

1 would not result in a cumulatively considerable contribution to world climate change
2 (DEIR, 6-4).

3 **G. Hazards and Hazardous Materials.**

4 **Cumulative Impact Finding:** Not cumulatively considerable.

5 The Project area is mostly undeveloped with rural land uses in the vicinity. With the
6 exception of potential soils contamination from previous use of chemicals associated with
7 past agricultural uses, potential impact with respect to Hazards and Hazardous Materials
8 were all found to be less than significant and, by their site-specific nature, will not cause
9 cumulatively significant impacts. The context for assessing hazard impacts related to
10 operation of the March Air Reserve Base/Inland Port Airport (March ARB/IPA) is any
11 development within the airport influence area. Future development in the March ARB/IPA
12 influence area could increase the number of people working or residing in the safety areas
13 of the airport; however, future development would be subject to the standards of the March
14 ARB/IPA Airport Land Use Compatibility Plan (ALUCP) and the regulations of the Federal
15 Aviation Administration. These regulations limit the density of people in safety areas to
16 minimize potential impacts to human life in case of an aircraft crash. As discussed in Section
17 4.8 of the DEIR, the proposed Project will be consistent with the March ARB/IPA ALUCP.
18 Cumulative safety impacts associated with the operation of March ARB/IPA would be less
19 than significant. A cumulative impact could occur if construction or operation of the
20 proposed Project would, in conjunction with the development of nearby projects, physically
21 interfere with an adopted emergency response plan or impede emergency access. The
22 proposed Project will provide four vehicular access points on Nuevo Road and will be of
23 sufficient width to provide access to emergency vehicles as required by the Fire Code. The
24 proposed Project will not cause area intersections to operate at deficient levels of service as
25 discussed in Section 4.15 of the DEIR, and therefore, not physically interfere with
26 emergency access to the area due to increased trips. All Project elements, including
27 landscaping, would be sited with sufficient clearance from proposed structures so as not to
28 interfere with emergency access to and evacuation from the structures. Therefore, Project

1 impacts would not be cumulatively considerable. In addition, the Project, as well as future
2 development projects, would be required to comply with all applicable hazardous materials
3 handling and storage requirements to ensure that potential impacts would be less than
4 significant. Therefore, the Project, in conjunction with other future development projects,
5 would not result in a cumulatively significant impact related to hazards and hazardous
6 materials (DEIR, 6-5).

7 **H. Hydrology and Water Quality.**

8 **Cumulative Impact Finding:** Not cumulatively considerable.

9 As discussed in Section 4.9 (Hydrology and Water Quality), on-site runoff will be conveyed
10 to the proposed on-site detention basins via proposed on-site catch basins and storm drains.
11 The basins are designed to capture and mitigate stormwater runoff from a two-year, 24-hour
12 event. The proposed Project will increase on-site runoff; however, the proposed basins will
13 mitigate both the water quality and quantity impacts of this increased runoff. Therefore, the
14 proposed Project will not substantially alter the existing drainage pattern of the site in a
15 manner that would increase the rate or amount of surface runoff in a manner that would
16 result in erosion, siltation, or flooding on- or off-site. Impacts would not be cumulatively
17 considerable. As discussed in Section 4.9 of the DEIR, a preliminary Project specific Water
18 Quality Management Plan (WQMP) was prepared for the proposed Project in compliance
19 with the requirements of County of Riverside Ordinance No. 754 as well as the requirements
20 of the Regional Water Quality Control Board Order No. R80-2010-0033, which is the
21 NPDES Permit and Waste Discharge Requirements of the Riverside County Flood Control
22 and Water Conservation District. In addition, the proposed project will include operational
23 Best Management Practices (BMPs) such as regular sweeping and "housekeeping". The
24 proposed Project will not result in any cumulative violations of water quality standards or
25 waste discharge requirements. The context for assessing cumulative groundwater impacts is
26 the subsurface aquifers serving the Project area and region that includes the San Jacinto
27 Groundwater Basin. As discussed in Section 4.9 of the DEIR, EMWD provides potable
28 water and recycled water to the proposed Project. The on-site runoff will be directed to on-

1 site basins where water will remain until it infiltrates into the ground. The proposed Project
2 will not interfere with groundwater recharge. Based on the Urban Water Management Plan
3 prepared for the EMWD service area, there is sufficient supply to meet projected water
4 demands through the year 2040. As development of cumulative projects occurs in the
5 vicinity, groundwater supplies and the ability to serve those projects will be assessed by
6 EMWD and increases in impervious surfaces would be mitigated in accordance with Low
7 Impact Development requirements. The proposed Project will not result in cumulative
8 depletion of groundwater supplies or cumulative interference of groundwater recharge
9 **(DEIR, 6-5).**

10 **I. Land Use and Planning.**

11 **Cumulative Impact Finding:** Not cumulatively considerable.

12 Agricultural and residential uses and vacant land surrounds the Project site. The proposed
13 residential use will be compatible with existing land uses, as discussed in Section 4.10. As
14 discussed in Section 4.2, the County is experiencing increased transition of agricultural land
15 to non-agricultural uses. Although the proposed development would facilitate further
16 conversion of land within a historically agricultural area to non-agricultural use, this
17 transition has been anticipated and contemplated in the County's General Plan. The proposed
18 Project is consistent with and reflects the County's vision for future development within the
19 area. The proposed Project will not result in the cumulative impacts related to land use
20 compatibility **(DEIR, 6-6)**. The context for assessing cumulative impacts related to land use
21 and planning would be the Lakeview-Nuevo Plan Area of unincorporated Riverside County.
22 As part of the proposed Project, a Zone Change, Tentative Parcel Map, and Tentative Tract
23 Map are proposed. In the event that these applications would affect future land uses on other
24 sites in unincorporated Riverside County, a cumulative impact would occur. However, the
25 Zone Change will only dictate development and development standards for the Project site.
26 Therefore, no cumulative impact to land use and planning would occur as a result of the
27 proposed Project. As detailed in **DEIR Table 3.10-3**, the Project is consistent with all
28

1 County of Riverside General Plan land use policies, and as shown in **DEIR Table 3.10-4,**
2 **(DEIR, 4-12).**

3 **J. Mineral Resources.**

4 **Cumulative Impact Finding:** Not cumulatively considerable. The County's General Plan
5 does not identify any significant mineral resources on the Project site or in the Project
6 vicinity. Other future development projects would be required to evaluate impacts on mineral
7 resources and provide mitigation where necessary. Therefore, the Project, in conjunction
8 with other projects, would not result in cumulatively significant impacts to mineral resources
9 **(DEIR, 4-14).**

10 **K. Noise.**

11 **Cumulative Impact Finding:** Not cumulatively considerable.

