: Prior to grading permit issuance

Enforcement Monitoring: County of Riverside Building and Safety Department

Air Quality Regulatory Requirement RR-6 states:

The Project is required to comply with the provisions of South Coast Air Quality Management District Rule 113, *Table of Standards*, by requiring that all architectural coatings must consist of low VOCs (i.e., VOCs of less than 100 grams per liter [g/L]) unless otherwise specified in the SCAQMD Table of Standards.

Timing/Implementation: Prior to building permit issuance

Enforcement Monitoring: County of Riverside Building and Safety Department

Air Quality Regulatory Requirement RR-7 states:

The Project's Air Quality Impact Analysis (AQIA) identifies a number of Project design features including energy-saving programs, sustainable design features, and operational programs. These design features are specified in proposed Specific Plan No. 312, Amendment No. 2, summarized in Subsection 1.4 of the Project's AQIA. Compliance with these Project design features would be assured by the County's future review of implementing building permits for compliance with the Specific Plan and would reduce air pollutant emissions.

Timing/Implementation: Prior to building permit issuance

Enforcement Monitoring: County of Riverside Building and Safety Department

Mitigation Measure MM 4.3-1 states:

Prior to grading permit issuance, the County shall verify that the following note is included on the grading plan. Project contractors shall be required to ensure

1 compliance with the notes and permit periodic inspection of the construction site by
2 County of Riverside staff or its designee to confirm compliance. This note also shall
3 be specified in bid documents issued to prospective construction contractors.

- 4 • “During grading activity, all construction equipment (>150 horsepower) shall
5 be California Air Resources Board (CARB) Tier 3 Certified or better. The
6 construction contractor shall keep a log of all construction equipment greater
7 than 150 horsepower demonstrating compliance with this requirement, and
8 the log shall be made available for inspection by Riverside County upon
9 request.”

10 *Timing/Implementation:* Prior to grading permit issuance

11 *Enforcement Monitoring:* County of Riverside Building and Safety Department

- 12 4. Rationale: Compliance with the Applicable Project Design Requirements,
13 Regulatory Requirements, and Mitigation Measure MM 4.3-1 would ensure the
14 Project’s construction-related emissions would fall below SCAQMD regional
15 thresholds and thus be consistent with the SCAQMD 2012 AQMP. No feasible
16 mitigation measures exist that would substantively reduce the Project’s operational
17 emissions of VOCs and NO_x. Thus, the Project’s conflict with the 2012 AQMP
18 would not be mitigated to below a level of significance. Project-related operational
19 air quality impacts derive predominantly from mobile sources. In this regard,
20 approximately 78 percent (by weight) of all Project operational-source emissions
21 would be generated by mobile sources (vehicles). The Project includes applicable
22 project design features (as summarized in detail of Section 1.4 of the Project’s AQIA
23 [EIR Technical Appendix B]) that would reduce NO_x emissions as a result of
24 pedestrian connectivity and collocation of residential, elementary school, and
25 recreational uses. Besides the applicable project design features, regulatory
26 requirements, and mitigation measures, neither the Project Applicant nor the County
27 has any regulatory control over mobile-source emissions. Rather, mobile-source
28 emissions are regulated by the California Air Resources Board (CARB) and the

1 United States Environmental Protection Agency (USEPA). Therefore, no
2 operational-source mitigation measures are feasible for the County to impose.
3 Accordingly, the Project's conflict with AQMP Consistency Criteria #1 cannot be
4 reduced to less-than-significant levels. Absent major revisions to the Project, there
5 are no available mitigation measures that would resolve the Project's exceedance of
6 the AQMP growth assumptions for the site. Therefore, the Project's conflict with
7 the SCAQMD 2012 AQMP during Project operation represents a significant direct
8 and cumulatively-considerable unavoidable impact. (DEIR, p. 4.3-33). The
9 evidence supporting these conclusions includes the discussion of these impacts in
10 Section S.O, Executive Summary, and Subsection 4.3, Air Quality, of the Draft EIR.

11 ***Impact: Air Quality Standards and Violations; Criteria Pollutants (Construction and***
12 ***Operations).***

13 ***Thresholds b and c: Project construction and operation would violate an air quality***
14 ***standard and contribute to an existing or projected air quality violation, and would result***
15 ***in a cumulatively considerable net increase of any criteria pollutant for which the project***
16 ***region is nonattainment under an applicable federal or state ambient air quality standard***
17 ***(including releasing emissions which exceed quantitative thresholds for ozone precursors).***

18 1. Construction and Operational Impact(s):

19 During construction activities, the Project would exceed the SCAQMD Regional
20 Threshold for NO_x. Under long-term operating conditions, the Project would exceed
21 the SCAQMD Regional Threshold for VOCs and NO_x. VOCs and NO_x are both
22 ozone precursors. Thus, the Project's emissions of VOCs (operation) and NO_x
23 (construction and operation) would: violate an air quality standard; contribute
24 substantially to an existing or projected air quality violation (ozone); and result in a
25 cumulatively considerable net increase of a criteria pollutant (ozone) for which the
26 Project region is non-attainment.

