

Chapter 6 Safety Element

A loss of power can make it more difficult for homes or businesses to receive emergency notifications if needed. PSPS events can also create vulnerabilities for community members that lack backup power supplies and depend on electricity for heating or cooling homes and buildings, lighting, and internet. PSPS events may also be harmful to people who depend on electrically powered medical devices. Additionally, community members may be faced with economic hardships and be deprived of important services, such as grocery stores, gas stations, and banks/ATMs. Traffic lights and other traffic control systems may not work, which can complicate any evacuation needs and may hinder emergency response. Although critical public health and safety facilities often have backup generators, the loss of power may also disable other key infrastructure systems.

Some natural disasters or other public safety events may require evacuation of parts of unincorporated Riverside County. In some instances, these evacuations may be limited to a particular neighborhood or street. In other instances, entire communities may need to evacuate. To allow for a safe and effective evacuation, all community members should be able to easily access an evacuation route that allows them to safely travel out of the evacuation zone. If there is limited access to evacuation routes or if these routes cannot accommodate evacuation traffic, evacuation efforts may be severely hampered by slow traffic and collisions, which can put community members at risk. Evacuation constraints can also slow down the public safety response by hindering access by emergency responders.

Policies

The following policies address disaster preparedness, critical facilities and lifelines, disaster recovery plans, and public information and outreach. These policies are intended to adequately prepare Riverside County for emergencies and disasters and develop an integrated approach to minimizing the threat of natural and manmade hazards. Policies with an asterisk next to them (*) are those that apply to development projects.

Disaster Preparedness

- S 6.1 Continually strengthen the Riverside County Emergency Management Department's Response Plan and Multi-Jurisdictional Local Hazard Mitigation Plan (as approved by the Federal Emergency Management Agency) and maintain mutual-aid agreements with federal, state, local agencies, and the private sector to assist in:
- a) Clearance of debris in the event of widespread slope failures, collapsed buildings or structures, or other circumstances that could result in blocking emergency access or regress
 - b) Heavy search and rescue
 - c) Fire suppression
 - d) Hazardous materials response
 - e) Temporary shelter
 - f) Geologic and engineering needs
 - g) Traffic and crowd control
 - h) Building inspection

- S 6.2 Provide alerts about potential, developing, and ongoing emergency situations through extensive early-warning and notification systems that convey information to all residents, in multiple languages and formats to ensure it is widely accessible.
- S 6.3 Prioritize multilingual staff personnel as a resource to assist in evacuation and short-term recovery activities. (AI 97)
- S 6.4 Use incentives and disincentives to encourage private businesses, consortiums, and neighborhoods to be self-sufficient in an emergency by maintaining a fire control plan, including an on-site firefighting capability and volunteer fire response teams to respond to small fires, and identifying medical personnel or residents capable and certified in first-aid and CPR.
- S 6.5 Conduct regional drills for earthquakes and other hazards as appropriate: (AI 82) Use HAZUS results in the Technical Background Report to develop internal scenarios for emergency response and test back-up power generators in public facilities and other critical facilities taking part in the earthquake drill. During emergency drills, encourage communication and cooperation between emergency response staff and designated contacts at hospitals, high-occupancy buildings, and dependent care facilities.
- S 6.6 Develop a system to respond to short-term increases in hazard on the southern San Andreas Fault, based on probabilities associated with foreshocks. (AI 85)
- S 6.7 As feasible, install solar energy and battery backup systems at critical facilities to ensure continuation of services if the power grid is disrupted.
- S 6.8 Maintain and continue to improve management and emergency dissemination of information using portable computers with geographic information systems (GIS) and disaster-resistant Internet access, to obtain: (AI 86)
 - Hazardous Materials Disclosure Program Business Plans regarding the location and type of hazardous materials;
 - Real-time information on seismic, geologic, or flood hazards; and
 - The locations of high-occupancy, immobile populations, potentially hazardous building structures, utilities, and other lifelines.
- S 6.9 Continue to improve collaboration between public agencies, disadvantaged and vulnerable communities, and community-based organizations.
- S 6.10 Regularly review and clarify emergency evacuation plans for dam failure, inundation, fire, and hazardous materials releases. The County shall also continue to maintain, periodically update, and test the effectiveness of the Emergency Operations Plan.
- S 6.11 Monitor the effectiveness of public safety, preparedness, and hazard mitigation policies under changing climate conditions to continue to protect the community as local and regional conditions change.

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- S 6.12 The County shall regularly update all appropriate planning documents, including the Safety Element, the Multi-Jurisdictional Local Hazard Mitigation Plan, emergency operations plans, and other public safety plans, and ensure these updates integrate climate change adaptation considerations.
- S 6.13 Develop a blueprint for managing evacuation plans, including allocation of buses, designation and protection of disaster routes to maximize capacity and redundancy, and creation of traffic-control contingencies. Ensure that evacuation transportation services are available for those with limited mobility or lacking access to a personal vehicle. (AI 84, 88)
- S 6.14 Adopt inundation alert and readiness levels corresponding with official forecasts by the State Office of Emergency Services, regarding earthquake prediction and potential for dam failure.

Critical Facilities and Lifelines

- S 6.15 * Strengthen the project permit and review process to ensure that proper actions are taken to reduce hazard impacts and encourage structural and nonstructural design and construction. Damage must be minimized for critical facilities, and susceptibility to structural collapse must be minimized, if not eliminated.
- a) Ensure that special development standards, designs, and construction practices reduce risk to tolerable levels for projects involving critical facilities, large-scale residential development, and major commercial or industrial development through conditional use permits and the subdivision review process. If appropriate, impact fees should be assessed to finance required actions.
 - b) Require mitigation measures to reduce potential damage caused by ground failure for sites determined to have potential for liquefaction to the extent feasible and appropriate. Such measures shall apply to critical facilities, utilities, and large commercial and industrial projects as a condition of project approval.
 - c) Require that planned lifeline utilities, as a condition of project approval and as feasible and appropriate, be designed, located, structurally upgraded, fit with safety shutoff valves, designed for easy maintenance, and have redundant backup lines where unstable slopes, earth cracks, active faults, or areas of liquefaction cannot be avoided.
 - d) Review proposed uses of fault setback areas closely to ensure that county infrastructure (roads, utilities, drains) are not unduly placed at risk by the developer. Insurance, bonding, or compensation plans should be used to compensate the County of Riverside for the potential costs of repair.
- S 6.16 * Promote strengthening of planned and existing utilities and lifelines, the retrofit and rehabilitation of existing weak structures, and the relocation of certain critical facilities.
- S 6.17 * Identify critical facilities in hazard-prone areas and work to relocate or harden these facilities to reduce risk of damage and loss of service. (AI 101)
- S 6.18 * Prohibit development of critical facilities that are proposed in dam failure inundation areas unless no feasible alternative exists and apply hazardous materials safety guidelines within such zones.

- S 6.19 * Coordinate with the Public Utilities Commission (PUC) and/or use the Capital Improvement Program, to strengthen, relocate, or take other appropriate measures to safeguard high-voltage lines, water, sewer, natural gas and petroleum pipelines, and trunk electrical and telephone conduits that (AI 4):
 - Extend through areas of high liquefaction potential.
 - Cross active faults.
 - Traverse earth cracks or landslides.
- S 6.20 * Require additional design considerations as appropriate for lifelines within subsidence areas.
- S 6.21 Communicate climate risks to energy utilities and request they ensure that new and upgraded infrastructure is climate resilient.
- S 6.22 * During the development review process, when developing alternatives and adaptation projects for consideration, the County shall require applicants to identify natural infrastructure that may be used through the conservation, preservation, or sustainable management of open space to reduce climate change hazards, where feasible.
- S 6.23 Establish a network of equitably located resilience centers throughout unincorporated Riverside County and ensure that resilience centers are situated outside of areas at risk from hazard impacts to the extent possible, offer refuge from extreme heat and extreme weather events, and are equipped with renewable energy generation and backup power supplies. Such facilities should be in easily accessible locations and be available to all community members as needed.

S 6.24 Collaborate with utility companies to support and enhance grid reliability during regular operations and extreme conditions.

Disaster Recovery Plans

- S 6.2425 Develop plans for short-term and long-term post-disaster recovery. (AI 103)

Public Information and Outreach

- S 6.2526 Conduct public outreach and education efforts to inform people in unincorporated Riverside County of the hazard risks, vulnerabilities, and threats in the community, and what steps community members should take to reduce their risks and provide all materials and information in both English and Spanish by default, as well as any other languages, as requested.
- S 6.2627 Forge productive working relationships and foster good communication with researchers, other government agencies, and providers of mitigation services.
- S 6.278 The County shall coordinate and share data, experience, and strategies with other emergency management agencies in state or regional efforts on disaster preparedness coordination and disaster response procedures.
- S 6.2829 Maximize use of technology and the Internet to effectively distribute emergency communications and alerts to members of the public to improve resiliency. (AI 94, 99)

- S 6.2930 Develop and maintain the County of Riverside Hazard Management website as a knowledge resource center for Riverside County officials, educators, developers, builders, and the general public. (AI 94, 95, 99)
- S 6.3031 Provide information to members of the public about evacuation concerns, including designated evacuation routes and evacuation plan details, through multiple formats and in multiple languages.
- ~~S 6.32 Work with local jurisdictions, Tribal governments, and community-based organizations to support implementation of community-identified resilience projects.~~

Additional Climate Change-Related Hazards

Drought

Unincorporated Riverside County chronically experiences drought cycles. A drought is a long period when precipitation levels are well below normal. Based on historical information, the occurrence of drought in California, including unincorporated Riverside County, is cyclical, driven by weather patterns.

Drought can severely impact a region both physically and economically. Drought makes less water available for people, businesses, agricultural activities, and natural systems. Less snow falling in mountainous areas causes water levels in lakes and reservoirs to drop, which can affect recreation activities. Local ecosystems that are not well adapted to drought conditions can be more easily harmed by it. Droughts can also indirectly lead to more wildfires, and the stress caused by water shortages can weaken plants, making them more susceptible to pests and diseases. As of spring 2021, conditions range from “severe drought” in western and southern Riverside County to “exceptional drought” in the northeast corner of the county.

The vulnerability of unincorporated Riverside County to drought is countywide, but impacts may vary and include reduction in water supply, agricultural losses, and an increase in dry fuels. Although droughts are a regular feature of California’s climate, scientists expect that climate change will lead to more frequent and more intense droughts statewide.

Extreme Heat

Extreme heat tends to occur on an annual basis in unincorporated Riverside County. While there is no universal definition of extreme heat, California guidance documents define extreme heat as temperatures that are hotter than 98 percent of the historical high temperatures for the area, as measured between April and October of 1961 to 1990. Days that reach this level (an average of 106-degrees Fahrenheit (°F) across all of unincorporated Riverside County, although this threshold varies by location) are called extreme heat days. Extreme heat is any period of time when the temperatures are well above the usual level.

Health impacts are the primary concern with this hazard, though economic impacts are also an issue. The Centers for Disease Control and Prevention (CDC) recognizes extreme heat as a substantial public health concern. Extreme heat events are dangerous because people exposed to extreme heat can suffer a number of heat-related illnesses, including heat cramps, heat exhaustion, and (most severely) heat stroke. Very high temperatures can harm plants and animals that are not well adapted to them. This includes wild ecosystems as well as farm crops and livestock. Extreme heat is expected to have a severe effect on agriculture. Indirectly, extreme heat puts more stress on power lines, causing them to run less efficiently. The heat also causes more demand for electricity (usually to run air conditioning units), and in combination with the stress on the power lines, may lead to brownouts and blackouts.

While extreme heat is relative to the area, extreme heat events may occur anywhere in unincorporated Riverside County. However, the threshold for extreme heat is likely to be lower in the higher elevations of the San Jacinto Mountains than in Coachella Valley where temperatures at or above 90°F are common most summer days. The warmer temperatures brought on by climate change are likely to cause an increase in extreme heat events in different regions of unincorporated Riverside County. According to the California Energy Commission, the number of extreme heat days is projected to, where the average year could include approximately 25 to 35 extreme heat days between 2041 and 2060, and 40 to over 60 extreme heat days per year between 2070 and 2099. Overall, unincorporated Riverside County is expected to see an increase in the average daily high temperatures.

Severe Weather

Severe weather is generally any destructive weather event, but usually occurs in unincorporated Riverside County as localized storms that bring heavy rain, hail, lightning, and strong winds. Heavy rain and thunderstorms are the most frequent type of severe weather occurrences. High winds, often accompanying severe storms, can cause significant property and crop damage, threaten public safety, and have adverse economic impacts from business closures and power loss. Santa Ana winds have caused large amounts of damage and increased the fire damage level dramatically. All wind events, including Santa Ana winds, pose several different types of threats. By themselves, the winds pose a threat to the health of people and structures in the county. Severe weather is an annual occurrence in unincorporated Riverside County. Damage and disaster declarations related to severe weather have occurred and will continue to occur in the future.

Climate change is expected to cause an increase in intense rainfall, which is usually associated with strong storm systems. This means that unincorporated Riverside County could see more intense storms in the coming years and decades, possibly causing an increase in the frequency of severe weather events and any associated hazards. Such an increase may not affect all forms of severe weather and may not always be apparent.

Agricultural Hazards

Agriculture in unincorporated Riverside County must be considered from two standpoints, namely, both as a product producer/exporter and a major economic provider to the County of Riverside. In 2019, Riverside County ranked in the top 14 leading agricultural counties in California, with an agricultural production value of \$1.32 billion, according to the California Department of Food and Agriculture. Major agricultural industries include milk, nursery products, citrus, avocado, grapes, vegetables, and hay.

According to the Hazard Mitigation Planning Committee, agricultural losses occur on an annual basis and are usually associated with severe weather events, including heavy rains, floods, heat, and drought. The 2018 State of California Multi-Hazard Mitigation Plan attributes most of the agricultural disasters statewide to drought, freeze, and insect infestations. Other agricultural hazards include fires, crop and livestock disease, and noxious weeds. As long as severe weather and other natural hazard events continue to be an ongoing concern to unincorporated Riverside County, the potential for agricultural losses remains.

Extreme heat is expected to have the most severe effect on unincorporated Riverside County’s agricultural assets, but drought, flooding, and severe weather may also cause significant harm. One of the most direct effects of climate change is that average temperatures will increase, and this has a bearing on many pests and diseases. Temperatures are expected to get warmer earlier in the year and remain warmer until later in the year due to climate change, creating a wider window for pests and diseases to be active. Moreover, excessive heat and prolonged dry or drought conditions can impact agriculture by creating worker safety issues for farm field workers, severely damaging crops, and reducing availability of water and food supply for livestock.

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Policies

The following policies address drought, extreme heat, severe weather and agriculture hazards. These policies are intended to minimize the impact of climate change-related hazards on Riverside County's citizens, property, and economy through collaboration and coordination with agencies local and state agencies, and implementation of resilient strategies. Policies with an asterisk next to them (*) are those that apply to development projects.

- S 7.1 Collaborate with local governments and special districts in Riverside County as well as with Inland Southern California Climate Collaborative to develop and implement regional climate change adaptation and resilience initiatives.
- S 7.2 Support the Resilient IE project to foster increased community resilience to climate-related hazards in unincorporated Riverside County and across the wider region. Incorporate the Resilient IE project files, including the Western Riverside County Vulnerability Assessment, the Western Riverside County Adaptation Strategies, and the WRCOG Subregion Hazard and Evacuation Maps, into this Safety Element by reference.
- S 7.3 Use the reported data and findings of applicable local, regional, or state documents or plans pertaining to climate change and climate-related hazards that could impact unincorporated Riverside County, including the California Climate Change Assessment, the California Adaptation Planning Guide, and the Safeguarding California plan.
- S 7.4 Prepare for a reduced, long-term water supply resulting from more frequent and severe drought events, including working with regional water providers to implement extensive water conservation measures and ensure sustainable water supplies.
- S 7.5 Coordinate with water agencies and irrigation districts to explore ways to improve and increase storage capacity and generation efficiency.
- S 7.6 Work with healthcare providers, including the Riverside University Health System to support free or reduced-cost vaccinations for vector-borne diseases that are widely available for unincorporated Riverside County residents, including to traditionally underserved communities.
- S 7.7 Coordinate with local governments, school districts, and regional transit providers to increase shading and heat-mitigating materials on pedestrian walkways, ~~and~~ transit stops, parks, schools, and outdoor gathering places.
- S 7.8 Ensure that unhoused persons or groups in unincorporated Riverside County have access to temporary and/or emergency housing, food, and other essential living materials to keep them safe during anticipated hazard events.
- S 7.9 * Encourage new developments and existing property owners to incorporate sustainable, energy-efficient, and environmentally regenerative features into their facilities, landscapes, and structures to reduce energy demands and improve on-site resilience. Support financing efforts to increase community access to these features.
- S 7.10 Ensure that lower-income households have access to low-cost programs (e.g., subsidies for National Flood Insurance Program participation, air-conditioning, low-cost healthcare) to protect their homes and wellbeing from climate-related hazards.

- S 7.11 * Promote and expand the use of drought-tolerant green infrastructure, including street trees and landscaped areas, as part of cooling strategies in public and private spaces.
- S 7.12 Use natural resources and infrastructure to absorb the impacts of climate change and associated natural hazards, as feasible.
- S 7.13 Work with regional educational and farming organizations to support efforts to develop and share best practices for improving climate resiliency in agricultural operations, including responding to changing temperature and precipitation patterns, increases in drought events, and new or more active pest regimes.
- S 7.14 Ensure that workers in outdoor industries have the training and resources to be adequately protected from environmental hazards, including extreme heat, poor air quality, and diseases.
- S 7.15 * Encourage the use of high-reflectivity pavement in new or significantly retrofitted large-scale paving projects, such as parking lots.

3. Technical Background Information

Seismic and Geologic Hazards

Seismic and geologic hazards are risks caused by the movement of different parts of the Earth's crust, or surface. Seismic hazards include earthquakes and hazardous events caused by them. Geologic hazards are other hazards involving land movements that are not linked to seismic activity and are capable of inflicting harm to people or property.

Seismic Hazards

Seismic activity occurs along boundaries in the Earth's crust, called faults. Pressure along the fault builds over time and is ultimately released, resulting in ground shaking that we refer to as an earthquake. Earthquakes can also trigger other hazards, including surface rupture (cracks in the ground surface), liquefaction (causing loose soil to lose its strength), landslides, and subsidence (sinking of the ground surface). Earthquakes and other seismic hazards often damage or destroy property and public infrastructure, and falling objects or structures pose a risk of injury or death.

While unincorporated Riverside County is at risk from many natural and human-caused hazards, the event with the greatest potential for loss of life or property and economic damage is an earthquake. This is true for most of Southern California, since damaging earthquakes affect widespread areas, trigger many secondary effects, and can overwhelm the ability of local jurisdictions to respond. In unincorporated Riverside County, earthquake-triggered effects include ground shaking, fault rupture, landslides, liquefaction, subsidence, and seiches. Earthquakes can also cause human-caused hazards such as urban fires, dam failures, and toxic chemical releases.

Earthquake risk is very high in the most heavily populated western portion of the county and the Coachella Valley, due to the presence of two of California's most active faults, the San Andreas and San Jacinto Faults. Risk is moderate in the eastern portion of the county beyond the Coachella Valley due to the lack of major faults in this region. Most of the loss of life and injuries from earthquakes are due to damage and collapse of buildings and structures. Building codes for new construction have generally been made more stringent following damaging earthquakes. However, in the County of Riverside, structures built prior to the enactment of these improved building codes have generally not been upgraded to current standards and are vulnerable in earthquakes. Comprehensive hazard mitigation programs that include the identification and mapping of hazards, prudent planning and enforcement of building codes, and expedient retrofitting and rehabilitation of weak structures can significantly reduce the scope of an earthquake disaster.

Unincorporated Riverside County contains parts of several known active and potentially active earthquake faults, including the San Andreas Fault, San Jacinto Fault, and Elsinore Fault. The San Andreas Fault, the largest fault in California, runs from the Salton Sea north along the east side of the Coachella Valley, continuing north along the Transverse and Coast Ranges until running offshore in Mendocino County. The San Jacinto Fault runs from the Imperial Valley northwest through western Riverside County until it ends at the Cajon Pass. The Elsinore Fault zone extends from western Imperial County to the Chino Hills, and runs along Riverside County's western border with Orange County. Historically, the San Andreas Fault is the most active among the fault network that cuts through rocks of the California coastal region. The San Jacinto Fault has had a higher level of moderate to large earthquakes during the past 50 to 100 years, although the rate of slip is not as high. The main trace of the Elsinore Fault zone has only seen one historical event greater than magnitude 5.2 – the earthquake of 1910, a magnitude 6 near Temescal Valley.

In the event of an earthquake, the location of the epicenter, as well as the time of day and season of the year, would have a profound effect on the number of deaths and casualties, as well as property damage. There are a number of small-scale earthquakes that happen weekly, but larger scale or catastrophe shaking is less likely. Unincorporated Riverside County is at risk for a significant earthquake causing catastrophic damage and strains on response and mitigation resources. Both property and human life are at high risk. The county experiences hundreds of minor quakes and tremblers each month from the myriad of faults in the area. Studies indicate that stress is building up in major faults like the San Andreas.

The San Andreas, San Jacinto, and Elsinore Faults are all capable of producing significant earthquakes, with a magnitude of 6.7 or greater. Table 1 shows the chances of a major earthquake on these three faults within unincorporated Riverside County by 2045, according to the Third California Earthquake Rupture Forecast. Other faults, both in and outside unincorporated Riverside County, may also be capable of generating significant earthquakes with damaging effects in the county.

Table 1: Chances of Significant Earthquakes on Major Riverside County Faults

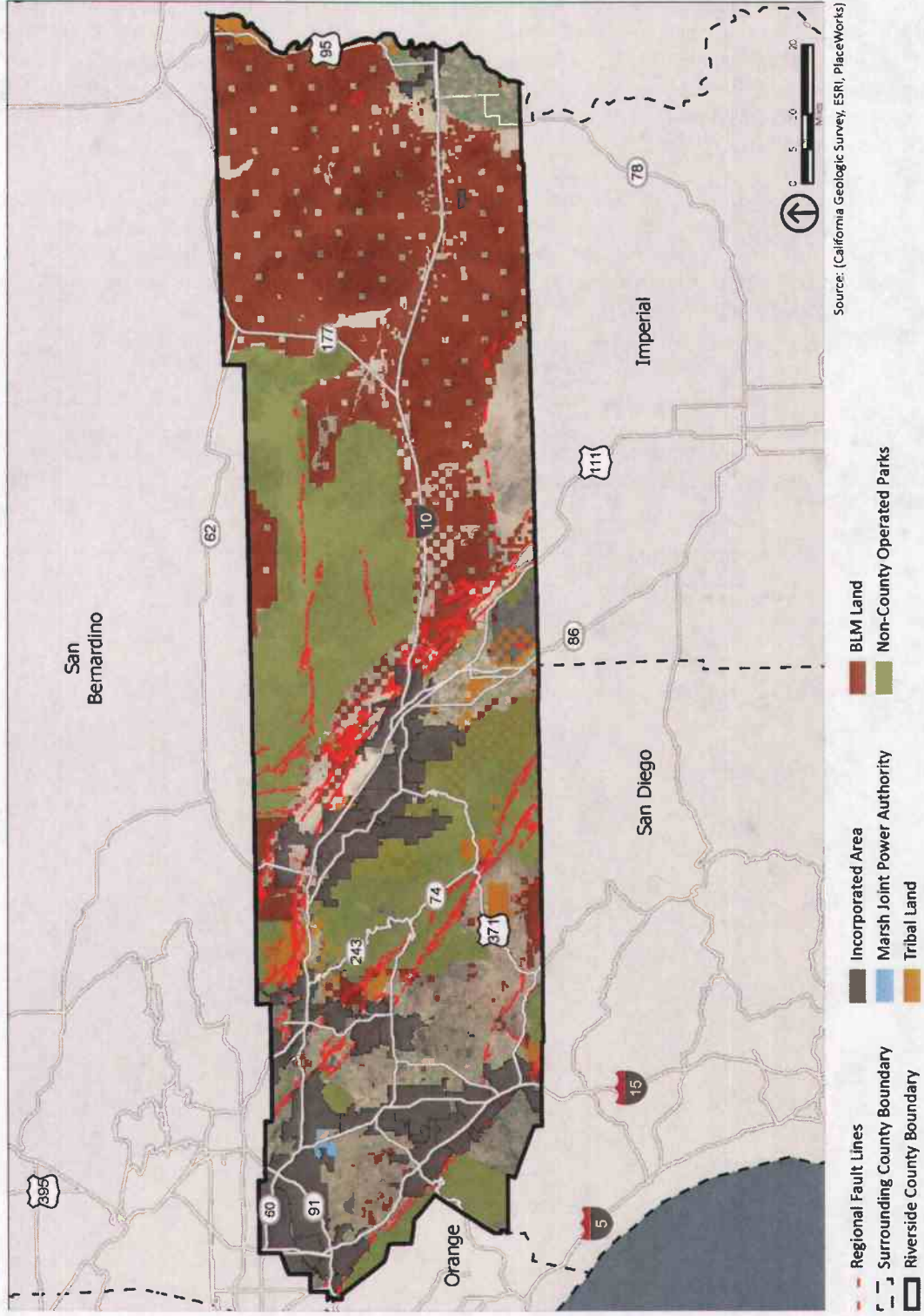
Fault	Mean Chance by 2045			
	Magnitude 6.7 or greater	Magnitude 7.0 or greater	Magnitude 7.5 or greater	Magnitude 8.0 or greater
SAN ANDREAS	24.21%	21.29%	11.62%	3.15%
SAN JACINTO	6.71%	6.43%	5.29%	2.75%
ELSINORE	3.66%	1.82%	0.95%	Less than 0.01%

Chances shown are the maximum mean probability for segments of these faults within unincorporated Riverside County.

Source: Third California Earthquake Rupture Forecast

Figure 1 shows the fault lines in and around unincorporated Riverside County.

FIGURE 1: FAULT LINES



Source: (California Geologic Survey, ESRI, PlaceWorks)

Portions of the county are susceptible to liquefaction, which is a potentially destructive secondary effect of strong seismic shaking. Liquefaction occurs primarily in saturated, loose, fine- to medium-grained soils in areas where the groundwater table is within approximately 50 feet of the surface. Shaking causes the soils to lose strength and behave as liquid. Excess water pressure is vented upward through fissures and soil cracks and can result in a water-soil slurry flowing onto the ground surface. Liquefaction-related effects include loss of bearing strength, ground oscillations, lateral spreading, and flow failures or slumping. Site-specific geotechnical studies are the only practical and reliable way of determining the specific liquefaction potential of a site; however, a determination of general risk potential can be provided based on soil type and depth of groundwater. Areas identified as susceptible to liquefaction are identified on Figure 2.

Areas are susceptible to liquefaction based on a combination of known factors in some areas and the absence of known factors in other areas. In addition, these potential hazard zones are not an absolute indication that the hazard truly exists nor are they an indicator of the extent of damage that may or may not occur at a given site. Research confirms there is a potential for liquefaction to occur; however, this research also confirms minimal liquefaction-induced ground settlement is anticipated to occur for the areas that were studied. In most cases, proper design and construction of subgrade soils and building foundations provides a mechanism to mitigate the risk of seismic hazard to an acceptable level in conformance with the California Building Code. Development in areas of high risk may need additional safety features to appropriately mitigate the risk of seismic hazards. The representation of areas having a liquefaction potential is only intended as notification to seek further site-specific information and analysis of this potential hazard as part of future site development. It should not be solely relied upon, without site-specific information and analysis, for design or decision-making purposes.

Geologic Hazards

Geologic hazards, such as landslides and erosion, depend on the geologic composition of the area. Landslides and rock falls may occur on sloped areas, especially areas with steep slopes, and usually in areas of loose and fragmented soil. Landslides, rockfalls, and debris flows occur continuously on all slopes; some processes act very slowly, while others occur very suddenly, often with disastrous results. They often occur as a consequence of seismic activity or heavy rainfall, either of which may cause slopes to lose their structural integrity and slide. There are predictable relationships between local geology and landslides, rockfalls, and debris flows. Slope stability is dependent on many factors and their interrelationships, including rock type, pore water pressure, slope steepness, and natural or human-made undercutting. Figure 3 shows the landslide risk in and around unincorporated Riverside County.

Subsidence refers to the sudden sinking or gradual downward settling and compaction of soil and other surface material with little or no horizontal motion. It may be caused by a variety of human and natural activities, including earthquakes and water saturation.

FIGURE 2: LIQUEFACTION ZONES

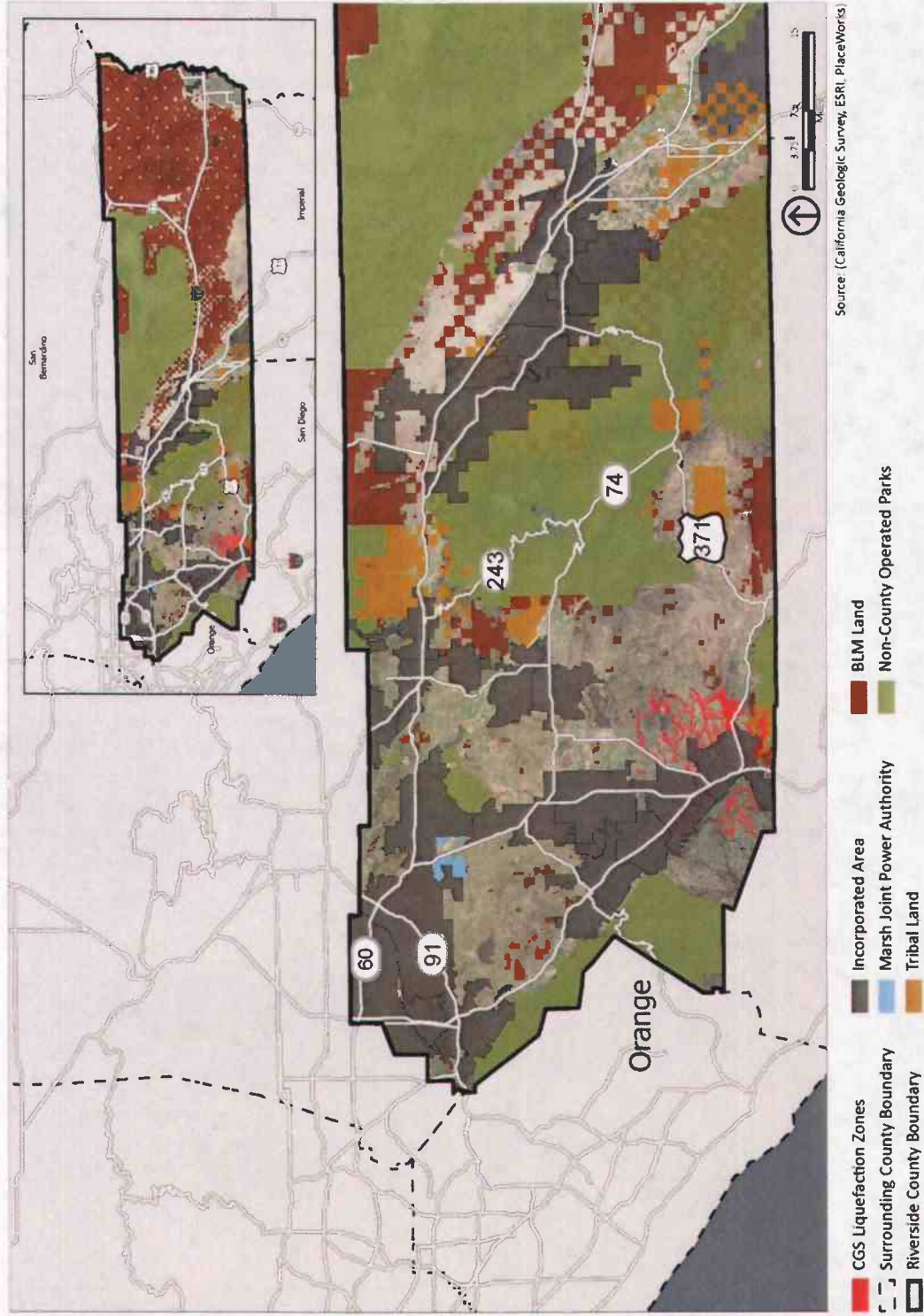
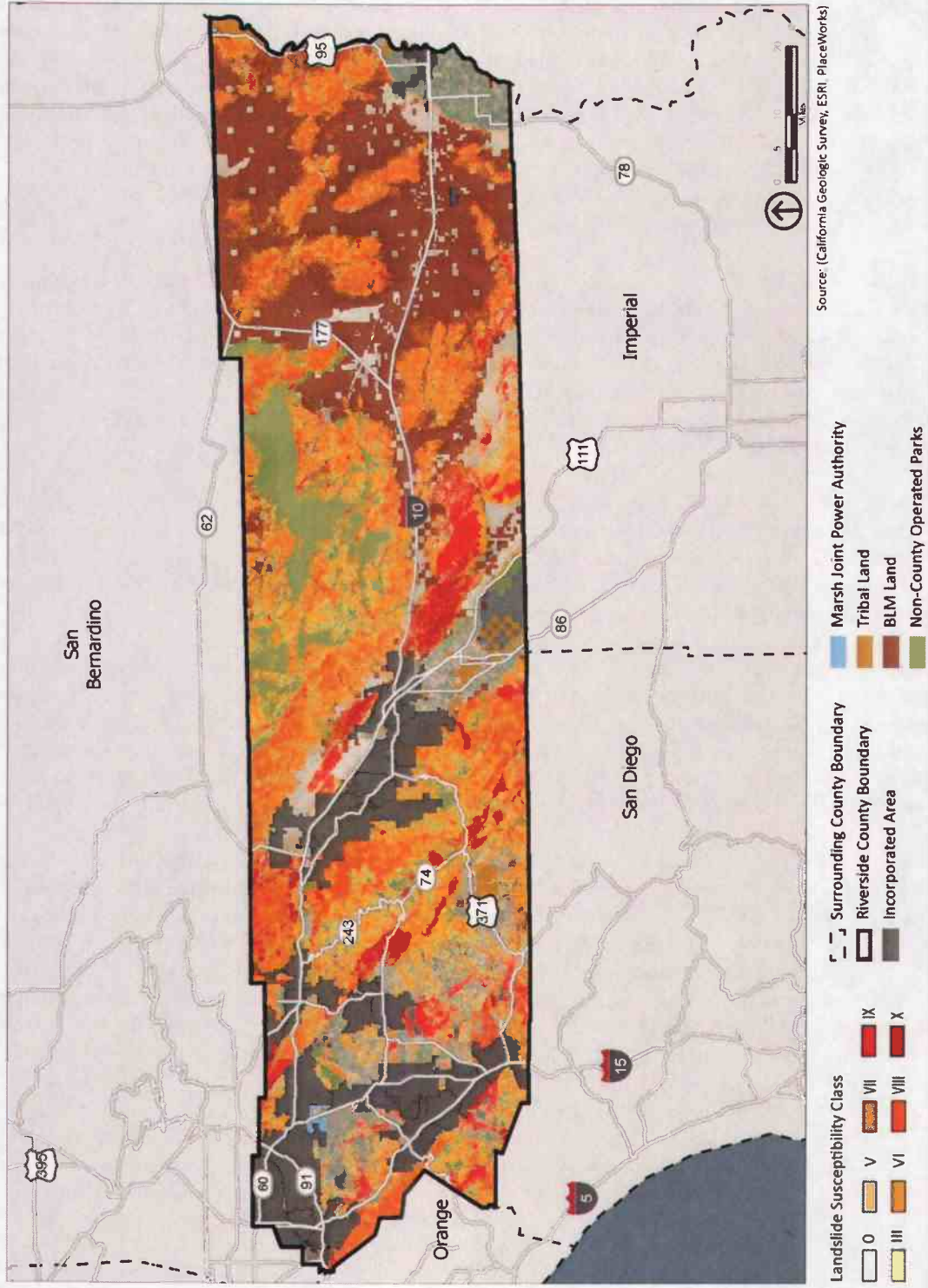


FIGURE 3: LANDSLIDE RISK



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Expansive soils have a significant amount of clay particles that can give up water (shrink) or take on water (swell). The change in volume exerts stress on buildings and other loads placed on these soils. The occurrence of these soils is often associated with geologic units having marginal stability. Expansive soils can be widely dispersed and can be found in hillside areas as well as low-lying alluvial basins. Expansive soils are now routinely alleviated through the Riverside County's implementation of the Building Code. Expansive soils are not the only cause of structural distress in existing structures. Poor compaction and construction practices, settlement, and landslides can cause similar damage, but require different mediation efforts. Once expansion has been verified as the source of the problem, mitigation can be achieved through reinforcement of the existing foundation, or alternatively, through the excavation and removal of expansive soils in an affected area.

Hydroconsolidation, or soil collapse, typically occurs in recently deposited, Holocene (less than 10,000 years old) soils that were deposited in an arid or semi-arid environment. Soils prone to collapse are commonly associated with human-made fill, wind-laid sands and silts, and alluvial fan and mudflow sediments deposited during flash floods. When saturated, collapsible soils undergo a rearrangement of their grains, and the water removes the cohesive (or cementing) material. Rapid, substantial settlement results. An increase in surface water infiltration, such as from irrigation, or a rise in the groundwater table, combined with the weight of a building or structure, can initiate settlement and cause foundations and walls to crack.

Wind erosion is a serious environmental problem attracting global attention. Soil movement is initiated as a result of wind forces exerted against the surface of the ground. Dust particles in the air create major health problems. Atmospheric dust causes respiratory discomfort, may carry pathogens that cause eye infections and skin disorders, and reduces highway and air traffic visibility. Dust storms can cause additional problems; buildings, fences, roads, crops, trees, and shrubs can all be damaged by abrasive blowing soil.

Landslide Management Zones (LMZs) are County-designated areas that identify regions susceptible to slope instability. This instability can include deep-seated landslides, rockfalls, soil slumps, and debris flows. Without the presence of extensive flood-control devices, including large debris basins, the areas outlined by an LMZ may be subject to debris flow inundation. Most often, debris flow inundation results in roadways and improvements blocked by boulders. Rarely do debris-flow-generating storms affect the entire county. However, most of the area within potential LMZs of County of Riverside are designated for open space or rural development.

Land subsidence and related issues have been well-documented in unincorporated Riverside County. Most of the early documented cases of subsidence affected only agricultural land or open space. As urban areas have expanded, so too have the impacts of subsidence on structures for human occupancy. Ground subsidence and associated fissuring in unincorporated Riverside County have resulted from both falling and rising groundwater tables. In addition, many fissures have occurred along active faults that bound the San Jacinto Valley and the Elsinore Trough. Subsidence typically occurs throughout a susceptible valley. In addition, differential displacement and fissures occur at or near the valley margin, and along faults. In the County of Riverside, the worst damage to structures as a result of regional subsidence may be expected at the valley margins. Alluvial valley regions are especially susceptible.

In unincorporated Riverside County, collapsible soils occur predominantly at the base of the mountains, where Holocene-age alluvial fan and wash sediments have been deposited during rapid runoff events. In addition, some windblown sands may be vulnerable to collapse. Typically, differential settlement of structures occurs when lawns or plantings are heavily irrigated in close proximity to the structure's foundation. Forensic indications of collapsible soils include tilting or sagging floors, cracking or separation of structures, and windows and doors that cannot open due to shifts in the building.

Wind and wind-blown sand are an environmentally-limiting factor throughout much of unincorporated Riverside County. Approximately 20 percent of the land area of Riverside County is vulnerable to “high” and “very high” wind erosion susceptibility. The Coachella Valley, the Santa Ana River Channel in northwestern Riverside County, and areas in and around the cities of Hemet and San Jacinto are zones of high wind erosion susceptibility.

Wind-blown sand is a well-recognized hazard for developments in the Coachella Valley. It has forced abandonment of dwellings and subdivided tracts in the central Coachella Valley. The primary source of sand here is the Whitewater River. Increases in the amount of wind-blown sand are related to episodic flooding of the Whitewater River. A 15-fold increase in wind erosion rates in this area has been noted following heavy flood events. Therefore, mitigation of wind-blown sand is directly related to mitigation of flood potential on the Whitewater River. Efforts to control the wind, using hedges and other barriers, may not be effective in mitigating wind erosion. However, the Whitewater River provides a large component of sand to sustain the dune fields, which is home to several endangered species. Erosion intervention has had serious and unforeseen consequences in many places, so any proposed mitigation program should be approached carefully, with an extended period of preparatory study.

Potential Changes to Seismic and Geologic Risk in Future Years

Likelihood of Future Occurrence

Seismic Risk

Earthquakes are likely to continue to occur on an occasional basis and are likely to be small. They may cause no substantive damage and may not even be felt by most people. Major earthquakes are rare, but a possibility in the region, as in other areas of the state. No major earthquakes have been recorded with epicenters within the county since the 1910 Elsinore earthquake, although the county has felt ground shaking from earthquakes with epicenters located elsewhere. Large earthquakes from faults such as the San Andreas Fault may cause significant damage to homes, businesses, and communities in the county. Based on historical data and the location of unincorporated Riverside County relative to active and potentially active faults, the Uniform California Earthquake Rupture Forecast projects that southern California has a 93 percent chance of a significantly damaging earthquake (magnitude 6.7 or higher) by 2044.

If serious shaking does occur, newer construction is in general more earthquake resistant than older construction because of improved building codes. Older manufactured housing is very susceptible to damage because their foundation systems are rarely braced for earthquake motions. Earthquake losses would vary across unincorporated Riverside County depending on the source and magnitude of the event.

Geologic Risk

Minor landslides have occurred in the past, probably over the last several hundred years, evidenced by both past deposits exposed in erosion gullies and recent landslide events. Unincorporated Riverside County has a history of landslides during seasons of high precipitation. With significant rainfall, additional failures are likely in the identified landslide hazard areas, minor landslides will likely continue to impact the area when heavy precipitation occurs, as they have in the past. In addition, areas affected by recent fires show an increased landslide risk.

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Climate Change and Seismic and Seismic Hazards

While climate change is unlikely to increase earthquake frequency or strength, the threats from other seismic and geologic hazards are expected to continue. Climate change may cause precipitation extremes (i.e., wetter wet periods and drier dry periods). While total average annual rainfall may not change significantly, rainfall may be concentrated in more intense precipitation events. Heavy rainfall could cause an increase in the number of landslides or make landslides larger than normal. Increased wildfire frequency can destabilize hillsides due to loss of vegetation and change soil composition, which can contribute to greater runoff and erosion. The combination of a generally drier climate in the future, which will increase the chance of drought and wildfires, and the occasional extreme downpour, is likely to cause more mudslides and landslides. Impacts from these conditions would compound landslide potential for the most susceptible locations.

Flood and Inundation Hazards

Flooding is the rising and overflowing of a body of water onto normally dry land. History highlights floods as one of the most frequent natural hazards impacting communities in unincorporated Riverside County. Floods are among the costliest natural disasters in terms of human hardship and economic loss nationwide. Floods can cause substantial damage to structures, landscapes, and utilities, as well as life-safety issues. Floods can be extremely dangerous, and even six inches of moving water can knock over a person given a strong current. Floodwaters can transport large objects downstream, which can damage or remove stationary structures, such as dam spillways. Ground saturation can result in instability, collapse, or other damage. Objects can also be buried or destroyed through sediment deposition. Floodwaters can also break utility lines and interrupt services. Standing water can cause damage to crops, roads, foundations, and electrical circuits.

Floods are usually caused by large amounts of precipitation, either from a period of very intense precipitation or a long period of steady precipitation. Historically, unincorporated Riverside County has been at risk of flooding primarily during the spring months when stream systems in the county swell with heavy rainfall. Flooding susceptibility in unincorporated Riverside County is primarily associated with several major stream drainages, including, but not limited to, the Santa Ana, San Jacinto and Whitewater Rivers, as well as smaller-scale and flash flood events on many of the alluvial fans that flank unincorporated Riverside County's hillsides.

Flash flooding is a common problem, especially in the Coachella Valley and the easterly portions of the county. Flash flooding is typically associated with short duration, high-intensity precipitation events often during summer thunderstorms. Such events can occur even during a drought. Localized flooding also occurs throughout unincorporated Riverside County at various times throughout the year with several areas of primary concern unique to each city. Historically, precipitation in and around unincorporated Riverside County has been low to moderate. Precipitation in the county area falls mainly in the fall, winter, and spring months, from November through April.

Although unincorporated Riverside County occasionally experiences periods of significant drought, the county can also experience periods of substantial rainfall. When unincorporated Riverside County does experience heavy rain, or rain over a period of days or weeks, many areas of the county are subject to flooding. Runoff from rain drains either naturally into rivers, washes, and creeks, or into flood-control facilities.

Unincorporated Riverside County has several major river systems, dams, and reservoirs. Excessive rainfall can stress these systems, causing serious damage to property and potential loss of life. Rivers can overflow their banks, destroying bridges and washing out roads and highways during major flood events.

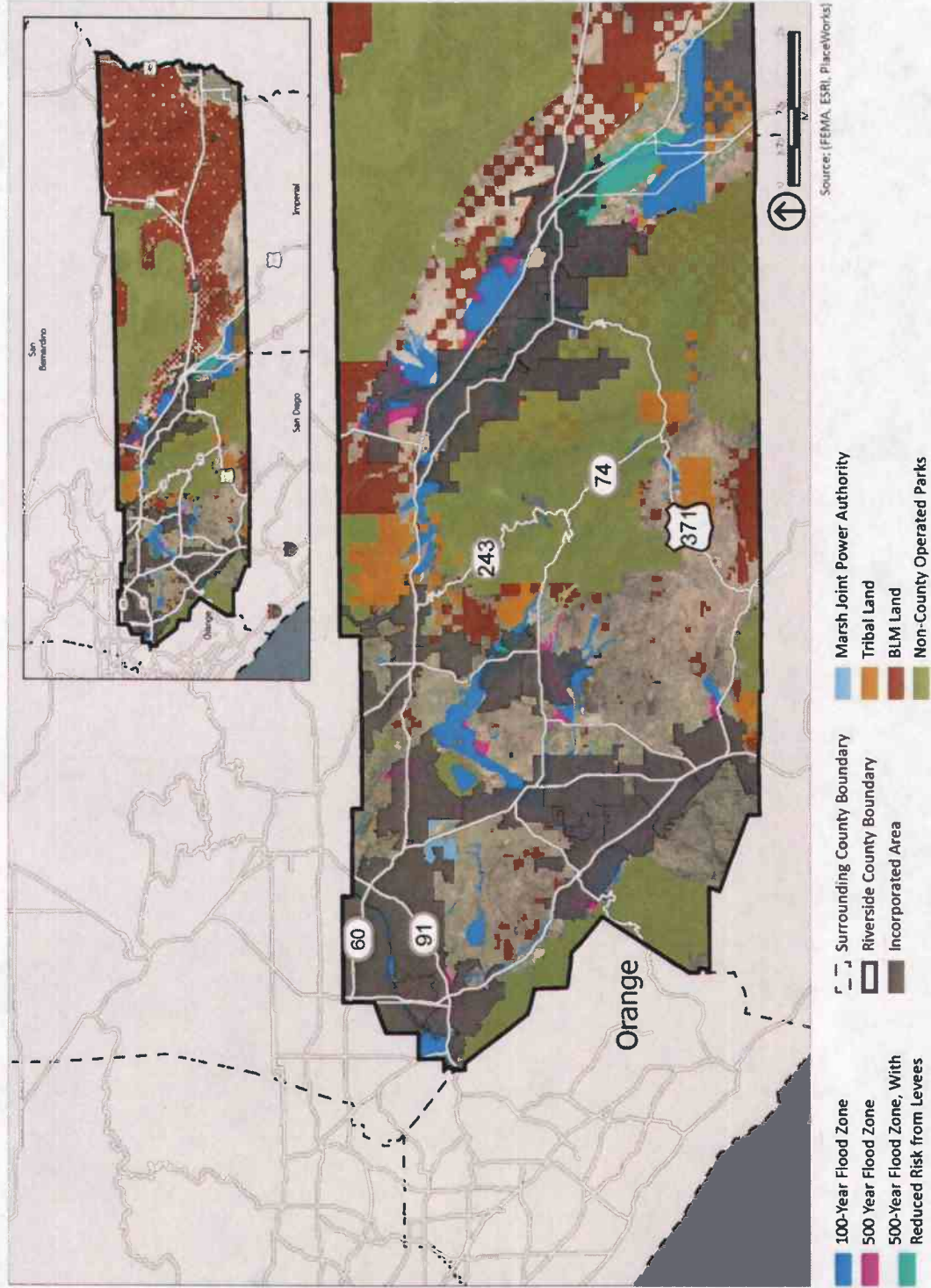
Areas at an elevated risk of flooding are generally divided into 100- and 500-year flood zones. A 100-year flood zone has a 1-percent chance of experiencing a major flood in any given year; a 200-year flood zone has a 0.5-percent

chance of flooding in any given year, a 500-year flood zone has a 0.2-percent chance of flooding in any given year. Figure 4 shows the 100- and 500-year flood zones in unincorporated Riverside County.

Agencies responsible for flood control in Riverside County include the County’s Flood Control and Water Conservation District (RCFWCD), the United States Army Corps of Engineers (USACE), the Federal Emergency Management Agency (FEMA), the Federal Insurance Administration (FIA), and the Department of Water Resources (DWR).

- RCFWCD: RCFWCD is the regional flood management authority for the western part of Riverside County. RCFWCD provides the following: identification of flood hazards and problems; regulation of floodplains and development; regulation of drainage and development; county watercourse and drainage planning; education for flood prevention and safety; construction of flood control structures and facilities; flood warning and early detection; maintenance and operation of completed structures.
- USACE: The USACE identifies the need for and constructs major flood-control facilities. It also develops flood and dam inundation maps and reports.
- FEMA: FEMA manages the National Flood Insurance Program (NFIP), providing insurance to the public in communities that participate in the program. FEMA is the main federal government agency contact during natural disasters and publishes the Flood Insurance Rate Maps (FIRM), which identify the extent of flood potential in flood-prone communities based on a 100-year flood (or base flood) event.
- FIA: The FIA is the primary agency that delineates potential flood hazard areas and floodways through the FIRMs and the Flood Boundary and Floodway Map. Flood insurance is required of all homeowners who have federally subsidized loans.
- DWR: DWR is responsible for managing and protecting California’s water. DWR works with other agencies to benefit the state’s people, and to protect, restore, and enhance the natural and human environments. DWR also works to prevent and respond to floods, droughts, and catastrophic events that would threaten public safety, water resources and management systems, the environment, and property.

FIGURE 4: FLOOD HAZARD ZONE



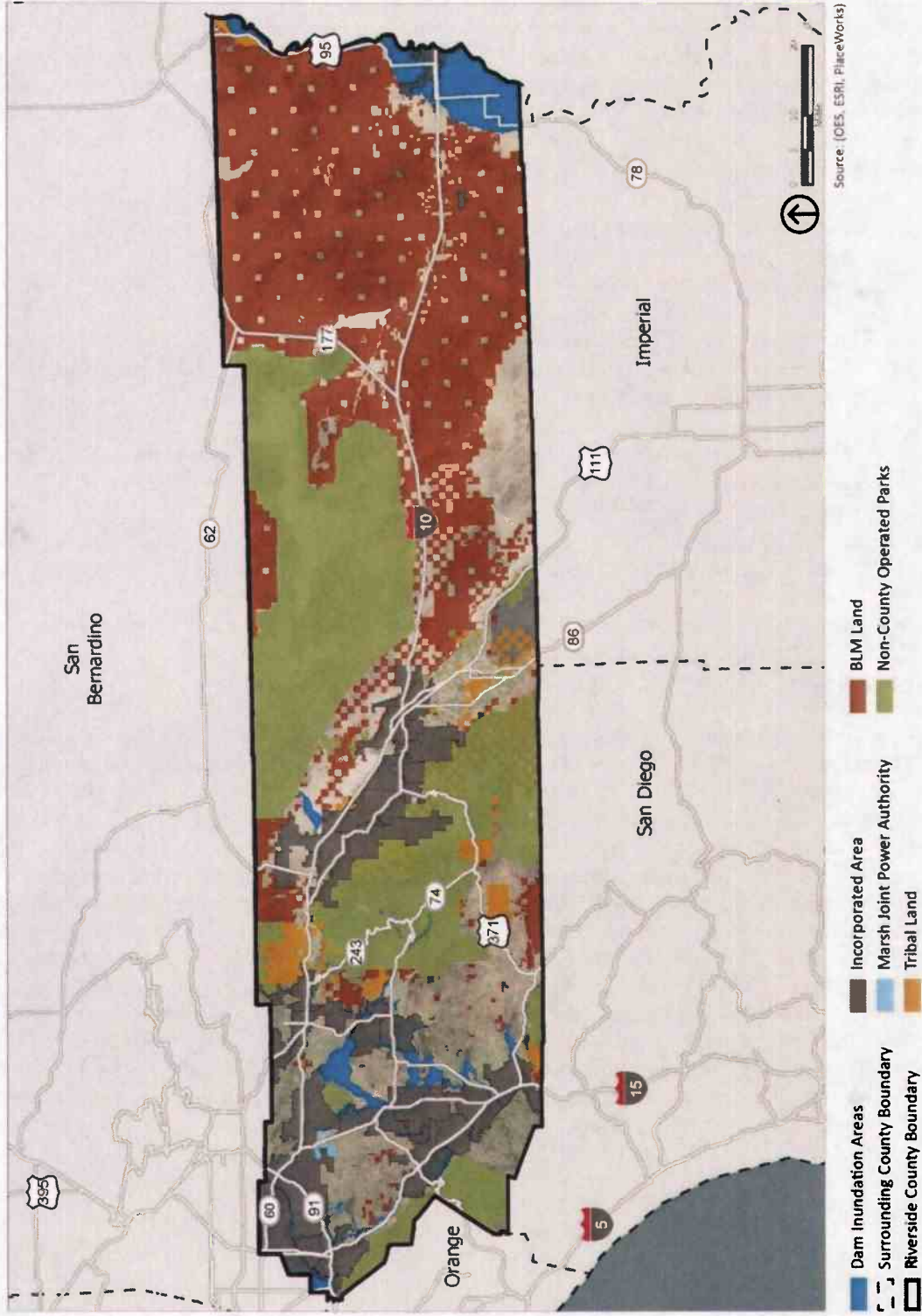
Dam failure also poses a risk to unincorporated Riverside County. Dam break floods are usually associated with intense rainfall or prolonged flood conditions. A dam failure is an uncontrolled release of water from a reservoir through a dam as a result of structural failures or deficiencies in the dam. Dam failures can range from fairly minor to catastrophic and can potentially harm human life and property downstream from the failure. In addition, ecosystems and habitats are destroyed as a result of waters flooding them. Although dam failures are very rare, these events are not unprecedented. Additionally, the older that dams get, the more potential exists for catastrophic dam failures. There are four major causes of dam failures, which include the following:

- Overtopping: These failures occur as a result of poor spillway design, leading to a reservoir filling too high with water, especially in times of heavy rainfall. Other causes of this type of failure include settling of the crest of the dam or spillway blockage.
- Foundation defects: These failures occur as a result of settling in the foundation of the dam, instability of slopes surrounding the dam, uplift pressures, and seepage around the foundation. All of these failures result in structural instability and potential dam failure.
- Piping and seepage failures: These failures occur as a result of internal erosion caused by seepage and erosion along hydraulic structures such as the spillways. As well, erosion as a result of animal burrows and cracks in the dam structure contribute to these failures.
- Conduit and valve failure: These failures occur as a result of problems with valves and conduits.

Other dam failures arise as a result of other miscellaneous causes. Many dam failures are also the secondary result of other natural disasters, such as earthquakes, landslides, extreme storms, or heavy snow-melt. Other causes include equipment malfunction, structural damage, and sabotage.

In unincorporated Riverside County, a major earthquake could cause a dam failure. Dams are constructed with safety features known as “spillways” that allow water to overtop the dam if the reservoir fills too quickly. Spillway overflow events, often referred to as “design failures,” result in increased discharges downstream and increased flooding potential. In a dam failure scenario, the greatest threat to life and property typically occurs in those areas immediately below the dam since flood depths and discharges generally decrease as the flood wave moves downstream. The primary danger associated with dam failure is the high-velocity flooding downstream of the dam and limited warning times for evacuation. The Mathews Dam, Robert A. Skinner Dam, and Railroad Canyon Dam present an extremely high downstream hazard to the communities of Home Gardens, French Valley, and Lakeland Village, respectively. Figure 5 identifies the areas at risk from dam failure. Both earthquake faults and developments reduce the total ground absorption area. Earthquake faults include bedrock features that create barriers to subsurface percolation, thus increasing the velocity and erosive capacity of stormwater runoff on hillsides. Development also creates impermeable surfaces (e.g., structures, pavement, streets). Storm runoff is augmented by water flows from development contributing to street flooding. Moreover, developed areas generate irrigation water runoff from landscaping, which may channel stormwater and other runoff flows into nearby underdeveloped areas and street gutters, increasing the possibility of flood events.

FIGURE 5: DAM HAZARD INUNDATION



Potential Changes to Flood Risk in Future Years

Likelihood of Future Occurrence

Flooding is a significant problem in unincorporated Riverside County. Historically, unincorporated Riverside County has been at risk to flooding primarily during the winter and spring months when river systems in the county swell with heavy rainfall runoff. Normally, storm floodwaters are kept within defined limits by a variety of storm drainage and flood-control measures. Occasionally, extended heavy rains result in floodwaters that exceed normal high-water boundaries and cause damage. Flooding has occurred both within the 100- and 500-year floodplains and in other localized areas. As land uses and climate conditions shift and as improvements are made to flood-control channels, the size of these flood zones is likely to change.

Historically, much of the development in the county has occurred adjacent to streams, resulting in significant damages to property, and losses from disruption of community activities when the streams overflow. Additional development in the watersheds of these streams affects both the frequency and duration of damaging floods through an increase in stormwater runoff. Other problems connected with flooding and stormwater runoff include erosion, sedimentation, degradation of water quality, losses of environmental resources, and certain health hazards.

Climate Change and Flooding

Floods are among the most damaging natural hazards in unincorporated Riverside County, and climate change is expected to make flood events worse. Although climate change may not change average precipitation levels significantly, scientists expect that it will cause more years with extreme precipitation events. This means that more years are likely to see particularly intense storm systems that drop enough precipitation over a short enough period to cause flooding. Although Southern California is likely to experience a decrease in overall precipitation levels from climate change, the region is also expected to see an increase in the number of extreme precipitation events. A meteorological phenomenon known as the “atmospheric river,” a narrow stream of extremely moist air, is frequently responsible for the more intense storms that strike California. Atmospheric rivers generally deliver high levels of precipitation, up to 50 percent of the state’s total precipitation in any given year.

Because of this, floods are expected to occur more often in and around unincorporated Riverside County and climate change may expand the parts of the county that are considered flood-prone. Although there are no specific flooding projections for the county, flood events are expected to become more frequent, and it is possible that the areas subject to flooding will expand.

There are some indirect effects of climate change that may also increase flooding in unincorporated Riverside County. Climate change is expected to increase the frequency and severity of droughts that cause soil to dry out and become hard. When precipitation does return, more water runs off the surface rather than being absorbed into the ground, which can lead to floods. Wildfires, which are also expected to become more frequent due to climate change, cause a similar effect by baking the surface of the ground into a harder and less--penetrable layer. Trees and other vegetation help slow water down, which lets the water absorb into the soil and prevents it from turning into runoff. Because of this, the loss of trees and other plants from wildfires, pests, diseases, or other climate-related exposures can also increase flooding risk.

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While the risk and associated short-and long-term impacts of climate change are uncertain, experts in this field tend to agree that among the most significant impacts include those resulting from increased heat and precipitation events that cause increased frequency and magnitude of flooding. Changes associated with climate change and flooding could be significant given the higher elevations in the county where winter snow could turn to more significant rain events. Increases in damaging flood events will cause greater property damage, public health and safety concerns, displacement, and loss of life. In addition, an increase in the magnitude and severity of flood events can lead to potential contamination of potable water and contamination of food crops given the agricultural industry in the county. Displacement of residents can include both temporary and long-term displacement, increase in insurance rates, or restriction of insurance coverage in vulnerable areas.

Fire Hazards

Fire hazards can come in the form of both wildfires and urban fires. California is recognized as one of the most fire-prone and consequently fire-adapted landscapes in the world. The combination of complex terrain, Mediterranean climate, and productive natural plant communities, along with ample natural ignition sources, has created conditions for extensive wildfires. Wildfire is an ongoing concern for communities in unincorporated Riverside County. Generally, the fire season extends from early spring through late fall of each year during the hotter, dryer months. Fire conditions arise from a combination of high temperatures, low-moisture content in the air and plant matter, an accumulation of vegetation, and high winds.

Three types of fires are of concern to unincorporated Riverside County: (1) wildfires, (2) wildland-urban interface fires, and (3) structural fires.

Wildfires

Wildfires occur on mountains, hillsides, and grasslands. Vegetation, wind, temperature, humidity, and slope are all factors that affect how these fires spread. In unincorporated Riverside County, native vegetation, such as chaparral, sage, and grassland provide fuel that allows fire to spread easily across large tracts of land. These plant species are capable of regeneration after a fire, making periodic wildfires a natural part of the ecology of these areas. A significant portion of the county is undeveloped and consists of rugged topography with highly flammable vegetation. In particular, the hillside terrain of unincorporated Riverside County has a substantial fire risk. Fire potential for unincorporated Riverside County is typically greatest in the months of August, September, and October, when dry vegetation coexists with hot, dry Santa Ana winds. However, in unincorporated Riverside County, fires with conflagration potential can occur at any time of the year. Seasonal drought conditions exacerbate fire hazards.

Wildland-Urban Interface Fires

The wildland-urban interface is an area where buildings and infrastructure (e.g., cell towers, schools, water supply facilities) mix with areas of flammable wildland vegetation. This interface is sometimes divided into the defense zone (areas in close proximity to communities, usually about a quarter mile thick) and threat zones (an approximately one-and-a-quarter-mile buffer around the defense zone). Hundreds of homes now border major forests and brush areas. With thousands of people living near and visiting wildland areas, the probability of human-caused fires is growing. The Idyllwild area in the San Jacinto Mountains is a heavily forested area that faces a high wildfire hazard risk.

In the wildland-urban interface, efforts to prevent ignitions and limit wildfire losses hinge on hardening structures and creating defensible space through a multi-faceted approach, which includes engineering, enforcement, education, emergency response, and economic incentive. Different strategies in the defense and threat zones of the wildland-urban interface help to limit the spread of fire and reduce the risk to people and property.

Wildfire threat within the county ranges from moderate to very high. Figure 6 shows the wildfire risk zones in unincorporated Riverside County, Figure 7 shows the risk zones in western Riverside County along with the locations of key emergency service facilities, and Figure 8 identifies the wildland-urban interface. The highest threat occurs in Western Riverside County, especially along the San Jacinto Mountains. A majority of this region is considered a Very High Fire Hazard Severity Zone, the Little San Bernardino Mountains northeast of the Coachella Valley have hazard severity zones ranging from Moderate to Very High, and Eastern Riverside County is considered a Moderate Fire Hazard Severity Zone.

Structural Fires

Urban fires occur in built-up environments, destroying buildings and other human-made structures. These disasters are often due to faulty wiring or mechanical equipment, combustible construction materials, or the absence of fire alarms and sprinkler systems. Structural fires are largely from human accidents, although deliberate fires (arson) may be a cause of some events. Older buildings that lack modern fire safety features may face greater risk of damage from fires. To minimize fire damage and loss, the County’s Fire Code, based on the California Fire Code, sets standards for building and construction. It requires the provision of adequate water supply for firefighting, fire-retardant construction, and minimum street widths, among other things. Fire prevention awareness programs and fire drills are conducted to train residents to respond quickly and correctly to reduce injury and losses during fires.

Fire Responsibility Areas

In and around unincorporated Riverside County, different organizations all have some responsibility for wildfire protection in different areas. These responsibility areas are codified under state law into three categories: local responsibility areas (LRAs), state responsibility areas (SRAs), and federal responsibility areas (FRAs).

- LRAs are areas protected by local agencies, including city and county fire departments, local fire protection districts, and the California Department of Forestry and Fire Protection (CAL FIRE) when under contract to local governments. Approximately half of the land in Western Riverside County is an LRA and nearly all land in Eastern Riverside County is an LRA.
- SRAs are areas where CAL FIRE has responsibility for wildfire protection. SRAs are generally unincorporated areas that are not federally owned, are undeveloped, and are covered by wildland vegetation or rangeland. Approximately half of the land in Western Riverside County is an SRA; much of the SRA land encompasses the San Jacinto Mountains.
- FRAs are areas that are managed by a federal agency, including the U.S. Forest Service, the U.S. Fish and Wildlife Service, and the Bureau of Land Management. In the San Jacinto Mountains, most of the land is federally owned and consists of FRAs.