12 As discussed in Section 5.2 of the Noise Report and DEIR Section 3.12, operation of the
13 Project would not create any significant stationary noise impacts above existing levels, nor
14 would they exceed residential noise standards; therefore, stationary noise impacts would not
15 be cumulatively significant. Construction activities associated with the proposed Project
16 have the potential to result in substantial sources of noise. As discussed in DEIR Section
17 3.12, Noise, the construction activities for the proposed Project could potentially exceed the
18 noise thresholds for certain receivers. Mitigation is proposed that would require the
19 contractor to implement various sound control measures, including limitation of construction
20 hours and using noise attenuation devices on heavy equipment. Implementation of these
21 mitigation measures would reduce Project impacts to a less than significant level. Similar to
22 short-term air quality cumulative impacts, the context for assessing cumulative short-term
23 construction-related noise and vibration impacts is the combination of nearby construction
24 activities occurring concurrently with development of the Project site. Cumulative impacts
25 would occur where the cumulative effects of Project construction and construction in the
26 Project vicinity cause noise level and vibration thresholds to be exceeded, thereby potentially
27 impacting the health and quality of life of persons in the project vicinity. Construction
28 activities increase temporary noise in the vicinity. Construction-related noise and vibration

1 would be subject to the standards of the General Plan and other industry standards for
2 modeling, analysis, and mitigation pursuant to CEQA and local agency standard
3 environmental review processes. With Project mitigation measures related to Project
4 construction noise and the requirements for mitigation of other construction projects,
5 potential cumulative construction noise and/or vibration impacts would not be considerable.
6 The context for assessing cumulative noise impacts in the Project vicinity is the extent to
7 where noise from operation of the proposed Project is no longer discernible with existing
8 and potential future ambient noise sources. Future development when considered with
9 existing development would result in traffic increase and other business and residential
10 activities in the Project vicinity. These activities would gradually increase ambient noise
11 levels throughout the area. Future development would be subject to development review to
12 assess noise impacts and ensure that General Plan Noise Element standards are met. Future
13 uses would also be subject to noise ordinance standards for the control of nuisance noise.
14 The Project build out will not result in noise levels over the County's threshold and will not
15 result in ambient noise levels increasing by greater than 3 dBA in areas already experiencing
16 noise levels in exceedance of allowable levels. Therefore, increase in traffic noise due to the
17 proposed Project, related projects, and ambient growth will not be cumulatively considerable
18 **(DEIR, 6-6).**

19 **L. Population and Housing.**

20 **Cumulative Impact Finding:** Not cumulatively considerable.

21 Rates of growth in unincorporated Riverside County would occur in response to a variety
22 of regional and national socio-economic factors, including birth rates, migration from other
23 states and other countries, land values, employment opportunities, interest rates, housing
24 supply, demand and pricing, and broad regional and national economic conditions. Growth
25 forecasts have been developed by SCAG. Population in unincorporated Riverside County is
26 projected to increase by approximately 37 percent by 2040 from 2016 levels (364,413 in
27 2016 and 499,200 in 2040). As discussed in Section 4.12 (Population and Housing), the
28 proposed Project has the potential to generate approximately 1,875 new residents. Housing

1 in unincorporated Riverside County is projected to increase by approximately 19 percent
2 (136,320 in 2016 and 162,900 in 2040). The proposed Project includes 584 housing units.
3 The anticipated increases in population and housing are within regional growth projections;
4 therefore, the proposed Project would not induce substantial growth within the area and
5 therefore would not result in cumulatively significant impacts (DEIR, 4-15).

6 **M. Public Services.**

7 **Cumulative Impact Finding:** Not cumulatively considerable.

8 The Project would not create any significant impacts with respect to public services. The
9 Project would not substantially increase the need for new or expanded facilities for fire,
10 police, schools, and other public facilities, the construction of which could cause significant
11 environmental impacts. The context for assessing cumulative environmental impacts
12 associated with expansion of facilities needed to provide school services is the extent of the
13 jurisdiction providing the service. School services will be provided by the Nuview Union
14 School District for grades kindergarten through eighth grade and Perris Union High School
15 District will provide school services for grades nine through twelve. Cumulative impacts
16 could occur if growth within each service area requires expansion of servicing facilities such
17 as construction of a new school or expansion of an existing school. Services are maintained
18 and expanded through property taxes and collection of fees that grow incrementally as
19 development occurs within a service area. As new facilities are required, environmental
20 review would commence consistent with CEQA to analyze and mitigate any potential
21 impacts. With the proposed Project, as discussed in Section 4.13 (Public Services), new or
22 expanded facilities will be required to maintain current level of service with the development
23 of the proposed Project and cumulative projects within the Project area. As discussed in
24 Section 4.13, the installation of portable class rooms will be required to serve the additional
25 students generated by anticipated development in the Project area in the short term. The
26 construction of additional schools may be required to serve increasing populations in the
27 long term. Therefore, impacts are cumulatively considerable. In addition, the Project would
28 pay into established development impact fee programs to offset incremental increases in

1 demand for fire, police, and school facilities from the Project. The Project will be required
2 to pay its "fair share" contribution into the County's development impact fee (DEIR, 6-6).

3 **N. Recreation.**

4 **Cumulative Impact Finding:** Not cumulatively considerable.