27 2. Finding: Implementation of Mitigation MM 4.3-1 and Air Quality Regulatory
28 Requirements RR-5, RR-6, RR-7, and RR-8 would reduce the Project's construction-

1 related emissions of NO_x to below the SCAQMD threshold of significance.
2 However, mitigation is not available to reduce the Project's operational significant
3 direct and cumulatively considerable impacts to less-than-significant levels. Air
4 Quality Regulatory Requirement RR-7 reflects changes or alternations that the
5 County has required, or incorporated into the Project that would lessen the potentially
6 significant impact as defined in the EIR (CEQA Guidelines § 15091(a)(1)); however,
7 impacts would remain significant and unavoidable.

8 3. Construction and Operational Mitigation and/or County Regulations and Design
9 Requirements (RR):

10 **Air Quality Regulatory Requirement RR-5 states:**

11 The Project is required to comply with the provisions of South Coast Air Quality
12 Management District Rule 403, "Fugitive Dust" by implementing the following dust
13 control measures during construction activities, such as earth moving activities,
14 grading, and equipment travel on unpaved roads. Prior to grading permit issuance,
15 the County shall verify that the following notes are included on the grading plan.
16 Project contractors shall be required to ensure compliance with the notes and permit
17 periodic inspection of the construction site by County of Riverside staff or its
18 designee to confirm compliance. These notes also shall be specified in bid
19 documents issued to prospective construction contractors.

- 20 • All clearing, grading, earth-moving, or excavation activities shall cease when winds
21 exceed 25 miles per hour (mph) per SCAQMD guidelines in order to limit fugitive
22 dust emissions.
- 23 • The contractor shall ensure that all disturbed unpaved roads and disturbed areas
24 within the Project are watered at least three (3) times daily during dry weather.
25 Watering, with complete coverage of disturbed areas, shall occur at least three times
26 a day, preferably in the midmorning, afternoon, and after work is done for the day.
- 27 • The contractor shall ensure that traffic speeds on unpaved roads and Project site areas
28 are reduced to 15 mph or less.

- 1 • The contractor shall implement the applicable actions specified in Table 2 of
- 2 SCAQMD Rule 403 at all times, and shall implement the applicable actions specified
- 3 in Table 3 of SCAQMD Rule 403 when the applicable performance standards cannot
- 4 be met through use of Table 2 actions.
- 5 • The contractor shall submit a fully executed Large Operation Notification (Form 403
- 6 N) to the SCAQMD within 7 days of qualifying as a Large Operation.
- 7 • The contractor shall maintain daily records to document the specific dust control
- 8 actions taken, maintain such records for a period of not less than three years; and
- 9 make such records available to the SCAQMD upon request.
- 10 • The contractor shall install and maintain project signage with project contact signage
- 11 that meets the minimum standards of the Rule 403 Implementation Handbook, prior
- 12 to initiating any earthmoving activities.
- 13 • The contractor shall appoint a dust control supervisor that meets the requirements
- 14 under SCAQMD Rule 403 subpart (e) paragraph (1)(E).
- 15 • The contractor shall notify the SCAQMD in writing within 30 days after the site no
- 16 longer qualifies as a Large Operation as defined by paragraph (c)(21) of SCAQMD
- 17 Rule 403.
- 18 • The contractor shall resubmit the Large Operation Notification (Form 403 N) on an
- 19 annual basis at least 30 days prior to the expiration date, pursuant to SCAQMD Rule
- 20 403 subpart (e) paragraph (2).

21 *Timing/Implementation:* Prior to grading permit issuance

22 *Enforcement Monitoring:* County of Riverside Building and Safety Department

23 **Air Quality Regulatory Requirement RR-6 states:**

24 The Project is required to comply with the provisions of South Coast Air Quality
 25 Management District Rule 113, *Table of Standards*, by requiring that all architectural
 26 coatings must consist of low VOCs (i.e., VOCs of less than 100 grams per liter [g/L])
 27 unless otherwise specified in the SCAQMD Table of Standards.

28 *Timing/Implementation:* Prior to building permit issuance

1 *Enforcement Monitoring:* County of Riverside Building and Safety Department

2 **Air Quality Regulatory Requirement RR-7 states:**

3 The Project's Air Quality Impact Analysis (AQIA) identifies a number of Project design
4 features including energy-saving programs, sustainable design features, and
5 operational programs. These design features are specified in proposed Specific Plan
6 No. 312, Amendment No. 2, summarized in Subsection 1.4 of the Project's AQIA.
7 Compliance with these Project design features would be assured by the County's
8 future review of implementing building permits for compliance with the Specific
9 Plan and would reduce air pollutant emissions.