FIGURE 6: FIRE HAZARD SEVERITY ZONES

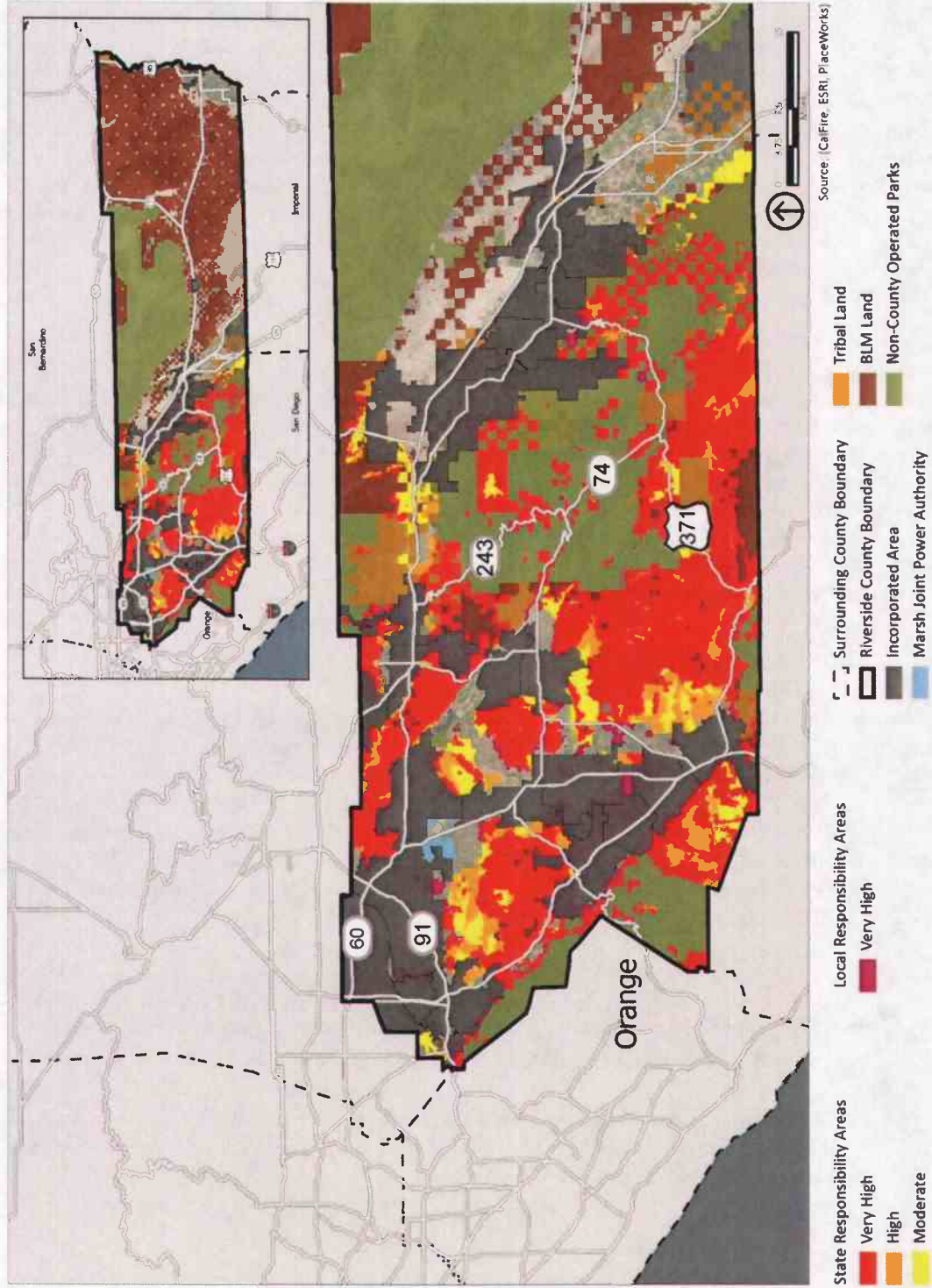


FIGURE 7: FIRE HAZARD SEVERITY ZONES (WEST COUNTY) AND EMERGENCY SERVICE FACILITIES

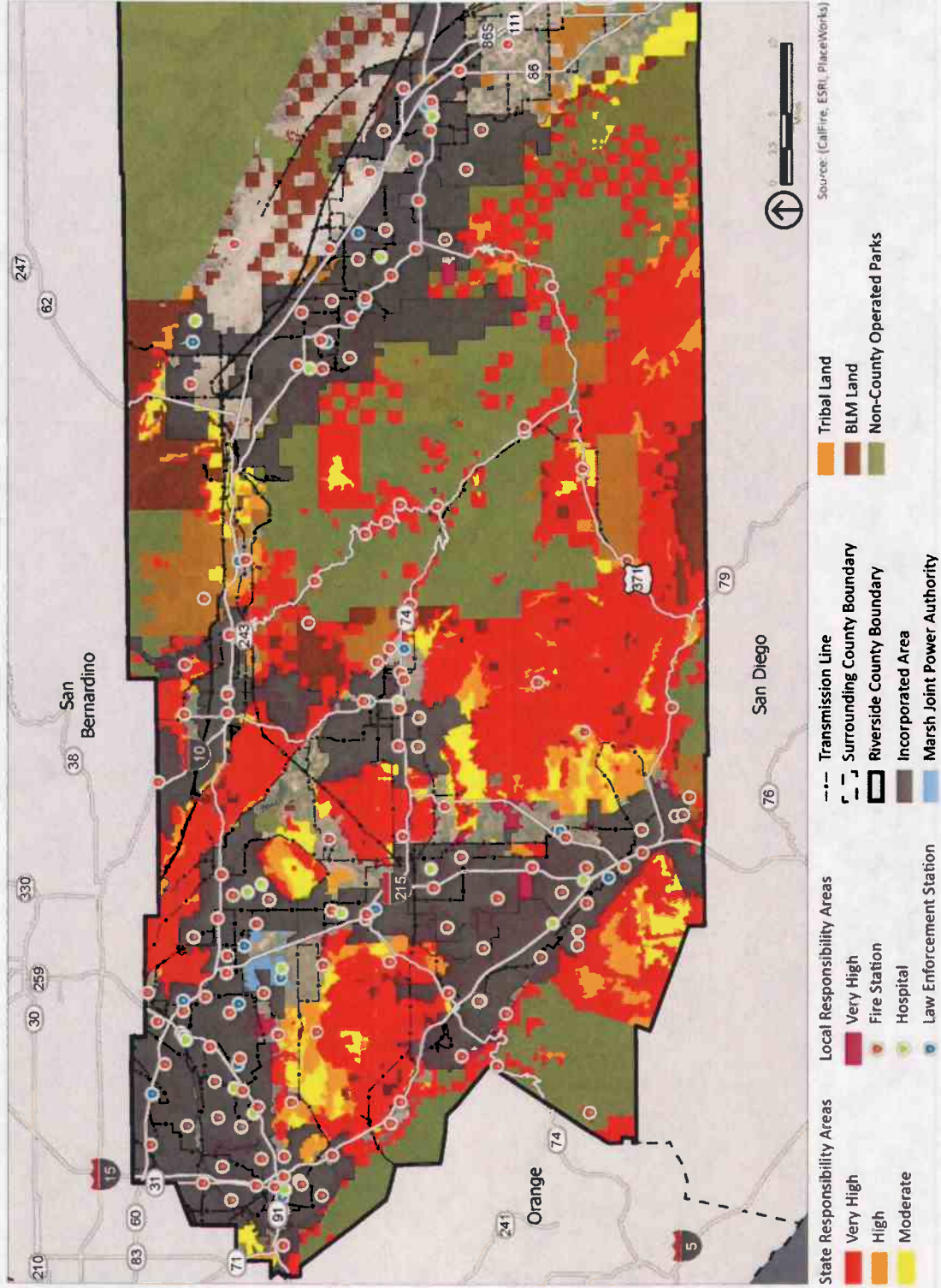
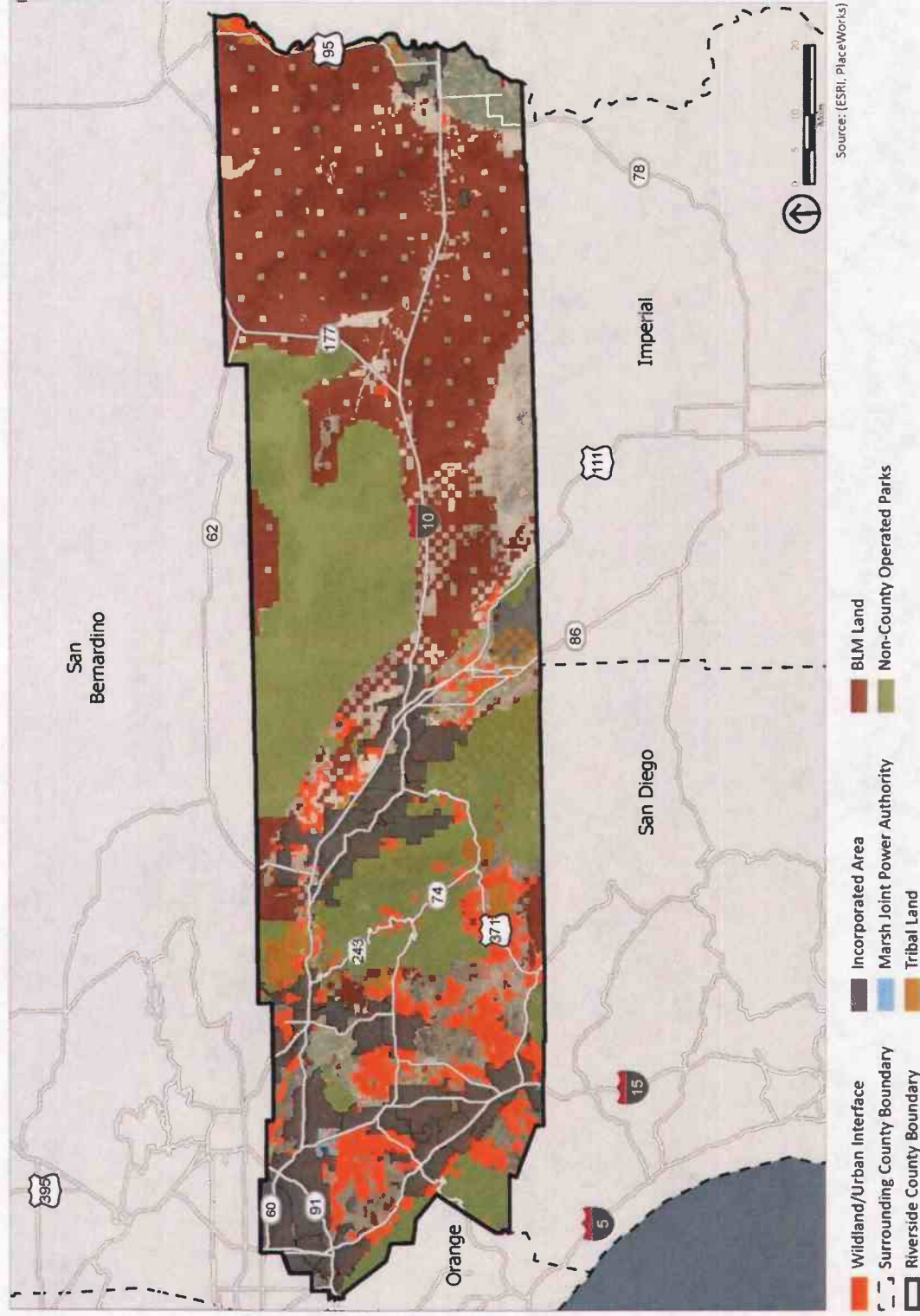


FIGURE 8: WILDLAND-URBAN INTERFACE



Past Occurrences

Table 2 contains a list of historical large fires that have occurred around the county dating back to 2008. Figure 9 shows the areas burned by historic wildfires in and around unincorporated Riverside County.

Table 2: Historical Large Fires in Riverside County, 2008 - 2019

Large Fires (500 Acres and Greater)							
Fire Name	Date		Acres Burned	Vegetation Type	Cause	Structures	
	Start	End				Destroyed	Damaged
LINCOLN FIRE	03/15/19	03/20/19	560	Grass	Arson	0	0
JERRY FIRE	06/21/19	06/21/19	500	Grass	Vehicle	0	0
TENAJA FIRE	09/04/19	09/14/19	1,926	Grass/Brush	Under Investigation	0	3
HORSESHOE FIRE	09/14/19	09/17/19	503	Grass/Brush	Undetermined	0	0
HILL FIRE	10/10/19	11/03/19	628	Grass/Brush	Under Investigation	0	0
SANDALWOOD FIRE	10/10/19	10/15/19	1,011	Grass/Timber	Undetermined	73	16
CRANSTON FIRE	07/25/18	08/09/18	13,139	Brush/Grass/Timber	Human	12	5
PATTERSON FIRE	05/17/18	05/18/18	1,261	Grass/Brush	Equipment Use	0	0
OPERA FIRE	04/30/17	05/02/17	1,350	Grass/Brush	Vehicle	0	0
MANZANITA FIRE	06/26/17	06/30/17	6,309	Grass/Brush	Vehicle	0	0
BLAINE FIRE	08/13/17	08/16/17	1,500	Grass/Brush	Undetermined	0	46
MIAS FIRE	08/14/17	08/18/17	600	Grass/Brush	Electrical Power	0	0
PALMER FIRE	09/02/17	09/09/17	3,800	Grass/Brush	Playing with Fire	0	0
WILDOMAR FIRE	10/26/17	11/01/17	866	Grass/Brush	Vehicle	0	0
BOGART FIRE	08/30/16	09/05/16	1,470	Grass/Brush	Undetermined	0	0
HIGHWAY FIRE	04/18/15	04/24/15	1,049	Timber/Grass	Equipment	0	0
ANZA FIRE	08/10/15	08/15/15	500	Brush	Human	0	0
SUMMIT FIRE	5/1/13	5/4/13	2,956	Grass/Brush	Undetermined	2	0
GORGONIO FIRE	5/4/13	5/4/13	650	Grass/Brush	Undetermined	0	0
MOUNTAIN FIRE	7/15/13	7/31/13	27,531	Timber/Brush	Electrical Power	23	1
SILVER FIRE	8/7/13	8/15/13	20,292	Brush	Undetermined	48	8
HATHAWAY FIRE	6/9/13	10/15/13	3,870	Brush	Under Investigation	0	0
FALLS FIRE	8/5/13	8/9/13	1,383	Grass/Brush	Under Investigation	0	0
HIGHLAND FIRE	6/16/12	6/18/12	2,171	Grass/Brush	Under Investigation	0	0
RUSHMORE FIRE	8/4/12	8/4/12	1,000	Grass	Undetermined	0	0
BUCK FIRE	8/14/12	8/18/12	2,681	Grass/Brush	Lightning	4	0
VISTA FIRE	8/20/12	8/21/12	500	Grass	Equipment	0	0
GILMAN FIRE	8/06/11	8/07/11	945	Grass	Undetermined	0	0
WINDY POINT FIRE	9/25/11	10/3/11	541	Grass	Miscellaneous	0	0
PEDLEY FIRE	5/12/10	5/13/10	850	Grass	Equipment	0	0
MCKINLEY FIRE	5/20/10	5/22/10	1,000	Grass	Equipment	0	0
SKINNER FIRE	7/15/10	7/18/10	503	Grass	Lightning	0	0
CACTUS FIRE	7/15/10	7/18/10	720	Grass	Lightning	0	0
OLIVER FIRE	05/27/09	05/27/09	500	Grass	Other	0	0
COTTONWOOD FIRE	08/27/09	08/31/09	2,409	Grass/Brush	Miscellaneous	0	0
FREEWAY COMPLEX FIRE	11/15/08	11/22/08	30,305	Grass	Structure	0	245
APACHE FIRE	4/29/08	5/4/08	769	Timber/Grass/Brush	Smoking	0	0

Source: Cal Fire Historical Wildfire Activity Statistics 2008 - 2019

Notable recent fires in Riverside County include:

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2019 Tenaja Fire – The Tenaja Fire started in the rural community of La Cresta southwest of Murrieta. The fire burned approximately 1,926 acres and damaged three structures.

2019 Sandalwood Fire – The Sandalwood Fire, located in the City of Calimesa, burned approximately 1,011 acres. This wind-driven fire engulfed most of the Villa Calimesa mobile home park, ultimately destroying 73 structures, damaging 16 structures, and resulting in two civilian deaths.

2018 Cranston Fire – This fire was the result of arson, burning approximately 13,139 acres. The Cranston Fire impacted the communities of Idyllwild and Mountain Center, as well as recreational activities in the Lake Hemet area, San Bernardino National Forest, and Mount San Jacinto State Park. It also caused road closures along Highway 74 and Highway 243, impacting access to Hemet. Parts of Highway 74 and Highway 243 were later closed multiple times due to the threat of mudslides caused by the fire. The fire resulted in 12 destroyed structures, 5 damaged structures, and an evacuation of over 7,000 people; no fatalities occurred.

2017 Blaine Fire – The Blaine Fire occurred in the Box Springs Mountain Area and resulted in the evacuation for homes in Moreno Valley. The fire burned approximately 1,500 acres and damaged 46 structures.

2013 Summit Fire – The Summit Fire started in the Mias Canyon area north of Banning. The fire burned approximately 2,956 acres and forced the evacuation of over 1,200 people, leading to the closure of multiple school districts in the Murrieta, Perris, and Lake Elsinore area. The fire destroyed two structures and one firefighter suffered minor injuries.

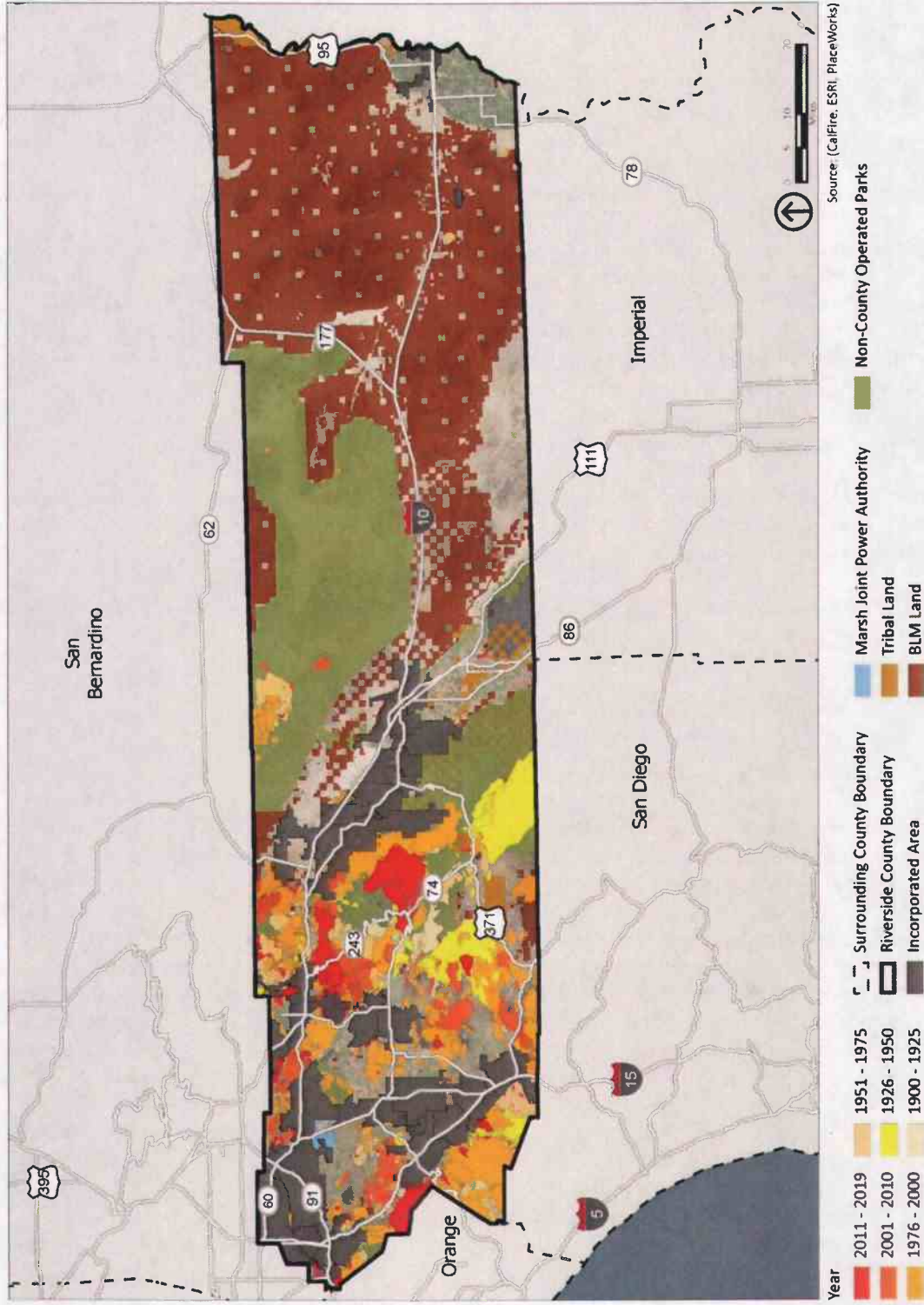
2013 Mountain Fire – The Mountain Fire burned 27,531 acres in Mountain Center. The fire burned for 16 days along steep slopes of timber and chaparral primarily in the San Jacinto Mountains of the San Bernardino National Forest. The fire threatened the town of Idyllwild, other small towns, and reached within two miles of Palm Springs. Nearly 6,000 residents of the Idyllwild and Fern Valley areas were ordered to evacuate; however, those communities were not damaged by the fire. While 23 structures were destroyed, and one structure was damaged, no fatalities occurred.

2013 Silver Fire – The Silver Fire burned 20,292 acres in the San Jacinto Mountains of the San Bernardino National Forest. Nearby communities of Poppet Flats, Twin Pines, and Silent Valley ordered to evacuate, displacing at least 1,500 residents. Highway 243 was also shut down as the fire quickly jumped the highway. Two firefighters and one civilian were reportedly injured. The fire destroyed 48 structures and damaged eight structures; no fatalities occurred.

2012 Buck Fire – The Buck Fire was a fire started by lightning in a rugged, rural area east of Temecula. Evacuations were ordered in the sparsely populated area near Aguanga, resulting in more than 30 homes to relocate. The fire burned approximately 2,681 acres, destroying four structures, and injuring one civilian that suffered serious burns.

2008 Freeway Complex Fire – The Freeway Complex Fire started along the Riverside Freeway in the riverbed of the Santa Ana River, located in Corona. The fire spread west and north into the hillsides of Yorba Linda and south into Anaheim Hills, where multiple businesses and residences were destroyed. It also burned homes in Olinda Ranch along Carbon Canyon Road in Brea, burned through much of Chino Hills, then spread north into Diamond Bar. Approximately 40,000 residents were evacuated during the fire. Areas under mandatory evacuation during the fire included Anaheim, Carbon Canyon, Chino Hills, Corona, Diamond Bar, and Yorba Linda. The fire burned approximately 30,305 acres and resulted in 245 damaged and destroyed structures; no fatalities occurred.

FIGURE 9: HISTORIC WILDFIRE AREAS



Fire Protection

Fire protection in unincorporated Riverside County is provided by the Riverside County Fire Department and CAL FIRE. Riverside County contracts with CAL FIRE to provide fire protection and rescue services in the unincorporated areas of the county. The Riverside County Fire Department and CAL FIRE participate in a Cooperative Fire Response Agreement, where fire agencies have agreed to automatically support each other on incidents using the closest available resource.

The Riverside County Fire Department is one of the largest regional fire service organizations in California. It is staffed with a combination of County of Riverside and CAL FIRE personnel and responds to both urban and wildland emergencies. The Riverside County Fire Department serves a vast geographic area and diverse communities. The County of Riverside supplements its staff by contracting with CAL FIRE to provide fire protection services. The Riverside County Fire Department, a unique partnership between CAL FIRE and the County of Riverside, serves residents of unincorporated areas as well as 21 partner cities. The Idyllwild Fire Protection District also provides firefighting, rescue, emergency medical services, and ambulance transport services for the unincorporated communities of Idyllwild and Fern Valley.

The Riverside County Fire Department provides fire protection, emergency medical services, and disaster preparedness and response. The department operates 101 fire stations in six divisions consisting of 15 line battalions, providing fire suppression, emergency medical, technical rescue, fire prevention, and related services.

CAL FIRE has a legal responsibility to provide fire protection on all SRA lands, which are defined based on land ownership, population density, and property use.

Potential Changes to Fire Risk in Future Years

Likelihood of Future Occurrence

Risk and vulnerability to unincorporated Riverside County from wildfire is of significant concern, especially in the forests and shrublands in the western county. High fuel loads in the county, along with geographical and topographical features, create the potential for both natural and human-caused fires that can result in loss of life and property. These factors, combined with natural weather conditions common to the area, including periods of drought, high temperatures, low relative humidity, and periodic winds, can result in frequent and sometimes catastrophic fires. During the historic August to October fire season, the dry vegetation and hot and dry Santa Ana winds, combined with continued growth in the wildland-urban interface areas, results in an increase in the number of ignitions. Any fire, once ignited, has the potential to quickly become a large, out-of-control fire. As development continues throughout the county, especially in these interface areas, the risk and vulnerability to wildfires will likely increase.

Structural fires can occur at any time throughout the year. Structural fires may occur in any buildings, often due to faulty wiring or mechanical equipment or combustible construction materials. The absence of fire alarms and sprinkler systems can allow small fires to rapidly grow and spread, potentially threatening the entire building and any neighboring structures. In general, the propagation rates of structural fires vary depending on the types of materials used in building construction. Building materials such as concrete and fire-resistive coated steel used in high rise or commercial buildings are most fire resistive. In contrast, building materials such as heavy timber for community-based buildings and wood frame for residential buildings are least resistive. The risk and vulnerability to structural fires is unpredictable and will vary across unincorporated Riverside County due to the incidental nature of human accidents and unique conditions of a built environment.

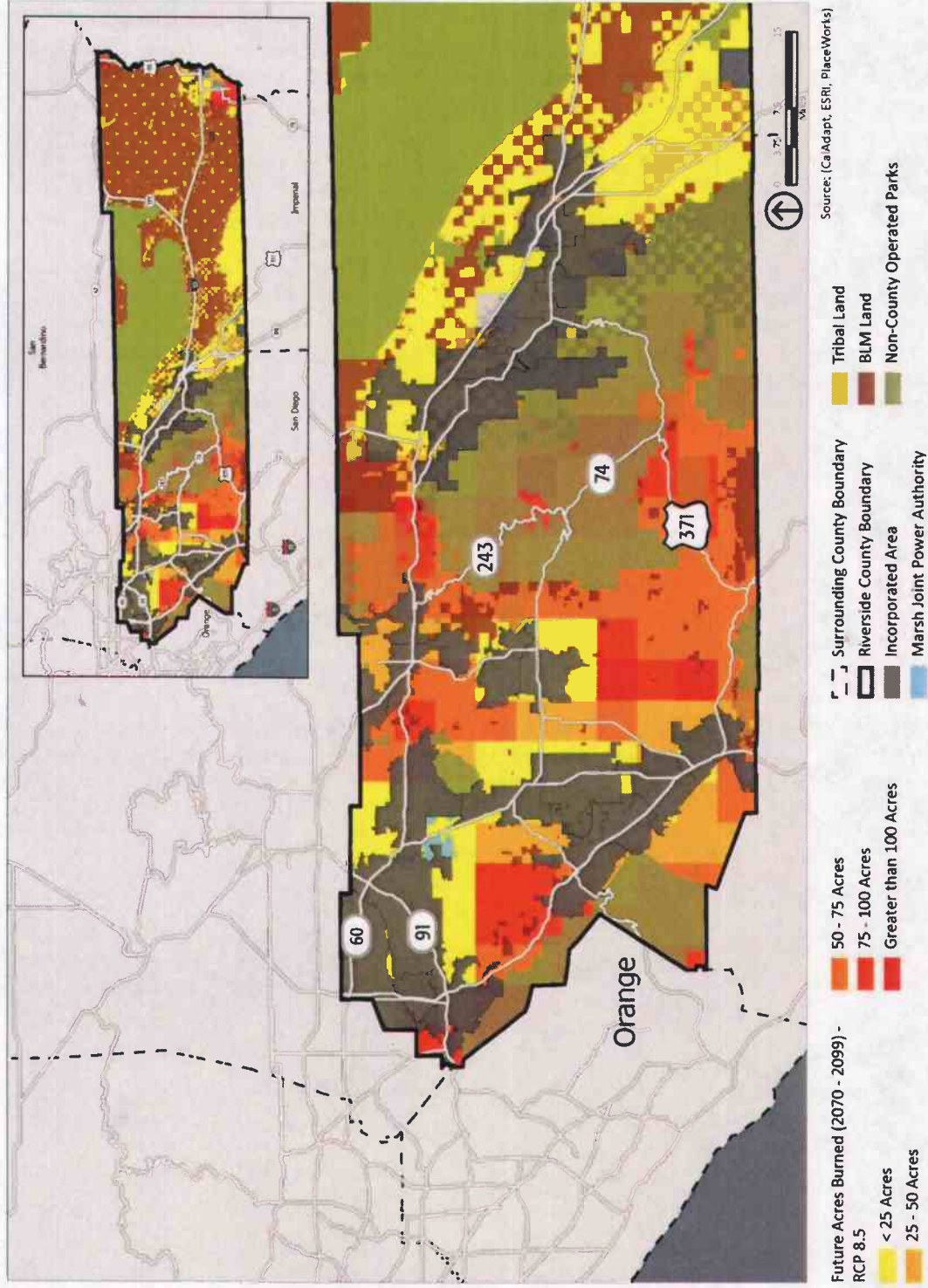
Wildfire hazard is the highest-priority hazard in the county and is the hazard with the greatest potential for catastrophic loss. Wildfires can cause short-term and long-term disruption to the County. Fires can have devastating effects on watersheds through loss of vegetation and soil erosion, which may impact the county by changing runoff patterns, increasing sedimentation, reducing natural and reservoir water storage capacity, and degrading water quality. Fires, including wildfires and structural fires, may result in casualties and can destroy buildings and infrastructure.

Although the physical damages and casualties arising from wildland-urban interface fires may be severe, it is also important to recognize that they can cause significant economic impacts by resulting in a loss of function of buildings and infrastructure. In some cases, the economic impact of this loss of services may be comparable to the economic impact of physical damages or, in some cases, even greater. Economic impacts of loss of transportation and utility services may include traffic delays/detours from road and bridge closures and loss of electric power, potable water, and wastewater services. Fires can also cause major damage to power plants and power lines needed to distribute electricity to operate facilities. The effects can be far-reaching in terms of the number of acres involved, the toll on human life, and the economic consequences. Wildfire and structural fires will continue to be a high-risk hazard for unincorporated Riverside County.

Climate Change and Fire

Changing climate conditions are expected to increase the wildfire risk in and around unincorporated Riverside County. Warmer temperatures brought on by climate change can exacerbate drought conditions. Droughts can kill or dry out plants, creating more fuel for wildfires. The biggest increase in wildfires is projected to occur in Western Riverside County, along the San Jacinto Mountains. Warmer temperatures are also expected to increase the number of pest outbreaks, such as the western pine beetle, creating more dead trees and increasing the fuel load. Due to warmer temperatures, the fire season is also likely to begin earlier in the year and extend later than it has historically. According to the California Fourth Climate Change Assessment, overall burned area may increase by as much as 60 percent during Santa Ana Wind events (typically October to March), and 75 percent during periods without Santa Ana Winds (typically April to September). Figure 10 shows the anticipated increase in areas burned by wildfires as a result of climate change. Structural fires are not expected to change directly as a result of climate change, although hotter and drier conditions may indirectly contribute to structural fires.

FIGURE 10: ANNUAL FUTURE WILDFIRE ACRES BURNED



Hazardous Waste and Materials

Hazardous materials are materials that pose a significant risk to public safety and environmental health. These include toxic chemicals, flammable or corrosive materials, petroleum products, and unstable or dangerously reactive materials. They can be released through human error, malfunctioning or broken equipment, or as an indirect consequence of other emergencies (e.g., if a flood damages a hazardous material storage tank). Hazardous materials can also be released accidentally during transportation, as a consequence of vehicle accidents.

A release or spill of bulk hazardous materials could result in fire, explosion, toxic cloud, or direct contamination of water, people, and property. The effects may involve a local site or many square miles. Health problems may be immediate, such as corrosive effects on skin and lungs, or gradual, such as the development of cancer from a carcinogen. Damage to property could range from immediate destruction by explosion to permanent contamination by a persistent hazardous material.

The majority of hazardous materials in the county are being transported by truck on Interstate (I-) 10, I-15, I-215, and State Route (SR-) 60 and SR-91. The most vulnerable areas along these routes are considered to be the on/offramps and interchanges. Pipeline systems also carry hazardous materials, and under some conditions these pipelines can rupture and cause a release of hazardous materials. The above-mentioned freeways are areas of concern, as are Union Pacific Railroad tracks that roughly parallel I-10. In addition to highway traffic, other hazardous materials are transported through the county on the Southern Pacific Railroad. Since 1970, approximately 1,067 rail and roadway hazardous materials incidents have occurred in Riverside County.

Several state agencies monitor hazardous materials/waste facilities. Potential and known contamination sites are monitored and documented by the Department of Health Services (DHS) and the Regional Water Quality Control Board (RWQCB). A review of the leaking underground storage tank list produced by the RWQCB, and the Hazardous Waste and Substances Sites List produced by the Office of Planning and Research indicates hazardous waste sites throughout the county.

If an imminent public health threat is posed by an outside factor, the County will support local regulating agencies in notifying the public. The transport of hazardous materials/wastes and explosives through the county is regulated by the California Department of Transportation (DOT). I-10, I-15, I-215, SR-60, and SR-91 are open to vehicles carrying hazardous materials/wastes. Transporters of hazardous wastes are required to be certified by the DOT and manifests are required to track the hazardous waste during transport. The danger of hazardous materials/waste spills during transport does exist and will potentially increase as transportation of these materials increases on freeways and the railroads. The Riverside County Sheriff's Department, Riverside County Fire Department, CAL FIRE, Riverside County EMD, and Riverside County Department of Environmental Health are responsible for hazardous materials accidents at all locations within the county.

Potential Changes to Hazardous Materials in Future Years

Likelihood of Future Occurrence

Given that 1,067 hazardous materials incidents have happened in transport through the county in the past 50 years, it is highly likely a hazardous materials incident will occur in unincorporated Riverside County every year. However, according to the California Department of Transportation (Caltrans), most incidences are related to releases of fluids from the transporting vehicles themselves and not the cargo, thus the likelihood of a significant hazardous materials release within the county is more limited and difficult to predict.

Chapter 6 **Safety Element**

Climate Change and Hazardous Materials

Climate change is unlikely to affect hazardous materials transportation incidents. However, increases in the frequency and intensity of hazards, such as floods, landslides, and severe storms, may create a greater risk of hazardous materials releases during these events.

Disaster Preparedness, Response, and Recovery

Riverside County Emergency Services establishes the responsibilities of the various Riverside County agencies in times of a disaster. Disaster preparedness and response planning include identifying short-term actions to reduce the scope of an emergency and managing necessary resources in the event of a disaster. After any disaster, particularly an earthquake, short-term disaster recovery requires many operations that are less urgent than fire suppression or medical attention but are equally important.

Emergency Preparedness

Emergency preparedness activities in unincorporated Riverside County are conducted through the County of Riverside's EMD and Emergency Operations Center (EOC) EMD, in cooperation with local cities, special districts, and fire and law enforcement agencies, provides emergency management services. EMD prepares emergency and contingency plans, ranging from evacuation plans to emergency operations plans that help specify the roles and responsibilities of first responders and emergency management personnel for an incident. Moreover, EMD plans and organizes trainings and exercises involving Riverside County and local, state, federal, and regional agencies.

The Riverside County Fire Department and CAL FIRE are prepared to handle most everyday emergencies, such as all types of fire, medical, or hazardous situations. However, during a disaster, the number and scope of incidents may exceed the fire department's and CAL FIRE's ability to provide effective emergency services. For this reason, Riverside County provides the public with access to a community emergency response team (CERT) training program. The CERT Program provides for community and employee self-sufficiency to meet the general public's urgent life-saving and sustenance needs until emergency personnel arrive. The CERT Program educates people about disaster preparedness and trains them in basic response skills, such as fire safety, light search and rescue, and disaster medical operations. CERT members assist their fellow citizens/coworkers in their community or workplace following a disaster. CERT members take an active role in their community by preparing for a disaster, thus reducing their own impact risk.

The County of Riverside uses Alert RivCo, a phone alert system to alert residents and businesses in Riverside County who are affected, threatened, or might be endangered by an emergency event or a disaster, such as wildfires, floods, hazardous materials, severe weather, and certain law enforcement incidents. Alert RivCo is part of a group of alert and warning tools used in the county. Other systems include the Emergency Alert Systems (EAS) and the Emergency Digital Information System (EDIS).

The EAS is a national public warning system commonly used by state and local authorities to deliver important emergency information, such as weather and AMBER alerts, to affected communities. EAS participants – radio and television broadcasters, cable systems, satellite radio and television providers, and wireline video providers. FEMA, the Federal Communications System, and NOAA's National Weather Service (NWS) work collaboratively to maintain the EAS and Wireless Emergency Alerts, which are the two main components of the national public warning system and enable authorities at all levels of government to send urgent emergency information to the public. The EDIS is a wireless datacast-based emergency and disaster information service operated by the State of California Governor's Office of Emergency Services and is an enhancement to the EAS. These systems are available in multiple languages.

Disaster Preparedness

In recent years, the County of Riverside has expanded its emergency preparedness planning. The County of Riverside is required under state law to prepare and maintain a Standardized Emergency Management System (SEMS) Multi-hazard Functional Plan. The California Governor’s Office of Emergency Services has extensive guidelines outlining the requirements of the Riverside County SEMS.

Public Safety Power Shutoffs

Unincorporated Riverside County is primarily served by Southern California Edison (SCE). Parts of the unincorporated area are also served by Anza Electric Cooperative and Imperial Irrigation District. Anza Electric Cooperative services over 700 miles of line in Southwest Riverside County covering the areas of Anza, Garner Valley, Pinyon, Alpine Village, Royal Carrizo, and parts of Aguanga. Imperial Irrigation District services Coachella Valley cities, including Mecca, Thermal, La Quinta, Coachella, Indio, Bermuda Dunes, Thousand Palms, Indio Hills, and Sky Valley.

Electricity utilities throughout California, including SCE, Anza Electric Cooperative, and Imperial Irrigation District, have begun to occasionally “de-energize,” or turn off the electricity for, power lines that run through areas where there is an elevated fire risk. This is intended to reduce the risk of power lines sparking or being damaged and starting a wildfire. These activities, called Public Safety Power Shutoffs (PSPSs), result in a loss of power for customers served by the affected power lines. A PSPS may occur at any time of the year, usually during high wind events, high temperatures, and dry conditions. PSPS events may be limited to specific communities or they may affect broad swaths of the state. In October 2019, SCE conducted four large-scale events, shutting off power to approximately 160,000 customers, including those in unincorporated Riverside County. The largest PSPS event during this time occurred on October 27 and ended on October 31, 2019. During this event, 498,660 customers in 12 counties (Fresno, Inyo, Kern, Los Angeles, Madera, Mono, Orange, Riverside, San Bernardino, Tulare, Tuolumne, and Ventura) served by 352 distribution circuits and seven transmission lines were identified as under consideration for PSPS. Ultimately, proactive de-energization was required for 126 circuits (including three transmission lines) affecting 126,364 customers, including some in unincorporated Riverside County, over two weather systems. PSPS events can impact emergency management activities. A loss of power can make it more difficult for homes or businesses to receive emergency notifications if needed. PSPS events can also create vulnerabilities for community members that lack backup power supplies and depend on electricity for heating or cooling homes and buildings, lighting, and internet. PSPS events may also be harmful to people who depend on electrically powered medical devices. Additionally, community members may be faced with economic hardships and be deprived of important services, such as grocery stores, gas stations, and banks/ATMs. Traffic lights and other traffic control systems may not work, which can complicate any evacuation needs and may hinder emergency response. Although critical public health and safety facilities often have backup generators, the loss of power may also disable other key infrastructure systems.

Evacuation Needs

Some natural disasters or other public safety events may require evacuation of parts of unincorporated Riverside County. In some instances, these evacuations may be limited to a particular neighborhood or street. In other instances, entire communities may need to evacuate. To allow for a safe and effective evacuation, all community members should be able to easily access an evacuation route that allows them to safely travel out of the evacuation zone. If there is limited access to evacuation routes or if these routes cannot accommodate evacuation traffic, evacuation efforts may be severely hampered by slow traffic and collisions, which can put community members at risk. Evacuation constraints can also slow down the public safety response by hindering access by emergency responders. Figures 11 through 13 show residential areas with only one access point, and so face a higher risk of

evacuation constraints. These include areas located on dead-end routes, are at least half a mile from a major roadway, or cannot be reached by at least two roads.

There are a number of routes in the unincorporated areas of Riverside County that can support evacuations, some of which have been identified by the Resilient IE project. Evacuation routes should have sufficient road capacity and freedom of traffic flow. Where possible, they should have limited exposure to hazard-prone areas as well. Table 3 list potential evacuation routes for unincorporated communities, although this is not meant to be an exhaustive list.

TABLE 3: EVACUATION ROUTES BY UNINCORPORATED COMMUNITY

Community	Evacuation Routes
Highgrove	Interstate 215, Center Street
University City	Interstate 215, Sycamore Canyon Boulevard
Temescal Canyon (El Cerrito, Montecito Ranch, Painted Hills, Sycamore Creek, etc.)	Interstate 15, Temescal Canyon Road, De Palma Road, Palm Canyon Drive, Trilogy Parkway/Knabe Road
Elsinore area (Rancho Carrillo, El Cariso, Warm Springs, etc.)	Interstate 15, State Route 74, Temescal Canyon Road, Grand Avenue
Southwest area (La Cresta, Deluz, Murrieta Hot Springs, French Valley, etc.)	Interstate 15, State Route 79, Rancho California Road, Borel Road/Washington Street, Sandia Creek Drive, De Portola Road, Deluz Road, Clinton Keith Road
Lake Matthews/Woodcrest	Interstate 15, Cajalco Road, La Sierra Avenue
Mead Valley area	Interstate 215, Cajalco Road
Harvest Valley/Winchester area	State Route 74, State Route 79, Domenigoni Parkway
Reche Canyon/Badlands area	State Route 60, Gilman Springs Road, Ramona Expressway, San Timoteo Road
Lakeview/Nuevo	Ramona Expressway, Nuevo Road, Juniper Flats Road
San Jacinto Valley area (Valley Vista, Gilman Hot Springs, etc.)	State Route 74, State Route 79, Gilman Springs Road
The Pass area (Twin Pines, Cabazon, Cherry Valley, etc.)	Interstate 10, State Route 79, State Route 243, Oak Glen Road, Bluff Street
Riverside Extended Mountain area (Idyllwild, Mountain Center, Anza, Aguanga, etc.)	State Route 74, State Route 243, State Route 371
Western Coachella Valley area (Whitewater, North Palm Springs, Thousand Palms, etc.)	Interstate 10, State Route 62, Dillon Road
Eastern Coachella Valley area (Arabia, Mecca, Oasis, Salton, etc.)	Interstate 10, State Route 86, State Route 111, Box Canyon Road/66th Avenue, Harrison Street
Desert Center	Interstate 10, State Route 177
Palo Verde Valley area (Mesa Verde, Palo Verde, Ripley, etc.)	Interstate 10, US Route 95, State Route 78, Midland Road/North Lovekin Boulevard

Mutual Aid Agreements

Additional emergency management and response services for jurisdictions throughout the county are provided through a mutual-aid agreement with the Riverside County Fire Department and CAL FIRE. The Riverside County Fire Department and CAL FIRE provide a variety of public safety services, including fire protection, medical aid, rescue, hazardous materials response, and educational safety programs.

FIGURE 11: RESIDENTIAL PARCELS WITH EVACUATION CONSTRAINTS (WEST COUNTY)

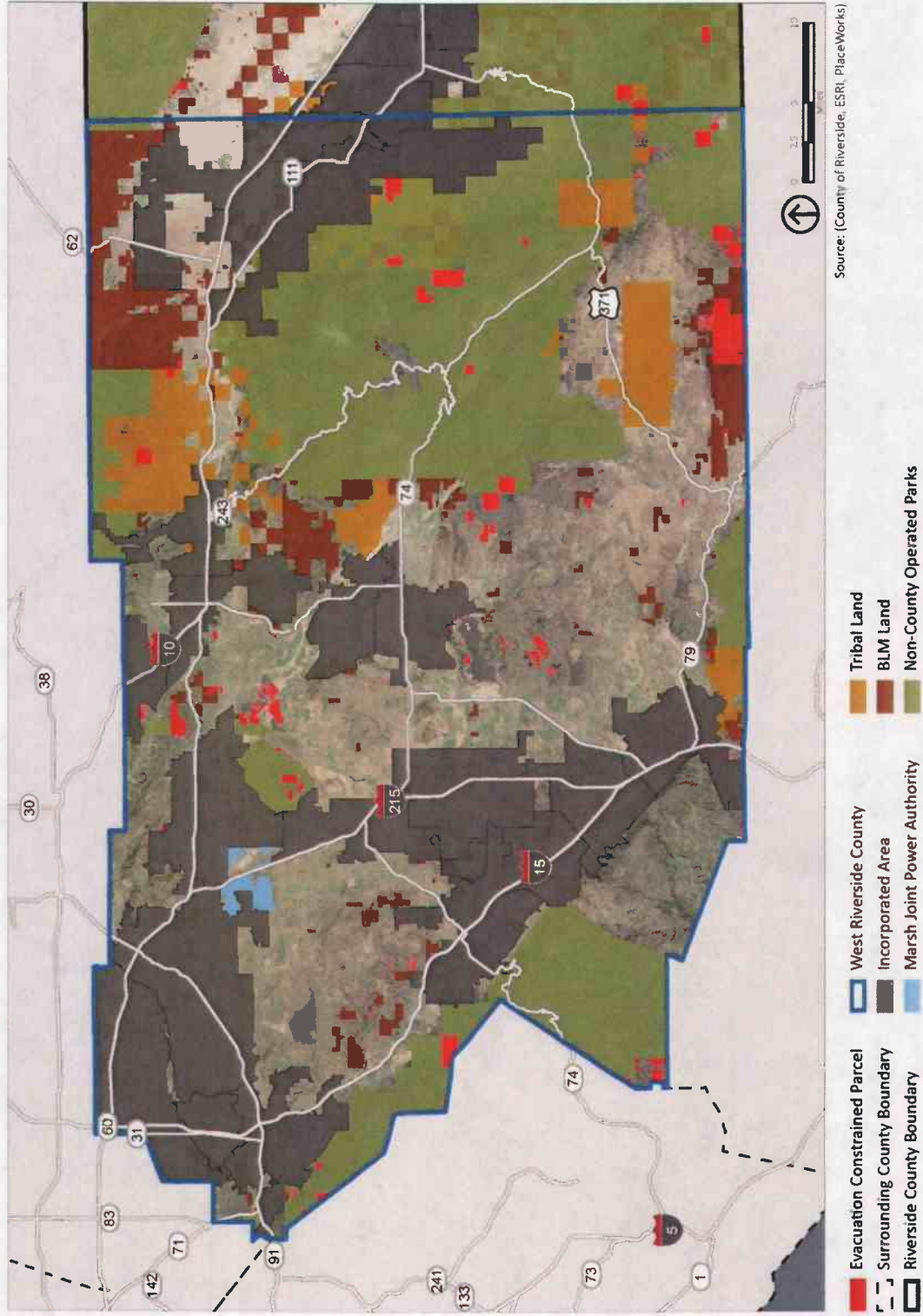


FIGURE 12: RESIDENTIAL PARCELS WITH EVACUATION CONSTRAINTS (CENTRAL COUNTY)

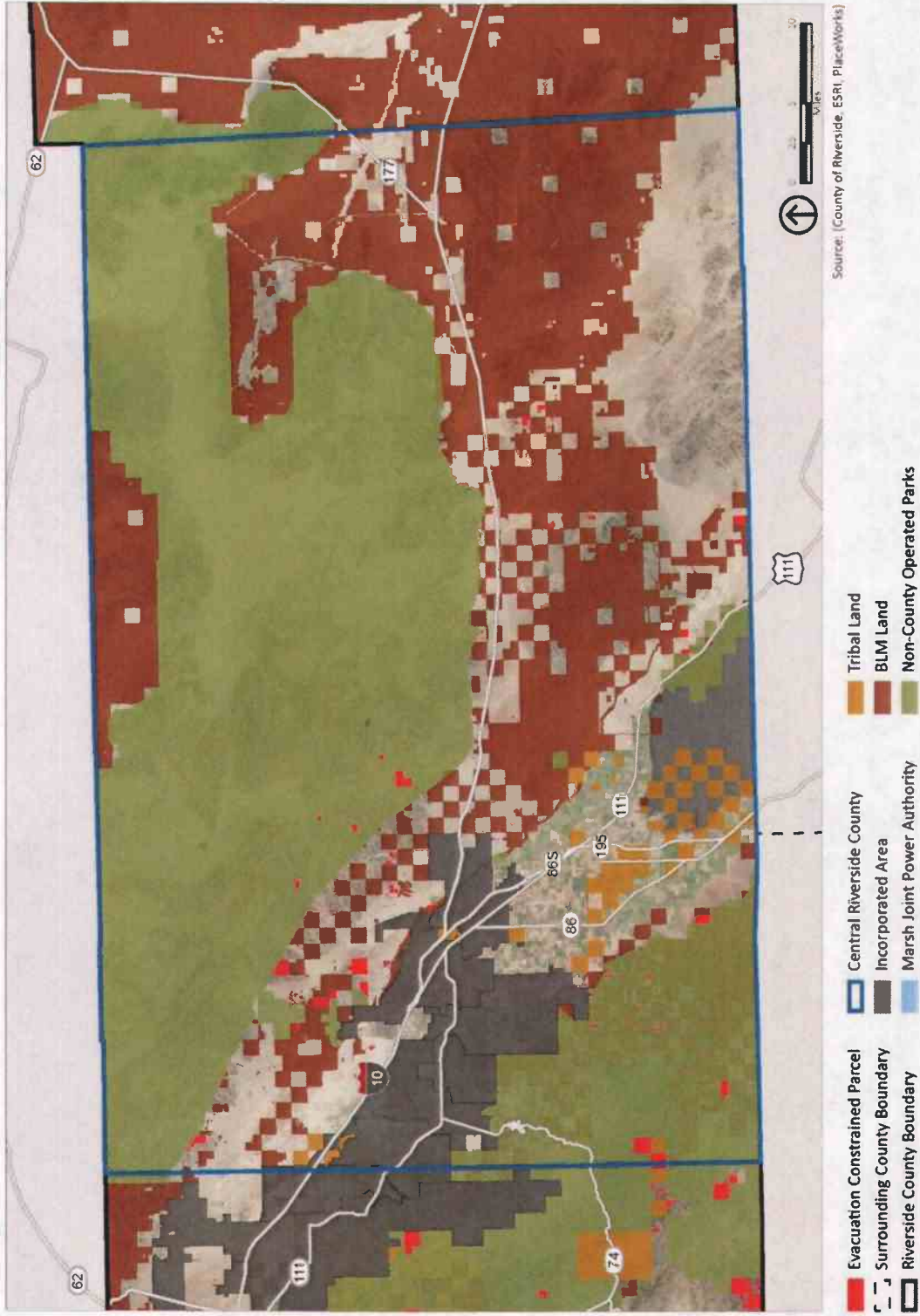
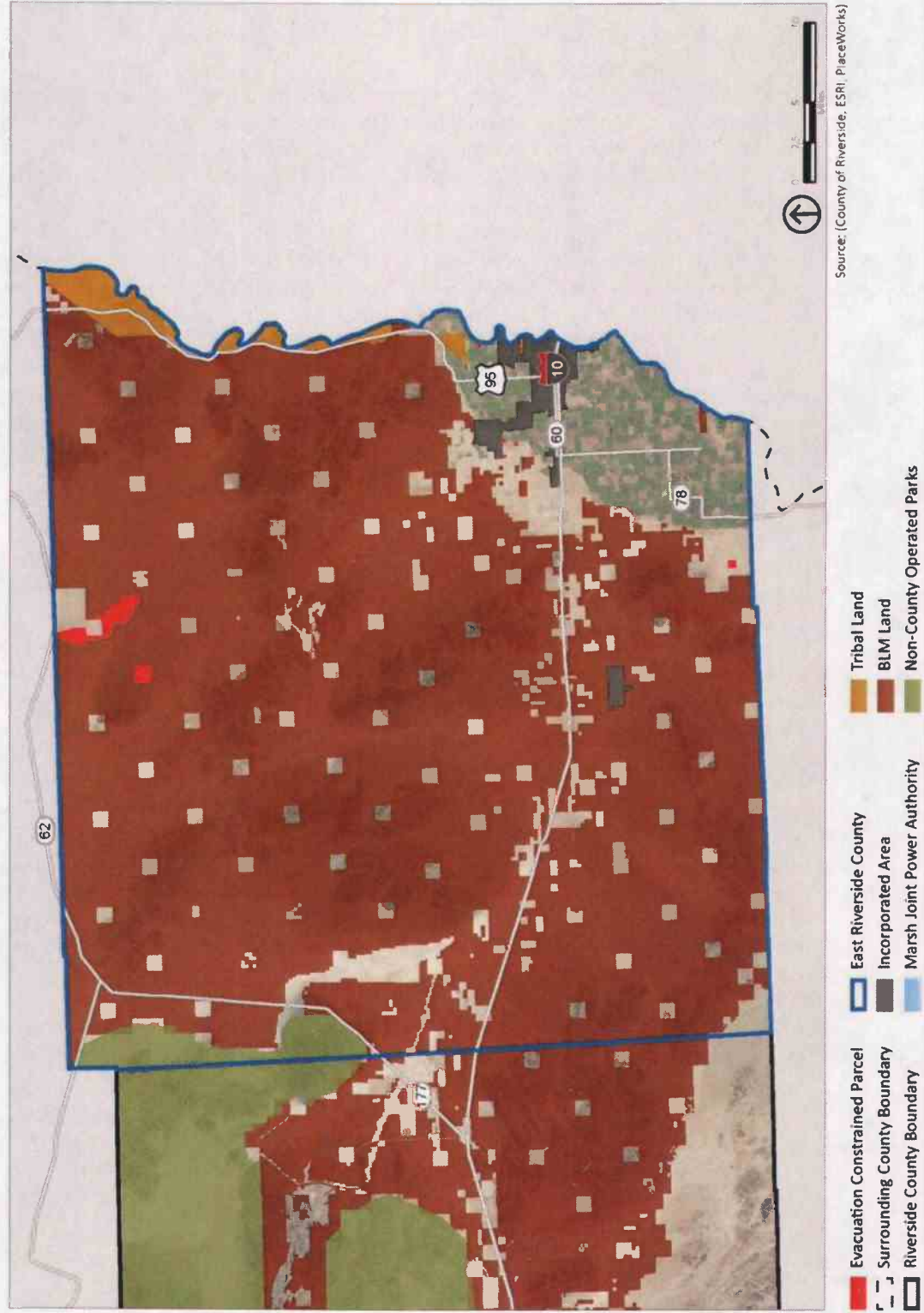


FIGURE 13: RESIDENTIAL PARCELS WITH EVACUATION CONSTRAINTS (EAST COUNTY)



Climate Change Vulnerability

Changes to the global climate system are expected to affect future occurrences of natural hazards in and around unincorporated Riverside County. Many hazards are projected to become more frequent and more intense in coming years and decades, and in some cases, these trends have already begun. According to California's *Fourth Climate Change Assessment*,¹ unincorporated Riverside County can expect the following changes to natural hazard events:

- Both droughts and floods are expected to become more frequent as periods of very high and very low precipitation become more common. Floods are among the most damaging natural hazards in unincorporated Riverside County, and climate change is expected to make them worse. Although Southern California is likely to experience a decrease in overall precipitation levels due to climate change, the region is also expected to see an increase in the number of extreme precipitation events. As a result, floods are expected to occur more often in and around unincorporated Riverside County and climate change may expand the parts of the county that are considered flood-prone. Climate change is expected to increase the frequency and severity of droughts that cause soil to dry out and become hard. When precipitation does return, more water runs off the surface rather than being absorbed into the ground, which can lead to floods.
- Warmer temperatures are projected to cause an increase in extreme heat events. Because extreme heat is relative to the area, this means that extreme heat events may occur anywhere in unincorporated Riverside County, even though temperatures in the eastern Riverside County will almost always be the hottest. Depending on emission levels, the number of extreme heat days is expected to rise from a historical annual average of 4 to between 26 and 37 by the middle of the century (2041 to 2060), and to between 39 and 63 by the end of the century (2070 to 2099), depending on the severity of climate change and the specific location. In addition to the increases in extreme heat events, all of unincorporated Riverside County is also expected to see an increase in the average daily high temperatures. Extreme heat poses a significant human health risk, especially to senior citizens, outdoor workers, and persons who do not have access to adequate cooling. Some buildings and infrastructure systems may be damaged by very high temperatures, constraining their ability to meet community needs. Pests and diseases may be active for longer periods of time due to warmer temperatures. Changes in temperature and precipitation patterns may cause pests and diseases that have historically not been present in unincorporated Riverside County to be more permanent in the community. This includes pests and diseases that are a threat to human health as well as those that may affect agricultural crops, livestock, and local wild ecosystems.
- Climate change can increase the rates of infection for various diseases because many of the animals that carry diseases are more active during warmer weather. There are a number of diseases that are linked to climate change and can be harmful to the health of unincorporated Riverside County community members, such as hantavirus pulmonary syndrome, Lyme disease, West Nile fever, and influenza. Many of these diseases are carried by animals such as mice and rats, ticks, and mosquitos, which are usually seen as pests even if they do not cause infections. Warmer temperatures earlier in the

¹ Bedsworth, Louise, Dan Cayan, Guido Franco, Leah Fisher, Sonya Ziaja. (California Governor's Office of Planning and Research, Scripps Institution of Oceanography, California Energy Commission, California Public Utilities Commission). 2018. *Statewide Summary Report. California's Fourth Climate Change Assessment*. Publication number: SUMCCCA4-2018-013.

spring and later in the winter can cause these animals to be active for longer periods, increasing the time that these diseases can be transmitted.

- Unincorporated Riverside County is expected to see an increase in wildfires due to hotter, drier weather. Although the risk is greatest in the forested areas of Western Riverside County along the San Jacinto Mountains, unincorporated Riverside County may still experience an increase in regional wildfire activity. More frequent regional wildfires may also create poor air quality. Wildfire activity across unincorporated Riverside County is expected to increase approximately 16 percent above historic levels by the middle of the century.
- Severe weather events, such as strong storms and high winds, may become more frequent and intense due to climate change. Climate change is expected to cause an increase in intense rainfall, which is usually associated with strong storm systems. Heavy rainfall may also contribute to an increased risk of landslides in the hills around unincorporated Riverside County. In unincorporated Riverside County, most severe weather is linked to high winds. The types of dangers posed by severe weather vary widely and include injuries or deaths, damage to buildings and structures, fallen trees, roads and railways blocked by debris, and fires sparked by lightning.

Vulnerability Assessment Results

The Climate Change Vulnerability Assessment indicates that unincorporated Riverside County’s populations and assets are most vulnerable to wildfires, extreme heat, severe weather, and drought.

Populations in unincorporated Riverside County tend to be more vulnerable to extreme heat, human health hazards, and wildfire, which directly affect health outcomes. Due to financial limitations, mobility challenges, and lack of access to medical care, the most vulnerable populations include households in poverty, seniors living alone, outdoor workers, and persons experiencing homelessness. The homes that vulnerable populations live in, especially those located on single access roads, are also highly vulnerable to direct damage from hazards, such as landslides, severe weather, flooding, and wildfire.

Throughout unincorporated Riverside County, the electricity transmission system is vulnerable to multiple hazards, including severe weather, such as high winds that can trigger PSPS events, extreme heat that reduces the capacity and strains the system, and wildfires that damage the system, ultimately disrupting energy service. These conditions can damage communication infrastructure, decreasing network capacity. There may be a higher demand for communication services during severe weather, potentially putting stress on the network and increasing the risk of service interruptions. Furthermore, energy delivery services, specifically electricity delivery, is subject to harm during extreme heat events. Extreme heat can lead to power outages by causing mechanical failure of grid equipment, by causing heat damage to power lines, and by creating a high demand for electricity to power air conditioners, all of which place stress on the network. This is likely to lead to greater service disruptions.

An increase in forestry pests and diseases, droughts, extreme heat, and wildfire create higher vulnerabilities for the montane coniferous forests and woodland. Drought and extreme heat can stress trees, weakening them or killing them outright. Weakened trees are more susceptible to forestry pests, creating a risk of further damage. Many conifers, especially some species of fir trees, are especially vulnerable to large and intense wildfires. Pests such as bark beetles, which have increased due to drought and higher temperature, can decimate woodland and coniferous habitats and these species may not be able to recover. This can in turn affect local economic activities in unincorporated Riverside County, such as outdoor recreation activities and visitors that travel through the county to get to state and national parks and forests.

Chapter 6 Safety Element

Unincorporated Riverside County's agriculture industry is vulnerable to extreme heat, drought, flooding, and severe weather. Floods and severe weather can severely harm or kill crops, and damage infrastructure, reducing agricultural yields and creating costly repairs. Livestock in the county, especially cattle, are highly vulnerable to drought and extreme heat events. Extreme heat can damage a number of different crops and can result in widespread animal illnesses or even death for livestock. As a result, agriculture yields and the cost of operations will likely be affected and impact local economies.

PSPS events can also create vulnerabilities for unincorporated Riverside County community members. The vast majority of homes and businesses do not have backup power supplies, so a loss of electricity can cause a loss of refrigeration for food and medical supplies, limit cooking, cause loss of heating or cooling (particularly dangerous during extreme heat or cold events), lighting, and limited or no access to the Internet or other information systems. Many businesses are forced to close during a PSPS, causing economic hardships and depriving community members of important services, such as grocery stores, gas stations, and banks/ATMs. PSPS events may also be harmful to people who depend on electrically powered medical devices. Some property owners have purchased backup power generators, although these produce high levels of noise, pollution, and odors.

A full list of the Vulnerability Assessment results can be found in **Appendix A**.

Additional Climate Change-Related Hazards

Drought

A drought is a long period when precipitation levels are well below normal. Unincorporated Riverside County chronically experiences drought cycles. Since the 1950s, unincorporated Riverside County has received an average of 8 inches of rainfall per year, although that number can vary greatly between years.

Drought makes less water available for people, businesses, agricultural activities, and natural systems. Less snow falling in mountainous areas causes water levels in lakes and reservoirs to drop, which can affect recreation activities. Local ecosystems that are not well adapted to drought conditions can be more easily harmed by it. During drought events, the flow of water in creeks and streams is reduced, creating more slow-moving or standing water. This can concentrate sediment and toxins in the low water levels, causing harm to plants and animals. Many fish species also prefer specific stream flow speeds, especially for spawning and egg incubation, and changes to stream velocity as a result of drought conditions can affect reproduction. Droughts can also indirectly lead to more wildfires, and the stress caused by water shortages can weaken plants, making them more susceptible to pests and diseases.

The U.S. Drought Monitor recognizes a five-point scale for drought events: D0 (abnormally dry), D1 (moderate drought), D2 (severe drought), D3 (extreme drought), and D4 (exceptional drought). According to the U.S. Drought Monitor, the most intensive drought conditions in recent years occurred during most of 2007, when all of unincorporated Riverside County was classified as being in "extreme" drought. As of spring 2021, conditions range from "moderate drought" in western Riverside County and close to the Salton Sea to "extreme drought" in the far eastern part of the county. For 74 percent of the time since 2000, at least half of unincorporated Riverside County has been under some level of drought conditions. Similarly, 48 percent of the time since 2000, all of unincorporated Riverside County has faced drought conditions. These figures do not include times when sources of unincorporated Riverside County's imported water may have also been under drought events.

Potential Changes to Drought in Future Years

Likelihood of Future Occurrence

Drought is different than many of the other natural hazards in that it is not a distinct event and usually has a slow onset. Drought can severely impact a region both physically and economically. Drought affects different sectors in different ways and with varying intensities. Adequate water is the most critical issue for agricultural, manufacturing, tourism, recreation, and commercial and domestic use. As the population in the area continues to grow, so will the demand for water.