5 The context for assessing cumulative environmental impacts associated with the accelerated
6 deterioration of existing regional parks or recreational facilities is the extent of the
7 jurisdiction providing the service. Cumulative impacts could occur if growth within the
8 Project area causes increased use of existing facilities such that physical deterioration of
9 those facilities would be accelerated. As discussed in Section 4.14, the proposed Project
10 would not significantly increase use of existing recreational facilities because residents
11 would be provided with sufficient private amenities. Existing public facilities may
12 occasionally be utilized if the recreation needs of all the residents are not met on site.
13 However, because of the extensive private amenities provided for residents, the likelihood
14 of residents going off-site to use public facilities to such an extent as to cause physical
15 deterioration of those facilities is unlikely. Therefore, cumulative impacts related to
16 recreational facilities would be less than significant (DEIR, 6-7).

17 **O. Traffic and Circulation.**

18 **Cumulative Impact Finding:** Not cumulatively considerable.

19 The Project traffic study includes analysis of without and with Project traffic impacts for
20 year 2019 and 2021 scenarios. The study analyzed 26 intersections with cumulative Project
21 trip generation and ambient traffic growth and is therefore inherently a cumulative analysis.
22 Section 4.15 discusses construction traffic in the Project vicinity. Based on the analysis,
23 construction of the Project is expected to generate fewer trips than Project operation and
24 consequently will not result in cumulative impacts to level of service. Based on the result of
25 the traffic analysis, the Project will not result in cumulatively considerable operational traffic
26 impacts with implementation of mitigation (DEIR, 6-7). A cumulative impact could occur
27 if construction or operation of the proposed Project would, in conjunction with the
28 development of nearby projects, physically interfere with an adopted emergency response

1 plan or impede emergency access. The proposed Project will provide four vehicular access
2 points on Nuevo Road and will be of sufficient width to provide access to emergency
3 vehicles as required by the Fire Code. The proposed Project will not cause area intersections
4 to operate at deficient levels of service as discussed in Section 4.15, and therefore, not
5 physically interfere with emergency access to the area due to increased trips. Therefore,
6 Project impacts would not be cumulatively considerable. The proposed Project does not
7 include any off-site improvements that would result in decreased performance or safety of
8 public transit, bicycle, or pedestrian facilities. The proposed Project includes internal
9 community trails and will provide a 20-foot wide easement along the south side of the
10 proposed development with the potential to connect to future regional trails. Therefore, the
11 proposed Project will increase connectivity for pedestrians and bicyclists and will not
12 decrease the safety of pedestrians or bicyclists. Impacts would not be cumulatively
13 considerable (DEIR, 6-7).

14 **P. Tribal Cultural Resources.**

15 **Cumulative Impact Finding:** Not cumulatively considerable.

16 The context for assessing cumulative impacts to Tribal Cultural Resources is through
17 government to government consultation as specified in Assembly Bill 52 (AB52) as defined
18 in Public Resources Code Section 5020.1(k). AB 52 amended CEQA to create a separate
19 category of cultural resources, "tribal cultural resources" as defined in Public Resources
20 Code Section 21074 that provides that a project with an effect that may cause a substantial
21 adverse change in the significance of a tribal cultural resource is a project that may have a
22 significant effect on the human environment. As discussed in Section 4.16, development of
23 the proposed Project will not cause a substantial adverse change in tribal cultural resources
24 as future projects in the Project area would also be subject to AB 52 regulations as defined
25 in Public Resources Code Section 5020.1(k) and to General Plan policies ensuring that a
26 collective loss of tribal cultural resources does not occur within the County. Outside of the
27 Project site and the County, projects statewide are subject to CEQA that requires AB 52
28 consultations, evaluations, and, if necessary, mitigation for the potential loss of tribal cultural

1 resources. This will ensure that tribal cultural resources throughout the state are not lost to
2 long-term development. Cumulative impacts would be less than significant with
3 implementation of mitigation (DEIR, 6-7).

4 **Q. Utilities and Service Systems.**

5 **Cumulative Impact Finding:** Not cumulatively considerable.

6 Wastewater

7 The context for assessing cumulative impacts to utilities and service systems is the water
8 supply and wastewater conveyance and treatment infrastructure that support the Project site
9 and other development within the Project area. This includes systems operated by Eastern
10 Municipal Water District (EMWD). Long-term maintenance and potential expansion of
11 these facilities would be required as the region continues to grow and existing infrastructure
12 ages. All utility providers currently impose development impact fees, connection fees, and
13 service fees designed to maintain and incrementally expand infrastructure to meet existing
14 and growing demand. Future development in the Project vicinity and throughout the region
15 would be subject to such fees in accordance with applicable ordinances and service master
16 plans. Any impacts associated with the need to expand service facilities would be subject to
17 environmental review pursuant to CEQA and local agency standards. The proposed Project
18 would not have a cumulatively considerable impact on these facilities because the proposed
19 Project does not require expansion of any water, wastewater, or solid waste facility.
20 Cumulatively considerable impacts to utilities and service systems would be less than
21 significant.

22 Water

23 The context for assessing cumulative impacts is the water sources serving the proposed
24 Project and the region. Water service to the proposed Project is provided by EMWD. EMWD
25 has prepared an Urban Water Management Plan (UWMP) in which EMWD assessed
26 whether it has the ability to meet current and projected water demands through 2040 during
27 normal, historic single-dry and historic multiple-dry year periods using imported water from
28 MWD with existing supply resources. The UWMP determined that EMWD will have

1 sufficient supplies to meet both retail and wholesale demands from 2020 to 2040 under
2 normal, single-dry and multi-dry year conditions. The proposed Project would not exceed
3 the SCAG projected growth rates and is within the long-term water demands anticipated by
4 EMWD. All substantial development proposed within the EMWD must undergo a similar
5 WSA planning process that will identify water demand and offset requirements. The
6 stringent water conservation requirements placed on new development combined with tiered
7 water rates will reduce the cumulative impact of new development. EMWD requires
8 development that would demand more water than has been planned for to offset the
9 additional demand, as is the case with the proposed Project. Cumulative impacts to water
10 supplies would therefore be less than significant (DEIR, 4-19).