10 *Timing/Implementation:* Prior to building permit issuance

11 *Enforcement Monitoring:* County of Riverside Building and Safety Department

12 **Air Quality Regulatory Requirement RR-8 states:**

13 The Project is required to comply with applicable SCAQMD rules for construction activities
14 on the Project site. SCAQMD Rules that are currently applicable during construction
15 activity for this Project include but are not limited to: Rule 1403 (Asbestos); Rule
16 1113 (Architectural Coatings); Rule 431.2 (Low Sulfur Fuel); Rule 403 (Fugitive
17 Dust); and Rule 1186 / 1186.1 (Street Sweepers).

18 *Timing/Implementation:* Prior to grading or building permit issuance

19 *Enforcement Monitoring:* County of Riverside Building and Safety Department

20 **Mitigation Measure MM 4.3-1 states:**

21 Prior to grading permit issuance, the County shall verify that the following note is
22 included on the grading plan. Project contractors shall be required to ensure
23 compliance with the notes and permit periodic inspection of the construction site by
24 County of Riverside staff or its designee to confirm compliance. This note also shall
25 be specified in bid documents issued to prospective construction contractors.

- 26 • “During grading activity, all construction equipment (>150
27 horsepower) shall be California Air Resources Board (CARB) Tier
28 3 Certified or better. The construction contractor shall keep a log of

1 all construction equipment greater than 150 horsepower
2 demonstrating compliance with this requirement, and the log shall
3 be made available for inspection by Riverside County upon
4 request.”

5 *Timing/Implementation:* Prior to grading permit issuance

6 *Enforcement Monitoring:* County of Riverside Building and Safety Department

7 4. Rationale: Compliance with the Applicable Project Design Requirements,
8 Regulatory Requirements, and Mitigation Measure MM 4.3-1 would reduce the
9 Project’s construction related impact due to NO_x emissions to a level below
10 significance, as shown in EIR Table 4.3-12, Overall Construction Emissions
11 Summary (Mitigated).

12 EIR Table 4.3-13, Summary of Peak Operational Emissions (Mitigated), summarizes
13 the level of emissions under Project operational conditions assuming compliance
14 with applicable regulations and the design features identified by Specific Plan No.
15 312, Amendment No. 2 (as required by Air Quality Regulatory Requirement RR-7).
16 As shown, emissions under operational conditions still would exceed the
17 SCAQMD’s Regional Thresholds for VOCs and NO_x, both of which are ozone
18 precursors. Project-related operational air quality impacts derive predominantly
19 from mobile sources. In this regard, approximately 78 percent (by weight) of all
20 Project operational-source emissions would be generated by mobile sources
21 (vehicles). The Project includes applicable project design features (as summarized
22 in detail of Section 1.4 of the Project’s AQIA [EIR Technical Appendix B]) that
23 would reduce NO_x emissions as a result of pedestrian connectivity and a mixed-use
24 design. Besides the applicable project design features, neither the Project Applicant
25 nor the County has any regulatory control over mobile-source emissions. Rather,
26 mobile-source source emissions are regulated by CARB and the US EPA.
27 Accordingly, the Project’s long-term emissions would:

- 28 • Violate the SCAQMD AQMP air quality standards for VOCs and NO_x;

- Contribute substantially to an existing or projected air quality violation (i.e., ozone); and
- Result in a cumulatively considerable net increase of ozone, for which the SoCAB is considered in non-attainment.

There is no feasible mitigation available to reduce the Project's mobile-source emissions such that operational emissions would be below the SCAQMD Regional Thresholds for VOCs and NO_x. Accordingly, the Project's operational VOC and NO_x impacts would be considered significant and unavoidable on both a direct and cumulatively-considerable basis. (DEIR, p. 4.3-34.) The evidence supporting these conclusions includes the discussion of these impacts in Section S.O, Executive Summary, and Section 4.3, Air Quality of the Draft EIR.

B. Transportation and Traffic.

Impact: Conflict with an Applicable Plan, Ordinance, or Policy Related to Transportation and Non-Motorized Travel.

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

1. Project Impact(s): The proposed Project would result in direct and/or cumulatively-considerable impacts as summarized below.

Existing Plus Ambient Plus Project (EAP) 2018 Conditions

The Project would result in significant direct impacts to the following intersections under EAP (2018) conditions:

- Intersection #26 – Briggs Road at Max Gilliss Boulevard at Leon Road: LOS F (PM peak hour).

Project-related impacts to the following intersections would be considered