Based on historical information, the occurrence of drought in California, including unincorporated Riverside County, is cyclical, driven by weather patterns. Drought has occurred in the past and will occur in the future. Periods of actual drought with adverse impacts can vary in duration, and the period between droughts is often extended. Although an area may be under an extended dry period, determining when it becomes a drought is based on impacts to individual water users. The vulnerability of unincorporated Riverside County to drought is countywide, but impacts may vary and include reduction in water supply, agricultural losses, and an increase in dry fuels.

Most of the imported water used comes from the Sierra Nevada range. Reduced winter precipitation levels and warmer temperatures have greatly decreased the size of the Sierra Nevada snowpack (the volume of accumulated snow), which in turn makes less fresh water available for communities throughout California. Continued decline in the Sierra Nevada snowpack volume is expected, which may lead to lower volumes of available imported water.

Climate Change and Drought

Although droughts are a regular feature of California’s climate, scientists expect that climate change will lead to more frequent and more intense droughts statewide. Overall, precipitation levels are expected to stay similar, and may even increase in some places. However, the state’s current data say that there will be more years with extreme levels of precipitation, both high and low, as a result of climate change. This is expected to cause more frequent and intense droughts compared to historical norms. Higher air temperatures are expected to increase evaporation, causing more water loss from lakes and reservoirs, exacerbating drought conditions.

Extreme Heat

While there is no universal definition of extreme heat, California guidance documents define extreme heat as temperatures that are hotter than 98 percent of the historical high temperatures for the area, as measured between April and October of 1961 to 1990. Days that reach this level (an average of 106-degrees Fahrenheit (°F) across all of unincorporated Riverside County, although this threshold varies by location) are called extreme heat days. An event with five extreme heat days in a row is called a heat wave. Extreme heat is any period of time when the temperatures are well above the usual level. This level is relative to the area, which means that extreme heat events may occur anywhere in unincorporated Riverside County, even though temperatures in eastern Riverside County will almost always be the hottest.

Health impacts are the primary concern with this hazard, though economic impacts are also an issue. The Centers for Disease Control and Prevention (CDC) recognizes extreme heat as a substantial public health concern. Historically, National Oceanic and Atmospheric Administration (NOAA) data indicates that about 175 Americans succumb to the demands of summer heat, although this number has increased in recent years. From 2004 to 2018, studies by the U.S. Department of Health and Human Services indicate that there is an average of 702 deaths annually that are directly or indirectly linked to extreme heat.

Chapter 6 Safety Element

Extreme heat events are dangerous because people exposed to extreme heat can suffer a number of heat-related illnesses, including heat cramps, heat exhaustion, and (most severely) heat stroke. Elderly persons, small children, chronic invalids, those on certain medications or drugs, and persons with weight and alcohol problems are particularly susceptible to heat reactions. The elderly and individuals below the poverty level are the most vulnerable to extreme heat. Nursing homes and elder care facilities are especially vulnerable to extreme heat events if power outages occur and air conditioning is not available. In addition, individuals below the poverty level may be at increased risk to extreme heat if use of air conditioning is not affordable. Areas with lower extreme heat thresholds are not necessarily at lower risk, as persons and community assets used to cooler temperatures may be less prepared for extreme heat events.

Very high temperatures can harm plants and animals that are not well adapted to them. This includes wild ecosystems as well as farm crops and livestock. Extreme heat can increase the temperature of water in lakes, streams, creeks, and other water bodies, especially during drought events when water levels are lower. In some cases, water temperatures may exceed comfortable levels for a number of plants and animals, causing ecological harm. Extreme heat is expected to have a severe effect on agriculture. Excessive heat and prolonged dry or drought conditions can impact agriculture by creating worker safety issues for farm field workers, severely damaging crops, and reducing availability of water and food supply for livestock. Outdoor workers are much more exposed to the elements than most people, so they are more susceptible to extreme heat conditions and the potential illnesses associated with very high temperatures. Additionally, excessive heat can cause high levels of mortality among livestock as well as damage to crops. Extreme heat can damage a number of different crops in unincorporated Riverside County.

Indirectly, extreme heat puts more stress on power lines, causing them to run less efficiently. The heat also causes more demand for electricity (usually to run air conditioning units), and in combination with the stress on the power lines, may lead to brownouts and blackouts.

Potential Changes to Extreme Heat in Future Years

Likelihood of Future Occurrence

Extreme heat tends to occur on an annual basis in unincorporated Riverside County and is likely to continue occurring annually. The threshold for extreme heat is likely to be lower in the higher elevations of the San Jacinto Mountains than in Coachella Valley where temperatures at or above 90°F are common most summer days.

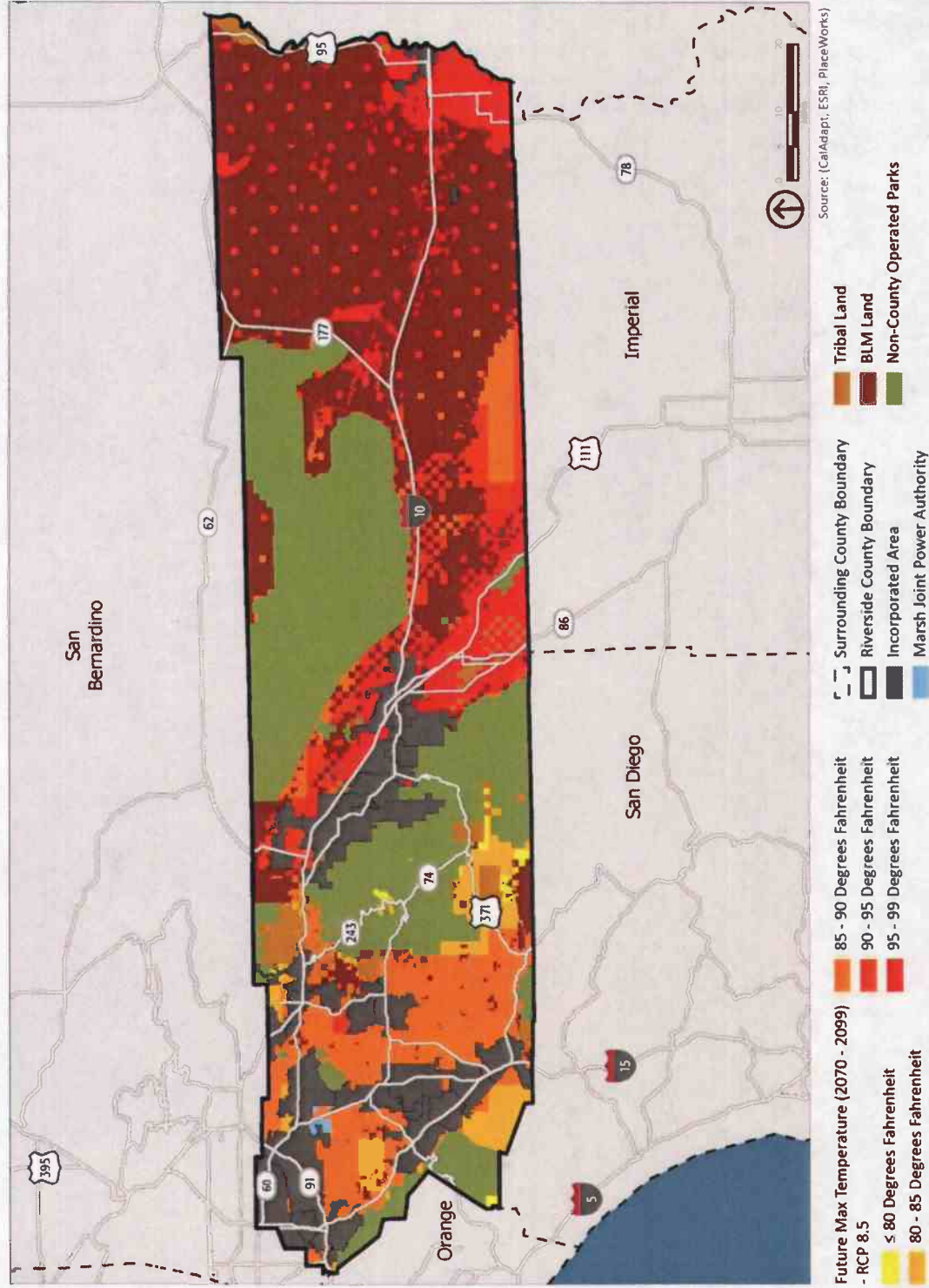
Climate Change and Extreme Heat

The warmer temperatures brought on by climate change are likely to cause an increase in extreme heat events in different regions of unincorporated Riverside County. Depending on the location and emissions levels, the state Cal-Adapt database indicates the number of extreme heat days is expected to rise from a historical annual average of 4 to between 26 and 37 by the middle of the century (2041 to 2060), and to between 39 and 63 by the end of the century (2070 to 2099), depending on the severity of climate change and the specific location. Cooler areas may see about as many extreme heat days as warmer areas. According to the California Energy Commission, the number of extreme heat days is projected to rise through 2050, where the average year could include 15 extreme heat days, and 30 extreme heat days per year by 2099.

Overall, unincorporated Riverside County is expected to see an increase in the average daily high temperatures. Although the temperature increases may appear modest, the projected high temperatures are substantially greater than historical norms. These increases also make it more likely that an above-average high temperature will cross the extreme heat threshold. Figure 14 shows the expected increases in average high temperatures as a result of climate change.

As temperatures increase, unincorporated Riverside County will face increased risk of death from dehydration, heat stroke, heat exhaustion, heart attack, stroke, and respiratory distress caused by extreme heat. Climate change can also indirectly create a greater risk of agriculture and forestry pests and diseases. Many crop plants, trees, and livestock may be harmed and consequently weakened by extreme heat and warmer temperatures. The weaker plants and animals may not be able to fend off infestations or infections as well as a stronger plant or animal, causing pests and diseases to affect more of the population. These pests and diseases can cause plants and animals to grow slower, damage crops so their products are less appealing and harder to sell, or even kill them.

FIGURE 14: ANNUAL AVERAGE OF FUTURE HIGH TEMPERATURES



Severe Weather

Severe weather is generally any destructive weather event, but usually occurs in unincorporated Riverside County as localized storms that bring heavy rain, hail, lightning, and strong winds. Severe weather is usually caused by intense storm systems, although types of strong winds can occur without a storm. The types of dangers posed by severe weather vary widely and may include injuries or deaths, damage to buildings and structures, fallen trees, roads and railways blocked by debris, and fires sparked by lightning. Severe weather often produces high winds and lightning that can damage structures and cause power outages. Lightning from these storms can ignite forest and structure fires that can cause damage to buildings and endanger people. Objects can also be struck directly, which may result in an explosion, burn, or total destruction. Lightning happens occasionally and there have been six injuries and one death reported from lightning events since 1950. Hail events are rare and there have only been two reported injuries from hail in unincorporated Riverside County since 1950. In unincorporated Riverside County, most severe weather is linked to high winds. High winds, often accompanying severe storms, can cause significant property and crop damage, threaten public safety, and have adverse economic impacts from business closures and power loss.

Santa Ana winds have caused large amounts of damage and increased the fire damage level dramatically. Santa Ana winds are generally defined as warm, dry winds that blow from the east or northeast (offshore). These winds occur below the passes and canyons of the coastal ranges of Southern California. Santa Ana winds often blow with exceptional speed in the Santa Ana Canyon. The complex topography of Southern California, combined with various atmospheric conditions, creates numerous scenarios that may cause widespread or isolated Santa Ana events. Commonly, Santa Ana winds develop when a region of high pressure builds over the Great Basin (the high plateau east of the Sierra Nevada and west of the Rocky Mountains, including most of Nevada and Utah). Santa Ana winds commonly occur between October and February with December having the highest frequency of events. Summer events are rare. Wind speeds are typically north to east at 40 miles per hour (mph) through and below passes and canyons with gusts to 58 mph. Stronger Santa Ana winds can have gusts greater than 69 mph over widespread areas and, in rare instances, gusts greater than 115 mph in specific areas. Frequently, the strongest winds in the basin occur during the night and morning hours due to the absence of a sea breeze.

All wind events, including Santa Ana winds, pose several different types of threats. By themselves, the winds pose a threat to the health of people and structures in the county. Dust and plant pollen blown by the wind can create breathing problems. The winds can blow roofs off buildings and cause tree limbs to fall on structures. High winds also increase the threat of wildfires. Winds may dry out brush and forest areas, increasing the fuel load in fire-prone areas. Winds may spark wildfires by knocking down power lines or causing them to arc. If fires do start, high winds can push flames quickly into new areas, contributing to rapid spread of wildfires and making them harder to control.

Potential Changes to Severe Weather in Future Years

Likelihood of Future Occurrence

According to historical hazard data, severe weather is an annual occurrence in unincorporated Riverside County. Damage and disaster declarations related to severe weather have occurred and will continue to occur in the future. Heavy rain and thunderstorms are the most frequent type of severe weather occurrences in the county. Wind and lightning often accompany these storms and have caused damage in the past. However, actual damage

associated with the primary effects of severe weather have been limited. It is the secondary hazards caused by weather, such as floods, fire, and agricultural losses that have had the greatest impact on the county.

Climate Change and Severe Weather

Climate change is expected to cause an increase in intense rainfall, which is usually associated with strong storm systems. This means that unincorporated Riverside County could see more intense storms in the coming years and decades, possibly causing an increase in the frequency of severe weather events and any associated hazards. Such an increase may not affect all forms of severe weather and may not always be apparent.

While average annual rainfall may increase or decrease slightly, climate change is expected to cause an increase in the number of years with intense levels of precipitation. Heavy rainfall can increase the frequency and severity of other hazards, including flooding and landslides. Some already-rare forms of severe weather, such as tornados, are not expected to increase in a noticeable way.

Agriculture Hazards

Agriculture in unincorporated Riverside County must be considered from two standpoints, namely, both as a product producer/exporter and a major economic provider to the County of Riverside. In 2019, Riverside County ranked in the top 14 leading agricultural counties in California, with an agricultural production value of \$1.32 billion, according to the California Department of Food and Agriculture. Major agricultural industries include milk, nursery products, citrus, avocado, grapes, vegetables, and hay.

Riverside County is divided into two general agriculture regions, Desert and Western Riverside County, with the San Bernardino National Forest acting as a natural dividing line.

Desert – Coachella Valley and Palo Verde Valley

Agriculture, primarily crop growing, is the second largest industry in the Desert Valleys. Over 61 percent of Riverside County's crop production is grown in the Coachella and Palo Verde Valleys. In addition to crop production, many supporting industries, such as packing and distribution, are located in the desert area. The Coachella Valley produces 95 percent of all dates grown in the United States and the annual fruit crop exceeds 40 million pounds. The Desert region's list of agriculture-related products includes:

- Vegetable and melon crops (bell peppers, lettuce, corn, watermelon, etc.)
- Nursery stock
- Turf/sod producers
- Field crops (hay, cotton, wheat, etc.)
- Citrus
- Tree and vine crops (table grapes, dates)

Western Riverside County

Agriculture in the Western Riverside County region is an ever-changing industry. With the large increase in housing in this area of the county over the past few years, there has been a reduction of several agriculture-related industries. This reduction is primarily in the poultry and dairy industries. The Western Riverside County list of agriculture-related products includes:

- Dairy cattle
- Nursery stock
- Beef cattle
- Poultry and eggs
- Citrus crops
- Tree and vine crops (avocado, wine grapes)
- Field crops (wheat, hay, green chop)
- Vegetable crops (potatoes, etc.)
- Fish hatcheries (for domestic and international distribution)

According to the Hazard Mitigation Planning Committee, agricultural losses occur on an annual basis and are usually associated with severe weather events, including heavy rains, floods, heat, and drought. The 2018 State of California Multi-Hazard Mitigation Plan attributes most of the agricultural disasters statewide to drought, freeze, and insect infestations. Other agricultural hazards include fires, crop and livestock disease, and noxious weeds.

Potential Changes to Agriculture Hazards in Future Years

Likelihood of Future Occurrence

As long as severe weather and other natural hazard events continue to be an ongoing concern to unincorporated Riverside County, the potential for agricultural losses remains. The primary causes of agricultural losses are from extreme heat, drought, insect infestations, and severe weather events, such as high winds and freeze.

Climate Change and Agriculture Hazards

Extreme heat is expected to have the most severe effect on unincorporated Riverside County’s agricultural assets, but drought, flooding, and severe weather may also cause significant harm. Droughts can make less water available for crop irrigation, potentially reducing yield if farmers cannot find alternative supplies. Extreme heat can damage a number of different crops in unincorporated Riverside County. Floods and severe weather can heavily harm or kill crops, and damage infrastructure, reducing agricultural yields and creating costly repairs. High winds often accompany severe storms and can result in significant damage to agriculture. One of the most

direct effects of climate change is that average temperatures will increase, and this has a bearing on many pests and diseases. Many pests and organisms that carry diseases are most active during warmer months, so the threat of infection or infestation can be higher during this time of year. Temperatures are expected to get warmer earlier in the year and remain warmer until later in the year due to climate change, creating a wider window for pests and diseases to be active.

Climate change can also indirectly create a greater risk of agriculture pests and diseases. Farms and ranches in unincorporated Riverside County all face risk from assorted pests and diseases that may affect crops, vineyards, and livestock. Many crop plants, trees, and livestock may be harmed and consequently weakened by warmer temperatures and changes in precipitation. The weaker plants and animals may not be able to fend off infestations or infections as well as a stronger plant or animal, causing pests and diseases to affect more of the agricultural areas. These pests and diseases can cause plants and animals to grow slower, damage them so their products are less appealing and harder to sell, or even kill them. Moreover, excessive heat and prolonged dry or drought conditions can impact agriculture by creating worker safety issues for farm field workers, severely damaging crops, and reducing availability of water and food supply for livestock.

Appendix A: Vulnerability Assessment Results

The tables below show the results of the Vulnerability Assessment prepared for Riverside County, in accordance with the requirements of Senate Bill 379. For each population or asset that may be vulnerable to each climate-related hazard, the population or asset is scored on a scale of one to five:

- V1: Minimal vulnerability
- V2: Low vulnerability
- V3: Moderate vulnerability
- V4: High vulnerability
- V5: Severe vulnerability

The vulnerability scores reflect both the severity of climate-related impacts and the ability of populations and assets to resist and recover from these effects. Refer to the “Climate Change” and “Vulnerable Populations and Assets” sections of the Safety Element for additional details on the Vulnerability Assessment method.

POPULATIONS AND ASSETS	Agricultural Pests and Diseases	Air Quality	Drought	Extreme Heat	Flood	Human Health Hazards	Landslides	Severe Weather	Wildfire
POPULATIONS									
Children age <10		V4		V4		V2			V4
Ethnic communities/non-English speakers		V2		V2	V1	V2		V3	V2
Healthcare workforce (doctors, nurses)				V1	V1	V3		V1	V2
Homeless persons		V5	V3	V5	V4	V5		V5	V5
Household renters		V2	V3	V2	V2		V2	V3	V2
Householders age >65		V3		V4	V3	V3	V4	V2	V4
Households in poverty		V4	V5	V5	V4	V3	V3	V3	V4
Households overpaying for housing (>30% of income)		V3	V3	V3	V3	V1	V2	V1	V2
Individuals chronically ill		V4	V1	V5	V3	V5	V3	V4	V4
Individuals uncertain about available resources because of citizenship		V2		V2	V2	V2		V3	V2

POPULATIONS AND ASSETS	Agricultural Pests and Diseases	Air Quality	Drought	Extreme Heat	Flood	Human Health Hazards	Landslides	Severe Weather	Wildfire
Individuals with disabilities		V2		V4	V3	V2	V3	V3	V4
Individuals without access to lifelines		V3		V4	V5	V3	V3	V3	V4
Low-income individuals		V3	V4	V4	V5	V3	V2	V2	V3
Outdoor workers	V3	V5	V4	V5	V2		V1	V3	V4
Overcrowded households		V2	V1		V2	V2		V1	V2
Persons in mobile homes		V3		V3	V4	V1	V4	V4	V4
Pregnant or nursing women		V4		V3	V1	V5		V1	V2
Seasonal residents/migrant workers		V5	V5	V5	V2	V2	V2	V3	V4
Senior citizens living alone		V4		V5	V4	V4	V5	V3	V5
BUILDINGS AND STRUCTURES									
Adult residential care facilities							V2	V1	
Airports				V2	V4			V1	V3
Bridges					V3		V3	V3	V2
City Halls and government offices					V2		V1	V1	V2
Commercial structures					V4		V1	V3	V3
Communication infrastructure				V1	V2		V2	V2	V2
Community gathering areas					V1		V1	V1	V2
Dams					V1		V4	V1	V1
Emergency Systems					V1			V1	
Energy generation infrastructure		V2	V2		V2		V3	V2	V3
Energy transmission/delivery				V4	V3		V3	V4	V4

Chapter 6 Safety Element

POPULATIONS AND ASSETS	Agricultural Pests and Diseases	Air Quality	Drought	Extreme Heat	Flood	Human Health Hazards	Landslides	Severe Weather	Wildfire
Evacuation routes					V4		V3	V2	V4
Fire stations					V1		V2	V1	V1
Flood control center					V2			V1	V1
Foster homes					V3			V3	V3
Fueling infrastructure and pipelines				V1	V3		V3	V2	V3
Healthcare facilities				V1	V2		V1	V2	V3
Industrial structures					V3		V4	V3	V2
Major roads and highways				V3			V3	V2	V3
Military facilities									V1
Natural gas facilities					V2		V4		V3
Old residential structures				V2	V3		V3	V3	V4
Parks	V1		V1	V2	V2		V3	V3	V2
Police/sheriff stations					V2			V1	V1
Private recreational sites	V1		V2	V2	V1		V2	V2	V2
Public housing					V3			V3	V3
Public open space and protected land	V2		V3	V1	V1		V2	V3	V4
Public works corporation yards					V1			V1	
Railway				V4	V4		V4	V3	V2
Residential structures					V4		V4	V2	V4
Road signals/traffic control centers					V1		V2	V2	V3
Schools and childcare centers					V3		V3	V2	V2

POPULATIONS AND ASSETS	Agricultural Pests and Diseases	Air Quality	Drought	Extreme Heat	Flood	Human Health Hazards	Landslides	Severe Weather	Wildfire
Senior care centers					V3		V2	V1	V3
Sidewalks, bikeways, trails					V2		V3	V1	V2
Transit infrastructure					V4		V2	V3	V2
Transportation facilities and infrastructure				V1	V4		V2	V2	V3
Wastewater treatment plant and collection infrastructure			V2	V1	V4		V3	V2	V1
Water treatment plant and delivery infrastructure			V1	V1			V3	V2	V1
BIOLOGICAL RESOURCES									
Chaparral	V3		V4	V3			V2	V2	V3
Coastal sage scrub	V2		V3	V3	O		V3	V1	V3
Desert scrub	V1		V2	V1			V1	V1	V3
Grassland	V2		V3	V2	O		V2	V2	V2
Meadows and marshes	V2		V5	V4	O			V2	V2
Montane coniferous forest	V4		V5	V3			V2	V2	V4
Playas and vernal pools	V1			V3	O			V2	V2
Riparian scrub, woodland, and forest	V3		V4	V4	O		V3	V3	V5
Riversidean alluvial san sage scrub	V2		V4	V2	V1		V1	V1	V3
Woodland and forests	V4		V4	V4			V3	V2	V4
IMPORTANT ECONOMIC ASSETS									
Agricultural lands	V4	V2	V5	V5	V5		V3	V4	V3
Renewable energy		V2	V1	V1	V1		V1	V2	V4

Chapter 6 Safety Element

POPULATIONS AND ASSETS	Agricultural Pests and Diseases	Air Quality	Drought	Extreme Heat	Flood	Human Health Hazards	Landslides	Severe Weather	Wildfire
State and federally owned land	V2		V3	V3	V1	V2	V3	V1	V3
Tourism	V1	V3	V2	V2	V2	V3	V2	V2	V3
KEY COMMUNITY SERVICES									
Communications				V2	V1		V1	V2	V3
Electricity			V2	V5	V2		V3	V4	V4
Emergency medical response				V1	V2	V2	V2	V2	V2
Government administration		V1			V1	V1			V1
Healthcare service delivery		V2		V1	V1	V3	V1	V1	V1
Natural gas							V3		V3
Public safety				V1	V2	V2	V3	V2	V3
Transit access				V3	V3		V2	V3	V2
Wastewater treatment			V3	V2	V4		V2	V3	V3
Water delivery			V4	V2			V3	V1	V4

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DRAFT

MEMORANDUM

TO: Robert Flores, Principal Planner
FROM: Peter Minegar, AICP, Associate Vice President
SUBJECT: General Plan Safety Element Update: Proposed Area Plan Consistency Updates
DATE: August 24, 2021

INTRODUCTION

Pursuant to California State law, a number of updates must be made to the County of Riverside's General Plan Safety Element as part of the Housing Element Update process to comply with new regulatory requirements. These updates cover a range of safety topics, including new information regarding floods, fires, and climate adaptation and resilience strategies. Minor Area Plan policies are also incorporated order to be consistent with amended General Plan Safety Element hazard policies (Wildfire, Flood and Inundation and Geologic Hazards).

The General Plan Safety Element serves as the County's comprehensive strategy to reduce both short-term and long-term potential for harm from various threats to community health and safety. Pursuant to State law, a number of updates must be made to the General Plan Safety Element during the Housing Element Update process. These updates cover a range of potential safety issues, including new information regarding floods, fires, and climate adaptation and resilience strategies. Specifically, the Modified Project would update the Safety Element pursuant to the following regulations:

- **AB 162:** Pursuant to Assembly Bill (AB) 162 (Government Code Section 65302[g][3]), upon the next revision of an agency's Housing Element on or after January 1, 2014, the Safety Element shall be reviewed and updated as necessary to address the risk of fire for land classified as state responsibility areas, as defined in Section 4102 of the Public Resources Code, and land classified as very high fire hazard severity zones, as defined in Section 51177.
- **SB 379:** Senate Bill (SB) 379 (Government Code 65302[g][4]) requires that the Safety Element be reviewed and updated as necessary to address climate change adaptation and applicable resiliency strategies.
- **SB 99:** SB 99 (Government Code 65302[g][5]) requires that on or after January 1, 2020, the Safety Element include information to identify residential developments in hazard areas that do not have at least two evacuation routes.
- **SB 1035:** SB 1035 (Government Code 65302[g][6]) requires that the Safety Element be reviewed and updated as needed upon each revision of the Housing Element or Local Hazard Mitigation Plan, but not less than once every eight years.

The revised Safety Element also incorporates new information from the 2018 Riverside County Multi-Jurisdictional Local Hazard Mitigation Plan and the 2020 Resilient IE study and toolkit. Minor revisions to the Area Plan hazard policies will be incorporated in order to be consistent with amended General Plan Safety Element hazard policies (Wildfire, Flood and Inundation and Geologic Hazards).

The following is a list of recommended consistency updates for each Area Plan of the County of Riverside's General Plan to reflect recent updates made to the General Plan Safety Element.

AREA PLAN REVISIONS

Desert Center Area Plan

Policy Revisions

1. Revise DCAP 10.1 to the following:

All proposed development located within High or Very High Fire Hazard Severity Zones shall protect life and property from wildfire hazards through adherence to policies identified in the Fire Hazards (Building Code and Performance Standards), Wind-Related Hazards and General and Long-Range Fire Safety Planning sections of the General Plan Safety Element.

2. Revise DCAP 11.1 to the following:

Protect life and property from seismic-related incidents through adherence to the policies in the Seismic Hazards and Geologic Hazards section of the General Plan Safety Element.

Map Revisions

1. Update Figure 9, Desert Center Area Plan Wildfire Susceptibility Map to be consistent with Figure 6, Fire Hazard Severity Zones Map in the 2021 Draft Safety Element to illustrate updated State and local responsibility areas.
2. Update Figure 11, Desert Center Area Plan Steep Slope Map to be consistent with landslide susceptibility classes identified in Figure 3, Landslide Risk Map of the 2021 Draft Safety Element and re-name to be consistent with Figure 3 of the 2021 Draft Safety Element.

Eastvale Area Plan

Policy Revisions

1. Revise EAP 15.1 to the following:

All proposed development located within High or Very High Fire Hazard Severity Zones shall protect life and property from wildfire hazards through adherence to policies identified in the Fire Hazards (Building Code and Performance Standards), Wind-Related Hazards and General and Long-Range Fire Safety Planning sections of the General Plan Safety Element.

2. Revise EAP 15.1 to the following:

Protect life and property from the hazards of flood events through adherence to the policies identified in the Flood and Inundation Hazards Abatement section of the General Plan Safety Element.

3. Revise ELAP 16.1 to the following:

Protect life and property from seismic-related incidents through adherence to the policies in the Seismic Hazards and Geologic Hazards section of the General Plan Safety Element.

Map Revisions

1. Update Figure 8, Eastvale Area Plan Flood Hazard Areas Map to be consistent with localized flood hazard zone areas as identified in Figure 4, Flood Hazard Zone Map in the 2021 Draft Safety Element, to illustrate 100-Year and 500-Year Flood Zones within the Area Plan.
2. Update Figure 9, Eastvale Area Plan Wildfire Susceptibility Map to be consistent with Figure 6, Fire Hazard Severity Zones Map in the 2021 Draft Safety Element to illustrate updated State and local responsibility areas.
3. Create a new figure that incorporates data from Figure 8, Historic Wildfire Perimeters, to illustrate the extent of areas previously burned within the Area Plan. Due to the presence of Very High/High Fire Hazard Severity Zones within the Area Plan these Severity Zones should also be shown on this figure.
4. Update Figure 11, Eastvale Area Plan Steep Slope Map to be consistent with landslide susceptibility classes identified in Figure 3, Landslide Risk Map of the 2021 Draft Safety Element and re-name to be consistent with Figure 3 of the 2021 Draft Safety Element.

Eastern Coachella Valley Area Plan

Policy Revisions

1. Revise ECVAP 20.1 to the following:

All proposed development located within High or Very High Fire Hazard Severity Zones shall protect life and property from wildfire hazards through adherence to policies identified in the Fire Hazards (Building Code and Performance Standards), Wind-Related Hazards and General and Long-Range Fire Safety Planning sections of the General Plan Safety Element.

2. Revise ECVAP 18.1 to the following:

Protect life and property from the hazards of flood events through adherence to the policies identified in the Flood and Inundation Hazards Abatement section of the General Plan Safety Element.

3. Revise ECVAP 21.1 to the following:

Protect life and property from seismic-related incidents through adherence to the policies in the Seismic Hazards and Geologic Hazards section of the General Plan Safety Element.

Map Revisions

1. Update Figure 12, Eastern Coachella Valley Area Plan Special Flood Hazard Areas Map to be consistent with localized flood hazard zone areas as identified in Figure 4, Flood Hazard Zone Map in the 2021 Draft Safety Element, to illustrate 100-Year and 500-Year Flood Zones within the Area Plan.
2. Update Figure 13, Eastern Coachella Valley Area Plan Wildfire Susceptibility Map to be consistent with Figure 6, Fire Hazard Severity Zones Map in the 2021 Draft Safety Element to illustrate updated State and local responsibility areas.
3. Create a new figure that incorporates data from Figure 8, Historic Wildfire Perimeters, to illustrate the

extent of areas previously burned within the Area Plan. Due to the presence of Very High/High Fire Hazard Severity Zones within the Area Plan these Severity Zones should also be shown on this figure.

4. Update *Figure 15, Eastern Coachella Valley Area Plan Steep Slope Map* to be consistent with landslide susceptibility classes identified in *Figure 3, Landslide Risk Map* of the 2021 Draft Safety Element and re-name to be consistent with Figure 3 of the 2021 Draft Safety Element.

Elsinore Area Plan

Policy Revisions

1. Revise ELAP 19.1 to the following:

All proposed development located within High or Very High Fire Hazard Severity Zones shall protect life and property from wildfire hazards through adherence to policies identified in the Fire Hazards (Building Code and Performance Standards), Wind-Related Hazards and General and Long-Range Fire Safety Planning sections of the General Plan Safety Element.

2. Revise ELAP 18.4 to the following:

Protect life and property from the hazards of flood events through adherence to the policies identified in the Flood and Inundation Hazards Abatement section of the General Plan Safety Element.

3. Revise ELAP 20.1 to the following:

Protect life and property from seismic-related incidents through adherence to the policies in the Seismic Hazards and Geologic Hazards section of the General Plan Safety Element.

Map Revisions

1. Update *Figure 10, Elsinore Area Plan Special Flood Hazard Areas Map* to be consistent with localized flood hazard zone areas as identified in *Figure 4, Flood Hazard Zone Map* in the 2021 Draft Safety Element, to illustrate 100-Year and 500-Year Flood Zones within the Area Plan.
2. Update *Figure 11, Elsinore Area Plan Wildfire Susceptibility Map* to be consistent with *Figure 6, Fire Hazard Severity Zones Map* in the 2021 Draft Safety Element to illustrate updated State and local responsibility areas.
3. Create a new figure that incorporates data from *Figure 8, Historic Wildfire Perimeters*, to illustrate the extent of areas previously burned within the Area Plan. Due to the presence of Very High/High Fire Hazard Severity Zones within the Area Plan these Severity Zones should also be shown on this figure.
4. Update *Figure 13, Elsinore Area Plan Steep Slope Map* to be consistent with landslide susceptibility classes identified in *Figure 3, Landslide Risk Map* of the 2021 Draft Safety Element and re-name to be consistent with Figure 3 of the 2021 Draft Safety Element.

Harvest Valley/Winchester Area Plan

Policy Revisions

1. Revise HVWAP 21.1 to the following:

All proposed development located within High or Very High Fire Hazard Severity Zones shall protect life and property from wildfire hazards through adherence to policies identified in the Fire Hazards (Building Code and Performance Standards), Wind-Related Hazards and General and Long-Range Fire Safety Planning sections of the General Plan Safety Element.

2. Revise HVWAP 20.1 to the following:

Protect life and property from the hazards of flood events through adherence to the policies identified in the Flood and Inundation Hazards Abatement section of the General Plan Safety Element.

3. Revise HVWAP 22.1 to the following:

Protect life and property from seismic-related incidents through adherence to the policies in the Seismic Hazards and Geologic Hazards section of the General Plan Safety Element.

Map Revisions

1. Update Figure 11, Harvest Valley/Winchester Area Plan Special Flood Hazard Areas Map to be consistent with localized flood hazard zone areas as identified in Figure 4, Flood Hazard Zone Map in the 2021 Draft Safety Element, to illustrate 100-Year and 500-Year Flood Zones within the Area Plan.
2. Update Figure 12, Harvest Valley/Winchester Area Plan Wildfire Susceptibility Map to be consistent with Figure 6, Fire Hazard Severity Zones Map in the 2021 Draft Safety Element to illustrate updated State and local responsibility areas.
3. Create a new figure that incorporates data from Figure 8, Historic Wildfire Perimeters, to illustrate the extent of areas previously burned within the Area Plan. Due to the presence of Very High/High Fire Hazard Severity Zones within the Area Plan these Severity Zones should also be shown on this figure.
4. Update Figure 14, Harvest Valley/Winchester Area Plan Steep Slope Map to be consistent with landslide susceptibility classes identified in Figure 3, Landslide Risk Map of the 2021 Draft Safety Element.

Highgrove Area Plan

Policy Revisions

1. Revise HAP 21.1 to the following:

All proposed development located within High or Very High Fire Hazard Severity Zones shall protect life and property from wildfire hazards through adherence to policies identified in the Fire Hazards (Building Code and Performance Standards), Wind-Related Hazards and General and Long-Range Fire Safety Planning sections of the General Plan Safety Element.

2. Revise HAP 20.1 to the following:

Protect life and property from the hazards of flood events through adherence to the policies identified in the Flood and Inundation Hazards Abatement section of the General Plan Safety Element.

3. Revise HAP 22.1 to the following:

Protect life and property from seismic-related incidents through adherence to the policies in the Seismic Hazards and Geologic Hazards section of the General Plan Safety Element.

Map Revisions

1. Update Figure 8, Highgrove Area Plan Special Flood Hazard Areas Map to be consistent with localized flood hazard zone areas as identified in Figure 4, Flood Hazard Zone Map in the 2021 Draft Safety Element, to illustrate 100-Year and 500-Year Flood Zones within the Area Plan.
2. Update Figure 9, Highgrove Plan Wildfire Susceptibility Map to be consistent with Figure 6, Fire Hazard Severity Zones Map in the 2021 Draft Safety Element to illustrate updated State and local responsibility areas.
3. Create a new figure that incorporates data from Figure 8, Historic Wildfire Perimeters, to illustrate the extent of areas previously burned within the Area Plan. Due to the presence of Very High/High Fire Hazard Severity Zones within the Area Plan these Severity Zones should also be shown on this figure.
4. Update Figure 11, Lake Matthews/Woodcrest Area Plan Steep Slope Map to be consistent with landslide susceptibility classes identified in Figure 3, Landslide Risk Map of the 2021 Draft Safety Element and re-name to be consistent with Figure 3 of the 2021 Draft Safety Element.

Jurupa Area Plan

Policy Revisions

1. Revise JURAP 18.2 to the following:

All proposed development located within High or Very High Fire Hazard Severity Zones shall protect life and property from wildfire hazards through adherence to policies identified in the Fire Hazards (Building Code and Performance Standards), Wind-Related Hazards and General and Long-Range Fire Safety Planning sections of the General Plan Safety Element.

2. Revise JURAP 17.1 to the following:

Protect life and property from the hazards of flood events through adherence to the policies identified in the Flood and Inundation Hazards Abatement section of the General Plan Safety Element.

3. Revise JURAP 19.1 to the following:

Protect life and property from seismic-related incidents through adherence to the policies in the Seismic Hazards and Geologic Hazards section of the General Plan Safety Element.

Map Revisions

1. Update Figure 8, Jurupa Area Plan Special Flood Hazard Areas Map to be consistent with localized flood hazard zone areas as identified in Figure 4, Flood Hazard Zone Map in the 2021 Draft Safety Element, to illustrate 100-Year and 500-Year Flood Zones within the Area Plan.
2. Update Figure 9, Jurupa Area Plan Wildfire Susceptibility Map to be consistent with Figure 6, Fire Hazard Severity Zones Map in the 2021 Draft Safety Element to illustrate updated State and local responsibility

areas.

3. Create a new figure that incorporates data from *Figure 8, Historic Wildfire Perimeters*, to illustrate the extent of areas previously burned within the Area Plan. Due to the presence of Very High/High Fire Hazard Severity Zones within the Area Plan these Severity Zones should also be shown on this figure.
4. Re-name *Figure 12, Jurupa Area Plan Slope Instability* to be consistent with Figure 3 of the 2021 Draft Safety Element (*Figure 12, Jurupa Area Plan Landslide Risk*). Update Figure 12 map to be consistent with landslide susceptibility classes identified in *Figure 3, Landslide Risk Map* of the 2021 Draft Safety Element.

Lake Matthews/Woodcrest Area Plan

Policy Revisions

1. Revise LMWAP 15.1 to the following:

All proposed development located within High or Very High Fire Hazard Severity Zones shall protect life and property from wildfire hazards through adherence to policies identified in the Fire Hazards (Building Code and Performance Standards), Wind-Related Hazards and General and Long-Range Fire Safety Planning sections of the General Plan Safety Element.

2. Revise LMWAP 14.1 to the following:

Protect life and property from the hazards of flood events through adherence to the policies identified in the Flood and Inundation Hazards Abatement section of the General Plan Safety Element.

3. Revise LMWAP 16.1 to the following:

Protect life and property from seismic-related incidents through adherence to the policies in the Seismic Hazards and Geologic Hazards section of the General Plan Safety Element.

Map Revisions

1. Update *Figure 10, Lake Matthews/Woodcrest Area Plan Special Flood Hazard Areas Map* to be consistent with localized flood hazard zone areas as identified in *Figure 4, Flood Hazard Zone Map* in the 2021 Draft Safety Element, to illustrate 100-Year and 500-Year Flood Zones within the Area Plan.
2. Update *Figure 11, Lake Matthews/Woodcrest Area Plan Wildfire Susceptibility Map* to be consistent with *Figure 6, Fire Hazard Severity Zones Map* in the 2021 Draft Safety Element to illustrate updated State and local responsibility areas.
3. Create a new figure that incorporates data from *Figure 8, Historic Wildfire Perimeters*, to illustrate the extent of areas previously burned within the Area Plan. Due to the presence of Very High/High Fire Hazard Severity Zones within the Area Plan these Severity Zones should also be shown on this figure.
4. Update *Figure 13, Lake Matthews/Woodcrest Area Plan Steep Slope Map* to be consistent with landslide susceptibility classes identified in *Figure 3, Landslide Risk Map* of the 2021 Draft Safety Element and re-name to be consistent with Figure 3 of the 2021 Draft Safety Element.

Lakeview/Nuevo Area Plan

Policy Revisions

1. Revise LNAP 16.1 to the following:

All proposed development located within High or Very High Fire Hazard Severity Zones shall protect life and property from wildfire hazards through adherence to policies identified in the Fire Hazards (Building Code and Performance Standards), Wind-Related Hazards and General and Long-Range Fire Safety Planning sections of the General Plan Safety Element.

2. Revise LNAP 15.1 to the following:

Protect life and property from the hazards of flood events through adherence to the policies identified in the Flood and Inundation Hazards Abatement section of the General Plan Safety Element.

3. Revise LNAP 17.1 to the following:

Protect life and property from seismic-related incidents through adherence to the policies in the Seismic Hazards and Geologic Hazards section of the General Plan Safety Element.

Map Revisions

1. Update Figure 10, Lakeview/Nuevo Area Plan Special Flood Hazard Areas Map to be consistent with localized flood hazard zone areas as identified in Figure 4, Flood Hazard Zone Map in the 2021 Draft Safety Element, to illustrate 100-Year and 500-Year Flood Zones within the Area Plan.
2. Update Figure 11, Lakeview/Nuevo Area Plan Wildfire Susceptibility Map to be consistent with Figure 6, Fire Hazard Severity Zones Map in the 2021 Draft Safety Element to illustrate updated State and local responsibility areas.
3. Create a new figure that incorporates data from Figure 8, Historic Wildfire Perimeters, to illustrate the extent of areas previously burned within the Area Plan. Due to the presence of Very High/High Fire Hazard Severity Zones within the Area Plan these Severity Zones should also be shown on this figure.
4. Update Figure 13, Lakeview/Nuevo Area Plan Steep Slope Map to be consistent with landslide susceptibility classes identified in Figure 3, Landslide Risk Map of the 2021 Draft Safety Element and re-name to be consistent with Figure 3 of the 2021 Draft Safety Element.

Mead Valley Area Plan

Policy Revisions

1. Revise MVAP 19.1 to the following:

All proposed development located within High or Very High Fire Hazard Severity Zones shall protect life and property from wildfire hazards through adherence to policies identified in the Fire Hazards (Building Code and Performance Standards), Wind-Related Hazards and General and Long-Range Fire Safety Planning sections of the General Plan Safety Element.

2. Revise MVAP 18.1 to the following:

Protect life and property from the hazards of flood events through adherence to the policies identified in the Flood and Inundation Hazards Abatement section of the General Plan Safety Element.

3. Revise MVAP 20.1 to the following:

Protect life and property from seismic-related incidents through adherence to the policies in the Seismic Hazards and Geologic Hazards section of the General Plan Safety Element.

Map Revisions

1. Update Figure 11, Mead Valley Area Plan Special Flood Hazard Areas Map to be consistent with localized flood hazard zone areas as identified in Figure 4, Flood Hazard Zone Map in the 2021 Draft Safety Element, to illustrate 100-Year and 500-Year Flood Zones within the Area Plan.
2. Update Figure 12, Mead Valley Area Plan Wildfire Susceptibility Map to be consistent with Figure 6, Fire Hazard Severity Zones Map in the 2021 Draft Safety Element to illustrate updated State and local responsibility areas.
3. Create a new figure that incorporates data from Figure 8, Historic Wildfire Perimeters, to illustrate the extent of areas previously burned within the Area Plan. Due to the presence of Very High/High Fire Hazard Severity Zones within the Area Plan these Severity Zones should also be shown on this figure.
4. Update Figure 14, Mead Valley Area Plan Steep Slope Map to be consistent with landslide susceptibility classes identified in Figure 3, Landslide Risk Map of the 2021 Draft Safety Element and re-name to be consistent with Figure 3 of the 2021 Draft Safety Element.

The Pass Area Plan

Policy Revisions

1. Revise PAP 18.1 to the following:

All proposed development located within High or Very High Fire Hazard Severity Zones shall protect life and property from wildfire hazards through adherence to policies identified in the Fire Hazards (Building Code and Performance Standards), Wind-Related Hazards and General and Long-Range Fire Safety Planning sections of the General Plan Safety Element.

2. Revise PAP 17.1 to the following:

Protect life and property from the hazards of flood events through adherence to the policies identified in the Flood and Inundation Hazards Abatement section of the General Plan Safety Element.

3. Revise PAP 19.1 to the following:

Protect life and property from seismic-related incidents through adherence to the policies in the Seismic Hazards and Geologic Hazards section of the General Plan Safety Element.

Map Revisions

1. Update Figure 11, The Pass Area Plan Special Flood Hazard Areas Map to be consistent with localized flood hazard zone areas as identified in Figure 4, Flood Hazard Zone Map in the 2021 Draft Safety Element, to

illustrate 100-Year and 500-Year Flood Zones within the Area Plan.

2. Update *Figure 12, The Pass Area Plan Wildfire Susceptibility Map* to be consistent with *Figure 6, Fire Hazard Severity Zones Map* in the 2021 Draft Safety Element to illustrate updated State and local responsibility areas.
3. Create a new figure that incorporates data from *Figure 8, Historic Wildfire Perimeters*, to illustrate the extent of areas previously burned within the Area Plan. Due to the presence of Very High/High Fire Hazard Severity Zones within the Area Plan these Severity Zones should also be shown on this figure.
4. Update *Figure 14, The Pass Area Plan Steep Slope Map* to be consistent with landslide susceptibility classes identified in *Figure 3, Landslide Risk Map* of the 2021 Draft Safety Element and re-name to be consistent with Figure 3 of the 2021 Draft Safety Element.

Palo Verde Valley Area Plan

Policy Revisions

1. Revise PVVAP 15.1 to the following:

All proposed development located within High or Very High Fire Hazard Severity Zones shall protect life and property from wildfire hazards through adherence to policies identified in the Fire Hazards (Building Code and Performance Standards), Wind-Related Hazards and General and Long-Range Fire Safety Planning sections of the General Plan Safety Element.

2. Revise PVVAP 13.1 to the following:

Protect life and property from the hazards of flood events through adherence to the policies identified in the Flood and Inundation Hazards Abatement section of the General Plan Safety Element.

3. Revise PVVAP 16.2 to the following:

Protect life and property from seismic-related incidents through adherence to the policies in the Seismic Hazards and Geologic Hazards section of the General Plan Safety Element.

Map Revisions

1. Update *Figure 9, Palo Verde Valley Area Plan Special Flood Hazard Areas Map* to be consistent with localized flood hazard zone areas as identified in *Figure 4, Flood Hazard Zone Map* in the 2021 Draft Safety Element, to illustrate 100-Year and 500-Year Flood Zones within the Area Plan.
2. Update *Figure 10, Palo Verde Valley Area Plan Wildfire Susceptibility Map* to be consistent with *Figure 6, Fire Hazard Severity Zones Map* in the 2021 Draft Safety Element to illustrate updated State and local responsibility areas.
3. Create a new figure that incorporates data from *Figure 8, Historic Wildfire Perimeters*, to illustrate the extent of areas previously burned within the Area Plan. Due to the presence of Very High/High Fire Hazard Severity Zones within the Area Plan these Severity Zones should also be shown on this figure.

4. Update Figure 12, Palo Verde Valley Area Plan Steep Slope Map to be consistent with landslide susceptibility classes identified in Figure 3, Landslide Risk Map of the 2021 Draft Safety Element and re-name to be consistent with Figure 3 of the 2021 Draft Safety Element.

Reche Canyon/Badlands Area Plan

Policy Revisions

1. Revise RCBAP 18.1 to the following:

All proposed development located within High or Very High Fire Hazard Severity Zones shall protect life and property from wildfire hazards through adherence to policies identified in the Fire Hazards (Building Code and Performance Standards), Wind-Related Hazards and General and Long-Range Fire Safety Planning sections of the General Plan Safety Element.

2. Revise RCBAP 17.2 to the following:

Protect life and property from the hazards of flood events through adherence to the policies identified in the Flood and Inundation Hazards Abatement section of the General Plan Safety Element.

3. Revise RCBAP 19.1 to the following:

Protect life and property from seismic-related incidents through adherence to the policies in the Seismic Hazards and Geologic Hazards section of the General Plan Safety Element.

Map Revisions

1. Update Figure 10, Reche Canyon/Badlands Area Plan Special Flood Hazard Areas Map to be consistent with localized flood hazard zone areas as identified in Figure 4, Flood Hazard Zone Map in the 2021 Draft Safety Element, to illustrate 100-Year and 500-Year Flood Zones within the Area Plan.
2. Update Figure 11, Reche Canyon/Badlands Area Plan Wildfire Susceptibility Map to be consistent with Figure 6, Fire Hazard Severity Zones Map in the 2021 Draft Safety Element.
3. Create a new figure that incorporates data from Figure 8, Historic Wildfire Perimeters, to illustrate the extent of areas previously burned within the Area Plan. Due to the presence of Very High/High Fire Hazard Severity Zones within the Area Plan these Severity Zones should also be shown on this figure.
4. Update Figure 13, Reche Canyon/Badlands Area Plan Steep Slope Map to be consistent with landslide susceptibility classes identified in Figure 3, Landslide Risk Map of the 2021 Draft Safety Element.

Riverside Extended Mountain Area Plan

Policy Revisions

1. Revise REMAP 15.1 to the following:

All proposed development located within High or Very High Fire Hazard Severity Zones shall protect life and property from wildfire hazards through adherence to policies identified in the Fire Hazards (Building Code and Performance

Standards), Wind-Related Hazards and General and Long-Range Fire Safety Planning sections of the General Plan Safety Element.

2. Revise REMAP 14.2 to the following:

Protect life and property from the hazards of flood events through adherence to the policies identified in the Flood and Inundation Hazards Abatement section of the General Plan Safety Element.

3. Revise REMAP 16.1 to the following:

Protect life and property from seismic-related incidents through adherence to the policies in the Seismic Hazards and Geologic Hazards section of the General Plan Safety Element.

Map Revisions

1. Update Figure 10, Riverside Extended Mountain Area Plan Special Flood Hazard Areas Map to be consistent with localized flood hazard zone areas as identified in Figure 4, Flood Hazard Zone Map in the 2021 Draft Safety Element, to illustrate 100-Year and 500-Year Flood Zones within the Area Plan.
2. Update Figure 11, Riverside Extended Mountain Area Plan Wildfire Susceptibility Map to be consistent with Figure 6, Fire Hazard Severity Zones Map in the 2021 Draft Safety Element to illustrate updated State and local responsibility areas.
3. Create a new figure that incorporates data from Figure 8, Historic Wildfire Perimeters, to illustrate the extent of areas previously burned within the Area Plan. Due to the presence of Very High/High Fire Hazard Severity Zones within the Area Plan these Severity Zones should also be shown on this figure.
4. Update Figure 13, Riverside Extended Mountain Area Plan Steep Slope Map to be consistent with landslide susceptibility classes identified in Figure 3, Landslide Risk Map of the 2021 Draft Safety Element and re-name to be consistent with Figure 3 of the 2021 Draft Safety Element.

San Jacinto Valley Area Plan

Policy Revisions

1. Revise SJVAP 16.1 to the following:

All proposed development located within High or Very High Fire Hazard Severity Zones shall protect life and property from wildfire hazards through adherence to policies identified in the Fire Hazards (Building Code and Performance Standards), Wind-Related Hazards and General and Long-Range Fire Safety Planning sections of the General Plan Safety Element.

2. Revise SJVAP 15.4 to the following:

Protect life and property from the hazards of flood events through adherence to the policies identified in the Flood and Inundation Hazards Abatement section of the General Plan Safety Element.

3. Revise SJVAP 17.1 to the following:

Protect life and property from seismic-related incidents through adherence to the policies in the Seismic Hazards and Geologic Hazards section of the General Plan Safety Element.

Map Revisions

1. Update Figure 10, San Jacinto Valley Area Plan Special Flood Hazard Areas Map to be consistent with localized flood hazard zone areas as identified in Figure 4, Flood Hazard Zone Map in the 2021 Draft Safety Element.
2. Update Figure 11, San Jacinto Valley Area Plan Wildfire Susceptibility Map to be consistent with Figure 6, Fire Hazard Severity Zones Map in the 2021 Draft Safety Element to illustrate updated State and local responsibility areas.
3. Create a new figure that incorporates data from Figure 8, Historic Wildfire Perimeters, to illustrate the extent of areas previously burned within the Area Plan. Due to the presence of Very High/High Fire Hazard Severity Zones within the Area Plan these Severity Zones should also be shown on this figure.
4. Update Figure 13, San Jacinto Valley Area Plan Steep Slope Map to be consistent with landslide susceptibility classes identified in Figure 3, Landslide Risk Map of the 2021 Draft Safety Element and re-name to be consistent with Figure 3 of the 2021 Draft Safety Element.

Southwest Area Plan

Policy Revisions

1. Revise SWAP 25.1 to the following:

All proposed development located within High or Very High Fire Hazard Severity Zones shall protect life and property from wildfire hazards through adherence to policies identified in the Fire Hazards (Building Code and Performance Standards), Wind-Related Hazards and General and Long-Range Fire Safety Planning sections of the General Plan Safety Element.

2. Revise SWAP 24.1 to the following:

Protect life and property from the hazards of flood events through adherence to the policies identified in the Flood and Inundation Hazards Abatement section of the General Plan Safety Element.

3. Revise SWAP 26.1 to the following:

Protect life and property from seismic-related incidents through adherence to the policies in the Seismic Hazards and Geologic Hazards section of the General Plan Safety Element.

Map Revisions

1. Update Figure 10, Southwest Area Plan Special Flood Hazard Areas Map to be consistent with localized flood hazard zone areas as identified in Figure 4, Flood Hazard Zone Map in the 2021 Draft Safety Element, to illustrate 100-Year and 500-Year Flood Zones within the Area Plan.
2. Update Figure 11, Southwest Area Plan Wildfire Susceptibility Map to be consistent with Figure 6, Fire Hazard Severity Zones Map in the 2021 Draft Safety Element to illustrate updated State and local responsibility areas.
3. Create a new figure that incorporates data from Figure 8, Historic Wildfire Perimeters, to illustrate the

extent of areas previously burned within the Area Plan. Due to the presence of Very High/High Fire Hazard Severity Zones within the Area Plan these Severity Zones should also be shown on this figure.

4. Update Figure 13, Southwest Area Plan Steep Slope Map to be consistent with landslide susceptibility classes identified in Figure 3, Landslide Risk Map of the 2021 Draft Safety Element and re-name to be consistent with Figure 3 of the 2021 Draft Safety Element.

Sun City/Menifee Valley Area Plan

Policy Revisions

1. Revise SCMVAP 15.1 to the following:

All proposed development located within High or Very High Fire Hazard Severity Zones shall protect life and property from wildfire hazards through adherence to policies identified in the Fire Hazards (Building Code and Performance Standards), Wind-Related Hazards and General and Long-Range Fire Safety Planning sections of the General Plan Safety Element.

2. Revise SCMVAP 14.4 to the following:

Protect life and property from the hazards of flood events through adherence to the policies identified in the Flood and Inundation Hazards Abatement section of the General Plan Safety Element.

3. Revise SCMVAP 16.1 to the following:

Protect life and property from seismic-related incidents through adherence to the policies in the Seismic Hazards and Geologic Hazards section of the General Plan Safety Element.

Map Revisions

1. Update Figure 9, Sun City Menifee Valley Area Plan Special Flood Hazard Areas Map to be consistent with localized flood hazard zone areas as identified in Figure 4, Flood Hazard Zone Map in the 2021 Draft Safety Element, to illustrate 100-Year and 500-Year Flood Zones within the Area Plan.
2. Update Figure 10, Sun City Menifee Valley Area Plan Wildfire Susceptibility Map to be consistent with Figure 6, Fire Hazard Severity Zones Map in the 2021 Draft Safety Element to illustrate updated State and local responsibility areas.
3. Create a new figure that incorporates data from Figure 8, Historic Wildfire Perimeters, to illustrate the extent of areas previously burned within the Area Plan. Due to the presence of Very High/High Fire Hazard Severity Zones within the Area Plan these Severity Zones should also be shown on this figure.
4. Update Figure 12, Sun City Menifee Valley Area Plan Steep Slope Map to be consistent with landslide susceptibility classes identified in Figure 3, Landslide Risk Map of the 2021 Draft Safety Element.

Temescal Canyon Area Plan

Policy Revisions

1. Revise TCAP 21.1 to the following:

All proposed development located within High or Very High Fire Hazard Severity Zones shall protect life and property from wildfire hazards through adherence to policies identified in the Fire Hazards (Building Code and Performance Standards), Wind-Related Hazards and General and Long-Range Fire Safety Planning sections of the General Plan Safety Element.

2. Revise TCAP 20.4 to the following:

Protect life and property from the hazards of flood events through adherence to the policies identified in the Flood and Inundation Hazards Abatement section of the General Plan Safety Element.

3. Revise TCAP 22.1 to the following:

Protect life and property from seismic-related incidents through adherence to the policies in the Seismic Hazards and Geologic Hazards section of the General Plan Safety Element.

Map Revisions

1. Update Figure 10, Temescal Canyon Area Plan Special Flood Hazard Areas Map to be consistent with localized flood hazard zone areas as identified in Figure 4, Flood Hazard Zone Map in the 2021 Draft Safety Element, to illustrate 100-Year and 500-Year Flood Zones within the Area Plan.
2. Update Figure 11, Temescal Canyon Area Plan Wildfire Susceptibility Map to be consistent with Figure 6, Fire Hazard Severity Zones Map in the 2021 Draft Safety Element to illustrate updated State and local responsibility areas.
3. Create a new figure that incorporates data from Figure 8, Historic Wildfire Perimeters, to illustrate the extent of areas previously burned within the Area Plan. Due to the presence of Very High/High Fire Hazard Severity Zones within the Area Plan these Severity Zones should also be shown on this figure.
4. Update Figure 13, Temescal Canyon Area Plan Steep Slope Map to be consistent with landslide susceptibility classes identified in Figure 3, Landslide Risk Map of the 2021 Draft Safety Element and re-name to be consistent with Figure 3 of the 2021 Draft Safety Element.

Western Coachella Valley Area Plan

Policy Revisions

1. Revise WCVAP 25.1 to the following:

All proposed development located within High or Very High Fire Hazard Severity Zones shall protect life and property from wildfire hazards through adherence to policies identified in the Fire Hazards (Building Code and Performance Standards), Wind-Related Hazards and General and Long-Range Fire Safety Planning sections of the General Plan Safety Element.

2. Revise WCVAP 23.4 to the following:

Protect life and property from the hazards of flood events through adherence to the policies identified in the Flood and Inundation Hazards Abatement section of the General Plan Safety Element.

3. Revise WCVAP 26.1 to the following:

Protect life and property from seismic-related incidents through adherence to the policies in the Seismic Hazards and Geologic Hazards section of the General Plan Safety Element.

Map Revisions

1. Update Figure 11, Western Coachella Valley Area Plan Special Flood Hazard Areas Map to be consistent with localized flood hazard zone areas as identified in Figure 4, Flood Hazard Zone Map in the 2021 Draft Safety Element, to illustrate 100-Year and 500-Year Flood Zones within the Area Plan.
2. Update Figure 12, Western Coachella Valley Area Plan Wildfire Susceptibility Map to be consistent with Figure 6, Fire Hazard Severity Zones Map in the 2021 Draft Safety Element to illustrate updated State and local responsibility areas.
3. Create a new figure that incorporates data from Figure 8, Historic Wildfire Perimeters, to illustrate the extent of areas previously burned within the Area Plan. Due to the presence of Very High/High Fire Hazard Severity Zones within the Area Plan these Severity Zones should also be shown on this figure.
4. Update Figure 14, Western Coachella Valley Area Plan Steep Slope Map to be consistent with landslide susceptibility classes identified in Figure 3, Landslide Risk Map of the 2021 Draft Safety Element and re-name to be consistent with Figure 3 of the 2021 Draft Safety Element.



MEMORANDUM

DATE August 24, 2021
TO Robert Flores, Principal Planner
Paul Swancott Planner
FROM Eli Krispi, PlaceWorks, Climate Action and Resilience, Senior Associate
Tammy L. Seale, PlaceWorks, Climate Action and Resilience, Principal
SUBJECT Safety Element Update – Response to Leadership Counsel Comment Letter

Introduction

PlaceWorks is working with Riverside County to prepare a targeted update to the Safety Element of the County’s General Plan, addressing new state requirements and updated information. The County released a draft of the updated Safety Element on July 8, 2021 for public review and comment. On August 13, 2021, the Leadership Counsel for Justice and Accountability, the California Institute for Rural Studies, and Consejo de Federaciones Mexicanas, in partnership with residents of the Eastern Coachella Valley (ECV), sent a letter commenting on the draft Safety Element to County staff. The letter requests that the County make revisions to the draft Safety Element.

Recommended Responses to Comments

In the comment letter, the Leadership Counsel and other authors identified four overarching issues they requested that the County make edits to address: (1) Fires and Hazardous Waste Material; (2) Critical Facilities; (3) Climate Change-Related Hazards; and (4) Timeline and Implementation. These comments (presented in italicized text below) and recommended responses to each are given in the following sections

FIRES AND HAZARDOUS WASTE MATERIAL

1. **Comment (pages 1-2):** *Develop and implement a protocol for collaborating with Native American and indigenous tribes that experience frequent fires, either natural or as a result of illegal burning. This includes developing working relationships and partnerships with Tribal governments and their fire departments to effectively address fires in order to protect surrounding communities that are part of County jurisdiction, including Fee land.*

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Recommended response: The County will amend draft Policy S 4.16, a new policy in the draft Safety Element, as follows: S 4.16: Continue to work cooperatively with the California Department of Forestry and Fire Protection and Tribal government fire departments to strengthen fire-fighting capabilities and successfully respond to multiple fires.

2. **Comment (page 2):** *This policy must also be enhanced by developing additional protocols for protecting nearby schools and homes from smoke and odor and other types of pollution exposure - especially those living in poorly weatherized mobile homes.*

Recommended response: The County will add an action item to Appendix K-2: Implementation Program of the General Plan as follows: Action Item AI X: The County will collaborate with tribal governments, incorporated cities, and community-based organizations to explore a program to improve resilience in mobile homes, including from air pollution, seismic hazards, water contamination and reliability, and extreme heat.

3. **Comment (page 2):** *Work with employers across the County to provide hazard pay and additional worker protections to outdoor workers, including mask distributions and a County-wide multi-lingual alert system to outdoor workers and employers when wildfire smoke reaches unhealthy levels.*

Recommended response: Policy S 6.2 directs the County to provide information about emergency situations through a multi-lingual alert system. Policy S 7.14 ensures that outdoor workers are given training and resources to be protected from environmental diseases, including poor air quality. Directing employers to provide hazard pay to outdoor workers is not within the purview of the Safety Element. Additional edits are not needed.

4. **Comment (page 2):** *Create and implement an illegal dumping monitoring system to identify dumping hot spots and implement preventative measures like fines for businesses or individuals dumping on both County and Tribal land. This policy shall also be co-developed with input and support from Tribal governments.*

Recommended response: The County will add an action item to Appendix K-2: Implementation Program of the General Plan as follows: Action Item AI X: Explore creating a program to investigate and address illegal dumping issues in coordination with tribal governments and incorporated cities.

5. **Comment (page 2):** *Implement and fund a notification system to ensure that nearby residents, employers, educational facilities, and other institutions to facilitate implementation of safety measures and safety precautions.*

Recommended response: Policy S 6.2 directs the County to provide information about potential, developing, and ongoing emergency situations through an alert system. Policy S 6.25 directs the County to inform residents of hazard risks, vulnerabilities and threats, and steps that can be taken to reduce risks, in multiple languages. Additional edits are not needed.

CRITICAL FACILITIES

6. **Comment (page 2):** *As mentioned in the draft, communities in the ECV experience extensive flooding during, heavy rain which can have severe impacts on roads, shoulders, and creates dangerous roadways. The County must conduct an analysis of areas that currently experience intense flooding and develop a strategy on how to reduce those impacts.*

Recommended response: Policy S 3.11 directs the County to consider identifying areas of poor drainage and conduct improvements, using natural infrastructure to the extent possible. Additional edits are not needed.

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7. **Comment (page 2):** *Identify critical facilities like parks, community centers, and other sites (i.e., the North Shore Community Park) that are at risk of flash flooding and extreme weather events and develop additional protections to prevent future damage and hazards for residents using those facilities.*

Recommended response: The County will draft an action item to Appendix K-2: Implementation Program of the General Plan, as follows: Action Item AI X: Identify existing at-risk public facilities and pursue opportunities to improve resilience as resources are available.