11 Solid Waste

12 The context for assessing cumulative impacts is the remaining capacity of Riverside County
13 landfills that would serve the proposed Project. According to the Riverside County General
14 Plan EIR, waste originating from anywhere within Riverside County may be accepted for
15 disposal at any of the County's sites. The Riverside County Waste Management Department
16 operates six active landfills and administers a contract agreement with one private landfill.
17 County landfills have sufficient capacity to accommodate projected growth through the year
18 2025, which is projected to have a surplus in capacity of 154,709,576 tons. The proposed
19 Project is anticipated to generate approximately 132.77 tons of solid waste a year with
20 consideration of required solid waste diversion rates. Therefore, there is sufficient capacity
21 to accommodate solid waste generated by the proposed Project and cumulative impacts
22 would therefore be less than significant (DEIR, 6-8).

23 **BE IT FURTHER RESOLVED** by the Board of Supervisors that it has considered the following
24 alternatives identified in DEIR No. 550 in light of the environmental impacts which cannot be avoided or
25 substantially lessened and has rejected those alternatives as failing to meet most of the Project's objectives,
26 as failing to reduce or avoid the Project's significant impacts or as infeasible for the reasons hereinafter
27 stated:

- 28 A. Pursuant to Public Resources Code Section 21002 and the State CEQA Guidelines section

1 15126.6(a), an EIR must assess a reasonable range of alternatives to the project action or
2 location. Section 15126.6(a) places special emphasis on focusing the discussion on
3 alternatives which provide opportunities for eliminating any significant adverse
4 environmental impacts, or reducing them to a level of insignificance, even if the alternative
5 would impede to some degree the attainment of the project objectives or would be costlier.
6 In this regard, the EIR must identify an environmentally superior alternative among the other
7 alternatives. As with cumulative impacts, the discussion of alternatives is governed by the
8 "rule of reason." The EIR need not consider an alternative whose effect cannot be reasonably
9 ascertained or does not contribute to an informed decision-making and public participation
10 process. The range of alternatives is defined by those alternatives which could feasibly attain
11 the objectives of the project. As directed by State CEQA Guidelines section 15126.6(a), an
12 EIR shall include alternatives to the project that could feasibly accomplish most of the basic
13 objectives of the project.

14 B. The Project has been developed to achieve the following objectives:

- 15 • **OBJ-1:** Establish a master planned community with a balance of land uses including
16 single family housing, recreation and natural open space.
- 17 • **OBJ-2:** Help the County achieve its General Plan housing growth goals and policies.
- 18 • **OBJ-3:** Provide three residential lot size categories consistent with the existing
19 Medium Density Residential Land Use Designation (2-5 du/ac) to accommodate a
20 variety of housing styles and resident lifecycles appropriate to the locale.
- 21 • **OBJ-4:** Utilize architectural styles and design elements which reflect
22 Lakeview/Nuevo heritage, namely through the use of Ranch, Farmhouse, Craftsman
23 and Spanish styles.
- 24 • **OBJ-5:** Provide two neighborhood parks at locations within the community which
25 are centrally located and accessible by the Project's pedestrian trail system.
- 26 • **OBJ-6:** Implement a trail system for the Project consistent with the Lakeview/Nuevo
27 Area Plan Trails System.
- 28 • **OBJ-7:** Preserve onsite natural resource areas consistent with the County's MSHCP.

1 These Project objectives were defined consistent with the development proposal for this
2 location. As directed in State CEQA Guidelines section 15126.6(a), an EIR shall include
3 alternatives to the project that could avoid or substantially reduce one or more of the
4 significant effects. Because not all significant effects can be substantially reduced to a less-
5 than-significant level, either by adoption of mitigation measures, Project Design Features,
6 existing regulations, or by standard conditions of approval, the following section considers
7 the feasibility of the Project alternatives as compared to the proposed Project. As explained
8 below, these findings describe and reject, for reasons documented in the Final EIR No. 550
9 and summarized below, each one of the Project alternatives. The evidence supporting these
10 findings is presented in Chapter 5, *Alternatives*, of the DEIR and elsewhere in the
11 administrative record as a whole.

12 C. Alternative 1: No Project Alternative -No Build Alternative

- 13 1. This alternative evaluated the environmental impacts resulting from a hypothetical
14 continuance of the existing land uses, under which the Project site would remain
15 vacant and no development would occur.
- 16 2. According to Section 15126.6(e)(2) of the CEQA Guidelines, the evaluation of
17 alternatives in an EIR shall include a *no Project* scenario, defined as “. . . what is
18 reasonably expected to occur in the foreseeable future if the Project were not
19 approved, based on current plans and consistent with available infrastructure and
20 community services.” Alternative 1 would consist of continued vacancy of the
21 Project site.
- 22 3. With respect to the No Project Alternative-No Build Alternative, Project objectives
23 are not attained because no development is included as a part of this alternative. With
24 respect to the significant unavoidable impacts of the Project, this alternative would
25 avoid all the unavoidable significant impacts of the Project; however, it would not
26 generate substantial benefits to the County of Riverside and local economy, by
27 providing new jobs and additional tax revenues. Alternative 1 would consist of
28 continued vacancy of the Project site. None of the Project objectives would be met

1 under this alternative.

- 2 4. The Board of Supervisors rejects as infeasible Alternative 1, the No Project
3 Alternative-No Build Alternative on the following ground, which individually
4 provides sufficient justification for rejection of this alternative: (1) Alternative 1 fails
5 to meet any of the Project objectives. This alternative would not meet Objectives 6
6 and 7 because although the Project site would remain in its undeveloped state, no
7 trail system would be developed, and no portion of the Project site would be
8 dedicated to Riverside County for use as an MSHCP Conservation Area. Alternative
9 1 was selected for evaluation because of CEQA mandate although it does not meet
10 the objectives of the Project.