8. **Comment (pages 2-3):** *Existing infrastructure in unincorporated areas is non-existent in some places, incomplete in others, and generally inadequate. The County must prioritize transportation project investments, including through the use of general funds, discretionary state and federal resources and other resources available to the County in disadvantaged communities. Such projects shall include paving of mobile home parks to reduce air quality impacts, active transportation infrastructure with protective measures, and additional safe routes to schools and other critical facilities. For community-identified projects, please continue referring to the Regional and Neighborhood Mobility Plans for the ECV and the ECV Climate Resilience Action Plan.*

Recommended response: It is not within the purview of the Safety Element to direct investments for transportation projects; however, the Safety Element can support collaboration and coordination of the County with community partners to support identification of public infrastructure projects that support resilience and the assessment of their inclusion in the County's Capital Improvement Program and annual budget process. The County will create a new policy under the Public Information and Outreach section as follows: S 6.32: Work with local jurisdictions, tribal governments, and community-based organizations to support implementation of community-identified resilience projects.

9. **Comment (page 3):** *The plan must address the impacts that extreme weather is having on the electrical power grid, it must note the urgency that's needed in upgrading and safeguarding climate resilient infrastructure in order to prevent future power outages and their impacts to residents. The County must work with IID to address this issue with more urgency, collaboration, and funding support.*

Recommended response: The County will create a new policy under the Critical Facilities and Lifelines section as follows: S 6.25: Collaborate with utility companies to support and enhance grid reliability during regular operations and extreme conditions.

10. **Comment (page 3):** *We greatly appreciate the inclusion of community resilience centers in the Draft to be located across unincorporated areas. This is a much needed and often requested resource in the ECV, especially to provide refuge during extreme heat and power outages, more gathering spaces, and centralized locations to provide more direct community and health services and other benefits in rural areas. Such resilience centers were also identified as a top priority by residents throughout the COVID-19 pandemic. In unincorporated ECV, organizations, agencies, and residents struggled to find accessible facilities to provide COVID-19 testing, medical services, food distribution sites, and vaccination clinics. Having open and community-oriented resilient centers can greatly provide a safe environment for multiple resources. With the allocated funding from the American Rescue Plan (ARP), the County has an incredible opportunity to fund a community health and resilience center in the ECV immediately. Residents will continue advocating for this project and urge the County to respond appropriately using ARP funding.*

Recommended response: Comment noted.

CLIMATE CHANGE-RELATED HAZARDS

11. **Comment (page 4):** *Work with the appropriate agencies to expedite consolidation projects in disadvantaged communities to reliable water and wastewater systems to eliminate exposure to groundwater contamination and cross-contamination between groundwater and wastewater from*

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septic systems. This includes communities most at risk, including Polanco Parks and other mobile home communities in the ECV. The County must also provide ongoing and emergency assistance to retrofit domestic wells as a short-term solution and identify a response protocol for providing emergency water supply to communities that rely on domestic wells when there are power outages.

Recommended response: The County will draft an action item for Appendix K-2: Implementation Program of the General Plan, as follows: Action Item AI X: Collaborate with tribal governments, incorporated cities, and community-based organizations to explore a program to improve resilience in mobile homes, including from air pollution, seismic hazards, water contamination and reliability, and extreme heat.

12. **Comment (page 4):** *Implement new requirements for drought-tolerant landscaping across the region to address issues of water and recycled water. The County must enforce effective uses of water to ensure that all residents within the County are receiving safe and affordable drinking water.*

Recommended response: This is not within the purview of the Safety Element. Additional edits are not needed.

13. **Comment (page 4):** *Enforce the appropriate working conditions standards across all agricultural employment facilities that help protect the health and safety of farmworkers, this includes working with the appropriate agencies to regulate the use of harmful pesticides, and protect other labor rights within the workplace.*

Recommended response: This is not within the purview of the Safety Element. Additional edits are not needed.

14. **Comment (page 4):** *Work with the South Coast AQMD and the AB 617 Community Steering Committee to establish a pesticide application notification system through the use of technology and other means and in multiple languages.*

Recommended response: This is not within the purview of the Safety Element. Additional edits are not needed.

15. **Comment (page 4):** *Increase the amount of thermal comfort infrastructure that exists in communities that experience above normal temperatures and extreme heat, particularly in key community locations, like parks, picnic areas, bus stops, schools, and other gathering places or sites frequented by residents.*

Recommended response: The County will amend draft Policy S 7.7, a new policy in the draft Safety Element, as follows: S 7.7 Coordinate with local governments, school districts, and regional transit providers to increase shading and heat-mitigating materials on pedestrian walkways, and transit stops, parks, schools, and outdoor gathering places.

16. **Comment (page 5):** *Effectively evaluate the potential impacts of projects and developments, including energy production (including renewable energy production), golf courses, recreational facilities, and other types of developments that may bring about additional environmental and public health impacts and that perpetuate the unequal use of and allocation of natural resources.*

Recommended response: The development review process addresses these issues. Additional edits are not needed.

17. **Comment (page 5):** *Through the creation and implementation of the Polanco Park Permitting Program, establish a strong policy on weatherization for mobile homes to provide safer homes to residents living in mobile home parks and mobile homes in general. In addition, further revitalization efforts shall be led to increase greening, cool paving, and other infrastructure improvements to energy, water, and wastewater in mobile home parks. This can be combined with the new Mobile Home Replacement program funded through the Unincorporated Communities Initiative.*

RIVERSIDE COUNTY | SAFETY ELEMENT UPDATE
RESPONSE TO LEADERSHIP COUNSEL COMMENT LETTER - DRAFT

Recommended response: The County will draft an action item for Appendix K-2: Implementation Program of the General Plan as follows: Action Item AI X: Collaborate with tribal governments, incorporated cities, and community-based organizations to explore a program to improve resilience in mobile homes, including from air pollution, seismic hazards, water contamination and reliability, and extreme heat. Policies S 7.9, S 7.11, and S 7.15 support new and existing developments to incorporate cool paving, green infrastructure, and related resilience efforts.

18. **Comment (page 5):** *In addition to what's currently written in S 7.14, require employer training to ensure they are implementing adequate protective measures and safe working conditions. In addition, the County must develop a process for anonymous reporting of unsafe working conditions and other exploitative practices to the County and Cal OSHA.*

Recommended response: This is not within the purview of the Safety Element. Additional edits are not needed.

19. **Comment (page 5):** *Reduce the urban heat-island effect by implementing cool pavement across different infrastructure projects, including unpaved mobile home parks, urban greening, active transportation infrastructure, road improvements, and other projects that can also combine greening with other needed infrastructure.*

Recommended response: Policies S 7.9, 7.11, and S 7.15 support new and existing developments to incorporate cool paving, green infrastructure, and related resilience efforts. Additional edits are not needed.

20. **Comment (page 5):** *Develop protective measures and standards for mobile homes in high seismic areas, including technical assistance and funding.*

Recommended response: The County will draft an action item for Appendix K-2: Implementation Program of the General Plan as follows: Action Item AI X: Collaborate with tribal governments, incorporated cities, and community-based organizations to explore a program to improve resilience in mobile homes, including from air pollution, seismic hazards, water contamination and reliability, and extreme heat.

TIMELINE AND IMPLEMENTATION

21. **Comment (page 5):** *While strong policy language is important, incorporating expected timelines and direction for implementation of these policies is equally important. As it stands, the Draft does not provide any information on how the County expects to implement the policies included in the Safety Element. This is particularly concerning given the fact that the resident safety is of the utmost importance and the County must work urgently to implement these policies and programs. According to SB 379, the County must include "a set of feasible implementation measures designed to carry out the goals, policies, and objectives identified". Without this, it is unclear how the County plans or expects to successfully and expeditiously implement the Draft or recommended policies. In order to comply with existing state law, the County must update this draft to include specific and time bound implementation measures for the public to review before adoption and address other recommendations included herein.*

Recommended response: The County will prepare a set of action items, as recommended in this memo, for inclusion of Appendix K-2: Implementation Program of the General Plan. In addition to the action items recommended in this memo, these further items, Action Item AI X, will address climate adaptation and resilience vulnerabilities as required by SB 379 consistent with the County's approach to implementation of the General Plan.

Next Steps

Following approval of these recommended edits, PlaceWorks will make the approved changes to the draft Safety Element.

DRAFT

COUNTY OF RIVERSIDE
ENVIRONMENTAL ASSESSMENT FORM: INITIAL STUDY

Project Case Type (s) and Number(s): General Plan Amendment Nos. 180002 (Safety Element), 190006 (Housing Element) and 210109 (Land Use Element)

Lead Agency Name: County of Riverside Planning Department

Address: 4080 Lemon Street, 12th Floor, Riverside, CA 92501

Contact Person: Robert Flores

Telephone Number: 951-955-1195 or 951-955-3200

Applicant's Name: County of Riverside

Applicant's Address: 4080 Lemon Street, 12th Floor, Riverside, CA 92501

I. PROJECT INFORMATION

A. INTRODUCTION:

An addendum to Certified Environmental Impact Report (EIR) No. 548 (State Clearinghouse No. 2015061083; for General Plan Amendment No. 1122 (GPA) No. 1122 and Change Of Zone (CZ) No. 7902) has been prepared in conformance with the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000 et seq.), the CEQA Guidelines (Cal. Code Regs., Title 14, Chapter 3, Section 15000 et seq.) and County of Riverside CEQA Guidelines to address minor changes to the County of Riverside General Plan for the Riverside County 6th Cycle Housing Element Update (Housing Element). This document also addresses minor changes to the General Plan Safety Element, the Land Use Element and to Area Plan hazard policies and maps for consistency with the updated General Plan Safety Element.

State law (California Government Code Sections 65580–65589.8) requires that jurisdictions evaluate their housing elements every eight years. The current statutory update in the Southern California Association of Governments (SCAG) region covers the planning period 2021 through 2029 (6th cycle). The proposed 6th Cycle Housing Element represents a comprehensive update of the adopted 2014-2021 Housing Element (5th Cycle), and the Mid-Cycle Housing Element update, in order to comply with State housing law and reflect the current 6th Cycle Regional Housing Needs Assessment (RHNA) Final Allocation Plan.

In general, the 6th Cycle Housing Element identifies and establishes the County's policies with respect to meeting the housing needs of existing and future residents in Riverside County. It establishes housing policies that will guide County decision-making and sets forth an action plan to implement its housing goals over the next eight years. The commitments are in furtherance of the statewide housing goal of "early attainment of decent housing and a suitable living environment for every California family," as well as a reflection of the concerns unique to Riverside County. The Housing Element is divided into two documents: (1) the Housing Element Policy Document and (2) the Housing Element Background Report, attached hereto and incorporated herein.

Pursuant to State law, a number of updates must be made to the General Plan Safety Element as part of the Housing Element Update process and to comply with new regulatory requirements. These updates cover a range of potential safety issues, including new information regarding floods, fires, and climate adaptation and resilience strategies. Additionally, the Land Use Element is being updated in furtherance of the goals established in the Housing Element and to create internal consistency amongst the General Plan Elements. Minor Area Plan policies are also incorporated to be consistent with the amended General Plan Safety Element hazard policies (Wildfire, Flood and Inundation and Geologic Hazards).

Attachment: Attachment H Addendum to EIR No. 548 (GPA Nos. 180002, 190006, 210109 6th Cycle Housing/Safety/Land Use)

B. PURPOSE OF AN ADDENDUM:

CEQA, a statewide environmental law contained in Public Resources Code Sections 21000–21177, applies to most public agency decisions that carry out, authorize, or approve actions that have the potential to adversely affect the environment. The CEQA Guidelines allow for updating and using a previously certified EIR for projects that have changed or are different from the previous project or conditions analyzed in the certified EIR. In cases where changes or additions occur with no new significant environmental impacts, an addendum to a previously certified EIR may be prepared, consistent with CEQA Guidelines Section 15164. This Addendum has been prepared in accordance with Section 21166 of CEQA and Sections 15162 and 15164 of the CEQA Guidelines.

Section 15164(a) of the CEQA Guidelines states that “the lead agency or a responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.” Pursuant to Section 15162(a) of the CEQA Guidelines, a Subsequent EIR or Negative Declaration is only required when:

1. Substantial changes are proposed in the project which will require major revision of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revision of the previous EIR due to the involvement of new significant environmental increase in the severity of previously identified significant effects; or
3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, shows any of the following:
 - (a) The project will have one or more significant effects not discussed in the previous EIR;
 - (b) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - (c) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - (d) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative. (CEQA Guidelines Section 15162[a])

The following describes the requirements of an Addendum, as defined by CEQA Guidelines Section 15164:

1. The lead agency or a responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.

2. An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.
3. An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.
4. The decision-making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.
5. A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

If none of these circumstances are present, and only minor technical changes or additions are necessary to update the previously certified EIR, an Addendum may be prepared, consistent with CEQA Guidelines Section 15164. This Addendum relies on Certified EIR No. 548 and the related administrative record and is intended to be included or attached to Certified EIR No. 548. It is not to be considered an independent or separate document from Certified EIR No. 548.

C. PROJECT DESCRIPTION:

The Modified Project consists of three key components: updates to the Housing Element, updates to the Safety Element, updates to the Land Use Element and to Area Plan hazard policies. All updates are limited to background information updates and policy updates in accordance with State law and internal consistency. A summary of the revisions proposed by the Modified Project is included below.

Housing Element Update Overview

The proposed 6th Cycle Housing Element Update represents a comprehensive update to the adopted 5th Cycle Housing Element, and the 2017 Mid-Cycle Housing Element update, and is included as Appendix A of this document. The update is proposed to comply with State housing law and reflect the current 6th Cycle RHNA Final Allocation Plan. The Housing Element, which is one of the County's nine General Plan Elements, consists of six key components:

- Introduction: This section provides information on the State of California's requirements, the purpose and requirements of the Housing Element, the organization of the document, the regional housing needs allocation, and General Plan consistency. As part of the Modified Project, the Introduction was updated based on current regulations and market conditions.
- Goals, Policies, and Actions: This section sets forth the County's goals, policies, and actions that are designed to address the housing needs in Riverside County. Based on the findings of all of the sections, the Goals, Policies, and Actions section identifies actions the County will take to meet local housing goals and quantified objective and address the housing needs in Riverside County. This section was significantly updated by the Modified Project to better manage and facilitate the County's housing policies and actions.
- Efforts to Achieve Citizen Participation: This section describes the opportunities the County provided for public participation during the preparation of the 6th Cycle Housing Element.
- Evaluation of the Previous Housing Element: This section contains an evaluation of the prior Housing Element and its accomplishments and analyzes the differences between what was

projected and what was achieved. The Modified Project updated the Evaluation of Previous to reflect any implementation actions that have occurred since the last Housing Element Update.

- Community Profile: This section focuses on demographic information, including population trends, ethnicity, age, household composition, income, employment, housing characteristics, housing needs by income, and housing needs for special segments of the population. This section also outlines the characteristics of the community and identifies those characteristics that may impact housing need and availability.

Significant revisions have been made to the Community Profile statistics and analyses based on updated demographic and housing data from the American Community Survey, SCAG, and market sources.

- Housing Resources: The Housing Resources section describes the County's housing resources, historical development patterns, and housing opportunities as well as the County's existing housing stock and the potential areas for future housing development. This section also discusses opportunities for energy conservation, which can reduce costs to homeowners and infrastructure costs to the County. With a reduction in basic living costs through energy savings, more households may be able to afford adequate housing.

The Housing Resources section has been revised to update the sites inventory to meet the current RHNA. The inventory distinguishes between sites retained from the sites inventory of the 5th Cycle Housing Element and additional sites that have been identified due to annexations or other changes. The sites inventory identified by the County for the updates to the Housing Element is limited to parcels previously zoned during the 5th Cycle Housing Element Update. All of these sites were analyzed in Certified EIR No. 548. After a review of the existing land inventory, additional sites were not required to accommodate the County's RHNA, and as such, changes in land use designations or zoning are not proposed by the Modified Project.

- Housing Constraints: This section analyzes potential governmental and nongovernmental constraints to housing development in Riverside County. This includes the County's planning, zoning, and building standards that directly affect residential development patterns as well as influencing housing availability and affordability. Potential nongovernmental constraints include the availability and cost of financing, the price of land, and the materials for building homes, as well as natural conditions that affect the cost of preparing and developing land for housing, and the business decisions of individuals and organizations (e.g., home building, finance, real estate, and rental housing that impact housing cost and availability).

Revisions have been made to the Housing Constraints statistics and analyses based on updated demographic and housing data from the American Community Survey, SCAG, and market sources.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, changes to the County's General Plan Land Use Element are not required because the Housing Element Update does not change any existing land use designations or zoning.

Safety Element Update Overview

The General Plan Safety Element serves as Riverside County's comprehensive strategy to reduce both short-term and long-term potential for harm from various threats to community health and safety. Pursuant to State law, a number of updates must be made to the General Plan Safety Element during the Housing Element Update process. These updates cover a range of potential safety issues, including new information regarding floods, fires, and climate adaptation and resilience strategies. Specifically, the Modified Project would update the Safety Element pursuant to the following regulations:

- **AB 162:** Pursuant to Assembly Bill (AB) 162 (Government Code Section 65302[g][3]), upon the next revision of an agency’s Housing Element on or after January 1, 2014, the Safety Element shall be reviewed and updated as necessary to address the risk of fire for land classified as state responsibility areas, as defined in Section 4102 of the Public Resources Code, and land classified as very high fire hazard severity zones, as defined in Section 51177.
- **SB 379:** Senate Bill (SB) 379 (Government Code 65302[g][4]) requires that the Safety Element be reviewed and updated as necessary to address climate change adaptation and applicable resiliency strategies.
- **SB 99:** SB 99 (Government Code 65302[g][5]) requires that on or after January 1, 2020, the Safety Element include information to identify residential developments in hazard areas that do not have at least two evacuation routes.
- **SB 1035:** SB 1035 (Government Code 65302[g][6]) requires that the Safety Element be reviewed and updated as needed upon each revision of the Housing Element or Local Hazard Mitigation Plan, but not less than once every eight years.

The revised Safety Element also incorporates new information from the 2018 Riverside County Multi-Jurisdictional Local Hazard Mitigation Plan and the 2020 Resilient IE study and toolkit. Minor revisions to the Area Plan hazard policies will be incorporated in order to be consistent with amended General Plan Safety Element hazard policies (Wildfire, Flood and Inundation and Geologic Hazards). Changes to the Safety Element are limited to addressing new hazards and resilience data, and do not increase the development capacity of the County, nor increase the area where development can occur. The update to the Safety Element is limited to mapping and policy changes to update the hazards noted in the Safety Element, in compliance with State law. The updated Safety Element is included as Appendix B of this report.

Land Use Element Update Overview

The Land Use Element is being revised to create consistency with the changes proposed with the Housing Element and conformance with State law. Specifically, updates to the Land Use Element include (1) updates to conform with SB 244 and (2) revisions to the dwelling unit’s density range for the Highest Density Residential (HHDR) from 20-40 dwelling Units per acre to 14-40 dwelling units per acre. Changes will apply to both the element and area plans that address these land use components. The revision to the HHDR by reducing the minimum dwelling per acre requirement will allow smaller parcels to be developed with affordable housing-multi-family projects. This will increase flexibility for the HHDR designation without compromising maximum allowable densities which are needed to provide the higher number of dwelling units for achieving RHNA targets.

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

B. Total Project Area: N/A

Residential Acres: N/A	Lots: N/A	Units: N/A	Projected No. of Residents: N/A
Commercial Acres: N/A	Lots: N/A	Sq. Ft. of Bldg. Area: N/A	Est. No. of Employees: N/A
Industrial Acres: N/A	Lots: N/A	Sq. Ft. of Bldg. Area: N/A	Est. No. of Employees: N/A
Other:			

C. Assessor’s Parcel No(s): Various.

D. **Street References:** Various.

E. **Section, Township & Range Description or reference/attach a Legal Description:** N/A

F. **Brief description of the existing environmental setting of the project site and its surroundings:** Riverside County encompasses 7,295 square miles that stretch across 200 miles of California, from the eastern edge of the Los Angeles metropolitan basin to the Colorado River; refer to Exhibit 1, Regional Vicinity. The County is bounded by San Bernardino County to the north, the State of Arizona to the east, San Diego and Imperial Counties to the south, and Orange County to the west. Riverside County is one of the most diverse counties in the state, and supports well-established urban, suburban, and rural communities. It also includes an extensive array of agricultural lands, lands devoted to mineral resources extraction, and recreational areas. The western portion of the County contains most of the County's non-desert and urbanized areas. To the east is the urbanizing hub of the Coachella Valley. Beyond the Coachella Valley is the northern half of the Salton Sea. Eastern Riverside County, which lies east of the crest of the San Jacinto Mountains, contains almost all the County's desert regions. The revisions to the Housing Element and Safety Element would apply to the entire unincorporated areas of the County of Riverside, which are primarily rural and agricultural with a limited number of suburban communities.

II. **APPLICABLE GENERAL PLAN AND ZONING REGULATIONS**

A. **General Plan Elements/Policies:**

1. **Land Use:**

- LU 5.1 Ensure that development does not exceed the ability to adequately provide supporting infrastructure and services, such as libraries, recreational facilities, educational and day care centers transportation systems, and fire/police/medical services.
- LU 5.2 Monitor the capacities of infrastructure and services in coordination with service providers, utilities, and outside agencies and jurisdictions to ensure that growth does not exceed acceptable levels of service.
- LU 7.7 Require buffers to the extent possible between development and watercourses, including their associated habitat.
- LU 9.7 Protect lands designated by the State Mining and Geology Board as being of regional or statewide significance from encroachment of incompatible land uses, such as high-density residential, low-density residential with high values, sensitive public facilities, institutions (e.g., schools, hospitals), etc., by requiring incorporation of buffer zones or visual screening into the incompatible land use.
- LU 18.1 Ensure compliance with Riverside County's water-efficient landscape policies. Ensure that projects seeking discretionary permits and/or approvals develop and implement landscaping plans prepared in accordance with the Water-Efficient Landscape Ordinance (Ordinance No. 859), the County of Riverside Guide to California Friendly Landscaping and Riverside County's California Friendly Plant List. Ensure that irrigation plans for all new development incorporate weather-based controllers and utilize state-of-the-art water-efficient irrigation components.
- LU 18.2 Minimize use of turf. Minimize the use of natural turf in landscape medians, front-yard typical designs, parkways, other common areas, etc. and use drought

tolerant planting options, mulch, or a combination thereof as a substitute. Limit the use of natural turf to those areas that serve a functional recreational element. Incorporate other aesthetic design elements such as boulders, stamped concrete, pavers, flagstone, decomposed granite, manufactured rock products to enhance visual interest and impact.

- LU 18.3 Design and field check irrigation plans to reduce run-off. Emphasize the use of subsurface irrigation techniques for landscape areas adjoining non-permeable hardscape. Utilize subsurface irrigation or other low volume irrigation technology in association with long, narrow, or irregularly shaped turf areas. Minimize use of irregularly shaped turf areas.
- LU 18.4 Coordinate Riverside County water-efficiency efforts with those of local water agencies. Support local water agencies' water conservation efforts.
- LU 25.4 Require that new development meet or exceed the parkland requirements as established in the Quimby Act and Riverside County enabling ordinances.
- LU 27.2 Protect lands designated as Open Space-Mineral Resource from encroachment of incompatible land uses through buffer zones or visual screening.
- LU 27.3 Protect road access to mining activities and prevent or mitigate traffic conflicts with surrounding properties.

2. Circulation:

- C 2.2 Require that new development prepare a traffic impact analysis and vehicle miles traveled (VMT) analysis as warranted by the Riverside County Traffic Impact Analysis and VMT Preparation Guidelines or as approved by the Director of Transportation. Apply level of service targets to new development per the Riverside County Traffic Impact Analysis and VMT Preparation Guidelines to evaluate traffic impacts and identify appropriate mitigation measures for new development.
- C 2.5 The cumulative and indirect traffic impacts of development may be mitigated through the payment of various impact mitigation fees such as County of Riverside Development Impact Fees, Road and Bridge Benefit District Fees, and Transportation Uniform Mitigation Fees to the extent that these programs provide funding for the improvement of facilities impacted by development.
- C 3.4 Allow roundabouts or other innovative design solutions such as triple left turn lanes, continuous flow intersections, or other capacity improvements, when a thorough traffic impact assessment has been conducted demonstrating that such an intersection design alternative would manage traffic flow, and improve safety, if it is physically and economically feasible
- C 3.23 Consider the utilization of traffic-calming techniques in the design of new community local street and road systems and within existing communities where such techniques will improve safety and manage traffic flow through sensitive neighborhoods.
- C 3.24 Provide a street network with quick and efficient routes for emergency vehicles, meeting necessary street widths, turn-around radius, secondary access, and

other factors as determined by the Transportation Department in consultation with the Fire Department and other emergency service providers.

- C 4.1 Provide facilities for the safe movement of pedestrians within developments, as specified in the Riverside County Ordinances Regulating the Division of Land of the County of Riverside.
- C 4.2 Maximize visibility and access for pedestrians and encourage the removal of barriers (walls, easements, and fences) for safe and convenient movement of pedestrians. Special emphasis should be placed on the needs of disabled persons considering Americans with Disabilities Act (ADA) regulations.
- C 4.3 Assure and facilitate pedestrian access from developments to existing and future transit routes and terminal facilities through project design.
- C 4.4 Plan for pedestrian access that is consistent with road design standards while designing street and road projects. Provisions for pedestrian paths or sidewalks and timing of traffic signals to allow safe pedestrian street crossing shall be included.
- C 4.6 Consult the Riverside County Transportation Department as part of the development review process regarding any development proposals where pedestrian facilities may be warranted. The County of Riverside may require both the dedication and improvement of the pedestrian facilities as a condition of development approval.
- C 6.5 Provide common access via shared driveways and/or reciprocal access easements whenever access must be taken directly off a General Plan designated highway. Parcels on opposite sides of a highway shall have access points located directly opposite each other, whenever possible, to allow for future street intersections and increased safety.
- C 11.1 Where appropriate, reserve right-of-way to accommodate designated transit service.
- C 11.2 Incorporate the potential for public transit service in the design of developments that are identified as major trip attractions (i.e., community centers, tourist and employment centers), as indicated in ordinances regulating the division of land of the County of Riverside.
- C 11.3 Design the physical layout of arterial and collector highways to facilitate bus operations. Locations of bus turn outs and other design features should be considered.
- C 11.4 Offer incentives to new development to encourage it to locate in a transit-oriented area such as a community center or along a designated transit corridor near a station.
- C 11.5 Accommodate transit through higher densities, innovative design, and right-of-way dedication.

3. Multipurpose Open Space:

- OS 2.2 Encourage the installation of water-conserving systems such as dry wells and graywater systems, where feasible, especially in new developments. The installation of cisterns or infiltrators shall also be encouraged to capture rainwater from roofs for irrigation in the dry season and flood control during heavy storms.
- OS 3.7 Where feasible, decrease stormwater runoff by reducing pavement in development areas, reducing dry weather urban runoff, and by incorporating "Low Impact Development," green infrastructure and other Best Management Practice design measures such as permeable parking bays and lots, use of less pavement, bio-filtration, and use of multi-functional open drainage systems, etc.
- OS 4.6 Retain storm water at or near the site of generation for percolation into the groundwater to conserve it for future uses and to mitigate adjacent flooding. Such retention may occur through "Low Impact Development" or other Best Management Practice measures
- OS 5.5 Preserve and enhance existing native riparian habitat and prevent obstruction of natural watercourses. Prohibit fencing that constricts flow across watercourses and their banks. Incentives shall be utilized to the maximum extent possible.
- OS 6.1 During the development review process, ensure compliance with the Clean Water Act's Section 404 in terms of wetlands mitigation policies and policies concerning fill material in jurisdictional wetlands.
- OS 6.2 Preserve buffer zones around wetlands where feasible and biologically appropriate.
- OS 14.3 Restrict land uses incompatible with mineral resource recovery within areas designated Open Space-Mineral Resources and within areas designated by the State Mining and Geology Board as being of regional or statewide significance.
- OS 14.4 The County Geologist shall impose conditions as necessary on proposed mining operations projects to minimize or eliminate the potential adverse impact of mining operations on surrounding properties, and environmental resources.
- OS 14.5 Require that new non-mining land uses adjacent to existing mining operations be designed to provide a buffer between the new development and the mining operations. The buffer distance shall be based on an evaluation of noise, aesthetics, drainage, operating conditions, biological resources, topography, lighting, traffic, operating hours, and air quality. The same standards shall apply to non-mining land uses within or adjacent to areas classified by the State Geologist as MRZ2a.
- OS 17.1 Enforce the provisions of applicable MSHCP's and implement related Riverside County policies when conducting review of possible legislative actions such as general plan amendments, zoning ordinance amendments, etc. including policies regarding the handling of private and public stand alone applications for general plan amendments, lot line adjustments and zoning ordinance amendments that are not accompanied by, or associated with, an application to subdivide or other land use development application. Every stand-alone application shall require an initial Habitat Evaluation and Acquisition Negotiation Process (HANS)

assessment and such assessment shall be made by the Planning Department's Environmental Programs Division. Habitat assessment and species specific focused surveys shall not be required as part of this initial HANS assessment for stand-alone applications but will be required when a development proposal or land use application to subsequently subdivide, grade or build on the property is submitted to the County.

- OS 17.2 Enforce the provisions of applicable MSHCP's and implement related Riverside County policies when conducting review of development applications.
 - OS 19.3 Review proposed development for the possibility of cultural resources and for compliance with the cultural resources program.
 - OS 19.4 To the extent feasible, designate as open space and allocate resources and/or tax credits to prioritize the protection of cultural resources preserved in place or left in an undisturbed state.
 - OS 19.5 Exercise sensitivity and respect for human remains from both prehistoric and historic time periods and comply with all applicable laws concerning such remains.
 - OS 19.6 Whenever existing information indicates that a site proposed for development has high paleontological sensitivity as shown on Figure OS-8, a paleontological resource impact mitigation program (PRIMP) shall be filed with the County Geologist prior to site grading. The PRIMP shall specify the steps to be taken to mitigate impacts to paleontological resources.
 - OS 19.7 Whenever existing information indicates that a site proposed for development has low paleontological sensitivity as shown on Figure OS-8, no direct mitigation is required unless a fossil is encountered during site development. Should a fossil be encountered, the County Geologist shall be notified, and a paleontologist shall be retained by the project proponent. The paleontologist shall document the extent and potential significance of the paleontological resources on the site and establish appropriate mitigation measures for further site development.
 - OS 19.8 Whenever existing information indicates that a site proposed for development has undetermined paleontological sensitivity as shown on Figure OS-8, a report shall be filed with the County Geologist documenting the extent and potential significance of the paleontological resources on site and identifying mitigation measures for the fossil and for impacts to significant paleontological resources prior to approval of that department.
- 4. Noise:**
- N 13.2 Ensure that construction activities are regulated to establish hours of operation in order to prevent and/or mitigate the generation of excessive or adverse noise impacts on surrounding areas.
 - N15.2 Require that commercial and residential mixed-use structures minimize the transfer or transmission of noise and vibration from the commercial land use to the residential land use.

N 16.1 Restrict the placement of sensitive land uses in proximity to vibration-producing land uses.

N 16.3 Prohibit exposure of residential dwellings to perceptible ground vibration from passing trains as perceived at the ground or second floor. Perceptible motion shall be presumed to be a motion velocity of 0.01 inches/second over a range of 1 to 100 Hz.

5. **Housing:** N/A

6. **Air Quality:**

AQ 1.1 Promote and participate with regional and local agencies, both public and private, to protect and improve air quality.

AQ 1.4 Coordinate with the SCAQMD and MDAQMD to ensure that all elements of air quality plans regarding reduction of air pollutant emissions are being enforced.

AQ 2.1 The County land use planning efforts shall assure that sensitive receptors are separated and protected from polluting point sources to the greatest extent possible.

AQ 2.2 Require site plan designs to protect people and land uses sensitive to air pollution through the use of barriers and/or distance from emissions sources when possible.

AQ 2.3 Encourage the use of pollution control measures such as landscaping, vegetation and other materials, which trap particulate matter or control pollution.

AQ 2.4 Consider creating a program to plant urban trees on an Area Plan basis that removes pollutants from the air, provides shade and decreases the negative impacts of heat on the air.

AQ 4.5 Require stationary pollution sources to minimize the release of toxic pollutants through:

- Design features
- Operating procedures
- Preventive maintenance
- Operator training
- Emergency response planning

AQ 4.6 Require stationary air pollution sources to comply with applicable air district rules and control measures.

AQ 4.7 To the greatest extent possible, require every project to mitigate any of its anticipated emissions which exceed allowable emissions as established by the SCAQMD, MDAQMD, SCAB, the Environmental Protection Agency, and the California Air Resources Board.

7. **Environmental Justice Amendments** Preliminary Approval of LUE and Healthy Communities Element Amendments on 7/20/2021.

- B. **General Plan Area Plan(s):** The proposed updates to the Housing Element and Safety Element would apply to all 19 Area Plans of the General Plan.
- C. **Foundation Component(s):** The proposed revisions to the Housing Element and Safety Element do not propose to change the Foundation Component of any site.
- D. **Land Use Designation(s):** The proposed revisions to the Housing Element and Safety Element would not alter or create new land use designations.
- E. **Overlay(s), if any:** The proposed revisions to the Housing Element and Safety Element would apply to all overlays.
- F. **Policy Area(s), if any:** The proposed revisions to the Housing Element and Safety Element would apply to all policy areas.
- G. **Adjacent and Surrounding:**
 - 1. **General Plan Area Plan(s):** N/A
 - 2. **Foundation Component(s):** N/A
 - 3. **Land Use Designation(s):** N/A
 - 4. **Overlay(s), if any:** N/A
 - 5. **Policy Area(s), if any:** N/A
- H. **Adopted Specific Plan Information**
 - 1. **Name and Number of Specific Plan, if any:** N/A
 - 2. **Specific Plan Planning Area, and Policies, if any:** N/A
- I. **Existing Zoning:** Various.
- J. **Proposed Zoning, if any:** N/A
- K. **Adjacent and Surrounding Zoning:** Various.

III. **ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED**

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

- | | | |
|--|---|---|
| <input checked="" type="checkbox"/> Aesthetics | <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Agriculture & Forest Resources | <input checked="" type="checkbox"/> Hydrology / Water Quality | <input checked="" type="checkbox"/> Transportation |
| <input checked="" type="checkbox"/> Air Quality | <input type="checkbox"/> Land Use / Planning | <input checked="" type="checkbox"/> Tribal Cultural Resources |
| <input checked="" type="checkbox"/> Biological Resources | <input type="checkbox"/> Mineral Resources | <input checked="" type="checkbox"/> Utilities / Service Systems |

- | | | |
|--|--|--|
| <input checked="" type="checkbox"/> Cultural Resources | <input checked="" type="checkbox"/> Noise | <input type="checkbox"/> Wildfire |
| <input type="checkbox"/> Energy | <input type="checkbox"/> Paleontological Resources | <input checked="" type="checkbox"/> Mandatory Findings of Significance |
| <input checked="" type="checkbox"/> Geology / Soils | <input type="checkbox"/> Population / Housing | |
| <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Public Services | |

IV. DETERMINATION

On the basis of this initial evaluation:

A PREVIOUS ENVIRONMENTAL IMPACT REPORT/NEGATIVE DECLARATION WAS NOT PREPARED

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

A PREVIOUS ENVIRONMENTAL IMPACT REPORT/NEGATIVE DECLARATION WAS PREPARED

- I find that although the proposed project could have a significant effect on the environment, **NO NEW ENVIRONMENTAL DOCUMENTATION IS REQUIRED** because (a) all potentially significant effects of the proposed project have been adequately analyzed in an earlier EIR or Negative Declaration pursuant to applicable legal standards, (b) all potentially significant effects of the proposed project have been avoided or mitigated pursuant to that earlier EIR or Negative Declaration, (c) the proposed project will not result in any new significant environmental effects not identified in the earlier EIR or Negative Declaration, (d) the proposed project will not substantially increase the severity of the environmental effects identified in the earlier EIR or Negative Declaration, (e) no considerably different mitigation measures have been identified and (f) no mitigation measures found infeasible have become feasible.
- I find that although all potentially significant effects have been adequately analyzed in an earlier EIR or Negative Declaration pursuant to applicable legal standards, some changes or additions are necessary but none of the conditions described in California Code of Regulations, Section 15162 exist. An **ADDENDUM** to a previously-certified EIR or Negative Declaration has been prepared and will be considered by the approving body or bodies.
- I find that at least one of the conditions described in California Code of Regulations, Section 15162 exist, but I further find that only minor additions or changes are necessary to make the previous EIR adequately apply to the project in the changed situation; therefore a **SUPPLEMENT TO THE ENVIRONMENTAL IMPACT REPORT** is required that need only contain the information necessary to make the previous EIR adequate for the project as revised.
- I find that at least one of the following conditions described in California Code of Regulations, Section 15162, exist and a **SUBSEQUENT ENVIRONMENTAL IMPACT REPORT** is required: (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; (2) Substantial changes have occurred with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any the following:(A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;(B) Significant effects

Attachment: Attachment H Addendum to EIR No. 548 (GPA Nos. 180002, 190006, 210109 6th Cycle Housing/Safety/Land Use)

previously examined will be substantially more severe than shown in the previous EIR or negative declaration;(C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measures or alternatives; or,(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR or negative declaration would substantially reduce one or more significant effects of the project on the environment, but the project proponents decline to adopt the mitigation measures or alternatives.


Signature

8/25/2001
Date

ROBERTO FLORES
Printed Name

For: Robert Flores
Principal Planner

V. ENVIRONMENTAL ISSUES ASSESSMENT

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

	Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
AESTHETICS Would the project:				
1. Scenic Resources				
a) Have a substantial effect upon a scenic highway corridor within which it is located?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings and unique or landmark features; obstruct any prominent scenic vista or view open to the public; or result in the creation of an aesthetically offensive site open to public view?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Source(s): County of Riverside General Plan (GPA No. 960), Figure C-8 "Scenic Highways"; County of Riverside 6th Cycle Housing Element Update; County of Riverside General Plan Amendment 1122 Change of Zone CZ No. 7902 State Clearinghouse No. 2015061083 Final Environmental Impact Report No. 548.

Findings of Fact:

a) **Have a substantial effect upon a scenic highway corridor within which it is located?**

According to Certified EIR No. 548, future Highest Density Residential (HHDR) or Mixed Use Area (MUA) development associated with GPA No. 1122 and Change Of Zone No. 7902 could impact scenic resources within a State scenic highway by allowing multistory development that could partially obscure scenic views. However, all future development under GPA No. 1122 and Change Of Zone No. 7902 would be subject to General Plan policies governing the visual impact of new development, such as GPA No. 960 Policy LU 4.1, which requires new developments to be located and designed to visually enhance and not degrade the character of the surrounding area. In addition, GPA No. 960 Policies OS

22.1 and OS 22.4 directly regulate development within scenic highway corridors, requiring that developments within designated scenic highway corridors be designed to balance the objectives of maintaining scenic resources with accommodating compatible land uses and that conditions be placed on development within scenic highway corridors requiring dedication of scenic easements when necessary to preserve unique or special visual features. These policies provide protection for scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway. During the County's development review process, the applicant/developer would be required to provide substantial evidence of compliance with these policies as part of the project application materials.

In addition, Certified EIR No. 548 Mitigation Measure 3.1.1 would be required as a condition of approval for future development projects and to address potential effects to identified aesthetic resources, including those within a scenic highway corridor, would be addressed during the County's development review process. Impacts were determined to be less than significant with mitigation incorporated in this regard.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the policy changes proposed by the Modified Project would not affect the level of intensity of development within HHDR or MUA areas. None of the components of the Modified Project present a new use or intensify a use that was considered under Certified EIR No. 548. The County would continue to require that future development activities comply with GPA No. 960 policies in place to protect scenic highway corridors, in addition to Certified EIR No. 548 Mitigation Measure 3.1.1. Therefore, the policy changes proposed by the Modified Project would not result in new or substantially more severe environmental impacts concerning scenic highway resources as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures:

EIR No. 548 MM 3.1.1	Development projects shall be subject to the requirements of all relevant guidelines, including the community center guidelines, Riverside County supervisorial district guidelines and all applicable standards, policies, and/or regulations of the County of Riverside or other affected entities pertaining to scenic vistas and aesthetic resources. Factors considered in these guidelines include the scale, extent, height, bulk or intensity of development; the location of development; the type, style and intensity of adjacent land uses; the manner and method of construction, including materials, coatings, and landscaping; the interim and/or final use of the development; the type, location, and manner of illumination and signage; the nature and extent of terrain modification required; and the potential effects to the established visual characteristic of the project site and identified scenic vista or aesthetic resource.
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Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact with Certified EIR No. 548 Mitigation Incorporated.

Monitoring: No monitoring is required.

- b) ***Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings and unique or landmark features; obstruct any prominent scenic vista or view open to the public; or result in the creation of an aesthetically offensive site open to public view?***

According to Certified EIR No. 548, future R-7 and Mixed Use zone classifications associated with GPA No. 1122 and Change Of Zone No. 7902 could impact scenic resources by allowing multistory development up to 50 feet in height that could partially obscure scenic views. However, all future development would be subject to General Plan policies governing the visual impact of new development, including GPA No. 960 Policy LU 4.1, which requires new developments to be located and designed to visually enhance and not degrade the character of the surrounding area, and Policy LU 14.8, which prohibits the blocking of public views by solid walls. In addition, Certified EIR No. 548 Mitigation Measure 3.1.1 would be required as a condition of approval for future development projects and would require that potential effects to scenic resources would be addressed during the County's development review process. Impacts were determined to be less than significant with mitigation incorporated in this regard.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the policy changes proposed by the Modified Project would not affect the level of intensity of development within R-7 and Mixed Use areas. None of the components of the Modified Project present a new use or intensify a use that was considered under Certified EIR No. 548. The County would continue to require that future development activities comply with GPA No. 960 policies in place to protect scenic resources, in addition to Certified EIR No. 548 Mitigation Measure 3.1.1. Therefore, the Modified Project would not result in new or substantially more severe environmental impacts concerning scenic resources as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures: Refer to Mitigation Measure 3.1.1 above.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact with Certified EIR No. 548 Mitigation Incorporated.

Monitoring: No monitoring is required.

- c) ***In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?***

According to Certified EIR No. 548, future HHDR and MUA zone classifications associated with GPA No. 1122 and Change Of Zone No. 7902 could impact visual character or quality by allowing multistory development up to 50 feet in height, which would represent an increase in density, massing, and height. However, all future development would be subject to GPA No. 960 Policy LU 4.1, which requires new developments to be located and designed to visually enhance and not degrade the character of the surrounding area. During the County's development review process, the applicant/developer would be required to provide substantial evidence of compliance with these policies as part of the project application materials. In addition, the County's design review process would require that future

development projects achieve compliance with General Plan policies and the Countywide Design Standards and Guidelines, which include requirements that address scale, intensity, architectural design, landscaping, sidewalks, trails, community logo, signage, and other visual design features, as well as standards for backlighting and indirect lighting to promote "night skies." Typical design modifications would include stepped setbacks for multistory buildings, increased landscaping, decorative walls and roof design, and themed signage. Certified EIR No. 548 Mitigation Measure 3.1.1 would also be required as a condition of approval for future development projects and would require that potential effects to visual character/quality would be addressed during the County's development review process. Impacts were determined to be less than significant with mitigation incorporated in this regard.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the policy changes proposed by the Modified Project would not affect the level of intensity of development within HHDR and MUA areas. None of the components of the Modified Project present a new use or intensify a use that was considered under Certified EIR No. 548. The County would continue to require that future development activities comply with GPA No. 960 policies in place to protect scenic resources through its development review and design review processes, in addition to Certified EIR No. 548 Mitigation Measure 3.1.1. Therefore, the Modified Project would not result in new or substantially more severe environmental impacts concerning visual character/quality as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures: Refer to Mitigation Measure 3.1.1 above.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact with Certified EIR No. 548 Mitigation Incorporated.

Monitoring: No monitoring is required.

2. Mt. Palomar Observatory	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) Interfere with the nighttime use of the Mt. Palomar Observatory, as protected through Riverside County Ordinance No. 655?				

Source(s): County of Riverside General Plan (GPA No. 960), Ordinance No. 655 (Regulating Light Pollution associated with Mt. Palomar Observatory); County of Riverside 6th Cycle Housing Element Update; County of Riverside General Plan Amendment 1122 Change of Zone CZ No. 7902 State Clearinghouse No. 2015061083 Final Environmental Impact Report No. 548.

Findings of Fact:

According to Certified EIR No. 548, the increase in density/intensity as a result of future HHDR and MUA development would increase urbanization throughout the unincorporated County. This development would introduce new sources of light and glare that would adversely affect day and/or nighttime views in some areas and contribute incrementally to the cumulative light pollution levels and skyglow experienced in Riverside County and Southern California.

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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As explained in Certified EIR No. 548, Riverside County has adopted several ordinances and policies to prevent the adverse effects of increased light and glare. Ordinance No. 461, Road Improvement Standards and Specifications, includes standards for residential lighting as well as lighting for highways, roadways, intersections, and traffic signage. Ordinance No. 655 addresses standards for acceptable nighttime lighting in Riverside County by requiring the use of low-pressure sodium lamps for outdoor lighting fixtures and regulating the hours of operation for commercial/industrial uses in order to reduce lighting impacts for development within 15 to 45 miles of the Palomar Observatory. Ordinance No. 915, Regulating Outdoor Lighting, establishes a countywide standard for outdoor lighting. The ordinance regulates light trespass in areas that fall outside of the 45-mile radius of Ordinance No. 655 and requires all outdoor luminaries to be located, adequately shielded, and directed such that no direct light falls outside the parcel of origin or onto the public right-of-way. Future development would also be subject to GPA No. 960 Policy LU 4.1, which requires new developments to be located and designed to visually enhance and not degrade the character of the surrounding area, including mitigating lighting and other impacts on surrounding properties. During the County's development review process, the applicant/developer would be required to provide substantial evidence of compliance with these ordinances and policies as part of the project application materials. Impacts were determined to be less than significant in this regard.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the policy changes proposed by the Modified Project would not affect the level of intensity of development within HHDR and MUA areas. None of the components of the Modified Project present a new use or intensify a use that was considered under Certified EIR No. 548. The County would continue to require that future development activities comply with applicable ordinances and GPA No. 960 policies in place to minimize the effects of light and glare through its development review process. Therefore, the Modified Project would not result in new or substantially more severe environmental impacts concerning lighting/glare and nighttime use of the Palomar Observatory as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact.

Monitoring: No monitoring is required.

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

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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Source(s): County of Riverside General Plan (GPA No. 960), Ordinance No. 655 (Regulating Light Pollution associated with Mt. Palomar Observatory) and Ordinance No. 915 (Regulating Outdoor Lighting); County of Riverside 6th Cycle Housing Element Update; County of Riverside General Plan Amendment 1122 Change of Zone CZ No. 7902 State Clearinghouse No. 2015061083 Final Environmental Impact Report.

Findings of Fact:

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

Refer to Response 2(a) above.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact.

Monitoring: No monitoring is required.

b) **Expose residential property to unacceptable light levels?**

Refer to Response 2(a) above.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact.

Monitoring: No monitoring is required.

AGRICULTURE & FOREST RESOURCES Would the project:

4. Agriculture

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

	Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
d) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source(s): County of Riverside General Plan (GPA No. 960), Figure OS-2 "Agricultural Resources"; County of Riverside 6th Cycle Housing Element Update; County of Riverside General Plan Amendment 1122 Change of Zone CZ No. 7902 State Clearinghouse No. 2015061083 Final Environmental Impact Report.

Findings of Fact:

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

As described in Certified EIR No. 548, GPA No. 1122 and Change Of Zone No. 7902 does not include site-specific development proposals, entitlements, or other project components that would directly result in the conversion of farmland. However, the proposed changes to land use designations and zone classifications, as well as changes to General Plan policies, would allow for increased development potential on individual sites throughout the County. These indirect impacts could occur where the project proposes to change the land use designation on sites designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as well as on sites adjacent to such farmland where residential and mixed-use development would be incompatible or encourage additional conversion via the extension of roadways or public service/utility infrastructure into an undeveloped area. In preceding Certified EIR No. 548, both EIR No. 521 and EIR No. 441 anticipated significant and unavoidable impacts to agricultural uses as a result of future development of land uses planned for in the General Plan. Thus, Certified EIR No. 548 concluded that GPA No. 1122 and Change Of Zone No. 7902 would not result in significant impacts to agricultural resources beyond those previously identified in EIR No. 521 and EIR No. 441, as the majority of sites included in the proposed project have been previously designated for development. Furthermore, all future development facilitated by GPA No. 1122 and Change Of Zone No. 7902 would be required to comply with Ordinance No. 625, Right-to-Farm Ordinance. The intent of Ordinance No. 625 is to reduce the loss of agricultural resources by limiting the circumstances under which agricultural operations may be deemed to constitute a nuisance. The ordinance protects existing agricultural uses from nuisance complaints often generated by encroaching nonagricultural uses and reduces legal nuisance liabilities by requiring new properties within 300 feet of any land zoned primarily for agricultural purposes to be given notice of the preexisting use and its rights to continue.

Certified EIR No. 548 also noted that while impacts to agriculture resources are not considered significant on a cumulative level, approximately 525 acres in the Eastern Coachella Valley Area Plan are currently zoned for agricultural uses and are proposed for redesignation and rezoning as part of GPA No. 1122 and Change of Zone No. 7902. Of those, approximately 472 acres are Prime Farmland, with the remaining 52 acres being a mixture of Prime Farmland, Farmland of Statewide Importance, Farmland of Local Importance, Urban and Built-Up Land, and lands designated as Other. Given that buildout of GPA No. 1122 and Change of Zone No. 7902 would result in the direct conversion of 472 acres of Prime Farmland, cumulative impacts were determined to be significant and unavoidable.

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus the policy changes proposed by the Modified Project would not affect the level of intensity of development within Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) areas. Furthermore, the Modified Project would not affect or change the significant unavoidable impact determination, nor invalidate Statement of Overriding Consideration findings as made in Certified EIR No. 548. None of the components of the Modified Project present a new use or intensify a use that was considered under Certified EIR No. 548. The County would continue to require that future development activities comply with Ordinance No. 625 and other regulations in place to minimize the effects of Farmland conversion through its development review process. Therefore, the policy changes proposed by the Modified Project would not result in new or substantially more severe environmental impacts concerning Farmland as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact.

Monitoring: No monitoring is required.

b) Conflict with existing agricultural zoning, agricultural use or with land subject to a Williamson Act contract or land within a Riverside County Agricultural Preserve?

As described in Certified EIR No. 548 and Response 4(a) above, approximately 525 acres of land currently zoned for agricultural uses in the Eastern Coachella Valley Area Plan, as well as land zoned Light Agriculture within the Southwest Area Plan and the Mead Valley Area Plan, were redesignated and rezoned as part of GPA No. 1122 and Change Of Zone No. 7902. Certified EIR No. 548 determined that, on a cumulative level, most of the sites included in GPA No. 1122 and Change Of Zone No. 7902 would be infill development sites zoned for urban uses and the project would not result in significant conflicts with agricultural zoning, lands under a Williamson Act contract, or land within a Riverside County Agricultural Preserve. Furthermore, all future development facilitated by GPA No. 1122 and Change of Zone No. 7902 would be required to comply with Ordinance No. 625. Impacts were determined to be less than significant in this regard.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the policy changes proposed by the Modified Project would not result in the redesignation or rezoning of agricultural lands. None of the components of the project present a new use or intensify a use that was considered under Certified EIR No. 548. Therefore, the Modified Project would not result in new or

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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substantially more severe environmental impacts concerning agricultural zoning as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact.

Monitoring: No monitoring is required.

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

Refer to Response 4(a).

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact.

Monitoring: No monitoring is required.

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

Refer to Response 4(a).

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact.

Monitoring: No monitoring is required.

5. Forest

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

Attachment: Attachment H Addendum to EIR No. 548 (GPA Nos. 180002, 190006, 210109 6th Cycle Housing/Safety/Land Use)

	Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
b) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source(s): County of Riverside General Plan (GPA No. 960), Figure OS-3a "Parks, Forests and Recreation Areas"; County of Riverside 6th Cycle Housing Element Update; County of Riverside General Plan Amendment 1122 Change of Zone CZ No. 7902 State Clearinghouse No. 2015061083 Final Environmental Impact Report.

Findings of Fact:

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

As noted in Certified EIR No. 548, there are no commercial timber operations or yields in Riverside County, nor do any existing or proposed zoning of forestland, timberland, or timberland production zones exist in the County. Hence, Certified EIR No. 548 determined that GPA No. 1122 and Change Of Zone No. 7902 would not conflict with existing zoning, or cause rezoning of, forestland, timberland, or timberland zoned Timberland Production.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the policy changes proposed by the Modified Project would not affect the level of intensity of development within HHDR or MUA areas. None of the components of the Modified Project present a new use or intensify a use that was considered under Certified EIR No. 548. The County would continue to require that future development activities comply with GPA No. 960 policies in place to protect forestland, timberland, or timberland zoned Timberland Production. Therefore, the policy changes proposed by the Modified Project would not result in new or substantially more severe environmental impacts concerning forest land, timberland, or timberland zoned Timberland Production as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: No Impact.

Monitoring: No monitoring is required.

- b) **Result in the loss of forest land or conversion of forest land to non-forest use?**

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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Refer to Response 5(a).

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: No Impact.

Monitoring: No monitoring is required.

C) *Involve other changes in the existing environment which, due to their location or nature, could result in conversion of forest land to non-forest use?*

Refer to Response 5(a).

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: No Impact.

Monitoring: No monitoring is required.

AIR QUALITY Would the project:

6. Air Quality Impacts	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors, which are located within one (1) mile of the project site, to substantial pollutant concentrations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Source(s): SCAQMD CEQA Air Quality Handbook; County of Riverside 6th Cycle Housing Element Update; County of Riverside General Plan Amendment 1122 Change of Zone CZ No. 7902 State Clearinghouse No. 2015061083 Final Environmental Impact Report.

Findings of Fact:

a) ***Conflict with or obstruct implementation of the applicable air quality plan?***

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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As described in Certified EIR No. 548, buildout associated with GPA No. 1122 and Change Of Zone No. 7902 would exceed SCAG's growth forecasts. Thus, GPA No. 1122 and Change Of Zone No. 7902 would allow for an increase in population growth that was not considered in the 2012 Air Quality Management Plan (AQMP) or considered in the Coachella Valley PM₁₀ State Implementation Plan (CVSIP). In addition, future development associated with GPA No. 1122 and Change Of Zone No. 7902 would result in long-term operational emissions. The site selection criteria used for changes to land use designation and zone classifications included sites in or very close to existing community cores and near existing or planned freeway access and public transit opportunities, schools, and other major public services, as well as the proximity of each potential site to existing or potentially available community support factors, such as jobs. The intent was to encourage development in areas with existing services, hopefully creating a catalyst and ability to live and work in close proximity. Ideally, this would reduce vehicle miles traveled for employment, education, and services, which would further the goals of the AQMP. Further, Certified EIR No. 548 explained that the adoption of the MUA ordinance would encourage both vertical and horizontal mixes of residential, office, and commercial land uses. Development of this type could provide owner-occupant and/or workforce housing within walking or easy transit distance to services. Nonetheless, buildout of GPA No. 1122 and Change Of Zone No. 7902 was determined to have the potential to hinder the region's compliance with the 2012 AQMP and the CVSIP. Impacts were considered cumulatively considerable and significant and unavoidable in this regard.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the policy changes proposed by the Modified Project would not affect the level of intensity of development within HHDR or MUA areas. None of the components of the Modified Project present a new use or intensify a use that was considered under Certified EIR No. 548. The County would continue to require that future development activities comply with GPA No. 960 policies in place and demonstrate consistency with the AQMP and CVSIP. Furthermore, the Modified Project would not affect or change the significant unavoidable impact determination, nor invalidate Statement of Overriding Consideration findings as made in Certified EIR No. 548. Therefore, the policy changes proposed by the Modified Project would not result in new or substantially more severe environmental impacts concerning consistency with the AQMP and CVSIP as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact.

Monitoring: No monitoring is required.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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As described in Certified EIR No. 548, buildout associated with GPA No. 1122 and Change Of Zone No. 7902 could result in a cumulatively considerable net increase of criteria pollutants. To minimize impacts to air quality, future development activities would be subject to compliance with General Plan Policy AQ 4.7 and Ordinances No. 706, 726, 782, and 824. Most notably, General Plan Policy AQ 4.7 would require the implementation of mitigation measures for all projects which exceed allowable emissions as established by air districts in order to reduce air pollutant emissions to the greatest extent possible. Future development allowed under the project would be required to adhere to these regulatory measures. Regardless, future development associated with GPA No. 1122 and Change Of Zone No. 7902 was determined to result in a cumulatively considerable net increase of criteria pollutants greater than what was anticipated under EIR No. 521 or EIR No. 441.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the policy changes proposed by the Modified Project would not affect the level of intensity of development within HHDR or MUA areas. None of the components of the Modified Project present a new use or intensify a use that was considered under Certified EIR No. 548. The County would continue to require that future development activities comply with GPA No. 960 policies in place to protect air quality. Therefore, the policy changes proposed by the Modified Project would not result in new or substantially more severe environmental impacts concerning air quality as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact.

Monitoring: No monitoring is required.

c) Expose sensitive receptors, which are located within one (1) mile of the project site, to substantial pollutant concentrations?

As described in Certified EIR No. 548, future development associated with buildout of GPA No. 1122 and Change Of Zone No. 7902 could potentially include short-term construction sources and long-term operational sources of toxic air contaminants (TACs), including stationary and mobile sources.

Short-Term Construction Sources

Construction of future residential development would result in short-term emissions of diesel particulate matter, which the California Air Resources Board has identified as a TAC, and would be required to meet South Coast Air Quality Management District (SCAQMD) thresholds in place to reduce particulate matter emissions or to implement mitigation in compliance with GPA No. 960 Policy AQ 4.7. In addition, in accordance with GPA No. 960 Policies AQ 1.1 and AQ 1.4, as well as Mitigation Measure 3.3.1, site-specific analyses of air quality impacts would be required to be conducted on a case-by-case basis for individual development projects associated with buildout of GPA No. 1122 and Change Of Zone No. 7902. At the time of specific environmental review, a site-specific air toxics pollutant analysis would be

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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conducted in accordance with the SCAQMD Final Localized Significance Threshold Methodology for construction activities. If SCAQMD screening thresholds would be exceeded, air toxic reduction measures are identified to reduce potential impacts to a level that is less than significant. If emissions remain in excess of SCAQMD screening thresholds despite the imposition of air toxic reduction measures, project-specific construction-related dispersion modeling acceptable to the SCAQMD is then used to identify potential impacts from TACs, including diesel particulate matter. If the modeling determines that SCAQMD risk thresholds will be exceeded, additional, quantifiable pollutant reduction measures must be identified in the air toxics analysis to address potential impacts, based on site-specific information such as the distance to the nearest sensitive receptors, project site plan details, and construction schedule. The County requires that construction contracts include all identified measures and that the measures reduce the health risk below SCAQMD risk thresholds.

Long-Term Operational Sources

Stationary TAC Sources

As described in Certified EIR No. 548, portions of the County are considered more sensitive to air pollution than others because of the types of population groups or activities involved. Sensitive population groups include children, the elderly, the acutely ill, and the chronically ill, especially those with cardiorespiratory diseases. The project allows development that would be considered sensitive since residential land uses are those allowed under the Housing Element; therefore, future sensitive receptors could potentially be exposed to TAC emissions from stationary sources, depending on location. The degree of impact would depend on the type of operation, distance from sensitive receptors, and the level of activity at each site.

Several General Plan policies and relevant SCAQMD rules would reduce TAC emissions, including GPA No. 960 Policies AQ 2.2, AQ 4.5, and AQ 4.6. GPA No. 960 Policy AQ 2.2 requires site plan designs to protect people and land uses sensitive to air pollution through the use of barriers and/or distance from emissions sources when possible. Policy AQ 4.5 requires stationary pollution sources to minimize the release of toxic pollutants through design features, operating procedures, preventive maintenance, operator training, and emergency response planning. GPA No. 960 Policy AQ 4.6 requires stationary air pollution sources to comply with applicable air district rules and control measures.

The SCAQMD limits public exposure to TACs through a number of programs, and reviews the potential for TAC emissions from new and modified stationary sources through the SCAQMD permitting process for stationary sources. TAC emissions from existing stationary sources are limited by:

- SCAQMD Rule 1401, which requires that construction or reconstruction of a major stationary source emitting hazardous air pollutants listed in Section 112(b) of the Clean Air Act be constructed with best available control technology and comply with all other applicable requirements.
- Implementation of the Air Toxics “Hot Spot” (AB 2588) program.
- Implementation of the federal Title III Toxics program.

Facilities and equipment that require permits from the SCAQMD are screened from risks from toxic emissions and can be required to install Toxic Best Available Control Technology (T-BACT) to reduce the risks to below significant if deemed necessary by the SCAQMD. T-BACTs are the most up-to-date methods, systems, techniques, and production processes available to achieve the greatest feasible

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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emission reductions for TACs. In addition, Certified EIR No. 548 Mitigation Measures 3.3.10 and 3.3.11 would apply for future development under GPA No. 1122 and Change Of Zone No. 7902.

Mobile TAC Sources

According to Certified EIR No. 548, adherence to Mitigation Measure 3.3.11 would require that future sensitive receptors allowed under the proposed project will not be exposed to substantial concentrations of air toxics from mobile sources by requiring minimum distances between potentially incompatible land uses unless a project-specific evaluation of human health risks defines, quantifies, and reduces the potential incremental health risks through site design or the implementation of additional reduction measures to levels below applicable standards.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the policy changes proposed by the Modified Project would not affect the level of intensity of development within HHDR or MUA areas. None of the components of the Modified Project present a new use or intensify a use that was considered under Certified EIR No. 548. The County would continue to require that future development activities comply with GPA No. 960 policies in place to protect sensitive receptor exposure to substantial pollutant concentrations, in addition to Certified EIR No. 548 Mitigation Measures 3.3.10 and 3.3.11. Therefore, the policy changes proposed by the Modified Project would not result in new or substantially more severe environmental impacts concerning sensitive receptor exposure to substantial pollutant concentrations as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures:

- EIR No. 548 MM 3.3.10 New developments shall include the following requirements to reduce emissions associated with toxic air contaminants (TACs):
- a. Electrical outlets shall be included in the building design of any loading docks to allow use by refrigerated delivery trucks. Signage shall also be installed, instructing commercial vehicles to limit idling times to five minutes or less. If loading and/or unloading of perishable goods would occur for more than five minutes and continual refrigeration is required, all refrigerated delivery trucks shall use the electrical outlets to continue powering the truck refrigeration units when the delivery truck engine is turned off.
 - b. Electrical outlets shall be installed on the exterior of new structures for use with electrical landscaping equipment. Further, the property owner(s) shall require that the hired landscape companies use electric-powered equipment where available to a minimum of 20 percent of the equipment used.

EIR No. 548 MM 3.3.11 The County of Riverside shall require minimum distances between potentially incompatible land uses, as described below, unless a project-specific evaluation of human health risks defines, quantifies, and reduces the potential incremental health risks through site design or the

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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implementation of additional reduction measures to levels below applicable standards (e.g., standards recommended or required by CARB, SCAQMD or MDAQMD).

SCAQMD Jurisdiction:

- a. Proposed dry cleaners and film processing services that use perchloroethylene must be sited at least 500 feet from existing sensitive land uses including residential, schools, day care facilities, congregate care facilities, hospitals, or other places of long-term residency for people.
- b. Proposed auto body repair services shall be sited at least 500 feet from existing sensitive land uses.
- c. Proposed gasoline dispensing stations with an annual throughput of less than 3.6 million gallons shall be sited at least 50 feet from existing sensitive land uses. Proposed gasoline dispensing stations with an annual throughput at or above 3.6 million gallons shall be sited at least 300 feet from existing sensitive land uses.
- d. Other proposed sources of TACs, including furniture manufacturing and repair services that use methylene chloride or other solvents identified as a TAC, shall be sited at least 300 feet from existing sensitive land uses.
- e. Proposed sensitive land uses shall be sited at least 500 feet from existing freeways, major urban roadways with 100,000 vehicles per day or more, and major rural roadways with 50,000 vehicles per day or more.
- f. Proposed sensitive land uses shall be sited at least 500 feet from existing dry cleaners and film processing services that use perchloroethylene.
- g. Proposed sensitive land uses shall be sited at least 500 feet from existing auto body repair services.
- h. Proposed sensitive land uses shall be sited at least 50 feet from existing gasoline dispensing stations with an annual throughput of less than 3.6 million gallons and 300 feet from existing gasoline dispensing stations with an annual throughput at or above 3.6 million gallons.
- i. Proposed sensitive land uses shall be sited at least 300 feet from existing land uses that use methylene chloride or other solvents identified as a TAC.

MDAQMD Jurisdiction:

- a. Proposed industrial projects must be sited at least 1,000 feet from existing sensitive land uses.
- b. Proposed distribution centers with 40 or more trucks per day shall be sited at least 1,000 feet from existing sensitive land uses.
- c. Proposed dry cleaners using perchloroethylene shall be sited at least 500 feet from existing sensitive land uses.
- d. Proposed gasoline dispensing facilities shall be sited at least 300 feet from existing sensitive land uses.

Attachment: Attachment H Addendum to EIR No. 548 (GPA Nos. 180002, 190006, 210109 6th Cycle Housing/Safety/Land Use)

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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- e. Proposed sensitive land uses shall be sited at least 500 feet from existing freeways, major urban roadways with 100,000 vehicles per day or more, and major rural roadways with 50,000 vehicles per day or more.
- f. Proposed sensitive land uses shall be sited at least 1,000 feet from existing industrial facilities or distribution centers with more than 40 trucks per day.
- g. Proposed sensitive land uses shall be sited at least 500 feet from existing dry cleaners using perchloroethylene.
- h. Proposed sensitive land uses shall be sited at least 300 feet from existing gasoline dispensing stations.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact with Certified EIR No. 548 Mitigation Incorporated.

Monitoring: No monitoring is required.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

As described in Certified EIR No. 548, future development associated with buildout of GPA No. 1122 and Change Of Zone No. 7902 may allow the construction of sensitive land uses near existing or future sources of odorous emissions. Future development in the vicinity of existing agricultural uses could expose future residents to agricultural odors such as manures or fertilizers. GPA No. 960 Policies AQ 2.1 through 2.4 reduce potential odor impacts by requiring site design considerations in new development, including barriers between sources and receptors. In addition, Certified EIR No. 548 Mitigation Measures 3.3.12 and MM 3.3.13 would require potential new odor sources be located away from sensitive receptors and would maintain an adequate buffer between odor sources and sensitive receptors.

Construction activities associated with future development could generate airborne odors as a result of operation of construction vehicles (i.e., diesel exhaust), paving with hot asphalt, and the application of architectural coatings. Because of the volatile nature of odor compounds, they either react quickly in the atmosphere or are diluted as they are carried away from the odor source. Therefore, construction odors are generally isolated and limited to the duration of construction and its immediate site vicinity. As such, they would not affect a substantial number of people, as impacts related to these odors are limited to the number of people living and working near the source. According to Certified EIR No. 548, compliance with existing County policies and Mitigation Measures 3.3.12 and MM 3.3.13 would require that future development associated with buildout of GPA No. 1122 and Change Of Zone No. 7902 would not result in exposure of sensitive receptors to substantial odorous emissions. Impacts were determined to be less than significant with mitigation in this regard.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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policy changes proposed by the Modified Project would not affect the level of intensity of development within HHDR or MUA areas. None of the components of the Modified Project present a new use or intensify a use that was considered under Certified EIR No. 548. The County would continue to require that future development activities comply with GPA No. 960 policies in place to reduce odor emissions, in addition to Certified EIR No. 548 Mitigation Measures 3.3.12 and 3.3.13. Therefore, the policy changes proposed by the Modified Project would not result in new or substantially more severe environmental impacts concerning odor emissions as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures:

EIR No. 548 MM 3.3.12 Locate potential new odor sources predominantly down-or cross-wind from existing sensitive receptors and potential new sensitive receptors predominantly upwind from existing odor sources. As indicated by the Right-to-Farm ordinance, agricultural uses that have been operated for more than three years cannot be reclassified as a public or private nuisance by new development.

EIR No. 548 MM 3.3.13 Maintain an adequate buffer between potential new odor sources and receptors such that emitted odors are dissipated before reaching the receptors (minimum of 500 feet depending on odor source). As indicated by the Right-to-Farm ordinance, agricultural uses that have been operated for more than three years cannot be reclassified as a public or private nuisance by new development.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact with Certified EIR No. 548 Mitigation Incorporated.

Monitoring: No monitoring is required.

BIOLOGICAL RESOURCES Would the project:				
7. Wildlife & Vegetation				
a) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect, either directly or through habitat modifications, on any endangered, or threatened species, as listed in Title 14 of the California Code of Regulations (Sections 670.2 or 670.5) or in Title 50, Code of Federal Regulations (Sections 17.11 or 17.12)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U. S. Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U. S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source(s): GIS database, Western Riverside County Multiple Species Habitat Conservation Plan and/or Coachella Valley Multiple Species Habitat Conservation Plan; *County of Riverside 6th Cycle Housing Element Update*; *County of Riverside General Plan Amendment 1122 Change of Zone CZ No. 7902 State Clearinghouse No. 2015061083 Final Environmental Impact Report*.

Findings of Fact:

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

As explained in Certified EIR No. 548, the Western Riverside County Multiple Species Habitat Conservation Plan (WRC-MSHCP) and the Coachella Valley Multiple Species Habitat Conservation Plan (CV-MSHCP) apply respectively to land use activities in western Riverside County and the Coachella Valley. The MSHCPs are the cornerstones of Riverside County's General Plan Multipurpose Open Space Element. As such, policies in the County General Plan specifically require compliance with existing MSHCPs to require there are no conflicts with local biological resource protections. In addition, the Stephens' Kangaroo Rat HCP remains in effect for the majority of western Riverside County. Although the reserve lands have already been acquired for this HCP, a mitigation fee is still collected on new development to require the long-term maintenance and monitoring of the reserves.

GPA No. 1122 and Change Of Zone No. 7902 did not make any changes to how these HCPs are implemented, nor change the steps required to comply with said HCPs. Future development accommodated by GPA No. 1122 and Change Of Zone No. 7902 would be required, through conditions of approval required for future development projects during the development review process, to comply with applicable fee ordinances relevant to the implementation of specific programs that protect biological resources, thereby reinforcing compliance with applicable resource protection policies. For example, Riverside County Ordinance No. 663 requires development projects within the Stephens' kangaroo rat HCP area to pay a development mitigation fee to establish the reserves, administer the plan, and otherwise meet the requirements of this HCP. Similarly, Riverside County Ordinances No. 810 and No.

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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875 require land use projects within the coverage areas of those plans to pay a development impact fee to establish reserves and implement the respective conservation plans. Impacts were determined to be less than significant in this regard.

Additional adopted HCPs are located in Riverside County but apply to other agency/special district activities. Examples include the Southwest Riverside County MSHCP, the Lake Mathews MSHCP, and the Lower Colorado River Multiple Species Conservation Program.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the policy changes proposed by the Modified Project would not affect the level of intensity of development within HHDR or MUA areas. None of the components of the Modified Project present a new use or intensify a use that was considered under Certified EIR No. 548. The County would continue to require that future development activities comply with GPA No. 960 policies in place to prevent conflict with provisions of any applicable adopted HCP. Therefore, the policy changes proposed by the Modified Project would not result in new or substantially more severe environmental impacts concerning conflict with any applicable adopted HCP as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact.

Monitoring: No monitoring is required.

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

As described in Certified EIR No. 548, there are 349 species in Riverside County that are considered candidate, sensitive, or special-status under the Endangered Species Act (ESA), the California Endangered Species Act (CESA), and/or a California Native Plant Society (CNPS) designation. These include species that are listed as endangered or threatened under the ESA, species proposed or candidates for such listing, and species similarly listed under the CESA. Of the 349 protected species, 146 are addressed under the WRC-MSHCP and 27 under the CV-MSHCP. As discussed in more detail in Certified EIR No. 548 (Section 2.3, *Regulatory Framework*), the County's MSCHPs provide for the long-term survival of protected and sensitive species by designating a contiguous system of habitat to be added to existing public/quasi-public lands, including an impact fee collected by the permittees and used in part to acquire these lands. Depending on the location of the private or public development project, certain biological studies are required for WRC-MSHCP and CV-MSHCP compliance. These studies may identify the need for specific measures to avoid, minimize, and reduce impacts to covered species and their habitat. Species addressed under the WRC-MSHCP and the CV-MSHCP would be

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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adequately covered by these plans to require that impacts to these species and their habitats would be less than significant.

As noted in Certified EIR No. 548, future development projects would be required to provide substantial evidence of compliance with the WRC-MSHCP or the CV-MSHCP (as applicable), as well as payment of the development mitigation fees, during the County’s development review process. With payment of the mitigation fee(s) and compliance with WRC-MSHCP or CV-MSHCP requirements, a project may be deemed compliant with CEQA, the National Environmental Policy Act (NEPA), CESA, and ESA, and impacts to covered species and their habitat would be deemed less than significant. For future development occurring in non-MSHCP areas, Mitigation Measures 3.4.1 and 3.4.2 require projects not covered by an existing MSHCP or HCP and with the potential to substantially adversely affect sensitive (listed, candidate, or special-status) species or habitats to have a Riverside County-approved biologist prepare a general Biological Resources Assessment (BRA). The measures require additional mitigation to reduce any impacts identified by the BRA to below a level of significance. Impacts were determined to be less than significant in this regard.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the policy changes proposed by the Modified Project would not affect the level of intensity of development within HHDR or MUA areas. None of the components of the Modified Project present a new use or intensify a use that was considered under Certified EIR No. 548. The County would continue to require that future development activities comply with GPA No. 960 policies in place to protect endangered or threatened species, in addition to Certified EIR No. 548 Mitigation Measures 3.4.1 and 3.4.2. Therefore, the policy changes proposed by the Modified Project would not result in new or substantially more severe environmental impacts concerning endangered or threatened species as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures:

EIR No. 548 MM 3.4.1

- Prior to discretionary project approval for projects with the potential to substantially adversely affect sensitive (listed, candidate, or special-status) species or habitats, a general biological resource assessment (BRA) shall be performed. The following requirements shall apply:
- a. The BRA shall be performed by a Riverside County-approved biologist pursuant to a Memorandum of Understanding executed between the biologist and the County of Riverside.
 - b. The biology/environmental firm or biologist preparing the BRA must be on Riverside County’s list of qualified consultants.
 - c. Fieldwork must be performed by qualified biologists according to professional standards.
 - d. If included in the BRA, presence/absence surveys for specific plants must be conducted during the applicable blooming season or other conditions as deemed scientifically appropriate and valid.
 - e. Should affected species or habitat occur on the project site, then a “Focused Protocol Survey” must be prepared for those species using

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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existing protocols established by the USFWS or CDFW. If no such protocols exist, the survey must be based on generally accepted biological survey protocols appropriate to the species.

The BRA requirement may be waived if any of the following conditions are documented to exist.

- a. The area affected by the proposed project ("footprint" herein) consists entirely of built environment (structures, pavement, etc.) and none of the biota or plant material present (i.e., landscaping) represent likely habitat used by a sensitive species.
- b. The Riverside County Ecological Resources Specialist (ERS) finds in writing that the proposed footprint does not have any biological resources expected to be used by a protected species or plant.
- c. The project or activity proposed is to be performed under an existing incidental take permit, habitat conservation plan or other governing permit, license or authorization (i.e., Section 7 consultation) and no new significant effect to the covered species or other protected species or resource is expected to occur.

In addition to the items herein, the BRA shall also be prepared in accordance with the Riverside County "Guide to Preparing General Biological Resource Assessments," as well as any other requirements of the Riverside County Environmental Programs Department, Planning Department, or other County of Riverside agency.

Upon receipt of the BRA, the Riverside County ERS shall review it and all supporting documentation. If the Riverside County ERS finds that the project does not have the potential to substantially affect sensitive species or habitat, no further mitigation is required. If the Riverside County ERS finds that the project has the potential to substantially adversely affect sensitive species or habitat, then additional mitigation will be developed and imposed to reduce such impacts to below a level of significance. Such mitigation may include but not be limited to obtaining incidental take permits from the USFWS and/or CDFW, as applicable, and acquisition and conservation of replacement habitat at appropriate ratios.

EIR No. 548 MM 3.4.2

A general biological resources assessment (BRA) shall be required as part of the discretionary project review process at Riverside County's discretion. For example, a BRA would be required if site inspection, aerial or other photos, resource agency data, or any other information indicates potential for sensitive habitat to occur on or be adversely affected by the proposed project. The BRA shall be prepared and reviewed as per the requirements outlined in mitigation measure MM 3.4.1.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact with Certified EIR No. 548 Mitigation Incorporated.

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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Monitoring: No monitoring is required.

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

Refer to Response 7(b).

Certified EIR No. 548 Mitigation Measures: Refer to Mitigation Measures 3.4.1 and 3.4.2 above.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact with Certified EIR No. 548 Mitigation Incorporated.

Monitoring: No monitoring is required.

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

Certified EIR No. 548 determined that future development activities associated with GPA No. 1122 and Change Of Zone No. 7902 would have the potential to result in the creation of new barriers to animal movement in the urbanizing areas. However, impacts to wildlife movement would be mitigated due to corridors and linkages established by the WRC-MSHCP and the CV-MSHCP. As part of the WRC-MSHCP, a system of corridors and linkages was established to accommodate wildlife movement in the open areas of western Riverside County. In the Coachella Valley, the CV-MSHCP establishes conservation areas and articulates objectives and measures for the preservation of core habitat and the biological corridors and linkages needed to maintain essential ecological processes in the plan area.

As indicated in Certified EIR No. 548, none of the future development activities that would be allowed under GPA No. 1122 and Change Of Zone No. 7902 would occur in the non-MSHCP areas of the County. Furthermore, implementation of Mitigation Measure 3.4.7 would reduce impacts to wildlife corridors by requiring that effects to wildlife nursery sites and/or corridors be avoided or preserved off-site. During the County's development review process, future development projects would be required to provide substantial evidence of compliance with the provisions of the applicable MSHCP and General Plan policies, and Mitigation Measure 3.4.7 would be enforced as a condition of approval for future development projects during the development review process. Impacts were determined to be less than significant with mitigation in this regard.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the policy changes proposed by the Modified Project would not affect the level of intensity of development within HHDR or MUA areas. None of the components of the Modified Project present a new use or intensify a use that was considered under Certified EIR No. 548. The County would continue to require

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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that future development activities comply with GPA No. 960 policies in place to protect wildlife corridors and nursery sites, in addition to Certified EIR No 548 Mitigation Measure 3.4.7. Therefore, the policy changes proposed by the Modified Project would not result in new or substantially more severe environmental impacts concerning wildlife corridors and nursery sites as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures:

EIR No. 548 MM 3.4.7 Should a wildlife nursery site or native resident or migratory wildlife corridor be uncovered through a biological resources assessment (BRA), then a consultation with a Riverside County Ecological Resources Specialist (ERS) shall occur. The ERS shall make a determination if the site is essential for the long-term viability of the species. If such a determination is made, then the ERS shall work with the project applicant to avoid the effects of development on the resource in question and condition the land use case accordingly. Should significant impacts to a nursery site or corridor not be avoidable, the applicant shall be required to require the preservation of comparable nursery or corridor habitat off-site.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact with Certified EIR No. 548 Mitigation Incorporated.

Monitoring: No monitoring is required.

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

According to Certified EIR No. 548, future development facilitated by GPA No. 1122 and Change Of Zone No. 7902 could adversely affect riparian or other sensitive habitats. However, future project-level analyses of biological resource impacts would be conducted on a case-by-case basis as individual, future residential development projects allowed under GPA No. 1122 and Change Of Zone No. 7902 proceed. The need for analysis would be determined during the County’s development review process, during which the applicant would be required to provide substantial evidence of compliance with County, State, and federal regulations, including the provisions of the applicable MSHCP and General Plan policies. GPA No. 960 Policy OS 17.2 requires the enforcement of the provisions of applicable MSHCPs when conducting review of development applications. For instance, discretionary projects that occur within the WRC-MSHCP criteria cells are submitted to the County of Riverside for review and are subject to the Habitat Evaluation and Acquisition and Negotiation Strategy (HANS), which requires that the sensitive habitats and riparian areas are conserved. The WRC-MSHCP also identifies the requisite studies and land use considerations necessary to protect riparian areas outside of the criteria cells that contribute to the function and value of the reserve system and the sensitive habitats conserved therein. Pursuant to Section 6.1.2 of the WRC-MSHCP, as projects are proposed within the plan area, potentially significant effects on riparian/riverine areas and vernal pools would be assessed using available information augmented by project-specific mapping provided to and reviewed by a Riverside County biologist. The CV-MSHCP is designed to require conservation of covered species as well as the natural communities on which they depend, including riparian habitat and other sensitive habitats. To require

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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necessary habitat is preserved, discretionary projects that occur within its conservation areas are submitted for joint project review by the County of Riverside and the Coachella Valley Conservation Commission pursuant to Section 6.6.1.1 of the CV-MSHCP. For proposals in the Santa Rosa and San Jacinto Mountains Conservation Area, the County of Riverside employs the HANS process instead. Implementation of joint project review and the HANS process requires that sensitive habitats and riparian areas are conserved pursuant to the CV-MSHCP. Certified EIR No. 528 also identifies Mitigation Measures 3.4.3 and 3.4.4 to require preparation of a jurisdictional delineation and BRA for areas not already regulated by the WRC-MSHCP and the CV-MSHCP. Impacts were determined to be less than significant in this regard.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the policy changes proposed by the Modified Project would not affect the level of intensity of development within HHDR or MUA areas. None of the components of the Modified Project present a new use or intensify a use that was considered under Certified EIR No. 548. The County would continue to require that future development activities comply with GPA No. 960 policies in place to protect riparian habitat and sensitive natural communities, in addition to Certified EIR No. 548 Mitigation Measures 3.4.3 and 3.4.4l. Therefore, the policy changes proposed by the Modified Project would not result in new or substantially more severe environmental impacts concerning riparian habitat and sensitive natural communities as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures:

EIR No. 548 MM 3.4.3 For sites not governed by an existing MSHCP, where site conditions (e.g., topography, soils, vegetation) indicate a project could adversely affect any riparian or riverine resources, an appropriate assessment shall be prepared by a qualified professional. An assessment shall include, but not be limited to, identification and mapping of any riparian/riverine areas and evaluation of species composition, topography/hydrology and soil analysis, as applicable. An assessment shall be completed as part of the environmental review for the development proposal prior to its approval. Upon receipt of an assessment, the Riverside County Ecological Resources Specialist (ERS) shall review the document and make a finding that:

- a. Riparian/riverine areas do not exist on site; or
- b. Project-specific avoidance measures have been identified that would be sufficient to require avoidance of riparian/riverine areas; or
- c. Impacts to riparian/riverine areas are significant and unavoidable. If avoidance is not feasible, a practicable alternative that minimizes direct and indirect effects to riparian/riverine areas and vernal pools and associated functions and values to the greatest extent possible must be developed.

EIR No. 548 MM 3.4.4 For sites not governed by an MSHCP, a general biological resources assessment (BRA) shall be required as part of the discretionary project

Attachment: Attachment H Addendum to EIR No. 548 (GPA Nos. 180002, 190006, 210109 6th Cycle Housing/Safety/Land Use)

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review process at Riverside County's discretion. For example, a BRA would be required if site inspection, aerial or other photos, resource agency data, or any other information indicates potential for sensitive habitat to occur on or be adversely affected by the proposed project. The BRA shall be prepared and reviewed as per the requirements outlined in mitigation measure MM 3.4.3.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact with Certified EIR No. 548 Mitigation Incorporated.

Monitoring: No monitoring is required.

- f) ***Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?***

Federally protected wetlands are defined in Section 404 of the Clean Water Act as areas that are inundated or saturated by surface water or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include freshwater marshes, riparian forests, riparian woodlands, open water, flood channels, rivers and stream beds, and similar areas. As indicated in Certified EIR No. 548, there are 470,800 acres of natural vegetation communities in unincorporated Riverside County with the potential to contain federally protected wetlands.

Where they meet US Army Corps of Engineers (USACE) guidelines, many wetland communities (e.g., freshwater marshes, riparian forests, riparian woodlands, open water, flood channels, rivers, and streambeds) in western Riverside County would be subject to the federal Clean Water Act (Sections 401, 402, and 404) as regulated by federal agencies. Since USACE permits must require no net loss of riparian habitat, and preservation of biological function and value of any jurisdictional waters on-site, compliance with Section 404 requirements would require that no wetlands are significantly affected. Where a proposed development project could affect riparian/riverine areas or federally protected wetlands as defined by Section 404 of the Clean Water Act or as defined by Fish and Game Code Section 1600 et seq., an appropriate assessment must be prepared by a qualified professional as part of Riverside County's project review process.

As stated in Certified EIR No. 548, the County enforces several policies to protect wetlands, including GPA No. 960 Policy LU 7.7, which states that buffers are required to the extent possible between development and watercourses, including their associated habitat. GPA No. 960 Policy OS 5.5 requires preservation and enhancement of existing native riparian habitat and prohibits the obstruction of natural watercourses as well as fencing that constricts flow across watercourses and their banks. GPA No. 960 Policy OS 6.2 seeks to preserve buffer zones around wetlands where feasible and biologically appropriate. GPA No. 960 Policy OS 6.1 requires compliance with Clean Water Act Section 404 in terms of wetlands mitigation policies.

In addition, the WRC-MSHCP identifies the requisite studies and land use considerations necessary to protect riparian areas in western Riverside County and outside of the criteria cells that contribute to the function and value of the reserve system and the sensitive habitats conserved therein. Pursuant to

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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Section 6.1.2 of the WRC-MSHCP, proposed projects require assessment of potentially significant effects on any riparian/riverine areas or vernal pools. The assessment must be performed per County of Riverside, MSHCP, California Department of Fish and Wildlife, and USACE standards, then be reviewed by a Riverside County biologist. As part of MSHCP compliance, the County of Riverside first looks to avoid, or at least minimize, direct and indirect effects to the mapped wetlands. If avoidance is feasible, measures are incorporated into project design to require the long-term conservation of the areas to be avoided. If avoidance is not feasible, a practicable alternative is selected that minimizes direct and indirect effects to riparian/riverine areas and vernal pools and their associated functions and values to the greatest extent possible. Section 6.1.4 of the WRC-MSHCP sets forth a range of measures to eliminate, reduce, or minimize edge effects associated with the interface between development and the natural environment. These also aid in reducing indirect impacts to wetlands.

To further protect wetland resources, Mitigation Measure 3.4.5 would require that, in areas of Riverside County not already regulated by a MSHCP, a jurisdictional assessment would be performed to determine if a project site may support federally protected wetlands and, where impacts to such wetlands are unavoidable, require a 404 permit to be obtained from the USACE. Similarly, Mitigation Measure 3.4.6 would address State-protected wetlands pursuant to Fish and Game Code Section 1600 et seq. Impacts were determined to be less than significant with mitigation in this regard.

The revisions to the Housing Element and Safety Element would not present a new use or intensify a use that was considered under Certified EIR No. 548. Future development activities would continue to be required to comply with applicable General Plan policies, HCP requirements, and Certified EIR No. 548 Mitigation Measures 3.4.5 and 3.4.6 in order to protect federal wetlands. Therefore, the revisions to the Housing Element and Safety Element would not result in new or substantially more severe environmental impacts to riparian habitat and sensitive natural communities as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures:

EIR No. 548 MM 3.4.5 If site conditions (for example, topography, soils, vegetation, etc.) indicate that the proposed project could affect riparian/riverine areas or federally protected wetlands as defined by Section 404 of the CWA, then an appropriate assessment shall be prepared by a qualified professional as part of Riverside County's project review process. An assessment shall include, but not be limited to, identification and mapping of any wetland(s) or riparian resources present; evaluation of plant species composition, topography and hydrology; a soils analysis (where appropriate) and conclusions stating the presence or absence of jurisdictional wetlands. An assessment shall be completed as part of the development review process. Should any grading or construction be proposed within or alongside the banks of the watercourse or wetland, the land divider/permit holder shall provide written notification to the Riverside County Planning Department that the alteration of any watercourse or wetland, located either on site or on any required offsite improvement areas, complies with the U.S. Army Corp of Engineers Nationwide Permit Conditions. Or, the land divider shall obtain a permit under Section 404 of the Clean Water Act. Copies of any agreements shall be submitted along with the notification.

Attachment: Attachment H Addendum to EIR No. 548 (GPA Nos. 180002, 190006, 210109 6th Cycle Housing/Safety/Land Use)

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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EIR No. 548 MM 3.4.6

If site conditions (e.g., topography, soils, vegetation) indicate that the proposed project could affect riparian/riverine areas or federally protected wetlands as defined by Fish and Game Code Section 1600 et seq., then an appropriate assessment shall be prepared by a qualified professional as part of Riverside County’s project review process. An assessment shall include, but not be limited to, identification and mapping of any wetland(s) or riparian resources present; evaluation of plant species composition, topography, and hydrology; a soils analysis (where appropriate); and conclusions stating the presence or absence of jurisdictional wetlands. An assessment shall be completed as part of the development review process.

Should any grading or construction be proposed within or along the banks of any natural watercourse or wetland located either on-site or on any required off-site improvement areas, the land divider/permit holder shall provide written notification to the Riverside County Planning Department that the appropriate CDFW notification pursuant to Sections 1601/1603 of the Fish and Game Code has taken place. Or, the land divider shall obtain an “Agreement Regarding Proposed Stream or Lake Alteration” (Section 1601/1603 Permit). Copies of any agreements shall be submitted along with the notification.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact with Certified EIR No. 548 Mitigation Incorporated.

Monitoring: No monitoring is required.

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

As described in Certified EIR No. 548, future development associated with GPA No. 1122 and Change Of Zone No. 7902 would be subject to compliance with the County’s Oak Tree Management Guidelines to address the treatment of oak woodlands in areas where zoning and/or General Plan density restrictions allow the effective use of clustering. Any conflicts between the future development activities and Riverside County’s Oak Tree Management Guidelines would be eliminated by project conditions of approval on all future residential development requiring compliance with the guidelines wherever qualifying oak resources are found to occur (e.g., through a biological resource assessment). All future development associated with GPA No. 1122 and Change Of Zone No. 7902 would be required to comply with Riverside County Ordinance No. 559, which regulates the removal of trees. No impact was identified in this regard.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the policy changes proposed by the Modified Project would not affect the level of intensity of development

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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within HHDR or MUA areas. None of the components of the Modified Project present a new use or intensify a use that was considered under Certified EIR No. 548. The County would continue to require that future development activities comply with GPA No. 960 policies and with the County's Oak Tree Management Guidelines to ensure tree preservation policies and ordinances. Therefore, the policy changes proposed by the Modified Project would not result in new or substantially more severe environmental impacts concerning tree preservation policies or ordinances as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: No Impact.

Monitoring: No monitoring is required.

CULTURAL RESOURCES Would the project:				
8. Historic Resources				
a. Alter or destroy a historic site?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in the significance of a historical resource, pursuant to California Code of Regulations, Section 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Source(s): County of Riverside 6th Cycle Housing Element Update; County of Riverside General Plan Amendment 1122 Change of Zone CZ No. 7902 State Clearinghouse No. 2015061083 Final Environmental Impact Report.

Findings of Fact:

a) Alter or destroy a historic site?

As described in Certified EIR No. 548, future development accommodated by GPA No. 1122 and Change Of Zone No. 7902 could impact historic properties and resources, as defined in Section 15064.5 of the CEQA Guidelines. However, historic properties and resources are protected by a wide variety of federal, State, and County regulations and procedures that would prevent substantial adverse changes and result in preservation or mitigation. Standard conditions addressing project-specific cultural resource impacts include requirements for site and tribal monitoring during construction; actions to take if a cultural resource is inadvertently discovered during grading/construction (e.g., halting ground disturbance until appropriate preservation or mitigation measures are determined in consultation with the Native American tribal representative, the archaeologist, and the Planning Director); documentation and reporting requirements to verify compliance; and specific protocols to be followed for the discovery of any human remains, whether modern, historic, or prehistoric (e.g., remains left in place and free from disturbance until a final decision as to the treatment and their disposition has been made in consultation with the Riverside County Coroner and/or the Native American Heritage Commission consistent with California Health and Safety Code Section 7050.5). Vacant parcels in areas known to have prehistoric

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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or historic resources, as well as any parcels with environmental, geomorphological, or vegetative features known to increase the likelihood of cultural resources being present, trigger a Phase I cultural resources study. In addition, Certified EIR No. 548 Mitigation Measure 3.5.1 establishes avoidance as the preferred treatment method for cultural resources. Impacts were determined to be less than significant in this regard.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the policy changes proposed by the Modified Project would not affect the level of intensity of development within HHDR or MUA areas. None of the components of the Modified Project present a new use or intensify a use that was considered under Certified EIR No. 548. The County would continue to require that future development activities comply with GPA No. 960 policies in place to protect historic resources, in addition to Certified EIR No. 548 Mitigation Measure 3.5.1. Therefore, the policy changes proposed by the Modified Project would not result in new or substantially more severe environmental impacts concerning scenic historic resources as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures:

EIR No. 548 MM 3.5.1 Avoidance is the preferred treatment for cultural resources. Where feasible, project plans shall be developed to allow avoidance of cultural resources. Where avoidance of construction impacts is possible, capping of the cultural resource site and avoidance planting (e.g., planting of prickly pear cactus) shall be employed to require that indirect impacts from increased public availability to the site are avoided. Where avoidance is selected, cultural resource sites shall be placed within permanent conservation easements or dedicated open space.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact with Certified EIR No. 548 Mitigation Incorporated.

Monitoring: No monitoring is required.

b) Cause a substantial adverse change in the significance of a historical resource, pursuant to California Code of Regulations, Section 15064.5?

Refer to Response 8(a) above.

Certified EIR No. 548 Mitigation Measures: Refer to Mitigation Measure 3.5.1 above.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact with Certified EIR No. 548 Mitigation Incorporated.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
9. Archaeological Resources				
a) Alter or destroy an archaeological site?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource, pursuant to California Code of Regulations, Section 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Source(s): County of Riverside 6th Cycle Housing Element Update; County of Riverside General Plan Amendment 1122 Change of Zone CZ No. 7902 State Clearinghouse No. 2015061083 Final Environmental Impact Report.

Findings of Fact:

a) Alter or destroy an archaeological site?

As noted in Certified EIR No. 548, future development accommodated by GPA No. 1122 and Change Of Zone No. 7902 could impact archaeological sites and resources. However, archaeological resources are protected by a wide variety of State and County regulations and procedures that would prevent substantial adverse changes and result in preservation or mitigation. Standard conditions addressing project-specific cultural resource impacts include requirements for site and tribal monitoring during construction; actions to take if a cultural resource is inadvertently discovered during grading/construction (e.g., halting ground disturbance until appropriate preservation or mitigation measures are determined in consultation with the Native American tribal representative, the archaeologist, and the Planning Director); documentation and reporting requirements to verify compliance; and specific protocols to be followed for the discovery of any human remains, whether modern, historic, or prehistoric (e.g., remains left in place and free from disturbance until a final decision as to the treatment and their disposition has been made in consultation with the Riverside County Coroner and/or the Native American Heritage Commission consistent with California Health and Safety Code Section 7050.5). Vacant parcels in areas known to have prehistoric or historic resources, as well as any parcels with environmental, geomorphological, or vegetative features known to increase the likelihood of cultural resources being present, trigger a Phase I cultural resources study.

Further, GPA No. 960 Policies OS 19.3 through OS 19.5 require that individual development projects be reviewed for the possibility of cultural resources and for compliance with the County's cultural resources program; to prioritize the protection of cultural resources preserved in place or left in an undisturbed state by designating open space and allocating resources and/or tax credits to the extent feasible; and to exercise sensitivity and respect for human remains through compliance with all applicable laws concerning such remains. During the County's development review process, the applicant would be required to provide substantial evidence of compliance with these policies as part of the project application materials. These policies would require that the CEQA Guidelines (Section 15064.5[e-f]) provisions for the accidental discovery of historical or archaeological resources and human remains during construction activities, as well as California Health and Safety Code Section 7050.5, would be adhered to during all future development projects.

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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Finally, Certified EIR No. 548 Mitigation Measure 3.5.2 would require Native American tribal consultation occurs when avoidance and/or preservation in place of cultural resources is not feasible. Impacts were determined to be less than significant with mitigation in this regard.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the policy changes proposed by the Modified Project would not affect the level of intensity of development within HHDR or MUA areas. None of the components of the Modified Project present a new use or intensify a use that was considered under Certified EIR No. 548. The County would continue to require that future development activities comply with GPA No. 960 policies in place to protect archaeological sites and resources, in addition to Certified EIR No. 548 Mitigation Measure 3.5.1. Therefore, the policy changes proposed by the Modified Project would not result in new or substantially more severe environmental impacts archaeological sites and resources as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures:

Refer to Mitigation Measure 3.5.1 above.

- EIR No. 548 MM 3.5.2 If avoidance and/or preservation in place of cultural resources is not feasible, the following mitigation measures shall be initiated for each impacted site:
- a. Discoveries shall be discussed with the Native American tribal (or other appropriate ethnic/cultural group representative) and the Riverside County Archaeologist, and a decision shall be made with the concurrence of the Planning Director, as to the mitigation (documentation, recovery, avoidance, etc.) appropriate for the cultural resource.
 - b. Further ground disturbance shall not resume within the area of the discovery until an agreement has been reached by all parties as to appropriate preservation or mitigation measures.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact with Certified EIR No. 548 Mitigation Incorporated.

Monitoring: No monitoring is required.

- b) *Cause a substantial adverse change in the significance of an archaeological resource, pursuant to California Code of Regulations, Section 15064.5?*

Refer to Response 9(a) above.

Certified EIR No. 548 Mitigation Measures: Refer to Mitigation Measure 3.5.2 above.

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact with Certified EIR No. 548 Mitigation Incorporated.

Monitoring: No monitoring is required.

c) Disturb any human remains, including those interred outside of formal cemeteries?

As discussed in Certified EIR No. 548, future development accommodated by GPA No. 1122 and Change Of Zone No. 7902 could result in disturbance of vacant lands, resulting in the potential to disturb buried human remains interred outside of formal cemeteries, in both known and previously unknown locations. However, adherence to California's Traditional Tribal Places Act (SB 18) would help require that historic and prehistoric cultural resources are considered prior to discretionary project approval and that mitigation measures appropriate to site conditions are applied to prevent significant impacts. Also, as uncovered human remains can also be of modern origins, and hence potentially part of a crime scene, Certified EIR No. 548 Mitigation Measure 3.5.3 would be required as a condition of approval for future development projects during the development review process. Certified EIR No. 548 Mitigation Measure 3.5.3 requires that unexpected human remains of modern origin discovered during future construction activities would be examined by a Riverside County Coroner and left in place and free from disturbance until a final decision as to their treatment and disposition has been made pursuant to Public Resources Code Section 5097.98. This measure, along with previously identified regulatory measures outlined for impacts to historical and archaeological resources, were determined to reduce impacts to less than significant levels.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the policy changes proposed by the Modified Project would not affect the level of intensity of development within HHDR or MUA areas. None of the components of the Modified Project present a new use or intensify a use that was considered under Certified EIR No. 548. The County would continue to require that future development activities comply with GPA No. 960 policies in place to protect human remains, in addition to Certified EIR No. 548 Mitigation Measure 3.5.3. Therefore, the revisions to the Housing Element and Safety Element would not result in new or substantially more severe environmental impacts to human remains as compared to Certified EIR No. 548. Therefore, the policy changes proposed by the Modified Project would not result in new or substantially more severe environmental impacts concerning human remains as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures:

Refer to Mitigation Measure 3.5.2 above.

EIR No. 548 MM 3.5.3 If human remains are encountered during a public or private construction activity, California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the Riverside County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. The Riverside County Coroner must be notified within 24 hours.

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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If the Coroner determines that the burial is not historic, but prehistoric, the Native American Heritage Commission must be contacted to determine the most likely descendant for this area. The most likely descendant may become involved with the disposition of the burial following scientific analysis.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact with Certified EIR No. 548 Mitigation Incorporated.

Monitoring: No monitoring is required.

ENERGY Would the project:

10. Energy Impacts

a. Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with or obstruct a State or Local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source(s): County of Riverside 6th Cycle Housing Element Update; County of Riverside General Plan Amendment 1122 Change of Zone CZ No. 7902 State Clearinghouse No. 2015061083 Final Environmental Impact Report.

Findings of Fact:

a) Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

As shown in Table 3.18-4 of Certified EIR No. 548, the increase in electricity usage as a result of GPA No. 1122 and Change Of Zone No. 7902 would constitute an approximate 3.9 percent increase in the typical annual electricity consumption and an approximate 4.0 percent increase in the typical annual natural gas consumption attributable to all residential buildings in Riverside County. Automotive fuel consumption in the County would increase by 3.9 percent. Certified EIR No. 548 determined that energy consumption would be less than significant based on existing regulatory requirements for energy efficiency. Specifically, future development would be required to comply with Title 24 Building Energy Efficiency Standards, which provide minimum efficiency standards related to various building features, including appliances, water and space heating and cooling equipment, building insulation and roofing, and lighting. Furthermore, the electricity provider, Southern California Edison, is subject to California's Renewables Portfolio Standard, which requires investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 50 percent of total procurement by 2030. Impacts were determined to be less than significant in this regard.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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would be limited in those required to maintain internal consistency within the General Plan. Thus, the Modified Project would not present a new use or intensify a use that was considered under Certified EIR No. 548. Future development activities would continue to be required to comply with regulatory requirements for energy efficiency. Therefore, the Modified Project would not result in new or substantially more severe environmental impacts to energy consumption as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact.

Monitoring: No monitoring is required.

b) Conflict with or obstruct a State or Local plan for renewable energy or energy efficiency?

Refer to Response 10(a) above.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact.

Monitoring: No monitoring is required.

GEOLOGY AND SOILS Would the project directly or indirectly:

11. Alquist-Priolo Earthquake Fault Zone or County Fault Hazard Zones	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a. Be subject to rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?				

Source(s): County of Riverside General Plan, Figure S-2 "Earthquake Fault Study Zones"; County of Riverside 6th Cycle Housing Element Update; County of Riverside General Plan Amendment 1122 Change of Zone CZ No. 7902 State Clearinghouse No. 2015061083 Final Environmental Impact Report.

Findings of Fact:

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

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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As described in Certified EIR No. 548, to minimize risk of earthquake fault rupture, all future development accommodated by GPA No. 1122 and Change Of Zone No. 7902 that is proposed within an earthquake fault zone would be subject to site-specific geotechnical investigations and engineering and design criteria required by the State and County. Riverside County Ordinance No. 547 establishes that projects located in an earthquake fault zone must comply with all provisions of the Alquist-Priolo Earthquake Fault Zoning Act. The regulations, which are implemented via County Municipal Code Chapter 15.60, Earthquake Fault Area Construction Regulations, apply to all grading, buildings, and structures, and regulate numerous aspects of design to require that structures and facilities are designed with the appropriate level of seismic safety warranted by the geology of their location. Among other things, the ordinance addresses grading, slopes and compaction, erosion control, retaining wall design, and earthquake fault zones. In addition to the requirements of this ordinance, all applicants for a building permit for a structure used for human occupancy that lies within an earthquake fault zone delineated by the State Geologist pursuant to Public Resources Code Section 2621 et seq. and which is subject to Ordinance No. 547 are required to comply with the provisions of this ordinance prior to the County's issuance of a building permit.

GPA No. 960 Policy S 2.1 requires geologic studies or analyses for high- occupancy structures within 0.5 miles of all Quaternary to historic faults shown on the County's *Earthquake Fault Studies Zones* map. Based on the study, development projects may be required to adhere to specific setbacks from faults, engineer structures to specific tolerances, engineer soils, etc. In addition, Certified EIR No. 548 Mitigation Measure 3.6.1 would be required as a condition of approval for development projects in earthquake fault zones. During the County's development review process, the applicant would be required to provide substantial evidence of compliance with these policies as part of the project application materials.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the Modified Project would not present a new use or intensify a use that was considered under Certified EIR No. 548. Future development activities would continue to be required to comply with State and County regulations and standards and Certified EIR No. 548 Mitigation Measure 3.6.1 to minimize risk of earthquake fault rupture. Therefore, the Modified Project would not result in new or substantially more severe environmental impacts related to earthquake fault rupture as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures:

EIR No. 548 MM 3.6.1 Before a project is approved or otherwise permitted within an Alquist-Priolo Zone, County Fault Zone, within 150 feet of any other active or potentially active fault mapped in a published US Geologic Survey or California Geological Survey reports, or within other potential earthquake hazard area (as determined by the County Geologist), a site-specific geologic investigation shall be prepared to assess potential seismic hazards resulting from development of the project site. The site-specific geotechnical investigation shall incorporate up-to-date data from government and nongovernment sources.

Attachment: Attachment H Addendum to EIR No. 548 (GPA Nos. 180002, 190006, 210109 6th Cycle Housing/Safety/Land Use)

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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Based on the site-specific geotechnical investigation, no structures intended for human occupancy shall be constructed across active faults. This site-specific evaluation and written report shall be prepared by a licensed geologist and shall be submitted to the County Geologist for review and approval prior to the issuance of building permits. If an active fault is discovered, any structure intended for human occupancy shall be set back at least 50 feet from the fault. A larger or smaller setback may be established if such a setback is supported by adequate evidence presented to and accepted by the County Geologist.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact with Certified EIR No. 548 Mitigation Incorporated.

Monitoring: No monitoring is required.

12. Liquefaction Potential Zone

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

Source(s): County of Riverside General Plan, Figure S-3 "Generalized Liquefaction"; County of Riverside 6th Cycle Housing Element Update; County of Riverside General Plan Amendment 1122 Change of Zone CZ No. 7902 State Clearinghouse No. 2015061083 Final Environmental Impact Report.

Findings of Fact:

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

As described in Certified EIR No. 548, future development accommodated by GPA No. 1122 and Change Of Zone No. 7902 could increase the exposure of persons and property to seismic hazards, including strong seismic ground shaking, seismic-related ground failure including liquefaction, and landslides. However, the County enforces regulations to reduce each of these seismic hazards when they have the potential to occur based on site-specific geologic conditions. The applicable regulatory measures for future development projects would be determined during the County's development review process and included in a project's conditions of approval. In addition, Certified EIR No. 548 includes Mitigation Measures 3.6.2 through 3.6.5 to require a site-specific seismic-related hazard assessment and demonstrate California Building Code and County Building Code compliance.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the Modified Project would not present a new use or intensify a use that was considered under Certified EIR No. 548. Future development activities would continue to be required to comply with State and County Building Code requirements as well as Certified EIR No. 548 Mitigation Measures 3.6.2 through 3.6.5 to minimize risk of seismic-related ground failure, including liquefaction. Therefore, the Modified

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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Project would not result in new or substantially more severe environmental impacts related to seismic-related ground failure as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures:

EIR No. 548 MM 3.6.2 The design and construction of structures and facilities shall adhere to the standards and requirement detailed in the California Building Code (California Code of Regulations, Title 24), County Building Code, and/or professional engineering standards appropriate for the seismic zone in which such construction may occur. Conformance with these design standards shall be enforced through building plan review and approval by the Riverside County Department of Building and Safety prior to the issuance of building permits for any structure or facility.

EIR No. 548 MM 3.6.3 As determined by the County Geologist, a site-specific assessment shall be prepared to ascertain potential ground shaking impacts resulting from development. The site-specific ground shaking assessment shall incorporate up-to-date data from government and nongovernment sources and may be included as part of any site-specific geotechnical investigation required in mitigation measure MM 3.6.1. The site-specific ground shaking assessment shall include specific measures to reduce the significance of potential ground shaking hazards. This site-specific ground shaking assessment shall be prepared by a licensed geologist and shall be submitted to the County Geologist for review and approval prior to the issuance of building permits.

EIR No. 548 MM 3.6.4 As determined by the County Geologist, a site-specific assessment shall be prepared to ascertain potential liquefaction impacts resulting from development. The site-specific liquefaction assessment shall incorporate up-to-date data from government and nongovernment sources and may be included as part of any site-specific geotechnical investigation required in mitigation measure MM 3.6.1. This site-specific liquefaction assessment shall be prepared by a licensed geologist and shall be submitted to the County Geologist for review and approval prior to the issuance of building permits.

EIR No. 548 MM 3.6.5 Where development is proposed within an identified or potential liquefaction hazard area (as determined by the County Geologist), adequate and appropriate measures such as (but not limited to) design foundations in a manner that limits the effects of liquefaction, the placement of an engineered fill with low liquefaction potential, and the alternative siting of structures in areas with a lower liquefaction risk, shall be implemented to reduce potential liquefaction hazards. Any such measures shall be submitted to the Riverside County Geologist and the County Department of Building and Safety for review prior to the approval of the building permits.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact with Certified EIR No. 548 Mitigation Incorporated.

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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Monitoring: No monitoring is required.

13. Ground-shaking Zone

a. Be subject to strong seismic ground shaking?

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Source(s): County of Riverside General Plan, Figure S-4 "Earthquake-Induced Slope Instability Map" and Figures S-13 through S-21 (showing General Ground Shaking Risk); County of Riverside 6th Cycle Housing Element Update; County of Riverside General Plan Amendment 1122 Change of Zone CZ No. 7902 State Clearinghouse No. 2015061083 Final Environmental Impact Report.

Findings of Fact:

a) *Be subject to strong seismic ground shaking?*

Refer to Response 12(a) above.

Certified EIR No. 548 Mitigation Measures: Refer to Mitigation Measures 3.6.2 through 3.6.5 above.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact with Certified EIR No. 548 Mitigation Incorporated.

Monitoring: No monitoring is required.

14. Landslide Risk

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

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Source(s): County of Riverside General Plan, Figure S-5 "Regions Underlain by Steep Slope"; County of Riverside 6th Cycle Housing Element Update; County of Riverside General Plan Amendment 1122 Change of Zone CZ No. 7902 State Clearinghouse No. 2015061083 Final Environmental Impact Report.

Findings of Fact:

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

Refer to Response 12(a) above.

Certified EIR No. 548 Mitigation Measures: Refer to Mitigation Measures 3.6.2 through 3.6.5 above.

Mitigation Measures: No additional mitigation measures are required.

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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Determination: Less Than Significant Impact with Certified EIR No. 548 Mitigation Incorporated.

Monitoring: No monitoring is required.

15. Ground Subsidence

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

Source(s): County of Riverside General Plan, Figure S-7 “Documented Subsidence Areas Map”; County of Riverside 6th Cycle Housing Element Update; County of Riverside General Plan Amendment 1122 Change of Zone CZ No. 7902 State Clearinghouse No. 2015061083 Final Environmental Impact Report.

Findings of Fact:

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

As described in Certified EIR No. 548, future development accommodated by GPA No. 1122 and Change Of Zone No. 7902 could result in the construction and occupation of structures in areas underlain by unstable or expansive soils. However, all new development in Riverside County is required to be compliant with Title 24 of the California Building Code, which addresses construction of structures in areas subject to unstable and expansive soils. Testing for expansive soils and the implementation of appropriate mitigation are required by the California Building Standards Commission (CBSC); special engineering designs, including the use of reinforcing steel in foundations, drainage control devices, over-excavation, and backfilling with non-expansive soil, are used to alleviate problems caused by expansive soils.

Geotechnical studies are required for new development in documented subsidence zones (GPA No. 960 Policy S 3.8). These studies would address site-specific subsidence concerns, as well as the requirements for grading, site preparation, and building foundations. Also, grading regulations implemented by the County of Riverside require that approved grading plans be consistent with the geotechnical study. During the County’s development review process, the applicant would be required to provide substantial evidence of compliance with these policies. Further, Certified EIR No. 524 Mitigation Measure 3.6.10 would require that significant impacts related to soil instability would be reduced through compliance with the California Building Code.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the Modified Project would not present a new use or intensify a use that was considered under Certified EIR No. 548. Future development activities would continue to be required to comply with California Building Code requirements, relevant County policies, and Certified EIR No. 548 Mitigation Measure

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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3.6.10 to minimize risk of subsidence. Therefore, the Modified Project would not result in new or substantially more severe environmental impacts related to subsidence as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures:

EIR No. 548 MM 3.6.10 Proponents of new development in Riverside County shall adhere to applicable policies and standards contained in the most recent version of the California Building Code related to the construction of structures and facilities on expansive soils.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact with Certified EIR No. 548 Mitigation Incorporated.

Monitoring: No monitoring is required.

15. Other Geologic Hazards

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

Source(s): County of Riverside 6th Cycle Housing Element Update; County of Riverside General Plan Amendment 1122 Change of Zone CZ No. 7902 State Clearinghouse No. 2015061083 Final Environmental Impact Report.

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

Refer to Response 12(a) and 15(a) above.

Certified EIR No. 548 Mitigation Measures: Refer to Mitigation Measures 3.6.2 through 3.6.5 and 3.6.10 above.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact with Certified EIR No. 548 Mitigation Incorporated.

Monitoring: No monitoring is required.

16. Slopes

a) Change topography or ground surface relief features?

b) Create cut or fill slopes greater than 2:1 or higher than 10 feet?

c) Result in grading that affects or negates subsurface sewage disposal systems?

Source(s): County of Riverside 6th Cycle Housing Element Update; County of Riverside General Plan Amendment 1122 Change of Zone CZ No. 7902 State Clearinghouse No. 2015061083 Final Environmental Impact Report.

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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Findings of Fact:

a) *Change topography or ground surface relief features?*

As described in Certified EIR No. 548, the County of Riverside minimizes impacts to topography and ground surface relief features through its grading permit process. Pursuant to Riverside County Ordinance No. 457, a grading permit is required for most earthmoving operations in the County. The Riverside County Building and Safety Department and/or the Riverside County Geologist would identify conditions of approval to be completed prior to issuance of a grading permit, including erosion and sediment control plans. Measures included in individual erosion control plans could include minimizing terrain modification, controlling surface water and diverting around potential landslide areas to prevent erosion and saturation of slopes, limiting the extent and duration of ground-disturbing activities during and immediately following periods of rain, balancing the amount of cut and fill, and erosion control devices to limit amount of water entering and exiting a graded site.

In addition, future development projects disturbing 1 or more acres of soil, or projects disturbing less than 1 acre but that are part of a larger common plan of development that in total disturbs 1 or more acres, are required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit Order 2012-0006-DWQ). The Construction General Permit requires the development and implementation of a stormwater pollution prevention plan that lists best management practices (BMPs) to be used to protect stormwater runoff and the placement of those BMPs. These National Pollutant Discharge Elimination System (NPDES) requirements would aid in reducing the potential for substantial erosion or topsoil loss that occurs in association with new development. Certified EIR No. 548 includes the County's grading requirements and NPDES requirements in Mitigation Measures 3.6.6 through 3.6.9.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the Modified Project would not present a new use or intensify a use that was considered under Certified EIR No. 548. Future development activities would continue to be required to comply with NPDES requirements, relevant County ordinances, and Certified EIR No. 548 Mitigation Measures 3.6.6 through 3.6.9 to minimize impacts to topography, ground surface relief features, and erosion/siltation. Therefore, the Modified Project would not result in new or substantially more severe environmental impacts related to slope and soil stability as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures:

EIR No. 548 MM 3.6.6 New development in identified or potential (as determined by the County Geologist) wind hazard areas shall adhere to applicable provisions of Riverside County Ordinance No. 484.2 or other local, state, or federal requirements established to control or limit the windborne erosion of soil. Prior to the approval of development permits, the County Building and Safety Department shall confirm that the design of any proposed structure, facility, or use incorporates appropriate features to control and/or limit the windborne erosion of soil.

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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EIR No. 548 MM 3.6.7 Riverside County, where required, and in accordance with issuance of a National Pollutant Discharge Elimination System permit, shall require the construction and/or grading contractor for individual developments to establish and implement specific best management practices at time of project implementation.

EIR No. 548 MM 3.6.8 Prior to any development in the County, a grading plan shall be submitted to the Riverside County Building and Safety Department and/or Riverside County Geologist for review and approval. As required by the County, the grading plan shall include erosion and sediment control plans. Measures in individual erosion control plans may include, but shall not be limited to, the following:

- a. Grading and development plans shall be designed in a manner which minimizes the amount of terrain modification.
- b. Surface water shall be controlled and diverted around potential landslide areas to prevent erosion and saturation of slopes.
- c. Structures shall not be sited on or below identified landslides unless landslides are stabilized.
- d. The extent and duration of ground-disturbing activities during and immediately following periods of rain shall be limited, to avoid the potential for erosion which may be accelerated by rainfall on exposed soils.
- e. To the extent possible, the amount of cut and fill shall be balanced.
- f. The amount of water entering and exiting a graded site shall be limited through the placement of interceptor trenches or other erosion control devices.
- g. Erosion and sediment control plans shall be submitted to the County for review and approval prior to the issuance of grading permits.

EIR No. 548 MM 3.6.9 Where required, drainage design measures shall be incorporated into the final design of individual projects on-site. These measures shall include, but will not be limited to, the following:

- a. Runoff entering developing areas shall be collected into surface and subsurface drains for removal to nearby drainages.
- b. Runoff generated above steep slopes or poorly vegetated areas shall be captured and conveyed to nearby drainages.
- c. Runoff generated on paved or covered areas shall be conveyed via swales and drains to natural drainage courses.
- d. Disturbed areas that have been identified as highly erosive shall be (re)vegetated.
- e. Irrigation systems shall be designed, installed, and maintained in a manner which minimizes runoff.
- f. The landscape scheme for projects within the project site shall utilize drought-tolerant plants.
- g. Erosion control devices such as rip-rap, gabions, and small check dams may be utilized in gullies and active stream channels to reduce erosion.

Attachment: Attachment H Addendum to EIR No. 548 (GPA Nos. 180002, 190006, 210109 6th Cycle Housing/Safety/Land Use)

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact with Certified EIR No. 548 Mitigation Incorporated.

Monitoring: No monitoring is required.

b) Create cut or fill slopes greater than 2:1 or higher than 10 feet?

Refer to Response 17(a).

Certified EIR No. 548 Mitigation Measures: Refer to Mitigation Measures 3.6.6 through 3.6.9 above.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact with Certified EIR No. 548 Mitigation Incorporated.

Monitoring: No monitoring is required.

d) Result in grading that affects or negates subsurface sewage disposal systems?

Refer to Response 17(a) and Response 18(c) below.

Certified EIR No. 548 Mitigation Measures: Refer to Mitigation Measures 3.6.6 through 3.6.9 above.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact with Certified EIR No. 548 Mitigation Incorporated.

Monitoring: No monitoring is required.

17. Soils				
a) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Be located on expansive soil, as defined in Section 1803.5.3 of the California Building Code (2019), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have soils incapable of adequately supporting use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source(s): USDA Soil Conservation Service Soil Surveys; County of Riverside 6th Cycle Housing Element Update; County of Riverside General Plan Amendment 1122 Change of Zone CZ No. 7902 State Clearinghouse No. 2015061083 Final Environmental Impact Report.

Findings of Fact:

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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a) Result in substantial soil erosion or the loss of topsoil?

Refer to Response 17(a).

Certified EIR No. 548 Mitigation Measures: Refer to Mitigation Measures 3.6.6 through 3.6.9 above.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact with Certified EIR No. 548 Mitigation Incorporated.

Monitoring: No monitoring is required.

b) Be located on expansive soil, as defined in Section 1803.5.3 of the California Building Code (2019), creating substantial direct or indirect risks to life or property?

As described in Certified EIR No. 548, future development accommodated by GPA No. 1122 and Change Of Zone No. 7902 could result in the construction and occupation of structures in areas underlain by unstable or expansive soils. However, several regulatory requirements are in place to minimize direct or indirect risks to life or property to less than significant levels. For example, all new development in Riverside County is subject to compliance with Title 24 of the California Building Code, which addresses construction of structures in areas subject to unstable and expansive soils. Also, grading regulations implemented by the County of Riverside require that approved grading plans be consistent with a site-specific geotechnical study. Compliance with the County’s requirements for proposed development to conduct geotechnical studies and implement appropriate mitigation per the CBSC, including CBSC requirements for the construction of a structure on expansive soils as addressed by Certified EIR No. 548 Mitigation Measure 3.6.10, would require that significant impacts related to expansive soil are less than significant with mitigation incorporated.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the Modified Project would not present a new use or intensify a use that was considered under Certified EIR No. 548. Future development activities would continue to be required to comply with Title 24 requirements, relevant County requirements, and Certified EIR No. 548 Mitigation Measure 3.6.10 to minimize the impacts of expansive soils. Therefore, the Modified Project would not result in new or substantially more severe environmental impacts related to expansive soils as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures:

EIR No. 548 MM 3.6.10	Proponents of new development in Riverside County shall adhere to applicable policies and standards contained in the most recent version of the California Building Code related to the construction of structures and facilities on expansive soils.
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Mitigation Measures: No additional mitigation measures are required.

Attachment: Attachment H Addendum to EIR No. 548 (GPA Nos. 180002, 190006, 210109 6th Cycle Housing/Safety/Land Use)

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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Determination: Less Than Significant Impact with Certified EIR No. 548 Mitigation Incorporated.

Monitoring: No monitoring is required.

c) *Have soils incapable of adequately supporting use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?*

As described in Certified EIR No. 548, future development accommodated by GPA No. 1122 and Change Of Zone No. 7902 in areas outside of existing sewer service providers would increase the potential for placement of structures and facilities in areas where soils are incapable of adequately supporting septic tanks, on-site wastewater treatment systems (OWTS), or alternative systems. The need for specific facilities/capacity is determined during the development review process, which considers project-specific features such as soil types, number of units, etc. The County regulates the construction of septic tanks in new development to require both adequate capacity for wastewater treatment and the protection of water quality. County Ordinance No. 650, Sewer Discharge in Unincorporated Territory of the County, establishes a variety of regulations regarding OWTS, including that the type of sewage facilities installed be determined on the basis of location, soil porosity, site slope, and groundwater level, and designed to receive all sanitary sewage from the property based on the higher volume estimation as determined by either the number of bedrooms or plumbing fixture unit counts. The minimum lot size required for each permanent structure with plumbing fixtures utilizing an OWTS to handle its wastewater is 0.50 acres, and construction of all new septic facilities requires approval from the Riverside County Health Officer (County Code Section 8.124.030 and Ordinance No. 650). Approval requires detailed review and on-site inspections including a scaled, contoured plot plan, a soils feasibility report that adequately evaluates soil percolation, a special feasibility boring report (for groundwater and/or bedrock), and an engineered topographical map.

Additionally, the US Environmental Protection Agency (EPA) has standards governing the placement of septic systems in proximity to water supply wells. Consistent with EPA standards, the County prohibits the placement of conventional septic tanks/subsurface disposal systems in any designated Zone A3 of an EPA wellhead protection area.

Compliance with these regulations and programs is required through conditions of approval issued by the County of Riverside for implementing projects and would require that any OWTS is installed consistent with all applicable County requirements on soils capable of supporting the system. Certified EIR No. 548 determined impacts would be less than significant in this regard.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the Modified Project would not present a new use or intensify a use that was considered under Certified EIR No. 548. Future development activities would continue to be required to comply with relevant County ordinances and EPA standards to minimize impacts related to septic tanks and OWTS. Therefore, the Modified Project would not result in new or substantially more severe environmental impacts related to septic tanks and OWTS as compared to Certified EIR No. 548.

Attachment: Attachment H Addendum to EIR No. 548 (GPA Nos. 180002, 190006, 210109 6th Cycle Housing/Safety/Land Use)

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact.

Monitoring: No monitoring is required.

18. Wind Erosion and Blowsand from project either on or off site.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a) Be impacted by or result in an increase in wind erosion and blowsand, either on or off site?				

Source(s): County of Riverside General Plan, Figure S-8 "Wind Erosion Susceptibility Map" Ordinance No. 460, Article XV, and Ordinance No. 484; County of Riverside 6th Cycle Housing Element Update; County of Riverside General Plan Amendment 1122 Change of Zone CZ No. 7902 State Clearinghouse No. 2015061083 Final Environmental Impact Report.

Findings of Fact:

Refer to Response 17(a).

Certified EIR No. 548 Mitigation Measures: Refer to Mitigation Measures 3.6.6 through 3.6.9 above.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact with Certified EIR No. 548 Mitigation Incorporated.

Monitoring: No monitoring is required.

GREENHOUSE GAS EMISSIONS Would the project:

19. Greenhouse Gas Emissions	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?				
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source(s): County of Riverside General Plan; Riverside County Climate Action Plan; County of Riverside 6th Cycle Housing Element Update; County of Riverside General Plan Amendment 1122 Change of Zone CZ No. 7902 State Clearinghouse No. 2015061083 Final Environmental Impact Report.

Findings of Fact:

Attachment: Attachment H Addendum to EIR No. 548 (GPA Nos. 180002, 190006, 210109 6th Cycle Housing/Safety/Land Use)

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Certified EIR No. 548 includes a summary of greenhouse gas (GHG) emissions associated with complete buildout of GPA No. 1122 and Change Of Zone No. 7902; refer to Certified EIR No. 548 Table 3.7-3. Certified EIR No. 548 did not quantify the specific GHG emissions from future, short-term, temporary construction activities allowed under GPA No. 1122 and Change Of Zone No. 7902, due to uncertainties related to future individual projects in terms of detailed site plans, construction schedules, equipment requirements, etc. However, all future development projects accommodated by GPA No. 1122 and Change Of Zone No. 7902 would be required to undergo an evaluation of potential GHG emissions-related impacts on a case-by-case basis during the development review process. The SCAQMD recommends that projected GHGs from construction be quantified and amortized over the life of the project (30 years), and added to the annual average operational emissions. As concluded in Certified EIR No. 548, buildout of GPA No. 1122 and Change Of Zone No. 7902 would result in a maximum net increase of approximately 529,779 metric tons of carbon dioxide equivalent (CO₂e) in the year 2020 and 498,410 metric tons of CO₂e in the year 2035. It is important to note that these estimates reflect combined emissions from all the potential residential units allowed under the proposed inclusion of HHDR and MU land uses in the Housing Element and do not reflect emissions attributable to individual projects, as none were currently proposed during the time of preparation of Certified EIR No. 548. The impact analysis in Certified EIR No. 548 assumed the “worst-case” development potential of GPA No. 1122 and Change Of Zone No. 7902 in order to present the maximum amount of pollutant emissions possible and was thus a conservative analysis.

The SCAQMD’s GHG emission plan-level threshold is 6.6 metric tons of CO₂e per service population (residents plus employees) per year by the year 2020 and 4.1 metric tons of CO₂e per service population per year by the year 2035. The SCAQMD’s approach is to identify the emissions level for which a project would not be expected to substantially conflict with existing California legislation adopted to reduce statewide GHG emissions. As indicated in Certified EIR No. 548 Table 3.7-4, full development potential allowed under GPA No. 1122 and Change Of Zone No. 7902 (240,805 persons) would not surpass the year 2020 or year 2035 significance thresholds. However, since it cannot be guaranteed that construction of future projects allowed under the Housing Element would generate GHG emissions below SCAQMD significance thresholds due to the programmatic and conceptual nature of the project and uncertainties related to future individual projects, impacts were determined to be significant and unavoidable.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the Modified Project would not present a new use or intensify a use that was considered under Certified EIR No. 548. Future development activities would continue to be required to analyze potential to generate GHG emissions and implement mitigation measures as appropriate to achieve SCAQMD’s goals. Furthermore, the Modified Project would not affect or change the significant unavoidable impact determination, nor invalidate Statement of Overriding Consideration findings as made in Certified EIR No. 548. Therefore, the Modified Project would not result in new or substantially more severe environmental impacts related to GHG emissions as compared to Certified EIR No. 548.

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact.

Monitoring: No monitoring is required.

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

Refer to Response 20(a) above.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact.

Monitoring: No monitoring is required.

HAZARDS AND HAZARDOUS MATERIALS Would the project:

20. Hazards and Hazardous Materials

	Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter (1/4) mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source(s): County of Riverside 6th Cycle Housing Element Update; County of Riverside General Plan Amendment 1122 Change of Zone CZ No. 7902 State Clearinghouse No. 2015061083 Final Environmental Impact Report.