11 D. Alternative 2: Rural Residential Development Alternative

- 12 1. This alternative would involve development of the Project site with 343 single-
13 family homes on 171.68 acres within the existing Rural Residential Zone.
- 14 2. This alternative would result in the development of up to 343 single-family homes.
15 Ordinance No. 348 requires a minimum lot size of one-half acre and allows the
16 development of single family residential, grazing, farms for selective breeding and
17 raising of specified livestock, and nurseries, greenhouses, orchards, to name a few.
18 The total buildable area of the Project site is approximately 171.68 acres. This
19 alternative assumes that the neighborhood parks, sewer lift stations, and recreational
20 trail will not be a part of the development. Not considering land area required for
21 internal roadways, park space, or sewer lift stations, this alternative assumes that a
22 worst-case maximum of 343 single family units would be developed.
- 23 3. The proposed Project's significant and unavoidable agricultural impacts would not
24 be reduced to less than significant levels. This Alternative would not meet most of
25 the basic Project objectives to the same extent as the proposed Project. This
26 Alternative would not meet Objectives 2 and 3 to the same extent as the proposed
27 Project because with fewer residential dwelling units the project would not allow for
28 sufficient dwelling units to be economically feasible. Objectives 1, 5, or 6 would not

1 be met as this alternative assumes that all developable area would be developed as
2 housing and/or agricultural and not as neighborhood parks or recreational trails. This
3 alternative would meet Objective 4 and 7 as development under this alternative
4 would still be required to reflect the architectural styles and elements which reflect
5 Lakeview/Nuevo heritage and to preserve onsite natural resources areas.

- 6 4. The Board of Supervisors rejects as infeasible Alternative 2, the Rural Residential
7 Development, because it does not meet most project objectives or does not meet
8 objectives to the extent that the Project does. Therefore, Alternative 2 is eliminated
9 from further consideration.

10 E. Alternative 3: Alternative Location

- 11 1. Alternative properties were examined through the Nuevo/Lakeview Area Plan of
12 Riverside County to identify potential alternative locations for the Project. Individual
13 parcels and assemblages of parcels were examined. This alternative assumes that the
14 scale and operational characteristics of the proposed project would remain the same;
15 therefore, an alternative location must consist of approximately 266 acres to support
16 the 584 single family homes in the following configurations:

- 17 • 599 lots/units
- 18 • 584 single-family homes

19 Alternative properties were examined throughout the Nuevo/Lakeview Area Plan of
20 Riverside County to identify potential alternative locations for the Project. Individual
21 parcels and assemblages of parcels were examined. This alternative assumes that the
22 scale and operational characteristics of the proposed Project would remain the same;
23 therefore, an alternative location must consist of approximately 266 acres to support
24 the 584 single family homes. Alternative locations are considered to reduce or avoid
25 potential immediate impacts around the Project site (DEIR, 6-25).

- 26 2. The Residential Alternative would result in similar significant adverse and
27 unavoidable impacts to Air Quality, due to increased vehicle trips.
- 28 3. The Board of Supervisors rejects as infeasible Alternative 3, the Residential

1 Alternative, on the following grounds, each of which individually provides sufficient
2 justification for rejection of this alternative: (1) Alternative 3 would not fully meet
3 the majority of the Project Objectives; and (2) Alternative 3 does not eliminate any
4 of the significant impacts such as air quality of the proposed Project. Therefore,
5 Alternative 3 is eliminated from further consideration.

6 F. Alternative 4: Reduced Project Size Alternative.

- 7 1. Under the Reduced project size Alternative, this alternative would result in the
8 development of up to 224 single family units with larger lot sizes within the
9 approximately 171.68 acres. This alternative would result in reductions in criteria
10 pollutant emissions, greenhouse gas emissions, traffic generation, and traffic-related
11 noise.
- 12 2. This alternative would result in significantly fewer population/housing and public
13 service impacts. Significant and unavoidable air quality impacts would be reduced
14 to less-than-significant levels. However, the proposed Project's significant and
15 unavoidable agricultural impacts would not be reduced to less than significant levels.
- 16 3. This Alternative would not meet most of the basic Project objectives to the same
17 extent as the proposed Project. This Alternative would not meet Objectives 2 and 3
18 to the same extent as the proposed Project due to substantially fewer residential
19 dwelling units. Objectives 1, 5, or 6 would not be met as this alternative assumes that
20 all developable area would be developed as housing and/or agricultural and not as
21 neighborhood parks or recreational trails. This alternative would meet Objective 4
22 and 7 as development under this alternative would still be required to reflect the
23 architectural styles and elements which reflect Lakeview/Nuevo heritage and to
24 preserve onsite natural resources areas.

25 G. Environmentally Superior Alternative.

- 26 1. Section 15126.6(e) (2) of the State CEQA Guidelines indicates that an analysis of
27 alternatives to a proposed Project shall identify an environmentally superior
28 alternative among the alternatives evaluated in an EIR. This issue is evaluated in

1 Section 5.0 of the DEIR.

- 2 2. Alternative 1, the No Project Alternative is the environmentally superior alternative.
3 Aside from the No Project Alternative, the Reduced Project Alternative is the
4 environmentally superior alternative. However, the Reduced Project Alternative fails
5 to meet the majority of the Project objectives and would not generate substantial
6 benefits to the County and local economy.
- 7 3. The DEIR also considered alternatives that were rejected from further analysis on
8 grounds they were infeasible. First, an alternative site location was considered
9 in the DEIR, but then rejected from further analysis because the Project applicant
10 does not own or control an alternative site, and because no other site was deemed
11 large enough to support the Project, based on considerations, such as size, and
12 configuration. Alternative 2, would not reduce impacts more significantly than
13 Alternative 4, and does not meet a greater quantity of the Project objectives than
14 Alternative 4 and was therefore rejected.
- 15 4. Alternative 4 would result in fewer environmental impacts when compared to the
16 Project but does not meet the majority of the Project objectives. Alternative 4 does not
17 meet the following Project objectives: objective 2, help County meet its General Plan
18 housing growth goals and policies; objective 3, to provide a residential development
19 consistent with the existing Medium Density Residential Land Use Designation (2-
20 5du/ac) to accommodate a variety of housing styles and resident lifecycles
21 appropriate to the locale; objective 5, provide centrally-located and pedestrian
22 accessible neighborhood parks to serve the community and preserve onsite natural
23 resources consistent with the County's MSHCP; and objective 6 implement a trail
24 system for the Project consistent with the Lakeview/Nuevo Area Plan Trails System.
25 When environmental impacts are compared to the extent of the proposed project,
26 Alternative 4 does not meet the majority of the Project objectives while reducing
27 environmental impacts and is therefore not a viable Alternative to the proposed
28 Project.