Attachment: Attachment H Addendum to EIR No. 548 (GPA Nos. 180002, 190006, 210109 6th Cycle Housing/Safety/Land Use)

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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Findings of Fact:

- a) ***Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?***

Hazardous materials are commonly used by all segments of society including manufacturing and service industries, commercial enterprises, agriculture, military installations, hospitals, schools, and households. As stated in Certified EIR No. 548, compliance with federal, State, and local hazardous material regulations, in addition to General Plan policies, would require impacts resulting from buildout of GPA No. 1122 and Change Of Zone No. 7902 would be less than significant. Specifically, as described in Title 49 of the Code of Federal Regulations and implemented by Title 13 of the California Code of Regulations, the US Department of Transportation Office of Hazardous Materials Safety prescribes strict regulations for the safe transportation of hazardous materials, including containment rules, hazardous material packaging requirements and standards, transporting guidelines and weight. In addition, the Riverside County Department of Environmental Health (RCDEH) is responsible for ensuring consolidation, consistency, and coordination of federal and State standards and regulations regarding hazardous materials in the County. The RCDEH oversees programs to reduce the potential for accidental hazardous substance releases and regularly inspects and monitors facilities that handle, generate, or treat hazardous wastes and materials, own/operate underground and aboveground tanks, or handle other materials subject to the California Accidental Release Program, as well as federal and state requirements for the generation, treatment, and handling of hazardous materials. In addition, the potential for previously unknown hazardous materials contamination from historical use of a property, including currently vacant properties, being released during future development activities (i.e., grading) would be addressed during the County’s development review process, which reviews development proposals and enforces site-specific investigation requirements to require that development of a site does not pose a threat to the health, safety, and welfare of the public. Impacts associated with hazardous materials were determined to be less than significant in this regard.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the Modified Project would not introduce a new use or intensify a use that was considered under Certified EIR No. 548. The County would continue to require federal, State, and local compliance with regulations associated with hazardous materials in order to avoid and/or minimize exposure to hazardous materials. Therefore, the Modified Project would not result in new or substantially more severe environmental impacts concerning hazardous materials as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less than Significant Impact.

Monitoring: No monitoring is required.

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Refer to Response 21(a) above.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less than Significant Impact.

Monitoring: No monitoring is required.

c) Impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan?

The Riverside County Fire Department (RCFD) Office of Emergency Services is responsible for developing emergency plans and actions in response to actual or potential disasters which may impact all or part of Riverside County. According to Certified EIR No. 548, GPA No. 1122 and Change Of Zone No. 7902 does not directly propose any changes or updates to existing emergency response or evacuation plans, nor does it include any components that would conflict with such plans. Any future development projects accommodated by GPA No. 1122 and Change Of Zone No. 7902 would be subject to the County's development review process, which would include a review by the RCFD Office of Emergency Services, as well as by the County's Transportation Department. The Office of Emergency Services would determine any project-specific impacts and necessary conditions of approval associated with emergency response at the time of development review. In addition, the Transportation Department would require compliance with General Plan policies regarding circulation, which would further reduce potential conflicts between new development and emergency plans. Impacts were determined to be less than significant in this regard.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan.. Thus, the Modified Project would not introduce a new use or intensify a use that was considered under Certified EIR No. 548. The Modified Project does not directly propose any changes or updates to existing emergency response or evacuations, nor do they conflict with such plans. Therefore, the Modified Project would not result in new or substantially more severe environmental impacts concerning emergency or evacuation plans as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Attachment: Attachment H Addendum to EIR No. 548 (GPA Nos. 180002, 190006, 210109 6th Cycle Housing/Safety/Land Use)

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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Determination: Less than Significant Impact.

Monitoring: No monitoring is required.

d) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter (1/4) mile of an existing or proposed school?

As discussed in Response 21(a), future development of GPA No. 1122 and Change Of Zone No. 7902 would not be expected to include industries that emit or handle significant quantities of hazardous materials. As described in Certified EIR No. 548, the potential exists for significant impacts on school facilities resulting from hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or wastes within a quarter mile. However, the potential for hazardous material exposure of future school facilities would not be a result of GPA No. 1122 and Change Of Zone No. 7902. The siting of school facilities is determined by individual school districts, based on criteria established by the California Department of Education, and subject to review and approval by the Department of Toxic Substance Control (DTSC). Therefore, this impact was determined to be less than significant.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the Modified Project would not introduce a new use or intensify a use that was considered under Certified EIR No. 548. The Modified Project does not include plans for school facilities and any potential increase in density/intensity potential that could require additional schools would be subject to the determination of individual school districts, and subject to the review and approval by the DTSC. In addition, local, State, and federal requirements would require that potential risks to public health and safety resulting from existing hazardous materials facilities/sites, hazardous materials use and transport, and inadvertent hazardous substance releases would be effectively monitored and managed to minimize impacts. Therefore, the Modified Project would not result in new or substantially more severe environmental impacts concerning hazardous emissions as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less than Significant Impact.

Monitoring: No monitoring is required.

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

According to Certified EIR No. 548, one open/active hazardous material is located on the lands that was proposed for changes in land use designation and zone classification as part of the project. This site has ongoing remediation that is compliant with Regional Water Quality Control Board (RWQCB)

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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directives and has no imposed restrictions that would impede future site development. Given the extensive distribution of hazardous material sites throughout Riverside County, it is reasonable to assume that some future development facilitated by the project would be on or near contaminated sites or facilities where hazardous materials are present. However, the use, storage, manufacture, and transport of hazardous materials are highly regulated both by state and federal governments, as well as the RCDEH and the California Highway Patrol. Additionally, all future development under the project would be subject to the County's development review process, which would review projects for proximity to existing hazardous materials facilities/sites. Therefore, this impact was determined to be less than significant.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the Modified Project would not introduce a new use or intensify a use that was considered under Certified EIR No. 548. Strict State and federal regulations would require that potential risks to public health and safety resulting from existing hazardous materials facilities/sites, hazardous materials use and transport, and inadvertent hazardous substance releases would be effectively monitored and managed to minimize impacts. Therefore, the Modified Project would not result in new or substantially more severe environmental impacts concerning hazardous material facilities/sites as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measure are required.

Determination: Less than Significant Impact.

Monitoring: No monitoring is required.

21. Airports				
a) Result in an inconsistency with an Airport Master Plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Require review by the Airport Land Use Commission?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) For a project located within an airport land use plan or, where such a plan has not been adopted, within two (2) miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) For a project within the vicinity of a private airstrip, or heliport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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Source(s): County of Riverside General Plan, Figure S-20 "Airport Locations"; County of Riverside 6th Cycle Housing Element Update; County of Riverside General Plan Amendment 1122 Change of Zone CZ No. 7902 State Clearinghouse No. 2015061083 Final Environmental Impact Report.

Findings of Fact:

a) Result in an inconsistency with an Airport Master Plan?

As described in Certified EIR No. 548, future development activities associated with buildout of GPA No. 1122 and Change Of Zone No. 7902 could increase the number of people and properties in the vicinity of public and private airports. All future development near public and private airports with the potential to adversely affect or be affected by airport hazards is regulated through the County's development review process. County Ordinance No. 448, Airport Approaches Zoning Ordinance, establishes airport operating areas and regulates height standards and limits. GPA No. 960 Policies LU 15.1, 15.2, 15.7, 15.8, 15.9, and 31.2 mitigate airport-related safety hazards by requiring that development proposals located within the boundaries of an airport land use plan be consistent with the plan prior to approval in order to prevent land use conflicts and reduce potential impacts. In addition, development proposals in the vicinity of airports would be subject to review by the Riverside County Airport Land Use Commission (ALUC), which seeks to require safety and minimize risks to both people and property in the vicinity of airports.

The proposed project was submitted to the ALUC, pursuant to Public Resource Code Section 21676, which requires a review of projects for consistency with the airport land use compatibility plan. On July 19, 2021, ALUC reviewed the proposed amendments to the Housing (GPA 190006) Safety (GPA 180002) and Land Use (GPA 210109) Elements and determined the amendments would not create an impact on the safety of air navigation within airport influence areas located within unincorporated areas of Riverside County. Changes to the Land Use Element do not affect any airport influence areas; therefore, no ALUC review is necessary.

The Airport Land Use Compatibility Plan (ALUCP) contains policies that include compatibility criteria and conditions of approval for development with regulations governing such issues as development intensity, density, lighting and reflectivity, and height of structures. Adherence with the ALUCP, along with the existing General Plan policies and Ordinance No. 448, would require that future development would not result in an airport-related safety hazard.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. Changes to the Safety Element are limited to addressing new hazards and resilience data, and do not increase the development capacity of the County, nor increase the area where development can occur.

Thus, the Modified Project would not present a new use or intensify a use that was considered under Certified EIR No. 548. The County would continue to require that future development activities comply with applicable ordinances and GPA No. 960 policies in place to avoid inconsistencies with an airport master plan through its development review process. Therefore, the Modified Project would not result in new or substantially more severe environmental impacts related to inconsistencies with an airport master plan as compared to Certified EIR No. 548.

Attachment: Attachment H Addendum to EIR No. 548 (GPA Nos. 180002, 190006, 210109 6th Cycle Housing/Safety/Land Use)

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact.

Monitoring: No monitoring is required.

b) *Require review by the Airport Land Use Commission?*

Refer to Response 22(a) above.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact.

Monitoring: No monitoring is required.

c) *For a project located within an airport land use plan or, where such a plan has not been adopted, within two (2) miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?*

Refer to Response 22(a) above.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact.

Monitoring: No monitoring is required.

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

Refer to Response 22(a) above.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact.

Attachment: Attachment H Addendum to EIR No. 548 (GPA Nos. 180002, 190006, 210109 6th Cycle Housing/Safety/Land Use)

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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Monitoring: No monitoring is required.

22. Hazardous Fire Area

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

Source: County of Riverside General Plan, Figure S-11 "Wildfire Susceptibility"; County of Riverside 6th Cycle Housing Element Update; County of Riverside General Plan Amendment 1122 Change of Zone CZ No. 7902 State Clearinghouse No. 2015061083 Final Environmental Impact Report.

Findings of Fact:

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

As described in Certified EIR No. 548, future development activities associated with buildout of GPA No. 1122 and Change Of Zone No. 7902 would accommodate development throughout the County, including in previously undeveloped areas with high or very high fire hazards. All future development would be reviewed by the Riverside County Department of Building and Safety and the RCFD, both of which enforce fire standards (such as those in Riverside County Ordinance No. 787) as they review building plans and conduct building inspections. The RCFD Fire Protection Planning Section is responsible for ensuring that new development in the County meets the various ordinances pertaining to building homes in the wildland. These ordinances include Public Resources Code Sections 4290 and 4291, Riverside County Ordinance 787, and the California Building Standards Code. Ordinance No. 787 adopts the Uniform Fire Code and adds requirements to further protect people and structures from fire risks, including standards for various land uses that require appropriate fire protection measures are incorporated into the design, construction, and operation of these land uses. Ordinance No. 787 includes requirements for fire-retardant building materials as well as requirements to require that buildings would not impede emergency egress for fire safety personnel or evacuation from fire.

In addition, the County requires new development in high fire hazard areas to design and implement fuel modification programs for the interface between developed and natural undeveloped areas. Fuel modification plans are subject to approval by the RCFD. The fuel modification plans require a graduated transition from native vegetation to irrigated landscape, as well as establishing parameters for the percentage, extent, and nature of native plant removal necessary to achieve the County's fire prevention standards to protect human lives and property while preserving as much natural habitat as practicable. The County actively enforces Ordinance No. 695, which requires the abatement of hazardous flammable vegetation. The type of abatement can depend on the location, terrain, and vegetation present, but typically includes mowing or disking (plowing) vegetation, such as seasonal and recurrent weeds, stubble, brush, dry leaves, and tumbleweeds. During the County's development review process, the applicant would be required to provide substantial evidence of compliance with these ordinances.

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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Additional programs include the maintenance of a Countywide Information Map, showing high fire hazard areas, and sighting and construction methods to reduce fire risks to structures developed in high fire hazard areas, as well as the continued update and use of the RCFD Fire Protection and Emergency Medical Services Strategic Master Plan to require new fire protection facilities are added when increases in demand frequency warrant additional facility infrastructure. The RCFD and Department of Building and Safety review requires that development would not expose people or structures to wildland fires. Impacts were determined to be less than significant with mitigation in this regard.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the Modified Project would not present a new use or intensify a use that was considered under Certified EIR No. 548. The County would continue to require that future development activities comply with applicable California Building Standards Code, relevant County ordinances, and GPA No. 960 policies in place to reduce the risk of wildfire through its development review process. Therefore, the Modified Project would not result in new or substantially more severe environmental impacts related to the risk of wildfire as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact.

Monitoring: No monitoring is required.

HYDROLOGY AND WATER QUALITY Would the project:				
23. Water Quality Impacts				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in substantial erosion or siltation on-site or off-site?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-site or off-site?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Create or contribute runoff water which would exceed the capacity of existing or planned	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
stormwater drainage systems or provide substantial additional sources of polluted runoff?				
g) Impede or redirect flood flows?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h) In flood hazard, tsunami, or seiche zones, risk the release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Source(s): County of Riverside General Plan, Figure S-9 “Special Flood Hazard Areas” and Figure S-10 “Dam Failure Inundation Zone”; Riverside County Flood Control District Flood Hazard Report/Condition; County of Riverside 6th Cycle Housing Element Update; County of Riverside General Plan Amendment 1122 Change of Zone CZ No. 7902 State Clearinghouse No. 2015061083 Final Environmental Impact Report.

Findings of Fact:

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

As described in Certified EIR No. 548, future development activities associated with buildout of GPA No. 1122 and Change of Zone No. 7902 could result in increased population and development throughout the unincorporated County. Increased urbanization has the potential to result in alterations to existing hydrology, increases in impervious surfaces, increases in urban runoff, and increases in wastewater discharge, all of which could increase the discharge of pollutants into receiving waters and violate water quality standards.

To protect (or restore) water quality, the RWQCB enforce the Clean Water Act through the NPDES, as well as the California’s Water Code. Pursuant to these regulations, permits from the applicable RWQCB are required for a wide variety of activities with potential to discharge wastes into waters of the State or waters of the United States. These include construction and operational activities, particularly operation of MS4s (municipal separate storm sewer systems) and industries that produce wastewater. The County operates its MS4s under permits from the three RWQCBs with jurisdiction in the County. Future projects would be required to comply with these regulations as applicable.

All construction activities are required to obtain and comply with NPDES permits, stormwater pollution prevention plans, and water quality management plans to prevent or minimize construction-related water quality impacts and waste discharges, particularly as related to soils (i.e., erosion, sedimentation, and fill deposition). All developed uses conveying water into existing storm drain systems must comply with the County’s MS4 permit conditions and the associated Master Drainage Plan standards (if applicable). Projects must also comply with Clean Water Act Sections 401 and 404 if waters of the United States would be disturbed.

GPA No. 960 Policies OS 3.7 and OS 4.6 encourage the incorporation of low-impact development (LID) features in new development, such as permeable parking bays and lots and biofiltration. Implementing LID principles and practices manages water in a way that reduces the impact of built areas and promotes the natural movement of water in an ecosystem or watershed. Applied on a broad scale, LID

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can maintain or restore a watershed's hydrologic and ecological functions. As such, LID techniques can reduce pollutants entering a watershed via runoff from development sites.

During the development review process, future development projects would be required to provide substantial evidence of compliance with County, State, and federal regulations, including General Plan policies and NPDES requirements. Certified EIR No. 548 Mitigation Measures 3.9.1 through 3.9.4 would be enforced as conditions of approval for future development projects during the development review process. Compliance with the extensive water quality regulations and programs, particularly those of the NPDES, requires no significant violations of water quality standards or waste discharge requirements occur. Impacts were determined to be less than significant with mitigation incorporated in this regard.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the Modified Project would not present a new use or intensify a use that was considered under Certified EIR No. 548. Future development activities would continue to be required to comply with NPDES requirements, the RWQCB, and GPA No. 960 policies, as well as Certified EIR No. 548 Mitigation Measures 3.9.1 through 3.9.4, to minimize impacts to water quality. Therefore, the Modified Project would not result in new or substantially more severe environmental impacts related to water quality as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures:

- EIR No. 548 MM 3.9.1 The development of septic systems shall be in accordance with applicable standards established by Riverside County and other responsible authorities.

- EIR No. 548 MM 3.9.2 Point source pollution reduction programs shall fully adhere to applicable standards required by federal, state, and local agencies. Prior to the approval of individual projects, Riverside County shall verify that the provisions of applicable point source pollution programs have been satisfied.

- EIR No. 548 MM 3.9.3 Where development may contribute to a worsening of local or regional ground or surface water quality (as determined by the RCDEH and/or applicable RWQCB), a water quality analysis shall be prepared. The water quality analysis shall include but not be limited to: an analysis of existing surface and subsurface water quality; an assessment of how the proposed development would affect existing water quality; an assessment of how the proposed development would affect beneficial uses of the water; and specific measures to limit or eliminate potential water quality impacts and/or impacts to beneficial uses of ground/surface water. Where determined necessary by the County of Riverside or other responsible entities, the water quality analysis shall include, at an equal level of detail, potential impacts to tributary or downstream areas. The water quality analysis shall be submitted to the County of Riverside and

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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the applicable RWQCB for review and shall be approved prior to the issuance of any entitlement that would result in the physical modification of the project site.

EIR No. 548 MM 3.9.4

The project applicant shall submit to the County of Riverside and the applicable RWQCB, for review and approval, evidence that the specific measures to limit or eliminate potential water quality impacts resulting from the entire development process will be implemented as set forth in the water quality analysis. Said evidence shall be submitted and approved prior to the issuance of any entitlement that would result in the physical modification of the project site.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact with Certified EIR No. 548 Mitigation Incorporated.

Monitoring: No monitoring is required.

b) *Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*

As described in Certified EIR No. 548, future development associated with buildout of GPA No. 1122 and Change Of Zone No. 7902 could result in increased water demands on areas relying on groundwater supplies. This is particularly likely in areas of Riverside County where new development would rely solely on groundwater for supply. According to Certified EIR No. 548, compliance with County- and State-required water management and conservation regulations would assist in reducing the amount of water required by future development and thus reduce the amount of water being extracted from groundwater basins. GPA No. 960 Policy OS 2.2 encourages the installation of water-conserving systems, such as dry wells and graywater systems, in new developments. Ordinance No. 859, Water-Efficient Landscape Requirements, requires new development projects to install water-efficient landscapes, thus limiting water applications and reducing water use. Decreasing irrigation water use would assist in decreasing drawdown of groundwater basins. During the development review process, future development projects would be required to provide substantial evidence of compliance with these regulations. In addition, the Sustainable Groundwater Management Act (SGMA) gives local agencies the authority to manage groundwater in a sustainable manner and allows limited State intervention when necessary to protect groundwater resources. Although compliance with County regulations and EIR No. 548 Mitigation Measure 3.9.5 would require the incorporation of feasible water conservation features, given the unpredictability and variability of water supplies and groundwater management as described, impacts were determined to be significant and unavoidable.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the Modified Project would not present a new use or intensify a use that was considered under Certified

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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EIR No. 548. Future development activities would continue to be required to comply with applicable ordinances, GPA No. 960 policies, and Certified EIR No. 548 Mitigation Measure 3.9.5 to minimize impacts with regard to decreasing groundwater supplies. Furthermore, the Modified Project would not affect or change the significant unavoidable impact determination, nor invalidate Statement of Overriding Consideration findings as made in Certified EIR No. 548. Therefore, the Modified Project would not result in new or substantially more severe environmental impacts related to groundwater supplies as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures:

EIR No. 548 MM 3.9.5 Riverside County shall enforce compliance with federal, state, and local standards for water conservation within residential, commercial, or industrial projects. Prior to approval of any development within the County of Riverside, the applicant shall submit evidence to Riverside County that all applicable water conservation measures have been met.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact With Certified EIR No. 548 Mitigation Incorporated.

Monitoring: No monitoring is required.

c) *Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces?*

As described in Certified EIR No. 548, future development associated with buildout of GPA No. 1122 and Change Of Zone No. 7902 could contribute to a cumulative increase in impervious surfaces and a decrease in water infiltration and natural groundwater recharge rates throughout the County. However, the General Plan includes policies to require that natural recharge areas are preserved in new development to the extent feasible. GPA No. 960 Policy LU 4.1 incorporates water conservation techniques, such as groundwater recharge basins, use of porous pavement, drought-tolerant landscaping, and water recycling, as appropriate. GPA No. 960 Policies OS 4.3 through 4.8 specifically address recharge areas, requiring that natural drainage systems be incorporated into developments where appropriate and feasible and that adequate aquifer water recharge areas are preserved and protected. These policies also encourage the natural management of streams where groundwater recharge is likely to occur. The applicability of specific policies and design measures to protect groundwater recharge would be determined during the development review process and would be included as project conditions of approval.

To further reduce impacts to drainage patterns, Certified EIR No. 548 includes Mitigation Measures 3.9.6 and 3.9.7 to require that construction of replacement recharge areas will be required to equal the amount of recharge area lost and/or incorporate equipment or facilities capable of replacing (at an equal volume) the amount of groundwater recharge capacity lost as a result of development. Impacts were determined to be less than significant with mitigation incorporated in this regard.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and

Attachment: Attachment H Addendum to EIR No. 548 (GPA Nos. 180002, 190006, 210109 6th Cycle Housing/Safety/Land Use)

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Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the Modified Project would not present a new use or intensify a use that was considered under Certified EIR No. 548. Future development activities would continue to be required to comply with GPA No. 960 policies, as well as Certified EIR No. 548 Mitigation Measure 3.9.6 and 3.9.7, to minimize impacts in regard to substantially altering drainage patterns. Therefore, Modified Project would not result in new or substantially more severe environmental impacts related to substantially altering drainage patterns as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures:

EIR No. 548 MM 3.9.6 In areas where it is not practical to conserve soils suitable for recharge (as determined by the Riverside County Flood Control and Water Conservation District), water harvesting and recharge facilities shall be built within the same groundwater basin in which the recharge area is lost. The construction of replacement recharge areas shall equal the amount of recharge area lost and/or shall incorporate equipment or facilities capable of replacing (at an equal volume) the amount of groundwater recharge capacity lost as a result of development. The identification, designation, location, or installation of replacement groundwater recharge capacity shall be reviewed and approved by the Riverside County Flood Control and Water Conservation District prior to the issuance of grading permits.

EIR No. 548 MM 3.9.7 New development that includes more than 1 acre of impervious surface area (e.g., roofs, parking areas, streets, sidewalk) shall incorporate features to facilitate the on-site infiltration of precipitation and/or runoff into groundwater basins. Such features shall include but not be limited to: natural drainage systems (where economically feasible); detention basins incorporated into project landscaping; and the installation of porous areas within parking areas. Where natural drainage systems are utilized for groundwater recharge, they shall be managed using natural approaches (as modified to safeguard public health and safety). Groundwater recharge features shall be included on development plans and shall be reviewed by the Riverside County Building and Safety Department and/or Riverside County Flood Control and Water Conservation District prior to the issuance of grading permits.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact with Certified EIR No. 548 Mitigation Incorporated.

Monitoring: No monitoring is required.

d) *Result in substantial erosion or siltation on-site or off-site?*

As described in Certified EIR No. 548, future development activities associated with buildout of GPA No. 1122 and Change of Zone No. 7902, could result in increased erosion potential in areas of new construction (vegetation removal, topsoil disturbance, etc.). However, a grading permit is required for

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most earthmoving operations in the County (Ordinance No. 457). As part of the grading permit process, the County Building and Safety Department and/or the County Geologist identifies conditions of approval, including erosion and sediment control plans. Measures included in individual erosion control plans could include minimizing terrain modification, controlling surface water, and diverting around potential landslide areas to prevent erosion. In addition, NPDES and County requirements (Ordinance No. 754) would require that future development would control the amount and quality of stormwater runoff leaving construction sites. Post-construction runoff is also addressed and mitigated through site design and various requirements of the State of California and of County programs, such as the County's MS4 permit requirements for new development and substantial redevelopment, as well as standard County conditions of approval. Certified EIR No. 548 also includes Mitigation Measures 3.6.8, 3.6.9, and 3.9.8 through 3.9.12 to reduce impacts related to erosion and siltation. Impacts were determined to be less than significant with mitigation incorporated in this regard.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the Modified Project would not present a new use or intensify a use that was considered under Certified EIR No. 548. Future development activities would continue to be required to comply with applicable ordinances and GPA No. 960 policies, as well as Certified EIR No. 548 Mitigation Measures 3.6.8, 3.6.9, and 3.9.8 through 3.9.12, to minimize erosion or siltation. Therefore, the Modified Project would not result in new or substantially more severe environmental impacts related to erosion or siltation as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures: Refer to Mitigation Measures 3.6.8 and 3.6.9 in Response 17(c) above.

- EIR No. 548 MM 3.9.8 For each new development project, the following principles and policies shall be considered and implemented:
- a. Avoid or limit disturbance to natural water bodies and drainage systems (including ephemeral drainage systems) when feasible. Provide adequate buffers of native vegetation along drainage systems to lessen erosion and protect water quality.
 - b. Appropriate BMPs must be implemented to lessen impacts to waters of the United States and/or waters of the state resulting from development. Drainages should be left in a natural condition or modified in a way that preserves all existing water quality standards where feasible. Any discharges of sediment or other wastes, including wastewater, to waters of the United States or waters of the state must be avoided to the maximum extent practicable. All such discharges will require an NPDES permit issued by applicable RWQCB.
 - c. Small drainages shall be preserved and incorporated into new development, along with adequate buffer zones of native vegetation, to the maximum extent practicable.

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- d. Any impacts to waters of the United States require a Section 401 Water Quality Standards Certification from the RWQCB. Impacts to these waters shall be avoided to the maximum extent practicable. Where avoidance is not practicable, impacts to these waters shall be minimized to the maximum extent practicable. Mitigation of unavoidable impacts must, at a minimum, replace the full function and value of the affected water body. Impacts to waters of the United States also require a Clean Water Act Section 404 Permit from the USACE and a Streambed Alteration Agreement from the CDFW.
- e. The County of Riverside shall encourage the use of pervious materials in development to retain absorption and allow more percolation of stormwater into the ground. The use of pervious materials, such as grass or permeable/porous pavement, for runoff channels and parking areas shall also be encouraged. Lining runoff channels with impermeable surfaces, such as concrete or grouted riprap, will be discouraged.
- f. The County of Riverside shall encourage construction of detention basins or holding ponds and/or constructed wetlands within a project site to capture and treat dry weather urban runoff and the first flush of rainfall runoff. These basins should be designed to detain runoff for a minimum time, such as 24 hours, to allow particles and associated pollutants to settle and to provide for natural treatment.
- g. The County of Riverside shall encourage development to retain areas of open space as natural or landscaped to aid in the recharge and retention of runoff. Native plant materials shall be used in replanting and hydroseeding operations, where feasible.
- h. The County of Riverside shall require that environmental documents for proposed projects in areas tributary to Canyon Lake Reservoir, Lake Elsinore, sections of the Santa Ana River, Fulmar Lake, and Mill Creek (as a result of the proposed 2002 303 (d) listing of these water bodies) include discharge prohibitions, revisions to discharge permits, or management plans to address water quality impacts in accordance with the controls that may be applied pursuant to state and federal regulation. Environmental documents shall acknowledge that additional requirements may be imposed in the future for projects in areas tributary to the water bodies listed above.
- i. The County of Riverside shall require that in new development, post development stormwater runoff flow rates do not differ from the predevelopment stormwater runoff flow rates.
- j. All construction projects should be designed and implemented to protect, and if at all possible, to improve the quality of the underlying groundwater.
- k. The County of Riverside shall encourage the enhancement of groundwater recharge wherever possible. Measures such as keeping stream/river channels and floodplains in natural conditions

Attachment: Attachment H Addendum to EIR No. 548 (GPA Nos. 180002, 190006, 210109 6th Cycle Housing/Safety/Land Use)

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or with pervious surfaces, as well as keeping areas of high recharge as open space, will be considered.

- l. The County of Riverside shall prohibit the discharge of waste material resulting from any type of construction into any drainage areas, channels, streambeds, streams, lakes, wetlands, or rivers. Spoil sites shall be prohibited within any streams or areas where spoil material could be washed into a water body.
- m. The County of Riverside shall require that appropriate BMPs be developed and implemented during construction efforts to control the discharge of pollutants, prevent sewage spills, and to avoid discharge of sediments into the streets, stormwater conveyance channels, or waterways.

EIR No. 548 MM 3.9.9

Where development may interfere with, disrupt, or otherwise affect surface or subsurface hydrologic baseline conditions (as determined by the Riverside County Flood Control and Water Conservation District, the USACE, the CDFW, and/or the RWQCB), preparation of a project-specific hydrologic study shall be required. The hydrologic study shall include but shall not be limited to: an inventory of surface and subsurface hydrologic conditions existing at the time of the study; an analysis of how the proposed development would affect these hydrologic baseline conditions; and specific measures to limit or eliminate the interference or disruption of the on-site hydrologic process. The hydrologic study shall evaluate the feasibility of incorporating bioengineering measures into any project that may alter the hydrologic process. Where required by the County of Riverside, the hydrologic study shall include analysis of, at an equal level of detail, potential impacts to tributary or downstream areas. The hydrologic study shall be submitted to the County or responsible entity for review and shall be approved prior to the issuance of any entitlement that would result in the physical modification of the project site.

EIR No. 548 MM 3.9.10

The project applicant shall submit to the County of Riverside, for review and approval, evidence that the specific measures to limit or eliminate the disruption or interference to the hydrologic process resulting from the entire development process will be implemented as set forth in the hydrologic study. Such evidence may take the form of but shall not be limited to: a development agreement; land banking; the provision of adequate funds to guarantee the construction, maintenance, or restoration of hydrologic features; or any other mechanism that will achieve said goals. Said evidence shall be submitted and approved prior to the issuance of any entitlement that would result in the physical modification of the project site.

EIR No. 548 MM 3.9.11

Where determined feasible by Riverside County or a responsible entity, bioengineering measures shall be incorporated into any project that may alter the hydrologic process.

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EIR No. 548 MM 3.9.12

Riverside County shall not necessarily require all land uses to withstand flooding. These may include land uses such as agricultural, golf courses, and trails. For these land uses, flows shall not be obstructed, and upstream and downstream properties shall not be adversely affected by increased velocities, erosion backwater effects, concentration of flows, and adverse impacts to water quality from point and nonpoint sources of pollution.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact with Certified EIR No. 548 Mitigation Incorporated.

Monitoring: No monitoring is required.

e) ***Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-site or off-site***

Refer to Response 24(d) above.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact with Certified EIR No. 548 Mitigation Incorporated.

Monitoring: No monitoring is required.

f) ***Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?***

As described in Certified EIR No. 548, NPDES and County requirements would require that future development would control the amount and quality of stormwater runoff leaving construction and development sites, which would also reduce the amount of stormwater runoff entering the County's storm drainage system. In addition, the County's Development Impact Fee (DIF) program covers all unincorporated portions of the County and provides funds for a variety of public facilities, including flood control and storm drain facilities; for those facilities in those authorized areas, the DIF program requires fees are collected and expended to provide necessary facilities commensurate with the ongoing levels of development. The provision of these facilities requires that future development would not result in runoff exceeding stormwater drainage systems or cause substantial additional sources of polluted runoff.

EIR No. 548 Mitigation Measure 3.9.8 would be required as a condition of approval for each new development project during the development review process. The measure requires the following in regard to drainage:

- Avoid or limit disturbance to natural water bodies and drainage systems when feasible;

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- Preserve and incorporate small drainages into new development, along with adequate buffer zones of native vegetation, to the maximum extent practicable;
- Encourage construction of detention basins or holding ponds and/or constructed wetlands within a project site to capture and treat dry weather urban runoff and the first flush of rainfall runoff;
- Encourage development to retain areas of open space as natural or landscaped to aid in the recharge and retention of runoff; and
- Ensure that post-development stormwater runoff flow rates do not differ from the predevelopment stormwater runoff flow rates.

Finally, GPA No. 960 Policy S 4.10 specifically requires all proposed projects in the County to address and mitigate any adverse impacts that the project may have on the carrying capacity of local and regional storm drain systems. During the County’s development review process, the applicant would be required to provide substantial evidence of compliance with this policy. Impacts were determined to be less than significant with mitigation incorporated in this regard.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the Modified Project would not present a new use or intensify a use that was considered under Certified EIR No. 548. Future development activities would continue to be required to comply with GPA No. 960 policies, as well as Certified EIR No. 548 Mitigation Measure 3.9.8, to minimize impacts with regard to stormwater drainage systems and runoff. Therefore, the Modified Project would not result in new or substantially more severe environmental impacts related to stormwater drainage systems and runoff as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures: Refer to Mitigation Measure 3.9.8 above.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact with Certified EIR No. 548 Mitigation Incorporated.

Monitoring: No monitoring is required.

g) *Impede or redirect flood flows?*

As described in Certified EIR No. 548, future development activities associated with buildout of GPA No. 1122 and Change of Zone No. consist of parcel-specific land use designation and zone classification changes for approximately 368 parcels totaling 1,434.41 acres in the existing 100-year floodplain. Ordinance No. 458, *Regulating Flood Hazard Areas and Implementing the National Flood Insurance Program*, includes specifications, standards, and requirements to mitigate potential flood hazards in the County in several ways, including reviewing all permit applications in the floodplain to determine whether proposed building sites would be reasonably safe from flooding. Ordinance No. 458 also includes protections against impeding or redirecting flood flows. Whenever a watercourse or mapped floodplain is to be altered or relocated, the ordinance requires the flood-carrying capacity of the altered or relocated portion of the watercourse or mapped floodplain to be maintained. In addition,

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the ordinance prohibits structures and land grading in areas designated as floodways, except upon approval of a plan which provides that the proposed development will not result in any increase in flood levels during the occurrence of the base flood discharge.

GPA No. 960 Policy S 4.1 requires new construction proposals for residential and nonresidential development in 100-year floodplains to apply a minimum level of acceptable risk and requires the County to disapprove projects that cannot mitigate the hazard to the satisfaction of the Building Official or another responsible agency. GPA No. 960 Policy S 4.2 requires all residential, commercial, and industrial structures to be flood-proofed from the mapped 100-year storm flow. GPA No. 960 Policy S 4.3 prohibits the construction of permanent structures for human housing or employment to the extent necessary to convey floodwaters without property damage or risk to public safety. GPA No. 960 Policy S 4.4 prohibits alteration of floodways and channelization unless alternative methods of flood control are not technically feasible or unless alternative methods are utilized to the maximum extent practicable. Certified EIR No. 548 includes Mitigation Measures 3.9.15 through 3.9.17 to regulate the development of structures within floodplains. Impacts were determined to be less than significant with mitigation incorporated in this regard.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the Modified Project would not present a new use or intensify a use that was considered under Certified EIR No. 548. Future development activities would continue to be required to comply with applicable County ordinances and GPA No. 960 policies, as well as Certified EIR No. 548 Mitigation Measures 3.9.15 through 3.9.17, to minimize impacts with regard to impeding or redirecting flood flow. Therefore, the Modified Project would not result in new or substantially more severe environmental impacts related to impeding or redirecting flood flow as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures:

- EIR No. 548 MM 3.9.15 Riverside County shall require that all structures (residential, commercial, and industrial) be flood-proofed from the 100-year storm flows. In some cases, this may involve elevating the finished floor more than 1 foot.
- EIR No. 548 MM 3.9.16 Riverside County shall require that fully enclosed areas that are below finished floors have openings to equalize the forces on both sides of the walls.
- EIR No. 548 MM 3.9.17 Provided the applicant does hydrological studies, engineers structures to be safe from flooding, and provides evidence that the structures will not adversely impact the floodplain, Riverside County may allow development into the floodway fringe.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact with Certified EIR No. 548 Mitigation Incorporated.

Monitoring: No monitoring is required.

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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h) In flood hazard, tsunami, or seiche zones, risk the release of pollutants due to project inundation?

According to Certified EIR No. 548, two water bodies in the County (Lake Perris and Lake Elsinore) may have the potential for seismically induced seiche. However, setbacks and flood hazard area regulations would be sufficient to protect against significant risks. Thus, future development along or near lakes and reservoirs is considered to be at minimal risk. Overall, seiche impacts would be minimal to none. Due to its inland location, there are no tsunami risks in the County. Refer to Response 24(g) regarding the effects of flooding. Impacts were determined to be less than significant in this regard.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the Modified Project would not present a new use or intensify a use that was considered under Certified EIR No. 548. Future development activities would continue to be required to comply with applicable County ordinances and GPA No. 960 policies, as well as Certified EIR No. 548 Mitigation Measures 3.9.15 through 3.9.17, to minimize impacts with regard to flood hazards, seiche, and tsunami. Therefore, the Modified Project would not result in new or substantially more severe environmental impacts related to flood hazards, seiche, and tsunami as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures: Refer to Mitigation Measures 3.9.15 through 3.9.17.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact with Certified EIR No. 548 Mitigation Incorporated.

Monitoring: No monitoring is required.

i) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Refer to Response 24(a) above.

Certified EIR No. 548 Mitigation Measures: Refer to Mitigation Measures 3.9.1 through 3.9.4 above.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact with Certified EIR No. 548 Mitigation Incorporated.

Monitoring: No monitoring is required.

LAND USE/PLANNING Would the project:

24. Land Use

Attachment: Attachment H Addendum to EIR No. 548 (GPA Nos. 180002, 190006, 210109 6th Cycle Housing/Safety/Land Use)

	Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
a) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				
b) Disrupt or divide the physical arrangement of an established community (including a low-income or minority community)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source(s): County of Riverside General Plan; County of Riverside 6th Cycle Housing Element Update; County of Riverside General Plan Amendment 1122 Change of Zone CZ No. 7902 State Clearinghouse No. 2015061083 Final Environmental Impact Report.

Findings of Fact:

a) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

As described in Certified EIR No. 548, GPA No. 1122 and Change of Zone No. 7902 would update the Housing Element and would implement and enhance, rather than conflict with, the land use plans, policies, and programs of the remainder of the General Plan, as well as other County other ordinances and regulatory programs. GPA No. 1122 and Change of Zone No. 7902 would not remove or modify any General Plan or other County policies adopted for the purpose of avoiding or mitigating an environmental effect, nor would it conflict with them. Facilitated through GPA No. 1122 and Change of Zone No. 7902, the revisions to the text of the General Plan and Ordinance No. 348 were intended both to adopt and implement the new HHDR and MUA land use designations and zone classifications and to comply with changes in State law and implementation of the Housing Element programs, including those encouraging multifamily development. The intent of the revisions was to improve the integration of the County's General Plan policies, Ordinance No. 348, and other regulatory programs with opportunities to implement the County's housing goals with respect to meeting the needs of existing and future residents and to accommodate the County's future housing in existing and planned urban areas. Impacts were determined to be less than significant in this regard.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the Modified Project would not present a new use or intensify a use that was considered under Certified EIR No. 548. Future development activities would continue to be required to demonstrate compliance with GPA No. 960 policies with regard to conflict with any land use plan, policy, or regulation. Therefore, the Modified Project would not result in new or substantially more severe environmental impacts related to conflict with any land use plan, policy, or regulation as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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Determination: Less Than Significant Impact.

Monitoring: No monitoring is required.

b) **Disrupt or divide the physical arrangement of an established community (including a low-income or minority community)?**

As described in Certified EIR No. 548, the physical division of an established community could generally occur via placement of a freeway, railroad, airport, dam, or large area of open space in an established community. As GPA No. 1122 and Change of Zone No. 7902 did not result in these land use activities, nor include land use changes in areas that would otherwise divide and established community, impacts were determined to be less than significant.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the Modified Project would not present a new use or intensify a use that was considered under Certified EIR No. 548. Like GPA No. 1122 and Change of Zone No. 7902, the revisions to the Housing Element and Safety Element would require that future development is integrated into the existing community and does not divide it. Therefore, the Modified Project would not result in new or substantially more severe environmental impacts related to dividing an established community as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact.

Monitoring: No monitoring is required.

MINERAL RESOURCES	Would the project:			
25. Mineral Resources				
a) Result in the loss of availability of a known mineral resource that would be of value to the region or the residents of the State?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Potentially expose people or property to hazards from proposed, existing, or abandoned quarries or mines?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source(s): County of Riverside General Plan, Figure OS-6 "Mineral Resources Area"; County of Riverside 6th Cycle Housing Element Update; County of Riverside General Plan Amendment 1122

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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Change of Zone CZ No. 7902 State Clearinghouse No. 2015061083 Final Environmental Impact Report.

Findings of Fact:

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

As described in Certified EIR No. 548, implementation of GPA No. 1122 and Change of Zone No. 7902 could result in the loss of land designated as containing a known mineral resource. Likewise, the Housing Element could result in residential development adjacent to areas of known or inferred to possess mineral resources (MRZ-2 areas), which is generally incompatible with mineral extraction activities.

However, compliance with current regulations and General Plan policies would require that significant impacts to known mineral resources of regional or statewide significance are either avoided or minimized. For instance, GPA No. 960 Policy LU 9.7 seeks to protect lands designated by the State Mining and Geology Board (SMGB) as being of regional or statewide significance from encroachment of incompatible land uses. GPA No. 960 Policy OS 14.3 prohibits land uses incompatible with mineral resource recovery in areas designated Open Space-Mineral Resources and in areas designated by the SMGB as being of regional or statewide significance. GPA No. 960 Policy OS 14.4 requires the County Geologist to impose conditions as necessary on proposed mining operation projects to minimize or eliminate the potential adverse impact of mining operations on surrounding properties and environmental resources. GPA No. 960 Policy OS 14.5 requires that new non-mining land uses adjacent to existing mining operations be designed to provide a buffer between the new development and the mining operations. The buffer distance must be based on an evaluation of noise, aesthetics, drainage, operating conditions, biological resources, topography, lighting, traffic, operating hours, and air quality. The same standards apply to non-mining land uses within or adjacent to areas classified by the State Geologist as MRZ-2a. GPA No. 960 Policy LU 27.2 seeks to protect lands designated as Open Space-Mineral Resource from encroachment of incompatible land uses through buffer zones or visual screening, and GPA No. 960 Policy LU 27.3 protects road access to mining activities and seeks to prevent traffic conflicts with surrounding properties. During the County’s development review process, the applicant would be required to provide substantial evidence of compliance with these policies. Impacts were determined to be less than significant in this regard

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the Modified Project would not present a new use or intensify a use that was considered under Certified EIR No. 548. Future development activities would continue to be required to comply with GPA No. 960 policies with regard to the loss of mineral resources. Therefore, the Modified Project would not result in new or substantially more severe environmental impacts related to the loss of mineral resources as compared to Certified EIR No. 548.

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact.

Monitoring: No monitoring is required.

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

Refer to Response 26(a) above.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact.

Monitoring: No monitoring is required.

c) *Potentially expose people or property to hazards from proposed, existing, or abandoned quarries or mines?*

Refer to Response 26(a) above.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact.

Monitoring: No monitoring is required.

NOISE Would the project result in:

26. Airport Noise

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) For a project located within an airport land use plan or, where such a plan has not been adopted, within two (2) miles of a public airport or public use airport would the project expose people residing or working in the project area to excessive noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) For a project located within the vicinity of a private airstrip, would the project expose people residing or | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Attachment: Attachment H Addendum to EIR No. 548 (GPA Nos. 180002, 190006, 210109 6th Cycle Housing/Safety/Land Use)

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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working in the project area to excessive noise levels?

Source(s): County of Riverside General Plan, Figure S-20 "Airport Locations"; County of Riverside "Airport Facilities Map"; County of Riverside 6th Cycle Housing Element Update; County of Riverside General Plan Amendment 1122 Change of Zone CZ No. 7902 State Clearinghouse No. 2015061083 Final Environmental Impact Report.

Findings of Fact:

- a) **For a project located within an airport land use plan or, where such a plan has not been adopted, within two (2) miles of a public airport or public use airport would the project expose people residing or working in the project area to excessive noise levels?**

As described in Certified EIR No. 548, future development activities associated with buildout of GPA No. 1122 and Change of Zone No. 7902 may result in the exposure of new noise-sensitive land uses to noise from operations at public and private airports, airstrips, and helipads. Around larger public airports, noise levels can exceed acceptable standards in certain areas, as shown by noise-contour maps of existing, future, and ultimate buildout operational conditions for public airports. The ALUCP adopted by the Riverside County ALUC addresses noise-related land use constraints for the various zones surrounding airports in the County. All future development proposed would be required to comply with applicable ALUC policies, as well as with State and County regulations and policies, regarding site design and building construction to achieve acceptable interior and exterior noise exposure levels for habitable structures.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the Modified Project would not present a new use or intensify a use that was considered under Certified EIR No. 548. Future development activities would continue to be required to comply with applicable ALUC policies in regard to development within or near an airport land use plan. Therefore, the Modified Project would not result in new or substantially more severe environmental impacts related to development within or near an airport land use plan as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact.

Monitoring: No monitoring is required.

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

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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Refer to Response 27(a) above.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact.

Monitoring: No monitoring is required.

27. Noise Effects by the Project

- | | | | | |
|---|--------------------------|-------------------------------------|--------------------------|--------------------------|
| a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan, noise ordinance, or applicable standards of other agencies? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Generation of excessive ground-borne vibration or ground-borne noise levels? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Source(s): *County of Riverside General Plan, Table N-1, "Land Use Compatibility for Community Noise Exposure"; County of Riverside 6th Cycle Housing Element Update; County of Riverside General Plan Amendment 1122 Change of Zone CZ No. 7902 State Clearinghouse No. 2015061083 Final Environmental Impact Report.*

Findings of Fact:

- a) **Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan, noise ordinance, or applicable standards of other agencies?**

Permanent Noise

According to Certified EIR No. 548, future development associated with buildout of GPA No. 1122 and Change Of Zone No. 7902 could result in the placement of noise-sensitive residential uses in areas that either are currently exposed to or would be exposed to future traffic, airport, or railroad noise levels that exceed the current standards (65 dBA L_{dn} for exterior areas and 45 dBA L_{dn} for interior areas). Riverside County standards specify that proposed new noise-sensitive uses must be sited, designed, and/or engineered to require that the interior and exterior exposure standards are not exceeded. To minimize the effects of permanent noise, Certified EIR No. 548 includes Mitigation Measures 3.12.1 through 3.12.4. Impacts related to permanent noise were determined to be less than significant with mitigation incorporated in this regard.

Temporary Noise

As described in Certified EIR No. 548, all future construction activities would be required to be conducted pursuant to the community noise exposure conditions placed on the project (e.g., limiting days and hours of construction, requiring mufflers and other sound-attenuating features on equipment).

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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Under development and/or grading permit conditions of approval, as well as Ordinance No. 847 and other regulations, the County enacts a number of noise controls on construction activities. These include limiting activities to specific hours of the day (or severely restricting allowable noise levels after certain hours, typically 10:00 p.m.), limiting idling, defining staging and loading locations (away from adjacent homes), and requiring setbacks, sound attenuation buffers, or other equipment modifications, as appropriate. Future project-level analyses of noise impacts would be required to be conducted on a case-by-case basis during the development review process. In addition, future development would be required to implement a construction-related noise mitigation plan pursuant to Certified EIR No. 548 Mitigation Measures 3.12.6 and 3.12.7 to require all construction-related activities that would result in high noise levels are limited to between the hours of 7:00 a.m. and 7:00 p.m. Monday through Saturday. Impacts related to temporary noise were determined to be less than significant with mitigation incorporated in this regard.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the Modified Project would not present a new use or intensify a use that was considered under Certified EIR No. 548. Future development activities would continue to be required to comply with applicable ordinances and GPA No. 960 policies, as well as Certified EIR No. 548 Mitigation Measures 3.12.1 through 3.12.4 and 3.12.6 and 3.12.7, to minimize impacts with regard to the generating of permanent or temporary increases in ambient noise levels. Therefore, the Modified Project would not result in new or substantially more severe environmental impacts related to the generating of permanent or temporary increases in ambient noise levels as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures:

- EIR No. 548 MM 3.12.1 All new residential developments in Riverside County shall conform to a noise exposure standard of 65 dBA L_{dn} for outdoor noise in noise-sensitive outdoor activity areas and 45 dBA L_{dn} for indoor noise in bedrooms and living/family rooms. New development that does not and cannot be made to conform to this standard shall not be permitted.

- EIR No. 548 MM 3.12.2 Acoustical studies, describing how the exterior and interior noise standards will be met, shall be required for all new residential developments with a noise exposure greater than 65 dBA L_{dn} . The studies shall also satisfy the requirements set forth in Title 24, Part 2 of the California Building Code (Noise Insulation Standards), for multiple-family attached homes, hotels, motels, etc. No development permits or approval of land use applications shall be issued until an acoustic analysis is received and approved by the Riverside County Planning Department.

- EIR No. 548 MM 3.12.3 Acoustical studies shall be required for all new noise-sensitive projects that may be affected by existing noise from stationary sources.

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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EIR No. 548 MM 3.12.4 To permit new development of residential and noise-sensitive land uses where existing stationary noise sources exceed Riverside County's noise standards, effective mitigation measures shall be implemented to reduce noise exposure to or below the allowable levels of the zoning code/noise control ordinance.

EIR No. 548 MM 3.12.6 Prior to the issuance of any grading plans, the County of Riverside shall condition approval of subdivisions adjacent to any developed/occupied noise-sensitive land uses by requiring applicants to submit a construction-related noise mitigation plan to the County for review and approval. The plan should depict the location of construction equipment and how the noise from this equipment will be mitigated during construction of the project through use of such methods as the following:

- The construction contractor shall use temporary noise attenuation fences where feasible, to reduce construction noise impacts on adjacent noise sensitive land uses.
- During all project site excavation and grading on-site, the construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturer standards. The construction contractor shall place all stationary construction equipment so that emitted noise is directed away from sensitive receptors nearest the project site.
- The construction contractor shall locate equipment staging in areas that will create the greatest distance between construction-related noise sources and noise-sensitive receptors nearest the project site during all project construction.
- The construction contractor shall limit all construction-related activities that would result in high noise levels to between the hours of 7:00 a.m. and 7:00 p.m. Monday through Saturday. No construction shall be allowed on Sundays and public holidays.

EIR No. 548 MM 3.12.7 The construction-related noise mitigation plan required shall also specify that haul truck deliveries be subject to the same hours specified for construction equipment. Additionally, the plan shall denote any construction traffic haul routes where heavy trucks would exceed 100 daily trips (counting those both to and from the construction site). To the extent feasible, the plan shall denote haul routes that do not pass sensitive land uses or residential dwellings. Lastly, the construction-related noise mitigation plan shall incorporate any other restrictions imposed by Riverside County staff.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact With Certified EIR No. 548 Mitigation Incorporated.

Attachment: Attachment H Addendum to EIR No. 548 (GPA Nos. 180002, 190006, 210109 6th Cycle Housing/Safety/Land Use)

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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Monitoring: No monitoring is required.

b) Generation of excessive ground-borne vibration or ground-borne noise levels?

As described in Certified EIR No. 548, future development associated with buildout of GPA No. 1122 and Change Of Zone No. 7902 could expose residents to groundborne vibration from existing vibration-producing land uses and roadway truck and bus traffic, as well as construction and demolition activities. However, the General Plan includes policies that address potential groundborne vibration impacts resulting from the operation of both existing and proposed land uses when proposed in proximity to each other. GPA No. 960 Policy N 16.1 expressly restricts the placement of sensitive land uses, which includes residential uses, in proximity to vibration-producing land uses. GPA No. 960 Policy N 16.3 prohibits the exposure of residential dwellings to perceptible ground vibration from passing trains as perceived at the ground or second floor. GPA No. 960 Policy N 15.2 requires that commercial and residential mixed-use structures minimize the transfer or transmission of noise and vibration from the commercial land use to the residential land use, which would apply to mixed-use development. During the County's development review process, the applicant would be required to provide substantial evidence of compliance with these policies. In addition, Certified EIR No. 548 Mitigation Measure 3.12.5 requires that all new development provide evidence that groundborne vibration levels would not be exceeded for sensitive development. With implementation of Mitigation Measure 3.12.5, impacts were determined to be less than significant.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the Modified Project would not present a new use or intensify a use that was considered under Certified EIR No. 548. Future development activities would continue to be required to comply with applicable ordinances and GPA No. 960 policies, as well as Certified EIR No. 548 Mitigation Measures 3.12.5, to minimize impacts with regard to groundborne vibration. Therefore, the Modified Project would not result in new or substantially more severe environmental impacts related to groundborne vibration as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures:

EIR No. 548 MM 3.12.5 Prior to the issuance of any grading permit for new development involving vibration-sensitive land uses (which shall include, but not be limited to, hospitals, residential areas, concert halls, libraries, sensitive research operations, schools and offices), the project proponent shall provide evidence to the County of Riverside that placement of such uses within the area would not exceed groundborne vibration or groundborne noise impact criteria identified by the FTA (for example, the standards shown in Table 3.12-1 of Certified EIR No. 548) or as otherwise deemed appropriate for the situation by the County of Riverside.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact With Certified EIR No. 548 Mitigation Incorporated.

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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Monitoring: No monitoring is required.

PALEONTOLOGICAL RESOURCES:

28. Paleontological Resources

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

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Source(s): County of Riverside General Plan, Figure OS-8 "Paleontological Sensitivity"; County of Riverside 6th Cycle Housing Element Update; County of Riverside General Plan Amendment 1122 Change of Zone CZ No. 7902 State Clearinghouse No. 2015061083 Final Environmental Impact Report.

Findings of Fact:

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

As described in Certified EIR No. 548, future development associated with buildout of GPA No. 1122 and Change Of Zone No. 7902 could result in impacts to unique paleontological or geologic resources or sites. However, when existing information indicates that a site proposed for development has high paleontological sensitivity, a paleontological resource impact mitigation program is required for the project that specifies steps to be taken to mitigate impacts to paleontological resources in accordance with the County's Standard Conditions of Approval. These steps may include but are not limited to professional site monitoring, sampling of sediments likely to contain the remains of small fossil invertebrates and vertebrates, and curation procedures to be employed. If a site has low paleontological sensitivity, no direct mitigation is required unless a fossil is encountered during site development, at which point the Riverside County Geologist must be notified and a paleontologist retained by the project applicant. The paleontologist documents the extent and potential significance of the paleontological resources on the site and establishes appropriate mitigation measures for further site development. When existing information indicates that a site proposed for development has undetermined paleontological sensitivity, a report is filed with the County Geologist documenting the extent and potential significance of the paleontological resources on-site and identifying mitigation measures for the fossils and for impacts to significant paleontological resources. Based on these regulatory procedures, impacts to paleontological resources and geologic features were determined to be less than significant.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the Modified Project would not present a new use or intensify a use that was considered under Certified EIR No. 548. Future development activities would continue to be required to comply with applicable ordinances and GPA No. 960 policies to minimize impacts with regard to paleontological resources. Therefore, the Modified Project would not result in new or substantially more severe environmental impacts related to paleontological resources as compared to Certified EIR No. 548.

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact.

Monitoring: No monitoring is required.

POPULATION AND HOUSING	Would the project:			
29. Housing				
a) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a demand for additional housing, particularly housing affordable to households earning 80% or less of the County's median income?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source(s): Project Application Materials; GIS database; County of Riverside 6th Cycle Housing Element Update; County of Riverside General Plan Amendment 1122 Change of Zone CZ No. 7902 State Clearinghouse No. 2015061083 Final Environmental Impact Report.

Findings of Fact:

a) **Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?**

As described in Certified EIR No. 548, GPA No. 1122 and Change Of Zone No. 7902 included changes to HHDR and MUA land use designations and zone classifications throughout the unincorporated County, which resulted in an increase in density/intensity potential on those sites. Most of the sites identified for changes in land use designation were vacant at the time of Certified EIR No. 548 preparation; none contain substantial numbers of existing homes whose loss would necessitate construction of replacement housing elsewhere. This is particularly true given that GPA No. 1122 and Change Of Zone No. 7902 cumulatively results in the capacity for up to 73,255 more dwelling units and 240,805 more people in the County in comparison to buildout of the adopted General Plan. Additionally, GPA No. 1122 and Change Of Zone No. 7902 included text revisions to the General Plan and Ordinance No. 348 that encourage multifamily development in the County. Therefore, GPA No. 1122 and Change Of Zone No. 7902 would accommodate an increase in housing opportunities in the County and would not displace substantial numbers of existing housing or people, necessitating the construction of replacement housing elsewhere. Impacts were determined to be less than significant in this regard.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the Modified Project would not present a new use or intensify a use that was considered under Certified EIR No. 548. Future development activities would continue to be required to comply with applicable ordinances and GPA No. 960 policies to minimize impacts with regard to displacing substantial numbers of existing people and housing. Therefore, the Modified Project would not result in new or substantially more severe environmental impacts related to displacing substantial numbers of existing people and housing as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact.

Monitoring: No monitoring is required.

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

Refer to Response 30(a) above.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact.

Monitoring: No monitoring is required.

c) ***Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?***

As described in Certified EIR No. 548, GPA No. 1122 and Change Of Zone No. 7902 would result in the capacity for up to 73,255 more dwelling units and 240,805 more people in comparison to buildout of the adopted General Plan. This represents a 16 percent increase. Because the increased density/intensity capacity as a result of GPA No. 1122 and Change Of Zone No. 7902 could increase growth beyond that already planned for and accommodated by the General Plan, growth resulting from GPA No. 1122 and Change Of Zone No. 7902 was determined to be significant and unavoidable.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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Modified Project would not present a new use or intensify a use that was considered under Certified EIR No. 548. Future development activities would continue to be required to comply with applicable ordinances and GPA No. 960 policies to minimize impacts with regard to inducing substantial unplanned population growth. Furthermore, the Modified Project would not affect or change the significant unavoidable impact determination, nor invalidate Statement of Overriding Consideration findings as made in Certified EIR No. 548. Therefore, the Modified Project would not result in new or substantially more severe environmental impacts related to inducing substantial unplanned population growth as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact.

Monitoring: No monitoring is required.

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

26. Fire Services

Source(s): County of Riverside General Plan Safety Element; County of Riverside 6th Cycle Housing Element Update; County of Riverside General Plan Amendment 1122 Change of Zone CZ No. 7902 State Clearinghouse No. 2015061083 Final Environmental Impact Report.

Findings of Fact:

As described in Certified EIR No. 548, the project would accommodate future development of both high-density residential and mixed-use development that would incrementally increase the demand for fire protection and emergency services in localized areas throughout unincorporated Riverside County. During the development review process, all future development would be subject to review by both the RCFD and the Riverside County Department of Building and Safety, both of which enforce fire standards including the Uniform Fire Code, Public Resources Code Sections 4290-4299, and California Government Code Section 51178. In addition, the County requires all new structures in unincorporated areas to comply with the construction requirements of the California Building and Fire Codes, which include minimum standards for access, fire flow, building ignition and fire resistance, fire protection systems and equipment, defensible space, and setback requirements. Ordinance No. 787 includes requirements for high-occupancy structures to further protect people and structures from fire risks, including requirements that buildings not impede emergency egress for fire safety personnel and that equipment and apparatus not hinder evacuation from fire, such as potentially blocking stairways or fire doors. These regulations would reduce the impacts of providing fire protection services by reducing the potential for fires in new development, as well as supporting the ability of the RCFD to suppress fires.

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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In addition, GPA No. 960 Policies LU 5.1 and LU 5.2 prohibit new development from exceeding the ability to adequately provide supporting infrastructure and services, including fire protection services, and GPA No. 960 Policy S 5.1 requires proposed development to incorporate fire prevention features. During the County's development review process, the applicant would be required to provide substantial evidence of compliance with these policies.

To require adequate services, the County requires new development to pay fire protection mitigation fees pursuant to Ordinance No. 659. These fees are used by the RCFD to construct new fire protection facilities or to provide facilities in lieu of the fee as approved by the RCFD. The construction of these future fire stations or other fire protection facilities could result in adverse impacts to the physical environment, which would be subject to CEQA review. As future development in the County would be required to contribute its fair share to fund fire facilities via fire protection mitigation fees, construction of any RCFD facilities would be subject to CEQA review, and compliance with existing regulations would reduce the impacts of providing fire protection services concurrent with new development, impacts were determined to be less than significant.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the project would not present a new use or intensify a use that was considered under Certified EIR No. 548. Pertinent to fire protection services, future development would also be required to comply with the Uniform Fire Code, Public Resources Code Sections 4290-4299, California Government Code Section 51178, Ordinance 787, Ordinance No. 659, and GPA No. 960 Policies LU 5.1 and 5.2. Therefore, the Modified Project would not result in new or substantially more severe environmental impacts concerning fire protection services as compared to the analysis in Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact.

Monitoring: No monitoring is required.

30. Sheriff Services

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Source(s): County of Riverside General Plan; County of Riverside 6th Cycle Housing Element Update; County of Riverside General Plan Amendment 1122 Change of Zone CZ No. 7902 State Clearinghouse No. 2015061083 Final Environmental Impact Report.

Findings of Fact:

As described in Certified EIR No. 548, buildout of GPA No. 1122 and Change Of Zone No. 7902 would incrementally increase the demand for law enforcement services in localized areas throughout unincorporated Riverside County. Certified EIR No. 548 determined that buildout of GPA No. 1122 and

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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Change Of Zone No. 7902 could result in the need for 361 sworn police officers, 52 supervisors, 52 support staff, and 120 patrol vehicles beyond what has been anticipated for buildout of the General Plan. Nonetheless, all future development in the County would be subject to GPA No. 960 Policies LU 5.1 and 5.2, which prohibit new development from exceeding the ability to adequately provide supporting infrastructure and services, including law enforcement services. Pursuant to Ordinance No. 659, the County requires the development applicant/owner to pay the Riverside County Sheriff Department (RCSD) an established development mitigation fee prior to issuance of a certificate of occupancy on any structure as each is developed. The fees are for the acquisition and construction of public facilities. Additionally, any increased demand would occur incrementally and in multiple locations, allowing time for planning and the provision of necessary services and facilities. As noted in Certified EIR No. 548, future development facilitated by GPA No. 1122 and Change Of Zone No. 7902 would be reviewed by the RCSD for the provision of adequate services, and additional officers and facilities would be funded through payment of mitigation fees and taxes. Furthermore, any facilities needed would be subject to project-specific CEQA review. Impacts were determined to be less than significant in this regard.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the Modified Project would not present a new use or intensify a use that was considered under Certified EIR No. 548. Future development activities would continue to be reviewed by the RCSD for the provision of adequate services, and additional officers and facilities would be funded through payment of mitigation fees and taxes. Furthermore, any facilities needed would be subject to project-specific CEQA review. Therefore, the Modified Project would not result in new or substantially more severe environmental impacts concerning sheriff services as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact.

Monitoring: No monitoring is required.

31. Schools

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Source(s): School district correspondence; GIS database; *County of Riverside 6th Cycle Housing Element Update*; *County of Riverside General Plan Amendment 1122 Change of Zone CZ No. 7902 State Clearinghouse No. 2015061083 Final Environmental Impact Report*.

Findings of Fact:

As discussed in Certified EIR No. 548, buildout of GPA No. 1122 and Change Of Zone No. 7902 would generate additional students in school districts throughout the County. According to Certified EIR No. 548, full buildout of future development accommodated by GPA No. 1122 and Change Of Zone No. 7902 would result in up to 59,775 additional students in Riverside County. This would result in the need

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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for additional classroom space and teaching and support staff where increases exceed current capacity. Where increases trigger new school facilities or expansion of existing facilities, environmental impacts could potentially occur.

According to Certified EIR No. 548, expansion of an existing school or construction of a new school would have environmental impacts that would need to be addressed once the school improvements are proposed. It is likely that growth associated with the project will occur over time, which means that any one development is unlikely to result in the need to construct school improvements. Instead, each future development project will pay its share of future school improvement costs prior to occupancy of the building. Pursuant to the Leroy F. Greene School Facilities Act (SB 50), future development would be required to pay residential and commercial/industrial development mitigation fees to fund school construction. Under CEQA, payment of development fees is considered to provide full mitigation for the impact of the project on public schools. Impacts were determined to be less than significant in this regard.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the Modified Project would not present a new use or intensify a use that was considered under Certified EIR No. 548. Future development activities would continue to be required to prepare their fair share of future school improvement costs through payment of development impact fees. Therefore, the Modified Project would not result in new or substantially more severe environmental impacts concerning schools as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact.

Monitoring: No monitoring is required.

32. Libraries

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Source(s): County of Riverside General Plan; County of Riverside 6th Cycle Housing Element Update; County of Riverside General Plan Amendment 1122 Change of Zone CZ No. 7902 State Clearinghouse No. 2015061083 Final Environmental Impact Report.

Findings of Fact:

Because Certified EIR No. 548 does not analyze impacts to library resources, a direct comparison between GPA No. 1122 and Change Of Zone No. 7902 and the Modified Project cannot be provided. Regardless, although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the Modified Project would not present a new use or intensify a use that was considered under Certified EIR No. 548 and therefore would not result in greater impacts to libraries than GPA No. 1122 and Change Of Zone No. 7902. Furthermore, future development activities would be subject to payment of development impact fees, which would be secured and directed toward the maintenance of existing library facilities. Therefore, the Modified Project would not result in new or substantially more severe environmental impacts concerning library resources. Impacts would be less than significant in this regard.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact.

Monitoring: No monitoring is required.

33. Health Services

Source(s): *County of Riverside General Plan; County of Riverside 6th Cycle Housing Element Update; County of Riverside General Plan Amendment 1122 Change of Zone CZ No. 7902 State Clearinghouse No. 2015061083 Final Environmental Impact Report.*

Findings of Fact:

Because Certified EIR No. 548 does not analyze impacts to health services, a direct comparison between GPA No. 1122 and Change Of Zone No. 7902 and the Modified Project cannot be provided. Regardless, although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the Modified Project would not present a new use or intensify a use that was considered under Certified EIR No. 548 and therefore would not result in greater impacts to health services than GPA No. 1122 and Change Of Zone No. 7902. Therefore, the Modified Project would not result in new or substantially more severe environmental impacts concerning health services. Impacts would be less than significant in this regard.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 54

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
RECREATION Would the project:				
34. Parks and Recreation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located within a Community Service Area (CSA) or recreation and park district with a Community Parks and Recreation Plan (Quimby fees)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source(s): GIS database; Ordinance No. 460, Section 10.35, Regulating the Division of Land – Park and Recreation Fees and Dedications; Ord. No. 659, Establishing Development Impact Fees; *County of Riverside 6th Cycle Housing Element Update*; *County of Riverside General Plan Amendment 1122 Change of Zone CZ No. 7902 State Clearinghouse No. 2015061083 Final Environmental Impact Report*.

Findings of Fact:

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

As discussed in Certified EIR No. 548, growth instigated by GPA No. 1122 and Change Of Zone No. 7902 would generate an incremental net increase in park needs, i.e., increase the number of people using existing recreational resources and necessitate the provision of new facilities to maintain adequate levels of service, pursuant to the County’s parkland standards. However, the incremental increase of people associated with GPA No. 1122 and Change Of Zone No. 7902 would be spread over the entire County in various amounts. In accordance with GPA No. 960 Policy LU 25.4, new development is required to meet or exceed the County’s parkland standard of 3 acres per 1,000 population. The specific environmental impacts resulting from the provision of parks and recreational facilities would be identified by project-level environmental review of those future park facilities. The typical environmental effects regarding the construction and operation of parks and recreational facilities may involve issues with noise (during construction and coming from active playfields and playgrounds), air quality (during the construction of the facility), biological resources (depending on location), historic/cultural resources (depending on location), public services and utilities (demand for police and fire protection, electric, water, and wastewater service), and traffic on a local neighborhood level. This impact was determined to be less than significant in this regard.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the Modified Project would not present a new use or intensify a use that was considered under Certified EIR No. 548. Future development activities would continue to be required to comply with the County’s parkland standard of 3 acres per 1,000 persons (GPA No. 960 Policy LU 25.4). Therefore, the Modified

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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Project would not result in new or substantially more severe environmental impacts concerning parks and recreational facilities as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact.

Monitoring: No monitoring is required.

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

Refer to Response 36(a) above.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact.

Monitoring: No monitoring is required.

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

Refer to Response 36(a) above.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact.

Monitoring: No monitoring is required.

35. Recreational Trails

a) Include the construction or expansion of a trail system?

Source(s): County of Riverside General Plan, Figure C-6, "Trails and Bikeway System"; County of Riverside 6th Cycle Housing Element Update; County of Riverside General Plan Amendment 1122 Change of Zone CZ No. 7902 State Clearinghouse No. 2015061083 Final Environmental Impact Report.

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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Findings of Fact:

a) *Include the construction or expansion of a trail system?*

I could make something up, but should probably leave it to the professionals to fill this section out.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact.

Monitoring: No monitoring is required.

TRANSPORTATION Would the project:				
36. Transportation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Cause an effect upon, or a need for new or altered maintenance of roads?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Cause an effect upon circulation during the project's construction?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Result in inadequate emergency access or access to nearby uses?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source(s): County of Riverside General Plan; County of Riverside 6th Cycle Housing Element Update; County of Riverside General Plan Amendment 1122 Change of Zone CZ No. 7902 State Clearinghouse No. 2015061083 Final Environmental Impact Report.

Findings of Fact:

a) *Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?*¹

¹ Certified EIR No. 548 was circulated for public review prior to adoption of vehicle miles travelled (VMT) as the primary metric for analyzing transportation impacts. In accordance with CEQA Guidelines § 15007(c), "If a document meets the content requirements in effect when the document is sent out for public review, the document shall not need to be revised to conform to any new content requirements in Guideline amendments taking effect before the document is finally approved." Since circulation of an Addendum is not required in accordance with CEQA Guidelines Section 15164, and LOS was the primary method for analyzing

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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Certified EIR No. 548 analyzed traffic volumes and level of service (LOS) on regional arterial roadway segments under buildout associated with GPA No. 1122 and Change Of Zone No. 7902 and concluded that this buildout would reduce traffic volumes on three regional arterial roadway segments. However, GPA No. 1122 and Change Of Zone No. 7902 would increase traffic volumes on all other regional arterial roadway segments already projected to operate at an unacceptable level (LOS F). In accordance with GPA No. 960 Policy C 2.2, future development projects accommodated by GPA No. 1122 and Change Of Zone No. 7902 would be required to prepare a focused traffic impact analysis addressing site- and project-specific traffic impacts as warranted by the Riverside County Traffic Impact Analysis Preparation Guidelines or as approved by the Director of Transportation. In addition, GPA No. 960 Policy C 2.5 would require the cumulative and indirect traffic impacts of development to be mitigated through the payment of impact mitigation fees. To implement this policy, Certified EIR No. 548 includes Mitigation Measures 3.16.1 (fair share contribution) and 3.16.2 (secured right-of-way).

Concerning the regional arterials are already projected to operate at LOS F under buildout of existing General Plan land use designations, Certified EIR No. 548 determined that buildout of GPA No. 1122 and Change Of Zone No. 7902 would worsen this condition and thus would involve significant and unavoidable impacts.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the Modified Project would not present a new use or intensify a use that was considered under Certified EIR No. 548. Future development activities would continue to be required to comply with County policies and mitigation measures in place related to the circulation system. Furthermore, the Modified Project would not affect or change the significant unavoidable impact determination, nor invalidate Statement of Overriding Consideration findings as made in Certified EIR No. 548. Therefore, the Modified Project would not result in new or substantially more severe environmental impacts concerning conflicts with a program, plan, or ordinance related to the circulation system as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures:

EIR No. 548 MM 3.16.1 As part of its review of land development proposals, the County of Riverside shall require project proponents to make a fair share contribution to required intersection and/or roadway improvements. The required intersection and/or roadway improvements shall be based on maintaining the appropriate level of service (LOS D or better). The fair share contribution shall be based on the percentage of project-related traffic to the total future traffic.

EIR No. 548 MM 3.16.2 As part of its review of land development proposals, the County of Riverside shall require sufficient right-of-way is reserved on critical

transportation impacts when the previously certified EIR was circulated for public review, an analysis of VMT is not required under CEQA.

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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roadways and at critical intersections to implement the approach lane geometrics necessary to provide the appropriate levels of services.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact With Certified EIR No. 548 Mitigation Incorporated.

Monitoring: No monitoring is required.

b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Certified EIR No. 548 did not include an analysis of whether GPA No. 1122 and Change Of Zone No. 7902 would conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b), as this Appendix G Checklist Question was modified by the California Natural Resources Agency in July 2020 to require the use of vehicle miles traveled (VMT) as the methodology for evaluating traffic impact and was not required at the time of preparation of Certified EIR No. 548. Nonetheless, although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the Modified Project would not present a new use or intensify a use that was considered under Certified EIR No. 548. Future development accommodated by the Modified Project would be required to adhere to the County's Transportation Analysis Guidelines for Level of Service and VMT (adopted December 2020). Therefore, the Modified Project would not result in new or substantially more severe environmental impacts concerning VMT, and impacts would be less than significant in this regard.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact.

Monitoring: No monitoring is required.

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?

As described in Certified EIR No. 548, GPA No. 1122 and Change Of Zone No. 7902 would accommodate future development of both high-density residential and mixed-use development, which could result in the need for additional transportation and circulation infrastructure throughout the County. If not constructed according to the appropriate design criteria, hazards could occur. However, all circulation improvements associated with GPA No. 1122 and Change Of Zone No. 7902 would be required to conform to the Riverside County Transportation Department Improvement Standards and Specifications (County Ordinance No. 461), as well as Caltrans Standard Plans and Specifications. These roadway design criteria would require that improvements would not substantially increase hazards due to a design feature or incompatible uses. GPA No. 960 Policy C 3.4 allows Riverside

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Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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County to use a variety of design techniques such as continuous flow intersections, provided that a detailed study has been completed showing that these facilities could improve safety. GPA No. 960 Policy C 3.23 directs the County to consider the use of traffic-calming techniques to improve safety in neighborhoods. GPA No. 960 Policy C 6.5 recommends the placement of access locations for properties to maximize safety. During the County's development review process, the applicant would be required to provide substantial evidence of compliance with these policies. Therefore, this impact was determined to be less than significant.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the revisions to the Housing Element and Safety Element would not present a new use or intensify a use that was considered under Certified EIR No. 548. Future development activities would continue to be required to comply with County ordinances, policies, and Caltrans Standard Plans and Specifications in place pertaining to transportation-related hazards. Therefore, the Modified Project would not result in new or substantially more severe environmental impacts concerning geometric design features or incompatible uses as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact.

Monitoring: No monitoring is required.

d) *Cause an effect upon, or a need for new or altered maintenance of roads?*

Refer to Response 38(a) above.

Certified EIR No. 548 Mitigation Measures: Refer to Mitigation Measures 3.16.1 and 3.16.2 above.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact With Certified EIR No. 548 Mitigation Incorporated.

Monitoring: No monitoring is required.

e) *Cause an effect upon circulation during the project's construction?*

Refer to Response 38(a) above.

Certified EIR No. 548 Mitigation Measures: Refer to Mitigation Measures 3.16.1 and 3.16.2 above.

Mitigation Measures: No additional mitigation measures are required.

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Determination: Less Than Significant Impact With Certified EIR No. 548 Mitigation Incorporated.

Monitoring: No monitoring is required.

f) Result in inadequate emergency access or access to nearby uses?

As described in Certified EIR No. 548, GPA No. 1122 and Change Of Zone No. 7902 would accommodate future development of both high-density residential and mixed-use development, which would require coordinated emergency access. However, GPA No. 960 Policy C 3.24 requires the County to consult with the RCFD and other emergency service providers to provide a street network with quick and efficient routes for emergency vehicles, meeting necessary street widths, turnaround radius, secondary access, and other factors as determined by the Transportation Department. This would include the provision of adequate emergency access in street networks for new development. During the County's development review process, the applicant would be required to provide substantial evidence of compliance with this policy. Impacts were determined to be less than significant in this regard.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the Modified Project would not present a new use or intensify a use that was considered under Certified EIR No. 548. Future development activities would continue to be required to comply with GPA No. 960 Policy C 3.24 as part of the County's development review process. Therefore, the Modified Project would not result in new or substantially more severe environmental impacts concerning emergency access or access to nearby uses as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact.

Monitoring: No monitoring is required.

37. Bike Trails

a) Include the construction or expansion of a bike system or bike lanes?

Source(s): County of Riverside General Plan; County of Riverside 6th Cycle Housing Element Update; County of Riverside General Plan Amendment 1122 Change of Zone CZ No. 7902 State Clearinghouse No. 2015061083 Final Environmental Impact Report.

Findings of Fact:

a) Include the construction or expansion of a bike system or bike lanes?

As described in Certified EIR No. 548, future development associated with GPA No. 1122 and Change Of Zone No. 7902 could result in increased demand for bicycle facilities. However, all future

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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development would be required to provide substantial evidence of compliance with applicable General Plan policies that promote the provision of alternative transportation facilities. These regulatory measures are included in a development's conditions of approval during the development review process. For example, GPA No. 960 Policies C 4.1 through C 4.4 address the provision of safe pedestrian access in new development and roadway projects, specifically requiring that project design include pedestrian access from developments to existing and future transit routes. GPA No. 960 Policy C 4.6 would permit the County of Riverside to condition development proposals such that pedestrian facilities are provided. Impacts were determined to be less than significant in this regard.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the Modified Project would not present a new use or intensify a use that was considered under Certified EIR No. 548. Future development activities would continue to be required to demonstrate consistency with GPA No. 960 policies in place related to bicycle facilities. Therefore, the Modified Project would not result in new or substantially more severe environmental impacts concerning construction or expansion of a bike system or bike lanes as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact.

Monitoring: No monitoring is required.

TRIBAL CULTURAL RESOURCES Would the project cause a substantial adverse change in the significance of a Tribal Cultural Resource, defined in Public Resources Code section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:

38. Tribal Cultural Resources	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? (In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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Source(s): *County of Riverside 6th Cycle Housing Element Update; County of Riverside General Plan Amendment 1122 Change of Zone CZ No. 7902 State Clearinghouse No. 2015061083 Final Environmental Impact Report.*

Findings of Fact:

- a) **Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?**

Both Senate Bill (SB) 18 and Assembly Bill (AB) 52 requirements were triggered for GPA No. 1122 and Change Of Zone No. 7902. While the Notice of Preparation (NOP) was issued for the project on June 26, 2015, prior to enactment of AB 52, the project was subsequently revised to include additional parcels not included in the original project description; a revised NOP was circulated on October 9, 2015, to include the new parcels. Therefore, the AB 52 requirements for tribal consultation were triggered. In June 2015, the County initiated contact with the tribes on the Native American Heritage Commission list. Only two tribes formally requested consultation: Pala Band of Mission Indians (August 4, 2015) and the Morongo Band of Mission Indians (August 11, 2015). The Pala Band of Mission Indians determined that the area affected by GPA No. 1122 and Change Of Zone No. 7902 is not within the boundaries of the recognized Pala Indian Reservation and is beyond the boundaries of the territory that the tribe considers its traditional use area. The Morongo Band of Mission Indians determined that GPA No. 1122 and Change Of Zone No. 7902 was not within the tribe’s current reservation boundaries but is within the boundaries of the traditional use area. As such, the Morongo Tribe requested a records search, archaeological survey, and tribal monitoring during construction of future projects.

Certified EIR No. 548 concluded that impacts to tribal cultural resources would be mitigated through the County’s development review process, existing regulations, and Mitigation Measure 3.5.2, which would provide for dialogue with the appropriate ethnic or cultural group concerning the dispensation of cultural resources where it is infeasible for those resources to be avoided or preserved in place. Impacts were determined to be less than significant with mitigation in this regard.

State law requires that an opportunity for consultation be made available to Native American Tribes in the County when considering a general plan amendment, pursuant to Senate Bill (SB) 18, which identifies a 90-day period to request a consultation. Request for consultation letters were sent out to the Tribes identified on a list provided by the Native American Heritage Commission on March 9, 2021 with a response for consultation required on or before June 9, 2021. 30 letters/notice were sent via electronic mail (Email) and three letters were sent via US Postal Service mail. The County received a request from the Soboba Tribe for a consultation. The County held a meeting with the Soboba Tribe where general information and clarification was provided such that there would be no impacts to tribal resources created by these amendments. This information was acceptable to the Tribe.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the revisions to the Housing Element and Safety Element would not present a new use or intensify a use that was considered under Certified EIR No. 548. Future development activities would continue to be required to comply with County policies and mitigation measures in place related to tribal cultural resources. Therefore, the revisions to the Housing Element and Safety Element would not result in new

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or substantially more severe environmental impacts concerning tribal cultural resources as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures: Refer to Mitigation Measure 3.5.2 in Response 9(a) above.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact With Certified EIR No. 548 Mitigation Incorporated.

Monitoring: No monitoring is required.

- b) *A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? (In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.)*

Refer to Response 40(a).

Certified EIR No. 548 Mitigation Measures: Refer to Mitigation Measure 3.5.2 in Response 9(a) above.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact With Certified EIR No. 548 Mitigation Incorporated.

Monitoring: No monitoring is required.

UTILITIES AND SERVICE SYSTEMS Would the project:

	Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
39. Water				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage systems, whereby the construction or relocation would cause significant environmental effects?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Source(s): County of Riverside 6th Cycle Housing Element Update; County of Riverside General Plan Amendment 1122 Change of Zone CZ No. 7902 State Clearinghouse No. 2015061083 Final Environmental Impact Report.

Findings of Fact:

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage systems, whereby the construction or relocation would cause significant environmental effects?

According to Certified EIR No. 548, the revisions to the Housing Element and Safety Element would have the potential to increase demands on existing water supplies, entitlements, and infrastructure; increase the amount of wastewater generated and require additional wastewater treatment capacity; and increase the amount and quality of stormwater runoff, thus requiring additional stormwater drainage systems.

Water

Certified EIR No. 548 determined that future development associated with GPA No. 1122 and Change Of Zone No. 7902 could result in the cumulative demand for up to 73,987 acre-feet per year of water beyond that anticipated under buildout of the approved General Plan. At the Countywide level, full buildout of the project would have the potential to result in demand for water supplies where such are insufficient or unavailable to serve the project from existing entitlements and resources, thus necessitating new or expanded entitlements to adequately serve future development, or result in development in locations in which water supply adequacy cannot be ascertained. As determined by EIR No. 521 and EIR No. 441, buildout of General Plan land uses would increase demand for water services to a degree that exceeds the limits of existing and currently planned facilities, and therefore could result in additional development beyond what was previously anticipated. However, additional water service expansion or future development would be subject to development review during which the applicant would be required to provide substantial proof that the development area has been included and evaluated in an Urban Water Manage Plan (UWMP) under its assigned water district, provides estimates of indoor and outdoor water demand estimates to the County for review pending a "Will Serve Letter", or in exceedance of 500 resident dwelling units proposed, require the preparation of a Water Supply Assessment (WSA) to evaluate and provide water conservation reduction measures to ensure that the development maintains consistency in water demand with that of projected in the current water district assigned UWMP. Future development would also require submittal of evidence of compliance with County- and State-required water management and conservation regulations that are intended to assist in reducing the amount of water supplies required by future development. In addition, GPA No. 960 Policy OS 2.2 encourages the installation of water-conserving systems, such as dry wells and graywater systems, in new developments. GPA No. 960 Policies LU 18.1 through LU 18.4 and Ordinance No. 859, Water-Efficient Landscape Requirements, require new development projects to install water-efficient landscapes, thus limiting water applications and reducing water use. Certified EIR No. 548 Mitigation Measure 3.17.3 establishes water use restrictions associated with development in unincorporated areas of Riverside County, which are subject to the California Water Code and/or Public Resources Code. Furthermore, Certified EIR No. 548 Mitigation Measure 3.9.5, as discussed in Section 24(b), would require an applicant for development to submit evidence to Riverside County that all applicable water conservation measures have been met. Given the absence of definitive identification of future water supplies for buildout associated with EIR No. 521 and EIR No. 441, impacts associated with water supply and demand were considered significant and unavoidable.

Wastewater Treatment

As stated in Certified EIR No. 548, the average wastewater generation rate for a residential unit in Riverside County is 230 gallons per day per capita. As a result of the revisions, future development from the project could result in the cumulative generation of 55.38 million gallons per day of wastewater

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Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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beyond that anticipated under buildout of the General Plan. However, it is feasible that wastewater service providers in Riverside County would continue to expand their treatment capacities consistent with any incremental increase of demand from future projects throughout the County. The implementation of conservation methods and increased use of reclaimed water would help decrease the need for treatment and storage capacity and provide for beneficial reuse of water. Any potential future expansion or construction of new wastewater treatment plants, as well as water reclamation and storage facilities, would be subject to developmental review and additional environmental analysis to determine on-site impacts. Additionally, Ordinance No. 659, DIF Program, is intended to mitigate growth impacts in Riverside County by ensuring fees are collected and expended to provide necessary facilities commensurate with the ongoing levels of development. Future development would also be subject to Riverside County Ordinance No. 592, Regulating Sewer Use, Sewer Construction and Industrial Wastewater Discharges in County Service Areas, which sets various standards and requirements for sewer use, construction, and industrial wastewater discharges to protect both water quality and the infrastructure conveying and treating wastewater. Ordinance No. 592 serves to protect water supplies, water and wastewater facilities, and water quality for both surface water and groundwater. Furthermore, where sewer services are not available, the County regulates the construction of septic tanks for adequate capacity as described under Impact Analysis 3.17.1. Given that existing wastewater treatment requirements would require that adequate sewer capacity is available to serve future development and that future development would not exceed wastewater treatment requirements of the applicable RWQCB.

Stormwater Drainage Systems

As described in Section 24(a), NPDES and County requirements would require that future development would control the amount and quality of stormwater runoff leaving construction and development sites, which would also reduce the amount of stormwater runoff entering the County’s storm drainage system. As discussed in Section 24(d), Certified EIR No. 548 Mitigation Measure 3.9.8 would require a condition of approval for each new development project. These measures address drainage requirements for new development projects, including requiring BMPs to lessen stormwater runoff, requiring on-site small drainages and pervious materials to allow more percolation of stormwater into the ground, and encouraging the construction of detention basins, holding ponds, and/or wetlands within a project site to capture and treat dry weather urban runoff. GPA No. 960 Policy S 4.10 specifically requires all proposed projects within Riverside County to address and mitigate any adverse impacts that they may have on the carrying capacity of local and regional storm drain systems. In addition, the County’s DIF program covers all portions of unincorporated Riverside County and provides funds for flood control and storm drain facilities. Any construction or expansion of storm drain facilities necessary to serve future development would be subject to site-specific CEQA review and mitigation of impacts. Implementation of the above regulations and mitigation measures would require that the construction of new stormwater drainage facilities or expansion of existing facilities would occur as needed to serve new development and were determined to be less than significant.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the Modified Project would not present a new use or intensify a use that was considered under Certified EIR No. 548. Future development activities would continue to be required to comply with County regulations and standards, Certified EIR No. 548 Mitigation Measures 3.9.5, 3.9.8, and 3.17.3, local

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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ordinances, and General Plan policies regarding water use, water systems, and water requirements. Furthermore, with regard to water services, the Modified Project would not affect or change the significant unavoidable impact determination, nor invalidate Statement of Overriding Consideration findings as made in Certified EIR No. 548. Therefore, the Modified Project would not result in new or substantially more severe environmental impacts related to water services as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures: Refer to Mitigation Measures 3.9.5 and 3.9.8 in Response 24(b) and 24(d), respectively, above.

EIR No. 548 MM 3.17.3 Development within unincorporated areas of Riverside County shall not use water of any source of quality suitable for potable domestic use for non-potable uses, including cemeteries, golf courses, parks, highway landscaped areas, industrial and irrigation uses, or other nondomestic use if suitable recycled water is available as provided in Sections 13550-13566 of the California Water Code and/or PRC Sections 65591-65600 and 65601-65607. Prior to the issuance of any land use permit, the County shall determine to what extent and in which manner the use of recycled water is required for individual water projects. Future development shall be designed, constructed, and maintained in accordance with the recycled water measures mandated by the County.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact with Certified EIR No. 548 Mitigation Incorporated.

Monitoring: No monitoring is required.

b) *Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?*

As described in Section 41(a), the project would accommodate increased density/intensity throughout the unincorporated County, which has the potential to increase demands on existing water supplies, entitlements, and infrastructure. Furthermore, Certified EIR No. 548 (refer to Section 24[b] above), indicates that the combination of increased water demand associated with the growth facilitated by the project, unpredictability and the cost of imported water supply, variability in long-term supply scenarios in non-adjudicated groundwater basins, exploitation of new groundwater sources, and the continuing pattern of basin overdraft would all result in or contribute incrementally to substantially decreasing groundwater supplies. This unpredictability and variability mean that significant impacts associated with project buildout cannot be ruled out in association with groundwater, which supplies about 8 percent of the water supply in the South Coast Hydrologic Region and 23 percent of water demand in the Colorado River Hydrologic Region. The State Water Project (SWP) supplies most of the water in Riverside County, supplies of which are constrained by key factors such as rainfall amounts, snowpack and stored water levels, and pumping capacity from the Delta, as well as legal and regulatory factors including those related to certain fish species listed as endangered by the state and federal governments. Inconsistencies in rainfall and snowpack, as well as frequently changing regulatory restrictions, mean that the availability of future SWP water supplies is, to some degree, uncertain. Similarly, the year-to-year availability of Colorado River water (the other primary source of imported water supply utilized in

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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Riverside County) to urban users can be variable and unpredictable because of legal challenges regarding water rights and priorities. As discussed in Section 41(a), additional water expansion or development would be subject to development review and must comply with County- and State-required water management and conservation regulations. Given the absence of definitive identification of future water supplies for buildout associated with GPA No. 1122 and Change Of Zone No. 7902, potential impacts associated with water supply and demand would be significant and unavoidable.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the Modified Project would not present a new use or intensify a use that was considered under Certified EIR No. 548. Future development activities would continue to be required to comply with County and State regulations and standards, Mitigation Measures 3.9.5, 3.9.8, and 3.17.3, local ordinances, and General Plan policies regarding water use, water systems, and water requirements. Because of the absence of definitive identification of future water supplies and inconsistencies in rainfall and snowpack, the availability of future water supply is uncertain. Furthermore, the Modified Project would not affect or change the significant unavoidable impact determination, nor invalidate Statement of Overriding Consideration findings as made in Certified EIR No. 548. Therefore, the Modified Project would not result in new or substantially more severe environmental impacts concerning water supply as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures: Refer to Mitigation Measures 3.9.5, 3.9.8, and 3.17.3 above.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact with Certified EIR No. 548 Mitigation Incorporated.

Monitoring: No monitoring is required.

40. Sewer

a) Require or result in the construction of new wastewater treatment facilities, including septic systems, or expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects?

b) Result in a determination by the wastewater treatment provider that serves or may service the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Source(s): County of Riverside 6th Cycle Housing Element Update; County of Riverside General Plan Amendment 1122 Change of Zone CZ No. 7902 State Clearinghouse No. 2015061083 Final Environmental Impact Report.

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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Findings of Fact:

- a) ***Require or result in the construction of new wastewater treatment facilities, including septic systems, or expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects?***

Certified EIR No. 548 concluded that GPA No. 1122 and Change Of Zone No. 7902 would accommodate increased density/intensity throughout the unincorporated County, which has the potential to increase the number of people and structures generating wastewater. Proper treatment of wastewater is required to protect receiving waters, which are protected through compliance with and enforcement of NPDES MS4 (municipal separate storm sewer systems) permits, as well as other permits required for a wide variety of activities with potential to discharge wastes into waters of the State or United States. Operation of MS4s is discussed further in Section 24(a) above.

Within areas without sewer services, development must rely on various types of septic systems or on-site waste treatment systems (OWTS), which typically result in percolation of wastewater into groundwater or to surface waters. As explained by Certified EIR No. 548, Riverside County regulates the construction of septic tanks in new developments and requires the approval of the Riverside County Health Officer (County Code Section 8.124.030 and Ordinance No. 650) on all new septic facilities, which require detailed review, on-site inspections, soil evaluations, reporting, and topographical mapping. In addition, the County has adopted several ordinances, policies, and federal regulations to require the safe placement and construction of sewage facilities and to protect water quality. County Ordinance No. 650, Sewer Discharge in Unincorporated Territory, establishes a variety of regulations regarding OWTS, including that the type of sewage facilities installed shall be determined on the basis of location, soil porosity, site slope, and groundwater level, and shall be designed to receive all sanitary sewage from the property based on the higher volume estimation as determined by either the number of bedrooms or plumbing fixture unit counts. Certified EIR No. 548 Mitigation Measures 3.17.1 and 3.17.2 would also require conditional approvals for future development that require septic systems are developed to protect water quality consistent with applicable regulations and would thus be prevented from exceeding wastewater treatment requirements. Additionally, the County will adhere to EPA standards governing the placement of septic systems in proximity to water supply wells. During the County's development review process, the applicant would be required to provide substantial evidence of compliance with these regulations. As determined by Certified EIR No. 548, the impacts associated with the construction of new wastewater treatment facilities, including septic systems, or the expansion of existing facilities, are less than significant.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the Modified Project would not present a new use or intensify a use that was considered under Certified EIR No. 548. Future development activities associated with the construction of new wastewater treatment facilities, including septic systems, or the expansion of existing facilities are regulated by the County and require conditions of approval, and are subject to General Plan policies and EPA standards to protect water quality. Therefore, the Modified Project would not result in new or substantially more severe environmental impacts related to septic systems as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures:

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EIR No. 548 MM 3.17.1 Conventional septic tanks/subsurface disposal systems shall be prohibited within any designated Zone A of an EPA wellhead protection area. Where a difference between Riverside County and EPA septic tank setback distance requirements exists, the more restrictive standard shall apply.

EIR No. 548 MM 3.17.2 The development of septic systems shall be in accordance with applicable standards established by Riverside County and other responsible authorities.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less than Significant Impact with Certified EIR No. 548 Mitigation Incorporated.

Monitoring: No monitoring is required.

b) *Result in a determination by the wastewater treatment provider that serves or may service the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*

As addressed under the Wastewater Treatment subsection in Section 41(a), future development from GPA No. 1122 and Change Of Zone No. 7902 could result in the cumulative generation of 55.38 million gallons per day of wastewater beyond that anticipated under buildout of the General Plan. This growth would incrementally increase the amount of wastewater generated, which could require additional wastewater treatment capacity to serve projected demand as well as additional wastewater treatment facilities. However, increased demand would likely occur incrementally over many years, therefore making it feasible for wastewater service providers in the County to continue expansion of their treatment capacities to meet this demand. Without the expansion of facilities to treat wastewater, development might not be able to occur on a long-term basis.

Additionally, the construction of new wastewater treatment plants, as well as water reclamation and storage facilities, would be subject to developmental review and additional environmental analysis to determine on-site impacts. These measures are implemented, enforced, and verified through their inclusion in project conditions of approval. Ordinance No. 659, DIF Program, is intended to mitigate growth impacts in Riverside County by ensuring fees are collected and expended to provide necessary facilities commensurate with the ongoing levels of development, including the potential future expansion of wastewater treatment facilities. Ordinance No. 592, Regulating Sewer Use, Sewer Construction and Industrial Wastewater Discharges in County Service Areas, sets various standards and requirements for sewer use, construction, and industrial wastewater discharges to protect both water quality and the infrastructure conveying and treating wastewater by (1) establishing construction requirements for sewers, laterals, house connections, and other sewerage facilities, and (2) prohibiting the discharge to any public sewer (which connects to Riverside County's sewerage system) any wastes that may have an adverse or harmful effect on sewers, maintenance personnel, wastewater treatment plant personnel or equipment, treatment plant effluent quality, or public or private property, or which may otherwise endanger the public or the local environment or create a public nuisance. Where sewer services are not available, the County regulates the construction of septic tanks for adequate capacity as described under Impact Analysis 3.17.1 (refer to Section 41(a) above). Given existing wastewater treatment requirements would require that adequate sewer capacity is available to serve future development and that future development would not exceed wastewater treatment requirements of the applicable

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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RWQCB, the potential impacts associated with wastewater treatment were determined to be less than significant.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the Modified Project would not present a new use or intensify a use that was considered under Certified EIR No. 548. Future development activities would continue to be required to demonstrate that adequate sewer capacity is available to serve future development. Therefore, the Modified Project would not result in new or substantially more severe environmental impacts related to wastewater treatment as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures: Refer to Mitigation Measure 3.17.1 above.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less than Significant Impact With Certified EIR No. 548 Mitigation Incorporated.

Monitoring: No monitoring is required.

41. Solid Waste

a) Generate solid waste in excess of State or Local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Comply with federal, state, and local management and reduction statutes and regulations related to solid wastes including the CIWMP (County Integrated Waste Management Plan)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Source(s): County of Riverside 6th Cycle Housing Element Update; County of Riverside General Plan Amendment 1122 Change of Zone CZ No. 7902 State Clearinghouse No. 2015061083 Final Environmental Impact Report.

Findings of Fact:

- a) **Generate solid waste in excess of State or Local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?**

Certified EIR No. 548 concluded that GPA No. 1122 and Change Of Zone No. 7902 would cumulatively result in the capacity for up to 73,255 more dwelling units in comparison to buildout of the adopted General Plan, which would result in solid waste generation beyond what was anticipated for buildout of current land use designations. Although the project would accommodate future development of both high-density residential and mixed-use development that would generate solid waste, future development facilitated by the project could hasten the end use of County landfills and contribute to the cumulative need for new or expanded landfills and other solid waste facilities.

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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According to Riverside County, the project would generate 30,034 tons of waste per year beyond that already planned for by the General Plan. As described in Certified EIR No. 548, the serving landfills have a collective remaining capacity of 63,095,267 tons to serve future development resulting from the project. Solid waste from full buildout of the project would represent 0.05 percent of this remaining capacity. However, these generation assumptions do not consider the effects of compliance with mandatory recycling and diversion programs, which would further reduce the amount of waste sent to landfills. Additionally, any new approved development would be required to comply with Riverside County's recycling and diversion programs via standard conditions of approval for new projects, including requiring recycling facilities to provide services for all new commercial and multifamily developments and requiring all plot plans to comply with AB 341 and Riverside County Department of Waste Resources (RCDWR) Design Guidelines for Refuse and Recyclables Collections and Loading Areas, as well as submitting a waste recycling plan for each building proposed. Additional conditions of approval are required for residential, commercial, and industrial developments as well as public facilities through the issuance of a clearance letter by the RCDWR, which outlines additional project-specific requirements to require that individual project developers provide adequate areas for collecting and loading recyclable materials, such as paper products, glass, and green wastes. Furthermore, any new development would be subject to RCDWR review and compliance, and subject to Certified EIR No. 548 Mitigation Measures 3.17.4 (adequate areas for collection of recyclables) and 3.17.5 (adequate waste disposal capacity), which would be required as conditions of approval for development projects facilitated by the project.

Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the Modified Project would not present a new use or intensify a use that was considered under Certified EIR No. 548. Although existing landfills have adequate capacity to serve future developments, future development activities would continue to be required to comply with RCDWR guidelines and requirements, AB 341, and EIR No. 548 Mitigation Measures 3.17.4 and 3.17.5 to reduce demand on area landfills. Therefore, the Modified Project would not result in new or substantially more severe environmental impacts related to solid waste as compared to Certified EIR No. 548.

Certified EIR No. 548 Mitigation Measures:

- EIR No. 548 MM 3.17.4 The County of Riverside shall require all future commercial, industrial, and multifamily residential development to provide adequate areas for the collection and loading of recyclable materials (i.e., paper products, glass, and other recyclables) in compliance with the State Model Ordinance, implemented on September 1, 1994, in accordance with AB 1327, Chapter 18, California Solid Waste Reuse and Recycling Access Act of 1991.

- EIR No. 548 MM 3.17.5 The County of Riverside shall require all development projects to coordinate with appropriate County departments and/or agencies to require that there is adequate waste disposal capacity to meet the waste disposal requirements of the project. The County shall recommend that all development projects incorporate measures to promote waste reduction, reuse, recycling and composting.

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact with Certified EIR No. 548 Mitigation Measures.

Monitoring: No monitoring is required.

b) **Comply with federal, state, and local management and reduction statutes and regulations related to solid wastes including the CIWMP (County Integrated Waste Management Plan)?**

Refer to Response 42(a) above.

Certified EIR No. 548 Mitigation Measures: Refer to Mitigation Measure 3.17.1 in Response 42(a) above.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact with Certified EIR No. 548 Mitigation Measures.

Monitoring: No monitoring is required.

39. Utilities

Would the project impact the following facilities requiring or resulting in the construction of new facilities or the expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects?

a) Electricity?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Natural gas?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Communications systems?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Street lighting?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Maintenance of public facilities, including roads?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Other governmental services?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source(s):

Findings of Fact:

a) **Electricity?**

Because Certified EIR No. 548 does not analyze impacts to electricity, a direct comparison between GPA No. 1122 and Change Of Zone No. 7902 and Modified Project cannot be provided. Regardless, although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, Modified Project would not present a new use or intensify a use that was considered under Certified EIR No. 548 and therefore would not result in greater impacts to electricity resources than GPA No. 1122 and Change Of Zone No. 7902. In addition, future development activities would be subject to the

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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County development review process, which evaluates the ability of utility providers to provide services concurrently with each project, and Title 24 Building Energy Efficiency Standards, which provide minimum efficiency standards related to various building features, including appliances, water and space heating and cooling equipment, building insulation and roofing, and lighting. Furthermore, the electrical service provider, Southern California Edison, is subject to California's Renewables Portfolio Standard, which requires investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 33 percent of total procurement by 2020 and to 50 percent of total procurement by 2030. Therefore, the Modified Project would not result in new or substantially more severe environmental impacts concerning electricity resources. Impacts would be less than significant in this regard.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact.

Monitoring: No monitoring is required.

b) *Natural gas?*

Certified EIR No. 548 does not analyze impacts to natural gas; therefore, a direct comparison between GPA No. 1122 and Change Of Zone No. 7902 and the Modified Project cannot be provided. Nevertheless, although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the Modified Project would not present a new use or intensify a use that was considered under Certified EIR No. 548 and therefore would not result in greater impacts to natural gas resources than GPA No. 1122 and Change Of Zone No. 7902. Furthermore, future development activities would be subject to the County development review process, which evaluates the ability of utility providers to provide services concurrently with each project, and Title 24 Building Energy Efficiency Standards, which provide minimum efficiency standards related to various building features, including appliances, water and space heating and cooling equipment, building insulation and roofing, and lighting. Therefore, the Modified Project would not result in new or substantially more severe environmental impacts concerning natural gas resources. Impacts would be less than significant in this regard.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact.

Monitoring: No monitoring is required.

c) *Communications systems?*

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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Because Certified EIR No. 548 does not analyze impacts to communications systems, a direct comparison between GPA No. 1122 and Change Of Zone No. 7902 and the Modified Project cannot be provided. In any case, although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the Modified Project would not present a new use or intensify a use that was considered under Certified EIR No. 548 and therefore would not result in greater impacts to communications systems than GPA No. 1122 and Change Of Zone No. 7902. In addition, future development activities would be subject to the County development review process; therefore, the Modified Project would not result in new or substantially more severe environmental impacts concerning communications systems. Impacts would be less than significant in this regard.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact.

Monitoring: No monitoring is required.

d) *Street lighting?*

Certified EIR No. 548 does not analyze impacts to street lighting resources; therefore, a direct comparison between GPA No. 1122 and Change Of Zone No. 7902 and the Modified Project cannot be provided. In any case, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the policy changes proposed by the Modified Project would not present a new use or intensify a use that was considered under Certified EIR No. 548 and therefore would not result in greater impacts to street lighting than GPA No. 1122 and Change Of Zone No. 7902. In addition, future development activities would be subject to the County development review process; therefore, the Modified Project would not result in new or substantially more severe environmental impacts concerning street lighting. Impacts would be less than significant in this regard.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact.

Monitoring: No monitoring is required.

e) *Maintenance of public facilities, including roads?*

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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Refer to Response 36(a) and 38(a) above.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact.

Monitoring: No monitoring is required.

f) Other governmental services?

Refer to the responses for 26, 30, 31, 32, 33, and 39(a-e) above. Although the analyses and findings in the Housing Element have been updated by the Modified Project, the Modified Project would not change any existing land use designations or zoning. The changes to the Safety Element are limited to addressing resilience data and policies related to Wildfire, Flood and Inundation and Geologic Hazards. Safety related consistency edits to other General Plan Elements would be limited in those required to maintain internal consistency within the General Plan. Thus, the policy changes proposed by the Modified Project would not result in new or substantially more severe environmental impacts concerning other governmental facilities. Impacts would be less than significant in this regard.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact.

Monitoring: No monitoring is required.

WILDFIRE If located in or near a State Responsibility Area (“SRA”), lands classified as very high fire hazard severity zone, or other hazardous fire areas that may be designated by the Fire Chief, would the project:

40. Wildfire Impacts				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Expose people or structures either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source(s): County of Riverside General Plan, Figure S-11 "Wildfire Susceptibility"; County of Riverside 6th Cycle Housing Element Update; County of Riverside General Plan Amendment 1122 Change of Zone CZ No. 7902 State Clearinghouse No. 2015061083 Final Environmental Impact Report.

Findings of Fact:

Note: For the following Impact Discussions, please refer to listed reference locations for discussion analysis within this document. This is because the Wildfire Impacts section was not created as a separate discussion topic at the time of preparation and circulation of Certified EIR No. 548.

- a) ***Substantially impair an adopted emergency response plan or emergency evacuation plan?***

Refer to Sections 20(c) and 36(f) above.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact.

Monitoring: No monitoring is required.

- b) ***Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?***

Refer to Response 22(a) above.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact.

Monitoring: No monitoring is required.

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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c) **Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?**

Refer to Response 22(a) above.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact.

Monitoring: No monitoring is required.

d) **Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?**

Refer to Response 12(a), 15(a), and 22(a) above.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact.

Monitoring: No monitoring is required.

e) **Expose people or structures either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?**

Refer to Response 22(a) above.

Certified EIR No. 548 Mitigation Measures: No mitigation measures were required in Certified EIR No. 548.

Mitigation Measures: No additional mitigation measures are required.

Determination: Less Than Significant Impact.

Monitoring: No monitoring is required.

MANDATORY FINDINGS OF SIGNIFICANCE Does the Project:

41. Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community,	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?

Source(s): Staff Review; Project Application Materials

Findings of Fact:

Implementation of the project would not substantially degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory.

42. Have impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, other current projects and probable future projects)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Source(s): Staff Review; Project Application Materials

Findings of Fact:

The project does not have impacts which are individually limited, but cumulatively considerable.

43. Have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Source(s): Staff Review; Project Application Materials

Findings of Fact:

The proposed project would not result in environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly.

VI. EARLIER ANALYSES

Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration as per California Code of Regulations, Section 15063 (c) (3) (D). In this case, a brief discussion should identify the following:

Earlier Analyses Used, if any: Certified EIR No. 548

Location Where Earlier Analyses, if used, are available for review:

Location: County of Riverside Planning Department
4080 Lemon Street 12th Floor
Riverside, CA 92501

Potentially Significant Impact	Less than Significant with EIR No. 548 Mitigation	Less Than Significant Impact	No Impact
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Attachment: Attachment H Addendum to EIR No. 548 (GPA Nos. 180002, 190006, 210109 6th Cycle Housing/Safety/Land Use)

From: [Dean and Kay Pierson](#)
To: [Flores, Robert](#)
Cc: [Swancott, Paul](#)
Subject: written comments for HE and SE
Date: Monday, August 16, 2021 4:42:53 PM
Attachments: [ADU-Paul Swancott_email.eml](#)

Good Day Mr. Flores,

This email is in response to your request of comments and /or concerns regarding the Housing Element Draft.

My name is Kay Pierson. My husband Dean and I are pursuing the construction of a ADU/Second Unit on our ¼ acre lot in Unincorporated Riverside County. I have been trying to reach you by phone, but when I didn't hear back from you, I called the office and was told you were on vacation. Btw, I hope you enjoyed your trip!

In the Housing Element Report there was a lot of information regarding the new ordinances and applications of Additional Residential Accommodations and ADU's. In the meantime, I reached out to Paul Swancott. We spoke about my frustrations with the information my husband and I were receiving from the Building Dept and DEH. Paul was helpful in his information, and thought that we had received old or misinformation. He thought that with the new ordinance #348 in April 2021 and since we were willing to be flexible in our design that we shouldn't have any resistance with approval. But unfortunately, we are still having the same constraints from DEH.

At first we planned a new septic system for the new unit. But we were told only one system is allowed on a lot one acre or less. So we said we would upgrade our existing Septic to a new larger system to accommodate two homes. And Ryan Olney @DEH said unless the homes are attached then they cannot be on the same system!

In a nutshell, if we add 1500 sq ft to our existing home then our plans and septic system it's ok!
If we build an additional new home and attach it with a REALLY LONG HALL WAY then it's ok!
But if the second home or 1500 square footage is not ATTACHED in someway....than the DEH's hands are tied.

DEH has said that the new ADU ordinances are not taking into consideration the existing DEH Codes. Ryan said that until the powers that be address these issues our plans and the plans of many will be denied.

In short, our constraint is DEH has stated that we "CANNOT put a primary dwelling and a detached ADU/Second Unit on one Septic System."

What changes will have to be made to the Housing Element and/or Ordinance #348 in order to allow DEH to approve permit?

We are not the only property in Unincorporated Riverside County with less than one acre on a septic system. My husband was told by the Planning Obudsman, Travis Engelking that this is a common denial with the ADU process and I'm sure with the new Housing Element you will be

running into the problem many more times.

I have attached copy of our email exchange with Paul for you to get more information.
Also, can I trust that with my email getting in to you before the deadline that we can have further discussion regarding this matter in the days ahead?
Please let me know.

Thank you for your time and consideration in this matter.
We look forward to hearing back from you.

Dean and Kay Pierson
2260 Rancho Corona Drive
Corona, 92882
951-415-3136

Sent from [Mail](#) for Windows



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August 16, 2021

SENT VIA EMAIL ONLY.

Robert Flores, Principal Planner
Riverside County Planning Department
RFlores@rivco.org

**RE: Riverside County Draft 6th Cycle Housing Element
Homelessness and Disability Analysis**

Dear Mr. Flores:

The Public Interest Law Project writes to provide public comments to Riverside County regarding inadequacies in its Draft 6th Cycle Housing Element (Draft) related to analysis of the housing needs of unhoused people and people with disabilities. The Public Interest Law Project is a statewide non-profit legal services support center that advances justice for low income people and communities by building the capacity of legal services organizations through impact litigation, trainings, and publications, and by advocating for low income community groups and individuals. We work with partner organizations throughout the state, including in Riverside County, on a variety of issues include affordable housing, fair housing, public benefits, and homelessness. We make these comments in addition the comments submitted by Leadership Counsel for Justice and Accountability and other local community-based organizations, and we encourage the County to revise the Draft to address both the concerns raised in this letter and input provided by other advocates and community members.

Needs of Unhoused People

The Housing Element must analyze the needs of "families and persons in need of emergency shelter." Gov. Code, § 65583(a)(7). That analysis must include analysis of disparities based on race, disability, and other characteristics protected by fair housing laws. Gov. Code, § 65583(c)(10); HCD AFFH Guidance, https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf, 36-37. The County is the lead agency for the Riverside County Continuum of Care and responsible for the coordination and administration of homelessness services countywide,

but the Draft lacks critical information, analysis, and actions to address the needs of the County's unhoused residents. The Draft's deficiencies include the following:

- The Draft's limitation of demographic analysis to the unincorporated county obscures countywide needs and issues. Because of the County's role in coordination and administration of homeless services, the Housing Element should analyze data for both the unincorporated areas and the County as a whole. For example, the Draft says that there were no children under 18 observed in the 2020 homeless Point-In-Time Count, but the Point-In-Time Count identified 2,117 homeless children under 18 countywide, nearly a quarter of the County's entire homeless population. Draft, P-68. Data available at <https://www.bcsd.ca.gov/hcfc/hdis/demographics.html>.
- The Draft does not address the prevalence of disabilities among unhoused people in the County. Draft, P-67. "People with disabilities are . . . overrepresented in the unhoused population and any solutions related to homelessness must address appropriate accommodations and accessibility." HCD AFFH Guidance, 36. In Riverside County, 37% of unhoused people surveyed in its most recent Point-in-Time Count reported having a disability. Data available at <https://www.bcsd.ca.gov/hcfc/hdis/demographics.html>. In contrast, Census data indicate that only 7.5% of people under 65 in the County have disabilities. The Draft does not analyze the relative overrepresentation of people with disabilities among its unhoused residents nor the appropriateness and accessibility of existing shelter resources to meet the needs of the homeless population. Draft, P-70-71; see also HCD AFFH Guidance, 37.
- The Draft does not address racial disparities in the homeless population. In 2019, 25.4% of unhoused people in the County were Black, but only 6.4% of people living in the County are Black. Data available at <https://www.bcsd.ca.gov/hcfc/hdis/demographics.html>. The Draft does not analyze the known or likely causes of this racial disparity, nor whether existing services are effective at affirmatively addressing this disparity.
- The Draft does not engage in racial impact or disability access analysis of the County's Coordinated Entry System. See AFFH Guidance, 37. Such analysis is necessary to ensure that services are accessible and do not further entrench existing patterns of segregation and exclusion.
- The County administers General Relief and other public benefits that unhoused individuals and families, as well as other low-income community members, rely on to secure and maintain housing. However, the Draft does not engage in any fair housing analysis of the County's public benefits administration.

Further, without adequate and accurate analysis of current needs, policies, and services, the Draft also lacks adequate, concrete programs to address the needs of its unhoused residents and to ensure that the County administers its programs equitably.

Reasonable Accommodation Ordinance

The Housing Element must analyze “potential and actual governmental constraints upon the maintenance, improvement, or development of housing for . . . people with disabilities.” Gov. Code, § 65583(a)(5). Program H-7 commits the County to “[r]eview the County’s findings for approving reasonable accommodation requests, including, but not limited to, potential impact on surrounding uses, physical attributes of the property and structures, and any other findings that may be potential barriers to housing for persons with disabilities.” H-10. But analysis of the County’s reasonable accommodation ordinance, and whether that ordinance poses constraints to the development of housing for people with disabilities, should be part of the Housing Element. See <https://www.hcd.ca.gov/community-development/building-blocks/constraints/constraints-for-people-with-disabilities.shtml>. The Draft does not discuss whether the County has received any reasonable accommodation requests, whether any reasonable accommodation requests were granted or denied, or what the bases for denial were in the case of any denials. See P-141.

Additionally, review of the County’s reasonable accommodation ordinance and its website reveals structural barriers to obtaining reasonable accommodations, including the following:

- Riverside County Municipal Code section 17.04.115(A)(2) requires the reasonable accommodation request to be made on form provided by the Planning Department, but there is no RA request form on the Planning Department’s website: <https://planning.rctlma.org/Development-Process/Applications>. Additionally, the Fair Employment and Housing Act (FEHA) prohibits the City from denying reasonable accommodation requests based on failure to use a prescribed form. 2 Cal. Code Regs., § 12176(c)(4).
- Section 17.04.115(A)(6) includes factors for potential denial of reasonable accommodations beyond those allowed under FEHA. See 2 Cal. Code Regs., § 12161(b)(8).
- The County charges a \$983.28 fee to appeal a reasonable accommodation denial, but state and federal law prohibit covered entities from charging a fee for reasonable accommodations. Draft, P-147; see 2 Cal. Code Regs., § 12180 (a)(1); HUD-DOJ Joint Statement on Reasonable Accommodations, p.

9, https://www.justice.gov/sites/default/files/crt/legacy/2010/12/14/joint_statement_ra.pdf.

The Housing Element must analyze the existing reasonable accommodation ordinance for potential violations of fair housing law and constraints to the development of housing for people with disabilities; and it must include a concrete program—with a concrete deadline—to amend the ordinance to comply with the law.

Please let me know if you have any questions or would like to discuss these comments further. I can be reached via email at mmorris@pilpca.org.

Sincerely,



Melissa A. Morris
Staff Attorney

Cc: Ashley Werner and Omar Gastelum, Leadership Counsel for Justice and Accountability
Jamillah Williams and Paul McDougall, Department of Housing and Community Development



COFEM
Consejo de Federaciones Mexicanas

August 16, 2021

Robert Flores, Principal Planner
Riverside County Planning Department
4080 Lemon Street
Riverside, CA 92501

Sent via Email

Re: Riverside County 6th Cycle Housing Element Update Policy and Program Recommendations

Dear Mr. Flores:

Thank you for the opportunity to provide feedback on Riverside County's draft 6th Cycle Housing Element update. After a review of the draft, we have identified a number of areas where we believe the County can take further action to promote fair and equitable housing for Riverside County residents. Our comments are listed below.

I. Release the Draft Housing Element for Public Review Before Submission to HCD

On July 8, 2021, Riverside County released its draft 6th Cycle Housing Element update for public review and concurrently submitted the same draft for review to the Department of Housing and Community Development (HCD). HCD's own Affirmatively Furthering Fair Housing Guidance states that, "Drafts of the housing element should be made available to the public for review and comment with ample time before submission to the Department of Housing and Community Development (HCD) for review." (p. 10.) By simultaneously releasing the draft Housing Element for review by HCD and the public, the

County has not met its requirement to diligently outreach to the community during its Housing Element Development process.

II. Comprehensive Polanco Park Permitting Program

We commend the County for including a Polanco Parks Program to streamline the mobile home park permitting process and provide rehabilitation loans to owners of unpermitted parks. Below are our recommendations for ensuring this program is comprehensive and proactive in preventing future Polancos from falling into disrepair.

A. Three Year Moratorium on Fines and Code Enforcement

In order to encourage park owners to participate in the program, the County should establish a three year moratorium on any potential fines and code enforcement. This will ensure the program is affordable and accessible to all Polanco Park owners.

B. Create an Eastern Coachella Valley Polanco Park Housing Directory

Given the number of dilapidated unpermitted mobile home parks in the Eastern Coachella Valley, the County Housing Authority should work with Polanco Park owners to map these parks and assess their individual needs. The directory could also serve as a way to identify potential parks for the Polanco Park Program.

C. Polanco Property Management Education Program

We recommend the Riverside County Transportation Land Management Agency (TLMA) in partnership with HCD create a Polanco Park Property Management Education Program to work directly with Polanco Park owners. This program could help owners with mobile home Residency Law, grant availability, technical assistance for compliance with state requirements including mobile home registration and annual operating permits and best practices for property management.

D. Mobile Home Replacement

Due to the large number of dilapidated mobile homes in County's disadvantaged communities, we suggest Riverside County proactively seek additional funding for mobile home replacement in DACs through state and local funds. We also recommend the County perform a 10-year assessment on mobile homes in the HCD database to determine if the mobiles in the County are habitable and safe according to state regulation. For a more long term solution the County should work with the California Department of Housing and Community Development to develop more efficient ways of replacing mobile homes.

III. Community Participation in Regional Housing and Community Development

A. Housing Element Advisory Committee

We request the County establish a housing element advisory committee to advise the Planning Department, Housing Authority, Transportation and Land Management, and the Riverside County Board of Supervisors on developing, implementing, and evaluating the various housing element policies and programs. This committee should be made up of at least 10 diverse stakeholders such as community based organizations, community members from disadvantaged communities (DACs), farmworkers, immigrants and other groups with special housing needs. This committee would play an important role in ensuring the County is actively implementing housing element priorities in an equitable manner.

B. Restructure Eastern Coachella Valley Community Councils

Residents of the Eastern Coachella Valley have repeatedly expressed concern with the current structure of the County's community council system. Among others, the primary concern of residents is the lack of a democratic system to elect the council's board and representatives. Traditionally, community councils are chartered by the County and led by the community. They are important spaces for encouraging public participation in the decision-making process and promoting leadership within the County's communities. In Riverside County's case, the fact that the 4th District Supervisor has the discretion to add and remove members to the council board undermines the idea of a community-led space. Even if the appointed members reside in the community.

In order to democratize and center community voices in our local community councils, we ask the County to work with residents to modify the A-21 Policy document. Potential changes to the bylaws would include requiring members to the council board be elected by the community, setting an election schedule, and requiring certain seats be held by underrepresented community members.

C. Review Housing Review Committee Efficacy

We ask that the Riverside County Transportation and Land Management Agency evaluate the efficacy of the Housing Review Committee. This committee should be a community centered space to discuss, design and implement housing solutions. So far, the space has proven ineffective at centering community priorities.

D. Community Outreach During Housing Element Development Process

In the Housing Element Appendix, the County states that of the 126 people who completed the online survey, 118 were English-language responses and 7 were Spanish responses. They also noted that during the in-person workshop, 11 of the 65 attendees utilized the Spanish break-out room. Given that approximately 50% of Riverside County Residents are Hispanic and 34% are native Spanish speakers, a Spanish language response rate of 5% does not appear representative of the County's population.

Additionally, the County notes that it attended several Community Council and Municipal Advisory Committee meetings during the outreach process. However, there is no mention of how well these meetings were attended or any analysis on the effectiveness of these spaces for holistic outreach. Overall, it seems like the county has not properly engaged vulnerable populations.

IV. Expand Tenant Protections

A. Landlord/Tenant Dispute Mediation Board

We recommend Riverside County Housing Authority create a landlord/tenant dispute mediation board to hear disputes submitted by tenants for issues such as rent increases, eviction threats, notice requirements, and other habitability concerns. This body would serve as a neutral third party that ensures a fair process for solving disputes and to prevent landlord harassment

B. Pass, Fund, and Implement a Right to Legal Counsel Program

We ask the County to pass a “legal right to counsel” ordinance that includes legal aid, tenants rights education, active and consistent outreach to the community on new legislation, and emergency payments through rental assistance to keep tenants housed. Considering the end of the eviction moratorium and the fact that many families are still being impacted by the effects of COVID, it is more important than ever to ensure low-income tenants have access to all legal representation necessary to stay housed.

C. County-run rental subsidy programs prioritizing undocumented and mixed-status families

Riverside County should allocate resources to create a new rental subsidy program for undocumented and mixed status families. These two groups are not eligible for federal aid and often have the lowest incomes along with the highest need for affordable housing. The County must create their own flexible publicly-run subsidy program to complement the federally-run voucher programs.

D. Emergency Housing Program

Many of Riverside County’s most vulnerable residents often find themselves at risk of homelessness due to eviction, retaliation threats, and habitability issues. Riverside County Housing Authority must allocate resources to fund an ongoing emergency housing program to temporarily house residents who have become homeless.

E. Rent Control & Just Cause for Eviction

Currently, only tenants who own their mobile home and rent their space have Just Cause protections under the Mobile Home Residency Law. Tenants who rent both their mobile home and the space can be evicted for no reason so long as they receive adequate notice. Riverside County must establish a local Just Cause ordinance to cover residents that currently lack these protections.

We also request Riverside County establish a fair and comprehensive rent control ordinance that includes various housing types such as single-family homes, apartments, and mobile home parks. The current *Mobile Home Park Rent Stabilization Ordinance of the County of Riverside* only protects mobile home parks that were built before January 1, 1990 from unreasonable space rent adjustments. The Riverside County Housing Authority should work directly with housing advocates, community organizations, and

the broader community to update the above ordinance or explore a more comprehensive ordinance to fit the current needs of tenants.

V. Sizes of Sites in Inventory Analysis

HCD's Housing Element Sites Inventory Guidebook states that sites identified to accommodate housing for lower income households should be between 0.5 to 10 acres in size to ensure development is feasible. If an identified site is outside this range, the County must provide an analysis that demonstrates the County has developed sites of similar size in the prior planning period, evidence that the site is capable of accommodating lower income housing, or prove an affordable housing development has been proposed or approved for the site.

Of the sites identified for the Eastern Coachella Valley, one is smaller than 0.5 acres and five are larger than 10 acres. However, the County did not provide any of the required analysis to demonstrate that these sites are actually feasible for affordable housing development. We ask the County to provide the required analysis for these sites in a future revision of the Housing Element update.

VI. Actively Seek Funding for Water and Wastewater Expansion in Disadvantaged Communities

Housing goal H 1.5 in the Housing Element states that the County will, "Encourage the development of higher-density, multifamily housing in locations where adequate infrastructure and public services are planned or are available." Unfortunately, water and wastewater infrastructure in the Eastern Coachella Valley is extremely limited. We recommend that in addition to exploring locations that already have infrastructure, the County commits to identifying potential funding sources for infrastructure expansion as well.

Additionally, the county should identify disadvantaged communities struggling with natural contaminants and if consolidation is not possible, seek funding for interim water solutions and well rehabilitation assistance.

VII. Prioritize Affordable Housing Developments In Unincorporated Areas

The draft housing element notes that the Eastern Unincorporated areas of Riverside County have a vacancy rate of 42% due to the large number of vacation homes. Given that many people in the Eastern Coachella Valley are forced to live in often inhumane conditions due to the lack of affordable housing, these vacancy rates are unacceptable. The County must prioritize the development of permanent, affordable housing in these areas to meet the demand of the local population.

Potential actions the County could take are creating local sources of funding for affordable housing developments through the use of general funds, setting higher tax rates on vacation homes, and regularly applying for state and federal grants.

VIII. Environmental Resilience

In order to ensure alignment across the housing and land-use elements and to strengthen the climate resilience of communities in Riverside County, we ask the county to consider the following recommendations and comments.

A. Weatherization of Mobile Home Parks

Although mobile homes are one of the most popular forms of housing in the Eastern Coachella Valley, they are also one of the housing types that are least prepared for the effects of climate change. Rising temperatures will only increasingly strain the already substandard electrical infrastructure of many mobile home parks across Riverside County and lead to even more frequent power outages. The County should develop plans to weatherize or replace mobile homes and park infrastructure so that they are more resistant to the surrounding environment.

B. Consider Transformative Climate Communities and other Community Plans

When looking to develop policies and programs for environmental resilience, the County should reference community plans such as the Eastern Coachella Valley's Action Plan For Climate Resilience and others that were made in collaboration with community residents.

C. Analysis of Environmental Health Factors

The housing element draft recognizes that many of the unincorporated communities in Riverside County are EJ communities which are low income areas disproportionately affected by environmental risks. And while the County makes reference to the Healthy Communities Element for policies to mitigate the health risks in these communities, there is no analysis on the specific health risks associated with the sites identified for the

IX. Promote Inclusionary Housing

Action 1.7e of Riverside County's current housing element states, "*the County will explore the adoption of a local inclusionary housing program. The program could include requiring developers of certain types of housing developments to construct inclusionary affordable units or, in limited circumstances where the County deems construction of inclusionary units to be impractical, pay an in-lieu fee, or donate land to subsidize affordable housing development.*" The current draft 6th Cycle housing element evaluation of this goal noted that in March 2021, the County adopted "Ordinance No. 348.4950 to establish requirements for providing a residential and special-needs housing density bonus or other incentives." While a density bonus is definitely a step in the right direction, it is not enough to address the urgent need for more affordable housing in Riverside County. We ask that the County follow up on action item 1.7e and propose an inclusionary housing ordinance to the community by the middle of the planning cycle.

* * * * *

The 6th Cycle Housing Element update requires Riverside county to affirmatively further fair housing by including policies and programs that both combat patterns of segregation and transform areas of poverty into areas of opportunity. We hope that our comments assist Riverside County in achieving this vision for fair and affordable housing for all residents.

A separate letter has also been submitted to the California Department of Housing and Community Development with further comments.

Sincerely,

Omar Gastelum, Policy Advocate
**Leadership Counsel for Justice and
Accountability**

Ashley Werner, Directing Attorney
**Leadership Counsel for Justice and
Accountability**

Vanessa Moreno, Coachella Programs Manager
Consejo de Federaciones Mexicanas

Erika Ramirez-Mayoral, Program Manager
California Institute for Rural Studies

Sergio Rodriguez, Community Outreach and
Programs Coordinator
Pueblo Unido CDC



LEADERSHIP COUNSEL
FOR
JUSTICE & ACCOUNTABILITY



**CALIFORNIA
INSTITUTE FOR
RURAL STUDIES**



COFEM
Consejo de Federaciones Mexicanas

August 13, 2021

Robert Flores, Principal Planner
Riverside County Planning Department
4080 Lemon Street
Riverside, CA 92501

Submitted Via Email

RE: Riverside County Draft Safety Element

Dear Mr. Flores,

On behalf of Leadership Counsel for Justice and Accountability, California Institute for Rural Studies, Consejo de Federaciones Mexicanas, and in partnership with residents in the Eastern Coachella Valley (ECV), we ask that you consider the following comments in the updated Safety Element of Riverside County's General Plan.

Fires and Hazardous Waste Material

The Draft provides good policies to ensure effective management of fires and hazardous waste and other material. However, two interrelated components that must also be addressed through additional and intersectional policies are illegal dumping and burning. As identified in the AB 617 Community Emission Reduction Program, the community of the ECV listed illegal dumping and burning as one of the six top air quality concerns in the region. Current policies must also be improved to prohibit illegal dumping of hazardous waste nearby communities and other sensitive receptors regardless of land jurisdiction. To address these issues, we recommend adding the following policies:

- Develop and implement a protocol for collaborating with Native American and indigenous tribes that experience frequent fires, either natural or as a result of illegal burning. This includes developing working relationships and partnerships with Tribal governments and their fire departments to effectively address fires in order to protect surrounding communities that are part of County jurisdiction, including Fee land. This policy must also be enhanced by developing additional protocols for protecting nearby

schools and homes from smoke and odor and other types of pollution exposure - especially those living in poorly weatherized mobile homes.

- Work with employers across the County to provide hazard pay and additional worker protections to outdoor workers, including mask distributions and a County-wide multi-lingual alert system to outdoor workers and employers when wildfire smoke reaches unhealthy levels.
- Create and implement an illegal dumping monitoring system to identify dumping hot spots and implement preventative measures like fines for businesses or individuals dumping on both County and Tribal land. This policy shall also be co-developed with input and support from Tribal governments.
- Implement and fund a notification system to ensure that nearby residents, employers, educational facilities, and other institutions to facilitate implementation of safety measures and safety precautions.