1 **BE IT FURTHER RESOLVED** by the Board of Supervisors that it has, pursuant to State CEQA
2 Guidelines section 15093, balanced the “economic, legal, social, technological, and other benefits” of the
3 Project, against the unavoidable adverse environmental effects described herein, and has determined that
4 each and every one of the following benefits individually outweigh and render acceptable each and every
5 one of those environmental effects:

- 6 A. The Project would include a Zone Change, Tentative Parcel Map, and Tentative Tract Map.
7 The Zone Change will only dictate development and development standards for the Project
8 site.
- 9 B. The Project would have the potential to generate approximately 1,875 new residents.
10 Housing in unincorporated Riverside County is projected to increase by approximately 19
11 percent (136,320 in 2016 and 162,900 in 2040). The proposed Project includes 584 housing
12 units. The anticipated increases in population and housing are within regional growth
13 projections; and the proposed Project would accommodate the projected growth within the
14 area.
- 15 C. The proposed Project will be subject to state water efficiency regulations pursuant to the
16 California Building Code (CBC) that will reduce long-term Project energy demand. These
17 requirements would reduce wasteful, inefficient, and unnecessary consumption of energy
18 over the long-term.
- 19 D. The proposed Project architecture reflects elements of California Ranch, American
20 Farmhouse, Craftsman, and Spanish Eclectic styles. The proposed residential use will have
21 maximum heights of 40 feet and would be compatible with the height and scale of residential
22 uses in the Project vicinity. The proposed Project, as well as future development projects
23 within the vicinity, is subject to County Design Guidelines and Zoning Code requirements
24 related to building height, setback requirements, landscaping, and visual character. As the
25 area develops over the long-term, the County and surrounding cities will consistently apply
26 design guidelines that require developments to comply with applicable design and
27 development standards.
- 28 E. The Project will maximize the use of a currently underutilized site and promote the efficient

1 use of land, while still providing natural open space consistent with the rural identity of the
2 community.

3 F. The Project will permanently preserve and protect 71.2 acres of the Project site as open
4 space. The Project includes thoughtful design elements such as decorative fencing, enhanced
5 landscaping, water tower and barn features, and equestrian/pedestrian trails. The Project site
6 will feature an attractive design with earth-tone colors and ranch-inspired architectural
7 features.

8 G. The Project will include on-site trails that connect with existing trails to contribute to the
9 development of the County of Riverside's trail system, thereby improving regional hiking
10 and recreational facilities.

11 H. The Project will generate 1,785 additional residents that would contribute to the local
12 employment base. The proposed Project would contribute to the local economy by
13 producing temporary construction and development positions.

14 **BE IT FURTHER RESOLVED** by the Board of Supervisors that the State CEQA Guidelines
15 section 15126(g) requires an EIR to discuss how a proposed project could directly or indirectly lead to
16 economic, population, or housing growth. Growth-inducing effects include ways in which the proposed
17 Project could foster economic or population growth, or the construction of additional housing, either
18 directly or indirectly, in the surrounding environment. A common example is a major infrastructure project
19 or road extension that provides urban service capacities to currently undeveloped areas, thus removing an
20 obstacle to population growth. A project may be growth inducing if it removes obstacles to growth, taxes,
21 community service facilities, or encourages other activities which cause significant environmental effect.
22 The discussion is as follows:

23 A. The proposed Project has the potential to generate approximately 1,875 new residents.
24 Housing in unincorporated Riverside County is projected to increase by approximately 19
25 percent (136,320 in 2016 and 162,900 in 2040). The proposed Project includes 584 housing
26 units. The anticipated increases in population and housing are within regional growth
27 projections; therefore, the proposed Project would not induce substantial growth within the
28 area and therefore would not result in cumulatively significant impacts.

1 B. In addition, the Project area is already in the process of transitioning to higher-intensity uses.
2 Implementation of the Project would not likely induce growth that is inconsistent with
3 historic and current trends in the area.

4 C. The proposed residential use will be compatible with existing land uses, and the County is
5 experiencing increased transition of agricultural land to non-agricultural uses. Although the
6 proposed development would facilitate further conversion of land within a historically
7 agricultural area to non-agricultural use, this transition has been anticipated and
8 contemplated in the County's General Plan and is consistent with the General Plan. The
9 proposed Project is consistent with and reflects the County's vision for future development
10 within the area.

11 **BE IT FURTHER RESOLVED** by the Board of Supervisors that the Final EIR also discusses,
12 pursuant to State CEQA Guidelines sections 15126(c) and 15126.2(c), significant irreversible
13 environmental changes and provides in **DEIR Section 6**, the following:

14 A. An "Energy Analysis" of the proposed Project was prepared and is included in Section 6.0
15 of the DEIR.

16 B. The following summary of findings relating to energy use and efficiency was provided in
17 the analysis in the **DEIR at pages 6-16 through 6-17**. For new development such as that
18 proposed, compliance with California Title 24 energy efficiency requirements is considered
19 to demonstrate evidence of efficient use of energy. As discussed in the Energy Analysis, the
20 proposed Project would provide for, and promote, energy efficiencies beyond those required
21 under other applicable state or federal standards and regulations, and in so doing would meet
22 or exceed all Title 24 standards.

23 C. Further, the proposed Project would not cause or result in the need for additional energy
24 producing facilities or energy delivery systems.

25 D. Accordingly, pursuant to State CEQA Guidelines Appendix F, this Project will not result in
26 the wasteful or inefficient use or consumption of energy.

27 **BE IT FURTHER RESOLVED** by the Board of Supervisors that Change of Zone No. 7869,
28 Tentative Parcel Map No. 36664 and Tentative Tract Map No. 36665 are consistent with the Riverside

1 County General Plan, including all of the General Plan policies.

2 **BE IT FURTHER RESOLVED** by the Board of Supervisors that it has reviewed and considered
3 EIR No. 550 in evaluating Change of Zone No. 7869, Tentative Parcel Map No. 36664 and Tentative Tract
4 Map No. 36665, that EIR No. 550 is an accurate and objective statement that complies with the California
5 Environmental Quality Act and reflects the County's independent judgment, and that EIR No. 550 is
6 incorporated herein by this reference.

7 **BE IT FURTHER RESOLVED** by the Board of Supervisors that it **ADOPTS** the statement of
8 overriding consideration, **CERTIFIES** EIR No. 550 and **ADOPTS** the Mitigation Monitoring and
9 Reporting Plan attached as Attachment A hereto. To the extent that there are any inconsistencies between
10 the mitigation measures as set forth in EIR No. 550, and those set forth in the Mitigation Monitoring and
11 Reporting Program, the Mitigation Monitoring and Reporting Program shall control.

12 **BE IT FURTHER RESOLVED** by the Board of Supervisors that EIR No. 550 Notice of
13 Determination shall be filed with the County of Riverside Clerk-Recorder and California State
14 Clearinghouse.

15 **BE IT FURTHER RESOLVED** by the Board of Supervisors that Tentative Parcel Map No. 36664,
16 on file with the Clerk of the Board, including the final exhibits and related cases, is hereby approved for the
17 real property described and shown on the final exhibits, and said real property shall be developed
18 substantially in accordance with Change of Zone No. 7869 and Tentative Tract Map No. 36665, unless
19 amended by the Board of Supervisors.

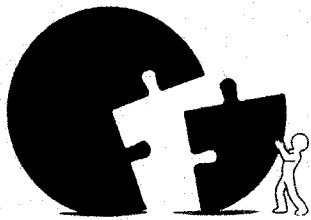
20 **BE IT FURTHER RESOLVED** by the Board of Supervisors that Tentative Tract Map No. 36665,
21 on file with the Clerk of the Board, including the final exhibits and related cases, is hereby approved for the
22 real property described and shown on the final exhibits, and said real property shall be developed
23 substantially in accordance with Change of Zone No. 7869 and Tentative Parcel Map No. 36664, unless
24 amended by the Board of Supervisors.

25 **BE IT FURTHER RESOLVED** by the Board of Supervisors that copies of Change of Zone No.
26 7869, Tentative Parcel Map No. 36664 and Tentative Tract Map No. 36665 shall be placed on file in the
27 Office of the Clerk of the Board, in the Office of the County Planning Department, and the Office of the
28 Building and Safety Director.

ATTACHMENT "A"

MITIGATION MONITORING AND REPORTING PROGRAM

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*Charissa Leach, P.E.
Assistant TLMA Director*

RIVERSIDE COUNTY PLANNING DEPARTMENT

Memorandum

DATE: January 29, 2019
TO: Board of Supervisors
FROM: Deborah Bradford, Project Planner
RE: Item 3.22 – Response to comment letters

The attached letter dated January 28, 2019 was prepared by the applicant's attorney addressing two comment letters received on December 3, 2018 and December 4, 2018 prior to the public hearing heard regarding this project.

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Michelle Ouellette
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File No. 30733.00001

January 28, 2019

DELIVERED VIA EMAIL

Riverside County Board of Supervisors
4080 Lemon Street
Riverside, CA 92501

**Re: Rio Vista Project: Change of Zone No. 7869, TPM No. 36664, TTM
36665, EIR No. 550**

Dear Supervisors:

On behalf of our client, Nuevo Road Properties, LLC, we are writing to respond to two late comment letters submitted to the County Board of Supervisors after the close of the public comment period on the Rio Vista Environmental Impact Report (EIR).

The Rio Vista Project (Project) is a planned residential development located in unincorporated County of Riverside. The Draft EIR for the Project was circulated for a 45-day public review period ending on May 7, 2018. The County Board of Supervisors held a public hearing on the Project on December 4, 2018 and, after the close of the public hearing, the Board approved the Project with a vote of 4-1.

On December 3, 2018, nearly six months after the close of the public comment period, the County received a late comment letter from the Rural Association of Mead Valley (RAMV). In addition, on December 4, 2018, immediately prior to the Project's public hearing, the County received a late comment letter from the Residents Association of Greater Lake Mathews (RAGLM).

Nuevo Road Properties, LLC provides the following responses to the comments raised in each of these letters:

I. Responses to December 3, 2018 Letter from RAMV

Comment #1: The comment letter states that the Project changes almost 437 acres to high density housing and commercial land use, and does so without a specific plan, and that this creates "enormous problems."



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Riverside County Board of Supervisors
January 28, 2019
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Response: The total Project size is 234 acres, not 437. The Project does not include a General Plan Amendment because it is consistent with the County General Plan existing land use designation for the site of Medium Density Residential. Although the Project does include a Change of Zone, the zone change (which applies only to the residential portion of the Project, and establishes a R-4 Planned Residential zoning designation) is consistent with the existing General Plan designation. The Project does not include a Specific Plan because none is required. However, the County did require, and the applicant did prepare, a Conceptual Design Manual. The Conceptual Design Manual was reviewed by County Staff and approved by the Planning Commission, consistent with County Zoning Ordinance No. 348, Section 8.95b.

Comment #2: The comment letter is concerned about the Project's proximity to the San Jacinto River and states that the Project is located within the 100-year flood plain.

Response: The Draft EIR analyzed the potential for the project to impact, and be impacted by, the 100-year flood plain, and determined that no potential impact would occur. A portion of the developed area is located within the existing 100-year flood plain. This portion will be graded to raise the site above the 100-year flood limits, and will be developed in compliance with all federal, state, and local statutes, regulations, and ordinances, which includes Federal Emergency Management Agency (FEMA) requirements, the California Building Code, and Riverside County Ordinance No. 458 (Regulating Flood Hazard Areas). These standard requirements and conditions mandate, among other things, that all utilities and facilities be located and constructed to minimize or eliminate flood damage, adequate drainage be provided to reduce flooding potential, and all required state and federal permits be obtained. In addition, new construction and substantial improvements of residential structures are required to have their lowest flood, including basement, located at or above the base (100-year) flood elevation. Mandated compliance with these requirements ensures that the Project's structures will not be subjected to increased hazards due to flooding.

Comment #3: The comment letter states that the Project area is within an important habitat area, and restates comments submitted by the San Bernardino Valley Audubon Society during the Project's public review and comment period.

Response: The San Bernardino Valley Audubon Society comment letter, and responses to each of the comments made in that letter, are included in the Project's Final EIR, starting at page 2-28. Additionally, the Project completed the Habitat Assessment and Negotiation Strategy (HANS) and Joint Project Review (JPR) processes as required by the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). Through that process, both the County of Riverside and the Western Riverside County Regional Conservation Authority (RCA) determined that the Project was consistent with MSHCP. The California Department of Fish and Wildlife and the United States Fish and Wildlife Service participated in that process and did not object to the Project on any related grounds.



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II. Responses to December 4, 2018 Letter from RAGLM

Comment #1: The comment letter claims that RAGLM did not have sufficient notice of the Project or sufficient time to prepare comments opposing the Project. The comment letter states that the Project is an attack on preservation of the rural community.

Response: Notice of the Project and the 45-day public comment period for the Project's Draft EIR were provided in several ways, consistent with CEQA and the County's public noticing requirements. The Project was advertised in the Press Enterprise newspaper, and public hearing notices were also mailed to property owners within 600 feet of the Project site. However, notably, the Project is located within the Lakeview/Nuevo Area Plan, not the Lake Mathews/Woodcrest Area Plan.

The Project does not include a General Plan Amendment because the Project is consistent with the County's existing General Plan land use designation for the site (Medium Density Residential). Although a Change of Zone is proposed for the Project, the zone change to R-4 Planned Residential is also consistent with the existing General Plan land use designation. In fact, as described in the Draft EIR, the existing zoning (Rural Residential, or R-R) for the site is presently inconsistent with the existing General Plan land use designation. (Draft EIR, p. 3-1.) Surrounding existing General Plan land use designations include Highest Density Residential (HHDR), Mixed-Use Area (MUA), and Medium Density Residential (MDR). (Draft EIR, p. 4.2-1.) Thus, the change from a rural General Plan land use designation to a more urban designation has already occurred in this area – both on the Project site and on surrounding parcels – and such a change is not a result of this proposed Project, which does not include a General Plan Amendment.

Comment #2: The comment letter states that the Project will result in thousands of new residents and businesses, and burden already congested highways and roadways.

Response: The Draft EIR includes a robust and detailed analysis of traffic impacts. (See Draft EIR, Chapter 4.15.) The Draft EIR's analysis was based on an even more detailed Traffic Impact Assessment (TIA) prepared by a licensed traffic engineer. (See Draft EIR, Appendix S.) The results of the TIA were also independently verified by County staff. The TIA, and the Draft EIR, identify those roadway intersections and segments potentially impacted by the Project. However, the Draft EIR also identified several mitigation measures, the incorporation of which was determined, through modeling and analysis, to reduce those impacts to a level of less than significant. Thus, the analysis fully complies with CEQA.

Comment #3: The comment letter is concerned that the Project's new residents and businesses will necessitate public services (water, schools, utilities, law enforcement, and fire services) that are unavailable.



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Response: The Draft EIR analyzed the Project's potential to impact public services and utilities. (See Draft EIR, Chapters 4.13 and 4.17.) These analyses determined that impacts to water supply and provision, waste water treatment, schools, public utilities, police protection, fire protection, and recreational resources were less than significant. These conclusions were based on the fact that the Project will be required to pay school and development impact fees as required by state law and local ordinance, and on the fact that the Project proposal includes construction of needed infrastructure. These infrastructure improvements include on-site stormwater drainage facilities (including storm drain pipe and water quality and retention basins), two on-site wastewater lift stations, connections to existing water and wastewater mains located in Nuevo Road and Pico Avenue, and the installation of underground electricity and natural gas utilities. Finally, the Draft EIR included a review of the Project Water Supply Assessment Report, communications with the water and wastewater treatment provider, and the Riverside County General Plan and General Plan EIR to determine that existing facilities (e.g., the existing water system, existing wastewater treatment plant) have capacity to serve the proposed Project. The comment does not raise any specific issues with these analyses.

Comment #4: The comment letter states that the community desires protection from further development, and that such development places burdens on social services and infrastructure.

Response: As described above, in the Draft and Final EIRs, the Project is consistent with the County's existing General Plan land use designation. Also as described above, the Draft EIR analyzed in detail the Project's potential to impact public services and infrastructure, and determined that impacts would be less than significant. (See Draft EIR, Chapters 4.10 [Land Use and Planning], 4.13 [Public Services], 4.15 [Transportation and Traffic], and 4.17 [Utilities and Service Systems].) The comment does not raise any specific issues with these analyses.

Comment #6: The comment letter implies that the Project is inconsistent with the County General Plan and local zoning laws, and states that the Project requires a Specific Plan.

Response: As discussed above, the Project is consistent with the County General Plan land use designation. In addition, a robust analysis of the Project's consistency with the General Plan and Zoning Code are included in the Draft EIR. (See Draft EIR, Chapter 4.10.) The Project does not include a Specific Plan because none is required. However, the County did require, and the applicant did prepare, a Conceptual Design Manual. The Conceptual Design Manual was reviewed by County Staff, and approved by the Planning Commission, consistent with County Zoning Ordinance No. 348, Section 8.95b.



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Thank you for both allowing us the opportunity to respond to these two late comment letters and including our responses to these letters within the administrative record for the Project.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Michelle Ouellette'.

Michelle Ouellette
of BEST BEST & KRIEGER LLP

Cc: Eric Flodine, Nuevo Road Properties, LLC
Deborah Bradford, County of Riverside