Critical Facilities

Unincorporated Riverside County lacks access to critical facilities that provide reliable infrastructure, resources, and other benefits. The Draft focuses its recommendations on infrastructure for new development and does not adequately address infrastructure upgrades needed in existing communities. In order to provide upgraded, resilient, and sustainable infrastructure, we recommend the County to update its policies with the following infrastructure inclusions:

- As mentioned in the draft, communities in the ECV experience extensive flooding during heavy rain which can have severe impacts on roads, shoulders, and creates dangerous roadways. The County must conduct an analysis of areas that currently experience intense flooding and develop a strategy on how to reduce those impacts
- Identify critical facilities like parks, community centers, and other sites (i.e., the North Shore Community Park) that are at risk of flash flooding and extreme weather events and develop additional protections to prevent future damage and hazards for residents using those facilities.
- Existing infrastructure in unincorporated areas is non-existent in some places, incomplete in others, and generally inadequate. The County must prioritize transportation project investments, including through the use of general funds, discretionary state and federal resources and other resources available to the County in disadvantaged communities.

Such projects shall include paving of mobile home parks to reduce air quality impacts, active transportation infrastructure with protective measures, and additional safe routes to schools and other critical facilities. For community-identified projects, please continue referring to the Regional and Neighborhood Mobility Plans for the ECV and the ECV Climate Resilience Action Plan.

- The plan must address the impacts that extreme weather is having on the electrical power grid, it must note the urgency that's needed in upgrading and safeguarding climate resilient infrastructure in order to prevent future power outages and their impacts to residents. The County must work with IID to address this issue with more urgency, collaboration, and funding support.
- We greatly appreciate the inclusion of community resilience centers in the Draft to be located across unincorporated areas. This is a much needed and often requested resource in the ECV, especially to provide refuge during extreme heat and power outages, more gathering spaces, and centralized locations to provide more direct community and health services and other benefits in rural areas. Such resilience centers were also identified as a top priority by residents throughout the COVID-19 pandemic. In unincorporated ECV, organizations, agencies, and residents struggled to find accessible facilities to provide COVID-19 testing, medical services, food distribution sites, and vaccination clinics. Having open and community-oriented resilient centers can greatly provide a safe environment for multiple resources. With the allocated funding from the American Rescue Plan (ARP), the County has an incredible opportunity to fund a community health and resilience center in the ECV immediately. Residents will continue advocating for this project and urge the County to respond appropriately using ARP funding.

Climate Change-Related Hazards

As stated in the Climate Change Vulnerability Assessment and given the current underdeveloped and under-resourced conditions of unincorporated communities in Riverside County, effective climate change mitigation, adaptation, and prevention are crucial to protect the most vulnerable communities. The ECV is particularly vulnerable because of its geographic characteristics, limited and outdated infrastructure, and frequency of extreme weather events. The Draft recognizes that damage from severe weather will continue to occur, but lacks policies that will expedite and effectively drive improvements to existing infrastructure to mitigate the impacts of climate change, and most importantly to help prevent severe impacts and damages to people's health, livelihoods, and the environment. The lack of urgency and sufficient implementation strategies do not meet the severity of the impacts already impacting the region. The County must update the Draft to reflect this urgency.

Environmental Justice communities have collaboratively developed various community and climate resiliency plans that can help the County achieve its goals. In the ECV, this includes the Regional and Neighborhood Mobility Plan and the ECV Action Plan for Climate Resilience. These plans include resident-identified projects and infrastructure improvements that can provide more accessibility and amenities in the community, but also provide mitigation and adaptation to climate impacts. The County must include action driven policies that will facilitate the implementation of County, community, and other agency-developed plans, including dedicating investment to these efforts from the County's General Fund, and actively applying to diverse funding programs that prioritize projects in disadvantaged and environmental justice communities.

Additional policies to address climate change-related hazards are outlined below:

- Work with the appropriate agencies to expedite consolidation projects in disadvantaged communities to reliable water and wastewater systems to eliminate exposure to groundwater contamination and cross-contamination between groundwater and wastewater from septic systems. This includes communities most at risk, including Polanco Parks and other mobile home communities in the ECV. The County must also provide ongoing and emergency assistance to retrofit domestic wells as a short-term solution and identify a response protocol for providing emergency water supply to communities that rely on domestic wells when there are power outages.
- Implement new requirements for drought-tolerant landscaping across the region to address issues of water and recycled water. The County must enforce effective uses of water to ensure that all residents within the County are receiving safe and affordable drinking water.
- Enforce the appropriate working conditions standards across all agricultural employment facilities that help protect the health and safety of farmworkers, this includes working with the appropriate agencies to regulate the use of harmful pesticides, and protect other labor rights within the workplace.
- Work with the South Coast AQMD and the AB 617 Community Steering Committee to establish a pesticide application notification system through the use of technology and other means and in multiple languages.
- Increase the amount of thermal comfort infrastructure that exists in communities that experience above normal temperatures and extreme heat, particularly in key community locations, like parks, picnic areas, bus stops, schools, and other gathering places or sites frequented by residents.

- Effectively evaluate the potential impacts of projects and developments, including energy production (including renewable energy production), golf courses, recreational facilities, and other types of developments that may bring about additional environmental and public health impacts and that perpetuate the unequal use of and allocation of natural resources.
- Through the creation and implementation of the Polanco Park Permitting Program, establish a strong policy on weatherization for mobile homes to provide safer homes to residents living in mobile home parks and mobile homes in general. In addition, further revitalization efforts shall be led to increase greening, cool paving, and other infrastructure improvements to energy, water, and wastewater in mobile home parks. This can be combined with the new Mobile Home Replacement program funded through the Unincorporated Communities Initiative.
- In addition to what's currently written in S 7.14, require employer training to ensure they are implementing adequate protective measures and safe working conditions. In addition, the County must develop a process for anonymous reporting of unsafe working conditions and other exploitative practices to the County and Cal OSHA.
- Reduce the urban heat-island effect by implementing cool pavement across different infrastructure projects, including unpaved mobile home parks, urban greening, active transportation infrastructure, road improvements, and other projects that can also combine greening with other needed infrastructure
- Develop protective measures and standards for mobile homes in high seismic areas, including technical assistance and funding.

Timeline and Implementation

While strong policy language is important, incorporating expected timelines and direction for implementation of these policies is equally important. As it stands, the Draft does not provide any information on how the County expects to implement the policies included in the Safety Element. This is particularly concerning given the fact that the resident safety is of the utmost importance and the County must work urgently to implement these policies and programs.

According to [SB 379](#), the County must include “a set of feasible implementation measures designed to carry out the goals, policies, and objectives identified”. Without this, it is unclear how the County plans or expects to successfully and expeditiously implement the Draft or recommended policies. In order to comply with existing state law, the County must update this

draft to include specific and time bound implementation measures for the public to review before adoption and address other recommendations included herein.

* * * * *

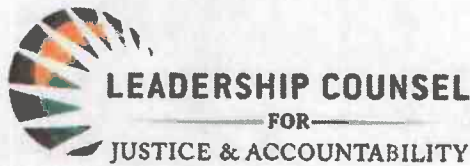
Climate change will continue to worsen and unincorporated communities who have been historically disinvested in will continue to bear the brunt of those impacts, putting residents' health and livelihoods at risk. We strongly urge the County to include the above recommendations in the Draft and ensure that there is meaningful and streamlined implementation. The County must ensure internal consistency with other elements, especially those pertaining to safety, healthy communities, and environmental justice. Protecting residents and improving the built environment and infrastructure systems of unincorporated communities will better set up communities to be more resilient to climate change.

Sincerely,

Rebecca T. Zaragoza
Regional Policy Manager
Leadership Counsel for Justice and Accountability

Erika Ramirez-Mayoral, Program Manager
California Institute for Rural Studies

Vanessa Moreno, Coachella Programs Manager
Consejo de Federaciones Mexicanas



**PUBLIC INTEREST
LAW PROJECT**

CELEBRATING 25 YEARS OF ADVANCING JUSTICE

August 12, 2021

Jamillah Williams
Housing Policy Analyst II
California Department of Housing & Community Development
2020 West El Camino Avenue
Sacramento, CA 95833

Sent Via Email

Re: Riverside County's Draft 6th Cycle Housing

Dear Ms. Williams,

We are writing to provide you with comments on Riverside County's 2021-2029 Draft Housing Element Revision for the 6th Cycle Housing Element Planning Period ("draft element" or "draft"). As our analysis details below, the draft fails to substantially comply with state Housing Element Law and fails to affirmatively further fair housing ("AFFH"). The draft element's deficiencies include a failure to adequately solicit public input, comply with requirements to demonstrate the feasibility and realistic capacity of the sites inventory, analyze disproportionate housing needs of classes protected by civil rights statutes, including displacement risk; ensure that the sites inventory complies with the County's duty to AFFH; and adopt programs that will result in a beneficial impact in the planning period. This letter strives to provide guidance to assist the County in developing a revised housing element and expanded public process to comply with state Housing Element Law and civil rights and fair housing mandates. We encourage HCD to use its authority to facilitate and ensure the County's compliance with these critical statutes for the benefit of Riverside County residents.

Leadership Counsel works alongside residents of disadvantaged communities in the Eastern Coachella Valley and the San Joaquin Valley to advocate for sound policy and eradicate injustice regardless of wealth, race, income or place. Leadership Counsel staff works with residents in the communities of Mecca, Thermal, Oasis, and North Shore to advance access to decent quality affordable housing, fair housing choice, safe and affordable drinking water, community sewer service, active transportation investments, parks and green space, a healthy environment, and equitable access to decision-making processes. The Public Interest Law Project (PILP) is a statewide organization that advances justice for low income people and communities by building the capacity of legal services organizations through impact litigation, trainings, and publications, and by advocating for low income community groups and individuals.

I. Failure to Demonstrate A Diligent Effort to Solicit and Incorporate Input from All Economic Segments of the Community and Protected Classes

Housing Element Law requires that cities and counties make a diligent effort to solicit public participation from all economic segments of the community. § 65583(c)(9); AFFH Guidance, p. 21. HCD's Affirmatively Furthering Fair Housing Guidance for All Public Entities and For Housing Elements ("AFFH Guidance") counsels that a variety of methods should be

Jamillah Williams, HCD

August 12, 2021

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used to “assure access and participation” and that the housing element must describe “meaningful, frequent, and ongoing public participation with key stakeholders.” Italics added, AFFH Guidance, p. 21. These key stakeholders must include a range of stakeholders, including but not limited to community members who are lower income, persons and households with special needs, and members of protected classes. AFFH Guidance, pp. 21-22. The draft element fails to describe public participation efforts by the County that meet these and other requirements of the Housing Element statute and AFFH duty. The County must identify additional efforts it will make to engage the public, including lower-income households, residents with special housing needs, and classes protected by civil rights laws, and revise the draft element to meaningfully incorporate public input.

A. Failure to Adequately Engage the Public, Demonstrate Inclusion of Low-Income Populations, Groups with Special Housing Needs, and Protected Classes

Based on Leadership Counsel’s staff participation in the housing element update public process and information contained in the draft element, the public meetings for the update were generally poorly attended and public input provided was limited. For instance, the draft element description of housing element workshops that took place at the Municipal Advisory Committee (“MAC”) and Community Council (“CC”) Meetings indicates that committee and council members and the public provided no or few comments at several meetings. PP.174-177. Leadership Counsel has advised the County that Community Council Meetings have historically not served as effective spaces to solicit public input because community residents we work with in the East Coachella Valley do not perceive CC members as representative of the community.

In addition, the draft element provides limited information relating to participation by lower-income households, groups with special housing needs, such as farmworkers, single-parent households, extremely low-income individuals, and unsheltered individuals; and members of classes protected by civil rights statutes, including classes based on race, ethnicity, country of origin, legal status, language, disability or other protected status. The information that the draft element does provide on this topic consists of numbers of online surveys completed in Spanish (7 out of 125 total) and participants who participated in Spanish-language breakout rooms at public meeting (11 out of 65 participants). The draft element provides no description of input provided by low-income individuals, persons with special housing needs, or protected classes in particular and describes no particular efforts to obtain input relating to the Assessment of Fair Housing by these or other groups.

Taken together, the draft element fails to describe adequate efforts to “assure access and participation” to the housing element update process, both by the general public and groups identified in statute and HCD guidance. The draft also fails to include any discussion of “issues that contributed to lack of participation in the housing element process by all economic segments, *particularly people with protected characteristics*,” as provided by the AFFH Guidance, p. 22. The little information the draft does provide relating to the participation of Spanish-speakers indicates a lack of representation in the public process comparable to that group’s share of the County population. The County must revise the draft housing element to acknowledge the limitations in public participation achieved for the housing element update in these meetings, identify additional strategies to solicit input from the full range of stakeholders, and ensure input received is incorporated prior to adoption. We suggest that the County conduct

Jamillah Williams, HCD

August 12, 2021

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extensive outreach in support of and hold in-person workshops within disadvantaged communities using robust COVID-19 safety practices to obtain more input from diverse stakeholders before finalization of the housing element.

B. Failure to Adequately Describe and Demonstrate Incorporation of Public Input Provided

HCD's AFFH Guidance states that the housing element must describe "a summary of [public] comments and how the comments are considered and incorporated (including comments that were not incorporated), particularly with changes to the housing element. p. 22. While the draft element provides some description of public input provided, its summary of public comments generally lacks sufficient detail for the reader to understand the nature of the issue raised or the solution proposed. In addition, the draft element fails to demonstrate incorporation of input provided and to identify input the County chose not to incorporate as required.

The draft element's repeatedly defaults to broad, ambiguous, and categorical descriptions of public input which do not provide the reader with a clear understanding of the nature of the public comment received. For example, with respect to MAC and CC meetings, the draft element states, "At these meetings, community members expressed concerns about the placement of affordable housing within certain neighborhoods," leaving it uncertain with respect to *which* neighborhoods commenters were concerned with the location of affordable housing (i.e., low-resource/lower-income neighborhoods, high resource/high opportunity neighborhoods, or other) P-1. With respect to the January 11, 2020 Stakeholder Meetings, the draft element states that stakeholders raised questions about "implications of the COVID-19 pandemic on housing and work conditions, displacement risk and environmental justice considerations, funding mechanisms, and additional outreach opportunities" and provides no further detail about the specific nature of the input provided relating to these topic categories. P-2. And in its description of input obtained at the February 16th public outreach meetings, the draft element states only that, "[t]he County also solicited input from participants on where they would like to see additional housing development" and fails to disclose participants' responses to the question. P-3. Finally, with respect to the February 18th public outreach meeting, the draft element fails to provide *any* information about specific issues and recommendations raised by participants, stating only that "[m]any of the same types of questions were raised during this meeting" as were raised during the February 16th meeting, and that "[p]articipants..raised concerns regarding barriers to securing housing and requested additional information on the requirement of the Housing Element." P-4. The lack of detail about the specific nature of public input received limits readers' ability to discern whether the County meaningfully incorporated public feedback into the draft element's analysis, policies, and programs.

Indeed, the draft element includes no description of how general and specific input received was used to inform the draft housing element's analysis, goals, policies, or programs. The "community profile" section states that various sources of information were used in preparing the draft and cites specifically to U.C. Census, ACS, Department of Finance, SCAG, and California EDD data as sources upon which the County relief. Notably, the element does not state that public input obtained through public outreach was used to inform the element. P-43. The draft element's analysis of housing needs and constraints to housing and the assessment of fair housing all rely on census or other data sources and general discussions of statutorily-

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mandated topic areas but almost entirely fail to include any information obtained through the public input process

The draft element also fails to acknowledge, discuss, or incorporate recommendations contained in the letter submitted to the County by Leadership Counsel and several other community-based organizations in February 2021 relating to the housing element update. Attachment 1, Leadership Counsel February 2021 Letter. The letter discusses documenting the policies and programs which the signatory organizations believe should be prioritized in the housing element update, based on our direct and daily work with low-income residents of color, farmworkers, residents of disadvantaged unincorporated communities, and other residents with special housing needs and members of protected classes. The County must revise the draft element to acknowledge this letter, summarize its contents, and revise goals, policies, and programs to incorporate its recommendations, in addition to other input it receives. The County must also revise the element to indicate what public input it chose not to incorporate, which the element currently fails to do.

C. The County's Submission of the Draft to HCD Before the End of the Public Comment Period Undermines Public Participation

HCD's AFFH Guidance states, "[d]rafts of the housing element should be made available to the public for review and comment with ample time before submission to the Department of Housing and Community Development (HCD) for review." AFFH Guidance, P. 10. Despite this, the County released the draft element for public for review on the same day it submitted the draft element to HCD for review – July 9, 2021. The County's submission of its draft element to HCD the same day as draft's release to the public undermines the public process by allowing the County to receive findings from HCD on the compliance of the draft with state Housing Element Law before the County or HCD has had the opportunity to consider and incorporate public input. Without first incorporating public input relating to housing needs and disparities, policies and programs best suited to address those needs and disparities, and suitability of sites in the sites inventory, the County's draft is incomplete and should not be subject to review by HCD pursuant to Section 65585(b). We encourage HCD to decline to find the housing element out of compliance with Housing Element Law, direct the County to make additional efforts to seek public input by all economic segments of the community and protected classes, and incorporate input into a revised draft element.

D. Failure to Align Outreach for Environmental Justice Element Development and Housing Element Update

Alongside its 6th cycle housing element update, the County is also developing an amendment to its General Plan pursuant to the environmental justice planning requirements set forth in Section 65302(h). HCD's AFFH Guidance states clearly that "housing element outreach should be aligned with the SB 1000 (2016) ("EJ Element") outreach to the extent possible, given the overlapping topic areas." Leadership Counsel and other organizations requested that the County align its development of both of these general plan element amendments, including by creating public participation opportunities that would provide the public with opportunities to obtain information about and provide input on both amendments at once. Despite our request, the County declined to do so, and we are unaware of the current status of the EJ Element.

The County should revise the draft housing element to identify additional public participation opportunities it will create which will allow for public input on topic areas relevant to both the housing element update and AFH and the County's SB 1000 compliance, including housing, environmental quality, and access to opportunity, to incorporate public input into the housing element update that was provided during the EJ Element development process, and ensure consistency between both amendments.

II. Failure to Evaluate the the 5th Cycle Housing Element Consistent with Section 65588(a)

Section 65588(a) requires that local governments review their housing elements to evaluate four factors:

- (1) the appropriateness of the housing goals, objectives, and policies in contributing to the attainment of the state housing goal.
- (2) the effectiveness of the housing element in attainment of the community's housing goals and objectives.
- (3) the progress of the city, county, or city and county in implementation of the housing element, and;
- (4) the effectiveness of the housing element goals, policies, and related actions to meet the community's needs, pursuant to the housing element needs analysis required by Section 65583(a)(7).

HCD's Building Blocks guidance makes clear that compliance with Section 65588(a) requires not only the provision of information about results achieved, but also analysis of how what was achieved compares to what was anticipated and to the community's needs, description of the jurisdiction's lessons learned based on that analysis, and the demonstration of a connection between modifications to the updated housing element and lessons learned.¹

The draft element fails to comply with Section 65588(a), because it entirely fails to include the analysis required by numerals (1), (2), and (3). In its "Evaluation of the Previous Housing Element" section, the draft element includes a matrix entitled "Progress in Implementing Programs and Objectives" ("Matrix"), which contains columns for "Program," "Implementation Status" and "Status" (i.e., status of the in the 6th Cycle Housing Element, including whether it is included, modified, or eliminated) and a section entitled "Efforts to Address Special Housing Needs," which describes certain results of housing element implementation with respect to various population groups, including groups identified as special needs in the 5th cycle housing element and other group. While the Matrix and Efforts to Address Special Housing Needs section contain certain information about results obtained from implementation of the 5th Cycle Housing Element, it contains none of the analysis required by Section 65588.

¹ See e.g., the Building Blocks description of the requirements of Sec. 65588(a)(1), which it describes in part as "[a] description of what has been learned based on the analysis of progress and effectiveness of the previous housing element. A description of how [the updated housing element is] being changed or adjusted to incorporate what has been learned from the results of the previous element," and with respect to Sec. 65588(a)(3), "[f]or each program, the analysis should compare significant differences between what was projected or planned in the earlier housing element and what was achieved. Analyze the differences to determine where the previous housing element met, exceeded, or fell short of what was anticipated."

With respect to Section 65583(a)(1) and (2), the Matrix notes whether programs have been “modified”, deleted” or continued” in the 6th Cycle draft element, but fails to evaluate the “appropriateness” of 5th cycle element goals, objectives, and policies “in contributing to attainment of the state housing goal” or the community’s housing goals and objectives nor describe any lessons learned based on implementation of the 5th cycle element or the basis for the County’s decisions to modify, delete, or continue various programs. The Evaluation of the Previous Housing Element does not even reference any of the 5th cycle element’s goals, objectives, or policies or compare the results to these goals.

With respect to Section 65583(a)(3), the Matrix and Efforts to Address Special Housing Needs section include information relating to the implementation of each program but fail to describe the implementation in terms of overall progress anticipated by the 5th Cycle Housing Element or analyze the differences between what was achieved and the 5th Cycle Housing Element’s projections, pursuant to HCD’s Building Blocks. In addition, while the Efforts to Address Special Housing Needs section mentions certain results relating to housing serving several different population groups, it does not include any information relating to outcomes that meet the specific needs of two special needs groups identified in the 5th Cycle Housing Element - large families and female heads of household. P-56; 5th Cycle Housing Element, H-57.

The Matrix and information contained in the special needs section in fact are largely identical to information contained in Annual Progress Reports submitted by the County to HCD on the 5th Cycle Housing Element. Section 65400’s APR requirements are aimed at ensuring that jurisdictions provide information to the public, elected officials, HCD, and OPR to allow these stakeholders to understand a jurisdiction’s progress in implementing its housing element and to take action if necessary to hold jurisdictions accountable to their obligations to do so. Section 65588 on the other hand aims to ensure that jurisdictions periodically evaluate the appropriateness and effectiveness of their housing element’s goals, policies, and programs in order to ensure that learning takes place that allows jurisdictions to modify programs as necessary to ensure that housing element implementation is effective. By simply replicating information provided by the County in its APRs in its evaluation of the 5th cycle housing element, the draft element fails to comply with Section 65588’s requirements and to achieve their fundamental purpose.

In addition, HCD’s AFFH Guidance states that, “[l]ocalities should make a specific effort to gather input from all segments of the community on the effectiveness of these programs and how to make adjustments moving forward.” p. 22. The Evaluation of the Previous Housing Element does not include any information about efforts by the County or analysis to comply with this provision. Neither do the “Efforts to Achieve Public Participation” or Appendix 1 (Public Participation) sections.

Finally, the draft element fails to incorporate data from County Consolidated Plan or other block grant reports, Department of Finance Demographic Research Unit, or other data sources as recommended by HCD’s Building Blocks. The County’s failure to do so further limits the Evaluation of the Previous Housing Element’s ability to meaningfully inform revisions to the 6th Cycle Update as the legislature intended in adopting Section 65588.

III. Inadequate Sites Inventory Analysis

A. Unwarranted Reliance on the Valante and Travertine Point Specific Plans to Accommodate 1,609 Lower-Income Units

To rely on residential capacity in specific plans areas to satisfy the RHNA, a housing elements sites inventory analysis must demonstrate that the sites are available and suitable for development within the planning period, and (1) identify the date of approval of the plans and expiration date, (2) identify approved or pending projects within these plans that are anticipated in the planning period, including anticipated affordability based on the actual or projected sale prices, rent levels, or other mechanisms for establishing affordability in the planning period of the units in the project, (3) describe necessary approvals or steps for entitlements for new development, and (4) describe any development agreements, and conditions or requirements such as phasing or timing, that impact development in the planning period. Sites Inventory Guidebook, p. 18.

The County relies on the Valante and Travertine Specific Plans to respectively accommodate 243 and 1,366 units of its lower-income RHNA but fails to provide the analysis required by the Sites Inventory Guidebook. For both plans, the County fails to identify the date of approval and expiration date, approved or pending projects within the plans that are anticipated during the planning period, or development agreements, conditions or requirements that impact development in the planning period. The County also fails describe necessary approvals or steps for entitlements for new development under the Travertine Point Specific Plan.

In fact, information contained in the draft element and available to the public indicates that the County's reliance on the Travertine Point Specific Plan² to accommodate lower-income sites is unjustified for several reasons. First, the draft element relies on the plan for 1,366 lower-income units based on what the draft describes as an "affordability requirement of 10 percent of the total units" in the plan "that must fall between 35-120 percent of the area median income." The draft element states that, to determine affordability breakdown, the County multiplied 1,366 by share of the County's total RHNA comprised by its moderate-income unit allocation, which equals 18%³, to arrive at 300 moderate-income units and allocated the remaining 1,366 units towards its low and very-lower income. Yet, the Travertine Point Specific Plan does not in fact require the development of affordable units or support the allocation of moderate and lower-income units proposed by the County's calculations. The Plan includes a schedule of units to be made available on an affordable basis for lower and moderate-income households broken down into five separate development phases based on the issuance of building permits for specified numbers of market-rate units. 3-438⁴. The plan states that "a housing unit shall qualify as an

² The Travertine Point Specific Plan is available on the County's website at the following link:
<https://planning.rctlma.org/Specific-Plans/Approved-Specific-Plans-Documents>.

³ The County's total RHNA of 40,647 divided by its moderate-income RHNA of 7,347 equals 18.075%. The County's total lower-income RHNA is 16,998 which equal 41.81% of the County's total RHNA.

⁴For example, Development Phase I includes the issuance of building permits for 3,249 residential units and calls for delivery of 7% of a total of 1,666 affordable units to be provided upon buildout of the entire 16,655 planned residential units, and Development Phase II includes permit issuance for an additional 3,608 units and delivery of 12% of the affordable units. See Travertine Point Specific Point Plan, Part 5, available at https://planning.rctlma.org/Portals/14/splans/sp_document/sp375/SP375%20Final%20SP%20Part-5.pdf

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affordable unit if rented or sold to very low, low, or moderate-income households.” This indicates that pursuant to the Travertine Point Specific Plan, the plan’s affordable housing obligation may be satisfied entirely with units affordable to moderate-income households. p. 3-437.

Further, the plan states that the plan’s minimum affordability requirement is based on the assumption that “the project is built out to the maximum of 16,655 units,” and that “[t]he number of affordable units...will be adjusted to respond to market conditions.” 3-436. The plan states that “it is not the intent to require the required amount of affordable units to be necessarily located within the corresponding development phase affordable units may be provided within any phase and at any time.” p. 3-437. The plan indicates that development will be phased over an estimated 35-year period. p. 3-460. Based on this estimate, the plan’s adoption in 2014 yields 2049 as a buildout date – well beyond the end of the 6th Cycle planning period. And no development envisioned by the Travertine Point Specific Plan has occurred to-date. These facts demonstrate that the plan does not require the dedication of any units affordable to lower-income households and that affordable units may not be built, if at all, until long after the planning period. It is therefore unrealistic for the County to rely on the Travertine Point Specific Plan to accommodate the development of 1,366 lower-income units in the planning period.

On top of this, the draft element also fails to acknowledge that 980 acres of the Travertine Point Specific Plan—comprising 18 percent of the total specific plan area—are in Imperial County or to analyze that fact’s impact on the realistic capacity of sites in the plan area to accommodate Riverside County’s need for lower-income housing.⁵ p. 2-1. At a minimum, the County must disclose how many residential units of the plan’s total 1,665 units will be located in Riverside County and adjust its calculation of lower-income units accommodated by the plan to acknowledge both its lack of control over development approvals in Imperial County and the potential for a share of the affordable units developed as a result of the plan’s affordability provisions to be located in Imperial County instead of Riverside County.

In addition, the draft element fails to acknowledge or include the requisite analysis to justify its reliance on the development of sites controlled by the Torres Martinez Desert Cahuilla Indians (“TMDCI”). The Sites Inventory Guidebook states that sites controlled by exempt entities, including tribes, can be used to accommodate the RHNA “when documentation can be provided that demonstrates the likelihood that the planned housing will be developed within the current RHNA/housing element cycle.” p. 6. The Sites Inventory Guidebook provides examples of documentation satisfying this requirement, including agreements with the entity controlling the land demonstrating approval of the planned units and data pertaining to the timing of project construction and unit affordability by household category. pp. 6-7. The plan states that TMDCI reservation lands occupy 1,410 acres of the specific plan area, which include land planned for approximately 1,307 residential units. Based on the housing element’s use of a 10% affordability standard for units anticipated by the plan, development of the 1,307 units in TMDCI territory would be associated with the delivery of approximately 130 units affordable to lower- and/or moderate-income households.⁶ p. 2-20. The plan acknowledges that TMDCI “maintains land use jurisdiction over properties within the reservation,” and “ultimate land use decisions are to be made by the Tribe.” p. 3-31. Despite this acknowledgment, the draft element fails to

⁵ See Travertine Point Specific Plan, Part 1, available at https://planning.rctlma.org/Portals/14/splans/sp_document/sp375/SP375%20Final%20SP%20Part-1.pdf

⁶ Travertine Point Specific Point Plan, Part 3, available at https://planning.rctlma.org/Portals/14/splans/sp_document/sp375/SP375%20Final%20SP%20Part-1.pdf

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include the analysis required for reliance on sites controlled by exempt entities; and the County, therefore, may not rely on the development of sites within TMCDI controlled-land to satisfy its RHNA.

Finally, the draft element does not disclose or analyze the impact on development feasibility of the lack of available infrastructure and services to support residential development that the element anticipates in the Travertine Specific Plan area. Section 65583.2(b)(5)(B) requires that parcels included in the sites inventory have “sufficient water, sewer, and dry utilities supply available and accessible to support housing development or be included in...[a] mandatory program or plan” to secure such utilities.” The Sites Inventory Guidebook explains that the analysis “must include sufficient detail to determine whether the service levels of water delivery/treatment systems and sewer treatment facilities are sufficient and have the capacity to accommodate development on all identified sites in order to accommodate the RHNA.” p. 8. As an example, the Sites Inventory Guidebook provides that “water supply should be a reliable supply that meets federal and state drinking water standards.” p.8

The draft element asserts that infrastructure availability limitations impose a “minimal impact” on site capacity, because “all parcels listed in the site inventory are located within water districts, which provide the facility of sewer, water, and wastewater provisions for new development.” P-160. Yet the draft element also acknowledges that Coachella Valley Water District (“CVWD”) “reports that there is not currently capacity for new development in most of the district.” P-164.⁷ The draft element lacks detail required by Section 65583.2(b) and the Sites Inventory Guidebook to justify that CVWD does in fact have capacity to supply development at Travertine Point during the planning period, including the quantities of residential units required to trigger the plan’s affordability provisions for lower and/or moderate-income households.

The Travertine Point Specific Plan indicates that infrastructure and service availability will pose a constraint to buildout of the planning area during the planning period. The plan states, “Travertine Point will need infrastructure systems to be in place prior to development.” p. 3-29. According to the plan, these systems “may include pump stations, lift stations, enclosed potable water storage tanks and similar [sic] for water distribution and waste water management.” “Other systems may include natural gas facilities, electrical substations, communications facilities, and similar utilities.” The plan also identifies the development of a wastewater treatment plant to serve the Travertine Point area and nearby properties as necessary. *Id.* The plan discusses conceptual locations for certain infrastructure and services but does not confirm definite locations, development timelines, or financing sources. Given the lack of development of any of these improvements and the lack of any program or other commitment ensuring their development in the planning period, the County cannot rely on the Travertine Point Specific Plan for sites to accommodate the RHNA.

B. Failure to Adequately Analyze Underutilized Sites’ Realistic Development Potential

Pursuant to Section 65583.2(b)(3) and (g)(1), housing elements must describe the existing uses on any nonvacant sites relied upon, specify the additional development potential for each site, and provide an explanation of the methodology used to determine the development

⁷ See Travertine Specific Plan, p. 1-1, available at https://planning.rctlma.org/Portals/14/splans/sp_document/sp375/SP375%20Final%20SP%20Part-1.pdf; CVWD Map available at <https://www.cvwd.org/333/CVWD-Map>

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potential. The methodology must consider specified factors, including the extent to which existing uses may constitute an impediment to additional residential development, the county's past experiences with converting existing uses to higher density residential development, current market demand for the existing use, an analysis of existing leases or other contracts that would perpetuate the existing use or prevent redevelopment, market conditions, and incentives or standards to encourage additional residential development on the sites. § 65583.2(g)(1). HCD's Sites Inventory Guidebook provides detailed guidance on the information and analysis which must be included to satisfy Section 65583.2(g). pp. 24-26.

The draft element provides little information about existing uses on nonvacant sites included in the inventory, making it difficult to determine the realistic potential for higher density development, potential impediments to development the use may pose, and the potential impacts of redevelopment on existing occupants. For example, for APNs 723162014 and 723174028, the sites inventory only indicates that the site's current use is "R1 – RESIDENTIAL," and that the "[p]arcel is in a development with a large portion of the lots remaining vacant." p-100. For these and other parcels with existing residential units, the draft element should confirm the type of housing that exists on the site (single family residential, multi-family residential, mobile home, etc.), the number of units, tenure (rental or ownership), current occupancy status, the presence of any affordability restrictions on the units, and any other available information. As another example, the draft element states with respect to APN 255170013 that four contiguous parcels "will likely be joined" but does not provide information about why this is so. P-108.

The draft element's site-specific information relating to nonvacant sites fails to address the requirements set forth in Section 65583.2(g) or the Sites Inventory Guidebook. While the draft provides some information about why sites may have potential for higher density development, the draft does not describe a particular methodology for determining the capacity of nonvacant sites and does not provide information about or analyze whether existing uses may impede additional residential development, the existence of any contracts or leases that could impede development, and development trends which would indicate that nonvacant sites have realistic development potential at higher densities.

With respect to APNs 520105002 and 520105007, the draft element states that there "is a possibility" of a large County facility opening in the area which would create a demand for multi-family housing. P-120. The draft should provide more detail about the possible County facility, including information about the nature of the County facility, the likelihood of its development and opening, details about the timeline, including whether development is anticipated to occur in the planning period, and information about specific efforts or plans by the County or other entities to develop the parcels for higher density housing. P-120.

With respect to development trends, the analysis does not provide any information about the County's track record or role in encouraging and facilitating redevelopment to residential or more intensive residential uses and does not describe any current or planned efforts to facilitate this type of development as provided by the Sites Inventory Guidebook. p. 25. Since the development trends analysis is missing from the draft element, the sites capacity calculation does not reflect the results of such an analysis as required. See Guidebook, p. 25. In addition, the draft sites inventory analysis fails to describe financial assistance or regulatory relief that will be provided to sufficient encourage and facilitate more intensive residential development on the non-vacant sites. Since the County does not describe a track record or development trends to

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demonstrate feasibility of a recycling strategy, the housing element must describe such financial assistance and standards. *See* Guidebook, p. 26.

C. Failure to Include a Program and Policy Requiring Replacement of Existing Affordable Units on Nonvacant Sites Pursuant to Section 65583.2(g)(3)

Section 65583.2(g)(3) provides that sites that are included in the inventory that currently have residential uses that are or were subject to restrictions on rents to level affordable to lower-income households or occupied by lower-income households shall be subject to a policy requiring the replacement of those units affordable to the same or lower income level as a condition of any development on the site. The draft element's sites inventory identifies a number of parcels occupied by existing housing, including mobile homes and single-family residential homes. P-100, 115, 120. The draft element also refers to mobile homes as an important source of affordable housing for lower-income households in Riverside County. Despite this, the draft element fails to include the policy required by Section 65583.2(g)(3)⁸.

D. Reliance on Sites Included in 5th Cycle HE Sites Inventory Without Required Rezoning Program

Section 65583.2(c) provides that a non-vacant site identified in a prior housing element "shall not be deemed adequate to accommodate a portion of the housing need for lower-income households" for the current planning period "unless the site is subject to a program in the housing element requiring rezoning within three years of the beginning of the planning period to allow residential use by right for housing developments in which at least 20 percent of the units are affordable to lower-income households."

The draft element relies on non-vacant sites that were also included in the County's 5th Cycle Housing Element Sites Inventory to meet the County's lower-income RHNA to accommodate 171 units of its 6th cycle lower-income RHNA. These sites include APNs 255170013, 526160011, 526160010, 526160012, 520110007, 520105002 located in the Highgrove Area Plan, the Pass Area Plan in Cabazon Town Center, and the Rushmore/Kimdale Community. However, the draft element fails to acknowledge or discuss its reliance on sites contained in the 5th Cycle Housing Element. While the draft element includes Policy H.3.3, which provides that the "County *should* allow housing developments with at least 20-percent affordable housing and on-site inventory housing sites that have been counted in previous Housing Element cycles as a by-right use," the draft element lacks a time-bound program scheduled to occur within three-years of the start of the planning period that *requires* rezoning pursuant to section 65583.2. Italics added. H-5. Therefore, the County may not rely on the underutilized sites referenced above unless it revises the draft element to include a program consistent with section 65583.2(c).

In addition, the housing element may not rely on sites that were identified to accommodate the lower-income RHNA in two or more consecutive planning periods. § 65583.2(c). The draft element fails to disclose if the sites inventory does so, and Riverside

⁸ Action H-17 provides for the County's provision of assistance to low-income mobile homeowners in un-permitted mobile home parks to purchase a replacement unit in a permitted mobile home park. H-14. This program is the only draft element Action or policy that address mobile home or housing replacement, and it does not require replacement of units located on inventory sites at prices affordable to the same or lower income level.

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County's 4th Cycle Housing Element appears not to be posted on either the County's or HCD's website, preventing public review of compliance with this requirement.

E. The Draft Element Fails to Include the Requisite Analysis to Rely on Sites Located on Tribal Land

As mentioned above, the draft element relies on land located in the Torres Martinez Desert Cahuilla Indians Reservation to accommodate a portion of its lower-income RHNA as a result of its reliance on the Travertine Point Specific Plan. According to Appendix P-2 Housing Element Maps, Figure P-25, the draft element also relies on tribal land located in the Cabazon Town Center. For sites in both tribal land areas, the draft element does not provide documentation demonstrating that the sites can be developed during the planning period and therefore the housing element may not rely on those sites unless its revised to do so. HCD Sites Inventory Guidebook, p. 6.

F. Inadequate Support For Reliance on 1,864 units Lower-Income Capacity From Mobile and Manufactured Homes

The draft element calculates that mobile and manufactured homes ranging in price for \$64,000 to \$120,300 in 2020 are an affordable source of housing for lower-income residents in Riverside County. The County estimates that 233 mobile/manufactured homes will be added to the County's housing stock per year based on data from 2018 to 2019 and calculates that over eight years, new mobile homes will add 1,864 units of lower-income housing capacity. P-121.

The County's analysis is flawed for several reasons. First, it appears not to take into account the costs to mobile/manufactured home owners to rent or own land upon which to place their mobile home or the costs of utilities. The County must assess these costs and revise its calculation of the mobile homes cost for the purpose of determining affordability.

Next, the County's use of only one year of data as a basis for its calculation for the number of new mobile/manufactured home units that will be added to the County's housing stock over eight years may be misleading. A more accurate analysis would consider mobile/manufactured home cost trends over a period of time and consider factors which may impact costs in the future. In addition, the County's analysis simply assumes that availability of land for the 1,864 new units but should identify likely areas of the location of these units given trends and potential limitations on available land. The County should also consider whether land prices for mobile homes will increase as units continue to be added and suitable land with willing owners becomes scarcer. The County must revise its draft element to include these considerations and calculations and adjust its determination of its mobile/manufactured home capacity accordingly.

G. The Draft Element Fails to Describe Environmental Constraints or Analyze Their Impacts on Inventory Site Capacity

The draft element fails to provide required information relating to the presence of environmental constraints and their impact on the feasibility of development at the densities anticipated by the sites inventory. Housing Elements must contain a description of "any environmental constraints to the development of housing within the jurisdiction." §

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65583.2(b)(4). The description must include features such as the presence of floodplains, very high fire hazard severity zones and other environmental features that have the potential to impact the development viability of sites identified in the inventory. Sites Inventory Guidebook, p. 9. The analysis “must demonstrate that the existence of these features will not preclude development of the sites identified in the planning period at the projected residential densities/capacities.” *Id.* Environmental constraints that constitute impediments to building “must be considered when determining how many residential units can be developed on [a given] site.” *Id.*

The draft element’s discussion of environmental constraints on the housing sites inventory consists of the general acknowledgement that environmental factors, such as lands with steep slopes, may also adversely affect a parcel’s potential for development; a reference to the County’s General Plan Safety Element and a conservation plan; and the assertion that environmental constraints “may be ameliorated through proper site design, infrastructure improvements, or other facility improvements.” P-160. These general statements and reference to other planning documents do not substitute for the description and analysis of environmental constraints and their impacts on site feasibility which Housing Element Law requires to be included within the Housing Element. § 65583.2(b)(4); Sites Inventory Guidebook, p. 9.

Further, information contained in other sections of the draft element itself and information generally available to the public demonstrates that significant environmental constraints to the development of inventory sites exist. The sites inventory maps contained in Appendix P-2 demonstrate that sites located in the Lee Lake Community (Figure P-19), Meadowbrook Town Center (Figure P-20), Winchester Town Center (Figure P-21) are in Very High and High Fire Hazard zones. The maps also depict sites in these and other plans located close to Very High and High Fire Hazard zones and in Moderate Fire Hazard zones. *See e.g.*, Figure P-22 (Highgrove Town Center), Figure P-23 (Lakeview Town Center and Nuevo Community), Figure P-24 (Good Hope Community, Mead Valley Town Center, & Mead Valley Community); Figure P-25 (Cabazon Town Center), Figure P-27 (Home Gardens); Figure P-30 (Rushmore Kimdale Community & 1-10 Haugen/Lehman Ave Community). The Sites Inventory analysis must disclose the presence of fire hazards in proximity to sites inventory sites and assess their impact on site development potential, including potential impacts on site feasibility as well as housing development cost. The Sites Inventory analysis should consider to what extent hotter temperatures and longer and more intense fire seasons that are occurring as a result of climate change will magnify or alter the impacts of fire hazards on sites inventory sites.

Similarly, the draft element depicts a large share of site inventory sites located adjacent to or near highways. Appendix P-2, Figures P-17, P-19, P-20, P-21, P-23, P-24, P-25, P-28, P-30, P-31. In addition to subjecting residents to unhealthy levels of air pollution, developing housing near freeways may entail additional costs to mitigate the freeways’ impacts. The sites inventory analysis should consider whether site adjacency or proximity to freeways constitutes a constraint to development and if so, the impact of the constraint on the realistic development capacity of sites in the inventory.

The draft element also contains sites in at least one community that appear to be located in a flood zone but does not disclose or analyze the impact of this environmental constraint. Specifically, the element includes sites outside of the unincorporated community of Mecca which appear to fall within the boundaries of a flood zones identified on Federal Emergency Management Agency mapping. *See* Attachment 2 (FEMA Flood Map – Mecca). The draft element must identify the presence of flood zones as an environmental constraint to the

development of sites in Mecca and any other sites located in a designated flood zone, assess the constraint's impact on the sites' development potential, and revise the housing element in accordance with the results of that analysis. The housing element should also consider the potential impacts of climate change during the planning period on the magnitude and nature of flood risks that may impact sites inventory sites.

IV. The Draft's Assessment of Fair Housing Fails to Comply with Section 65583(c)(10)

A. Failure to Analyze Disproportionate Housing Needs and Displacement Risks Impacting Protected Classes

The AFH must include an assessment of disproportionate housing needs, including displacement risk, on protected classes and households with low-income. § 65583(c)(10)(A)(ii); AFFH Guidance, p. 39. The draft element's disproportionate housing needs analysis fails to comply with this requirement, as it considers only disparities between renters and homeowners, with a brief reference to housing needs impacting low-income households, and entirely fails to consider the disproportionate needs of protected classes or homeless individuals. P. 87; See AFFH Guidance (identifying homelessness as one of four topics which must be considered in the disproportionate housing needs analysis), p. 39. In addition, the AFH's assessment of displacement risks consists only of a brief review of certain displacement risks associated with poor housing conditions that may be associated with housing age and type (i.e., manufactured housing) in Riverside County. The draft also notes that stakeholders emphasized the poor conditions of housing occupied by farmworkers, but it does not go beyond this statement to analyze the actual risk of displacement. The analysis omits any discussion of a range of critical components of a displacement analysis, including investment driven displacement, disinvestment-driven displacement associated with limited or absent public sector investment; and disaster-driven displacement. See AFFH Guidance, pp.41-42. Disproportionate displacement risks the draft element fails to consider include but are not limited to risks associated with:

- housing prices increases;
- population movement into Riverside County;
- lawful and unlawful evictions, both formal and informal;
- landlord harassment and retaliation against renters, including in particular renters of color, renters with a primary language other than English, and undocumented renters;
- limited local tenant protections, including a rent control;
- the lack of affordable legal counsel available to serve low-income and undocumented renters;
- the proliferation of vacation homes and luxury development in the Coachella Valley which exacerbate patterns of segregation;
- inadequate or absent public investment in basic infrastructure, services and amenities in lower-income communities and communities of color;
- development of incompatible land uses such as warehouses next to communities;

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- the sites inventory inclusion of sites with existing mobile homes and single-family housing;
- environmental and climate-driven displacement, including but not limited to as a result of fires, flooding, and extreme heat

The AFFH Guidance emphasizes the importance of local data and knowledge to the Disproportionate Housing Needs and Displacement analysis. p. 39. The County must revise the draft element to include a thorough analysis which meaningfully incorporates input by diverse stakeholders, including lower-income residents and protected classes, as well as relevant local data.

B. Failure to Assess Disparities in Access to a Healthy Environment

The AFH must analyze disparities in access to a healthy environment in Riverside County. HCD, AFFH Guidance, p. 35. HCD's AFFH Guidance provides that this analysis "should, at a minimum" (1) describe any disparities in access to environmentally healthy neighborhoods by protected class groups, (2) consider available statewide data such as CalEnviroScreen, (3) evaluate consistency with the environmental justice element, and (4) discuss policies, practices, and investments that impact access to environmentally healthy neighborhoods. p. 35.

The draft element fails almost entirely to conduct this analysis. The draft does not identify any general or specific disparities in access to a healthy environment impacting protected classes or other populations, beyond noting that "there are a number of EJ communities" located in unincorporated Riverside County according to the draft CalEnviroScreen 4.0. P-82. The draft element mentions that the County General Plan includes a Healthy Communities Element with an Environmental Justice section but does not provide any information about its contents or evaluate the housing element's consistency with that element. Neither does the draft element discuss policies, practices, or investments that impact access to environmentally healthy neighborhoods. P-82. The AFH contains no information based on public input provided to the County on this topic either.

The draft element's failure to meaningfully assess and address disparities in access to a healthy environment has significant implications for the County's compliance with its duty to AFFH given the deep and wide-ranging environmental health disparities that impact unincorporated Riverside County residents on the basis of race, ethnicity, country of origin, language, and other protected class status. The disparities span access to safe and affordable drinking water, functional waste water, clean air, safe and sanitary housing, flood protection, and more. Some of the environmental health disparities that impact residents of low-income communities of color and immigrant communities with which we work include but are not limited to the following:

- Reliance on contaminated water and/or shallow and unreliable domestic wells for household use;
- Reliance on aging, dilapidated and leaching septic systems which put residents at risk of exposure to coliform bacteria and nitrates in water supplies;
- Dust exposure resulting from unpaved local roadways;
- Exposure to toxic air pollution associated with the receding Salton Sea;

- Exposure to hazardous air contaminants as a result of excessive truck and vehicle traffic associated with warehouse distribution centers travelling in close proximity to sensitive land uses;
- Exposure to enhanced flood risks due to a lack of adequate flood control infrastructure in lower-income communities of color;
- Excessive heat exposure due to a combination of job conditions (such as working outdoors for farmworkers), a lack of effective and energy-efficient in-home air conditioning units, and inadequate insulation and neighborhood shade to lower indoor temperatures;.

The County must revise the AFH to include a thorough analysis of these and other environmental health disparities impacting protected classes in Riverside County. The analysis must address the components set forth in HCD's AFFH Guidance, consider and discuss available data sources, and incorporate public comment.

C. Failure to Demonstrate That Sites Inventory AFFHs

Housing Element Law requires that jurisdiction's sites inventory "identify sites throughout the community" consistent with its duty to AFFH. § 65583.2; 8899.50; HCD AFFH Guidance, p. 45. The housing element must evaluate sites "relative to the full scope of the assessment of fair housing." AFFH Guidance, p. 45.

The draft element fails to adequately evaluate the sites it relies on to meet its lower-income RHNA, because it fails to include a meaningful analysis of the extent to which sites' location further or exacerbate disparities in access to opportunity, including access to educational, employment, and transportation opportunities and access to a healthy environment. The AFH's sites inventory analysis with respect to these categories consists of (1) the claim that large sites zoned for mixed use development in R/ECAPs will facilitate development of services and retail to meet the needs of residents, and (2) the draft identifies sites in high poverty, low-resource areas which may be subject to longer commute distances and will advance economic mobility for residents with the inclusion of certain Actions. p. 90. First, the draft does not provide support for its claim that lower-income housing development in R/ECAPs in and of itself will lead to development of the retail and services that R/ECAPs lack at present. Second, a much more detailed analysis is necessary for the element to actually demonstrate that the sites inventory AFFHs relative to the full scope of the AFH. This analysis should consider not only the location of sites in broad geographic planning areas, but also their proximity to different types of opportunity at a smaller scale within those areas. For instance, while the draft element indicates that 30% of lower-income site capacity is located in high resource areas, it should discuss those sites proximity to transportation, employment, and high quality education in relationship to the community in or near which they are located.

The AFH's sites inventory analysis also falls short, because it includes fails to evaluate and demonstrate the sites' contribution to reducing disparities in access to a healthy environment. At the same time, a large share of lower-income RHNA sites appear to be impacted by adverse environmental health factors. First, many RHNA sites are located in environmentally-burdened disadvantaged communities pursuant to CalEnviroScreen 3.0. These includes sites in Meadowbrook Town Center, with sites in census tracts ranking in the 90-95th percentile under CalEnviroScreen, Highgrove Town (85th-90th percentile), North Shore (80-85th percentile),

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Lakeview and Nuevo Community (with sites in the 90-95th percentile and 75-80th percentile), Good Hope Community and Mead Valley (with sites in the 90-95th percentile and 85-90th percentile), Home Gardens, Mecca, and Oasis. As discussed above, the sites inventory also includes a large quantity of sites next to and in close proximity to highways, which are considered major sources of pollution associated elevated cancer risk for nearby residents. Further, many lower-income sites are located in and near Very High Risk and High Risk Fire Hazard Zones and some sites appear to be located in a flood zone. The County must revise the draft element to evaluate these and other environmental health factors in relation to the sites inventory and its duty to AFFH.

V. Governmental Constraints Analysis Deficiencies

The draft element's governmental constraints analysis contains several deficiencies. First, the County severely restricts siting of "parolee-probationer homes." P-141; Riverside Co. Mun. Code 17.290. The Housing Element should analyze these limitations as a potential constraint to housing for people with criminal histories and should also analyze whether they have a disparate impact based on race or other protected characteristics. See 2 CCR 12265.

Second, the draft discusses SB 330 processing procedures but does not discuss SB 330's relocation and replacement housing requirements for projects that redevelop existing residential uses, nor does it include a program to implement SB 330's relocation and replacement housing requirements. P-157. The County must supplement its analysis of governmental constraints and revise its programs accordingly.

Third, as mentioned in the following section, the draft element identifies the need for County action to ensure compliance with Health and Safety Code Section 17021.5 to allow employee housing of up to 6 units by right on parcels that allow single-family housing but the draft does not analyze the County's compliance with Health and Safety Code Section 17021.6, the Employee Housing Act provision requiring cities and counties to allow employee housing of up to 36 beds in group quarters or 12 units by right in zone districts where agriculture is allowed. The County must revise the draft to address this omission.

VI. Failure to Adopt Programs That Will Result in A Beneficial Impact During the Planning Period and AFFH

Section 65583(c) requires that the housing element include a program with a "schedule of actions during that planning period, each with a timeline for implementation...such that there will be beneficial impacts of the programs within the planning period." Actions must reflect the results of the housing element's analysis, be specific with timelines, concrete steps, and measurable outcomes, and must AFFH. AFFH Guidance, pp. 51, 53. Pursuant to the requirement that housing elements AFFH, actions, actions must be "meaningful" and, when taken as a whole, address significant disparities in housing needs and in access to opportunity, replace segregated living patterns with truly integrated and balanced living patterns, transform R/ECAP into areas of opportunity, and foster and maintain compliance with civil rights and fair housing laws. §§ 65583(c)(5)&(10), 8899.50(a)&(b).

The draft element's Housing Action Plan fails contains numerous actions that lack concrete steps and measurably outcomes and will not necessarily result in a beneficial impact during the planning period in violation of the Housing Element Law's standards. Examples of

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such inadequate programs, and some of our recommendations to improve them, include the following:

- **Action H-1 - Sites to Accommodate the Regional Housing Needs Assessment (RHNA) Allocation.** As discussed above, this program is inadequate to comply with the requirements of Government Code section 65583.2.
- **Action H-2 – Infrastructure Availability and Coordination.** Lower-resource areas in Riverside County have an urgent need for safe, affordable, and sound infrastructure and services, including but not limited to water and waste water, sidewalks, storm water drainage, streetlights and infrastructure supporting public transportation, retail, recreation facilities, and parks and green space. As currently drafted, Action H-2 is inadequate to address the scope of the need given its urgency and disparities in access to infrastructure and services based on race, ethnicity, country of origin, and language and among farmworkers, single-parent households, large families, and other populations with special housing needs. The draft element’s proposal to “*coordinate every two years with service providers to assess the needs for infrastructure and services and discuss plans for expansion based on future proposed developments*” provides no guarantee of any meaningful action that will address these disparities. Instead, the County should commit to developing a comprehensive analysis, in partnership with community residents and CBOs, of infrastructure and service needs in lower-income communities and communities of color, a prioritized schedule to address those needs considering the health and environmental consequences of infrastructure and service deficits, and commitments to serve as the lead agency to implement projects, including commitments to conduct feasibility studies, lead environmental review, develop financing mechanisms, and assist with and seek funding. The County should also revise every other action contained in Action H-2 to ensure concrete steps and measurable outcomes in the planning period.
- **Action H-7 – Land use (zoning) ordinance amendments.** The draft element includes a program to comply with Healthy and Safety Code section 17021.5 for employee housing that serves six or fewer persons. However, the draft element fails to analyze and include a similar program to ensure compliance with Healthy and Safety Code section 17021.6 which requires the County to allow employee housing up to 12 units or 36 beds by right in zone districts where agriculture is allowed. The County must revise the draft element to demonstrate compliance with section 127021.6 or include a program to attain compliance in more than one year from adoption of the 6th cycle housing element.
- **Action H-10 – Innovative Housing Options.** This action commits the County to “promote innovative and alternative housing options” and to “explore a variety of densities and housing types in all zoning districts.” These commitments lack specificity and do not ensure a beneficial outcome within the planning period. The detail included in the Implementation column that the County will “[a]nnually distributive [*sic*] educational and promotional materials to developers also does not demonstrate a beneficial impact will be achieved.

- **Action H-12 – Inclusionary Housing Requirements.** This action provides that the County will “promote” very low and low-income housing requirements for multifamily housing projects by negotiating for such units on a project-by-project basis and that the County will “explore alternatives within 3 years” and “adopt a program by the end of the 6th Cycle Housing Element.” The commitment to “explore alternatives” ensures no specific outcome or impact on the availability of affordable and inclusionary housing. The adoption of a program by the end of the planning period likewise will not achieve a beneficial outcome in the planning period, because no time will be left after adoption to allow for implementation during the planning period. On top of this, County negotiation for affordable units on a project-by-project basis, beginning at the end of the 6th cycle planning period, provides no assurance of a beneficial outcome either, since it establishes no parameters on how the County will use its negotiating powers and only applies to multi-family housing developments. Adoption of an inclusionary zoning ordinance is one of few specific policy and program recommendations provided by the public that the draft element notes in Appendix P on Public Participation section, and it was a program of the Fifth Cycle Housing Element that the County failed to implement. P-28, 177, 189. Instead of an ambiguous commitment to “negotiate”, the County should adopt a program to develop and adopt an inclusionary zoning ordinance by a date certain that is no more than three years into the planning period in order to allow the ordinance to result in the production of lower-income units during the planning period. To ensure that the ordinance AFFH and maximizes the production of affordable units, the ordinance should apply to single-family and multi-family housing and require a minimum share of affordable units (approx. 25-30%) and affordability levels of those units, including affordability for very-low and extremely-low income households. County should develop this ordinance in partnership with lower-income residents and CBOs.
- **Action H-13 – Code Enforcement.** This action commits only to continuing the County’s current code enforcement practices, but the draft element does not evaluate the effectiveness of current practices with respect to housing conditions and fair housing. Adequate analysis of code enforcement might reveal a need to change the County’s code enforcement program. In fact, the AFH notes that poor housing conditions significantly impact farmworkers, who are disproportionately Latino and immigrants compared to the County as a whole, and are a primary driver of displacement risk. This indicates that County code enforcement practices merit enhancement, not just continuation. P-87.
- **Action H-17 – Mobile Homes.** This Action contains non-specific commitment to “promote purchasing and/or installing mobile home units in moderate- and high-resource areas.” H-14. The County fails to identify measurable outcomes with respect to the Mobile Home Tenant Program included in Action H-17. This action should also consider its potential AFFH impacts given the program’s support for the essential displacement of ELI mobile home owners and should consider complimenting this action with actions that support those same residents’ ability to remain in the current mobile home park in a decent, sanitary conditions. The action also fails to describe

how the County will determine if mobile home and manufactured homes are not meeting the lower-income housing need two years into the planning period and how many and what type of “other housing sites” the County will ensure are available to accommodate the unmet portion of the lower-income RHNA. Finally, Action H-17 includes a quantified objective which includes six different numbers of moderate and lower-income units, but no detail is included to clarify to which discrete actions these quantified objectives relate. The County must revise Action H-17 to comply with the Housing Element Law’s action requirements. Additional actions are needed to address housing needs of current mobile home park residents and prevent loss of mobile home housing, including adoption of a mobile home park conversion ordinance, rental assistance, programs to improve conditions in mobile home parks (including Polanco Parks), and foreclosure-prevention assistance.

- **Action H-19 – Polanco Parks Program.** This programs commitment to “review and evaluate” the County’s Polanco Park permitting process does not include any commitment to actually revise the program based on the County’s review and therefore will not in and of itself result in a beneficial impact. The County should also consider adopting the Polanco Property Management Education Program and other actions identified in Leadership Counsel’s February 2021 letter, including a program for information and education for Polanco park owners on best management practices and the development of a Polanco park housing directory.
- **Action H-20 – Persons with Disabilities.** This program commits the County to “*cooperate* with nonprofit agencies that provide placement or referral services for persons with disabilities,” “[*e*]ncourage universal design,” “[*e*]ncourage housing developers to designate accessible and/or adaptable units,” “[*c*]oordinate with Inland Regional Center to promote outreach efforts...” H-16. These commitments are not concrete or specific and provide no assurance of a beneficial impact on persons’ with disabilities access to housing. Action H-20 should be revised to include review and enforcement of compliance with legal requirements for accessibility of multi-family and affordable housing, including in permitting processes, not just “encourage[ing]” accessibility features.
- **Action H-22 – Housing Choice Voucher Program.** This program provides that the County will “continue to administer the Housing Choice Voucher Program” and will “promote the use” of HCVs in high opportunity areas. H-16. This action lacks concrete steps, including to ensure increased use of voucher in high opportunity areas. The County should revise this program to include specific actions with measurable outcomes to increase the use of vouchers, including in high opportunity areas. These actions could include collaborating with and funding CBOs and fair housing organizations to provide information to voucher holders and landlords on California’s source of income discrimination prohibitions, which include vouchers; establishing and funding a program within the County to actively pursue enforcement against discrimination against voucher-holders and/or funding a right to counsel program which guarantees access to legal counsel to low-income tenants on housing matters;

and supplementing vouchers with additional subsidies to support voucher use in higher-cost markets in high resource areas.

- **Action H-23 – Monitor At-Risk Units.** Action H-23 does not include concrete actions or timelines that the County commits to with respect to Paseo de los Poetas, a 21-unit LIHTC property whose subsidy expires in 2026. *See* P-72.
- **Action H-27. Improve Low Income Areas Access to Opportunities.** Action H-27 is the Action Plan’s primary action focused on expanding access to opportunities in low-resource areas. Unfortunately, the Action relies on unenforceable and vague commitments without measurable or specific outcomes. These commitments include to “[c]oordinate with public transit providers,” “[a]llow for employment centers to be located near housing developments,” “[p]romote CalWorks offered by the County in rural areas,” “[i]ncrease community services in low-resource areas,” “[s]eek opportunities to access funding for improved transit service,” and “[c]ontinue to facilitate the integration of affordable housing and mixed income settings in new growth specific plan areas. While each of these commitments addresses a critical need of low-resource communities, the actions are ineffectual. Despite the inclusion of 9 discrete actions, Action 27 lists only one quantified objective: “200 low-income households, all near existing or proposed high resource areas.” It is unclear if this quantified objective is referring to the Action 27 action that addresses development of affordable housing or something else. Regardless, Action 27 includes no quantified objectives relating to the expansion of access to opportunities in existing low-resource areas.
To comply with the County’s duty to AFFH, the draft element must be revised to include specific, timebound actions with measurable outcomes and that respond to community input provided during the housing element update.
- **Action H-28 – Homeless Collaboration.** Action H-28 commits to the County to “[c]ontinue to collaborate” with the Continuum of Care and to “support inter-jurisdictional emergency shelter programs.” The Action does not commit the County to any concrete action. Adequate analysis of needs of unhoused County residents, including AFH analysis of disproportionate needs, would likely reveal a need for concrete programs. H-19.

The draft element is also lacking policies and programs identified in Leadership Counsel’s February 2021 letter, attached hereto. We incorporate the policies and programs recommended in that letter here by reference.

In addition, to the policies and programs highlighted in Leadership Counsel’s February 2021 letter, the draft element should also be revised to include the following programs:

- A program or programs to address the impact of the prevalence of vacant vacation housing on the price and availability of housing in Eastern Riverside County, given the draft element’s finding that the area’s astounding 42% vacancy rate is primarily attributable to the presence of vacation homes. Programs we recommend the County consider include a tax on vacation homes to help fund the

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- development and maintenance of housing affordable to lower-income households and adoption of inclusionary zoning requirements in all new development. P-58.
- A program for ensuring water and sewer priority for affordable housing. *See* § 65589.7.
 - Dedication of County land and other firm support for the creation of community-land trusts and development of permanent affordable housing, parks and green space, recreational facilities, and other community amenities on these sites.
 - Resource a program to pay for weatherization of mobile homes.
 - Commit resources to implementing policies, programs and projects contained in the Eastern Coachella Valley Transformative Climate Communities on at least an annual basis.

As discussed previously, each program must contain clear action steps, deadlines, and measurable outcomes that will be achieved within the planning period and address housing and fair housing needs prioritized during the public process.

* * * * *

Thank you for your consideration of our comments. Please contact us if you would like to find a time to discuss them. We look forward to working together to advance access to safe, affordable housing for all Riverside County residents.

Sincerely,



Ashley Werner
Directing Attorney
Leadership Counsel for
Justice and Accountability

/s/

Omar Gastelum
Policy Advocate
Leadership Counsel for
Justice and Accountability



Melissa A. Morris
Staff Attorney
Public Interest Law Project

cc: Paul McDougall, Manager, HCD
Paul Swancott, Planning Department, Riverside County

Sent: Monday, August 16, 2021 1:27 PM - Follow up to 8/12/2021 Letter
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Cc: Omar Gastelum <ogastelum@leadershipcounsel.org>; Rebecca Zaragoza
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Subject: Re: Comments on Riverside County Draft Housing Element

Dear Jamillah and Paul,

I am writing to follow up regarding a few additional concerns regarding Riverside County's Draft 6th Cycle Housing Element (Draft). I will send these concerns to the County today as well.

Needs of Unhoused People

The Housing Element must analyze the needs of "families and persons in need of emergency shelter." Gov. Code, § 65583(a)(7). That analysis must include analysis of disparities based on race, disability, and other characteristics protected by fair housing laws. Gov. Code, § 65583(c)(10); HCD AFFH Guidance, 36-37. The County is the lead agency for the Riverside County Continuum of Care and responsible for the coordination and administration of homelessness services Countywide, but the Draft lacks critical information, analysis, and actions to address the needs of the County's unhoused residents. The Draft's deficiencies include the following:

- The Draft's limitation of demographic analysis to the unincorporated county obscures countywide needs and issues. Because of the County's role in coordination and administration of homeless services, the Housing Element should analyze data for both the unincorporated areas and the County as a whole. For example, the Draft says that there were no children under 18 observed in the 2020 Point-In-Time count, but the Point-In-Time count identified 2,117 children under 18 countywide, nearly a quarter of the County's entire homeless population. Draft, P-68. Data available at <https://www.bcsd.ca.gov/hcfc/hdis/demographics.html> [www.bcsd.ca.gov].
- The Draft does not address the prevalence of disabilities among unhoused people in the County. Draft, P-67. "People with disabilities are . . . overrepresented in the unhoused population and any solutions related to homelessness must address appropriate accommodations and accessibility." HCD AFFH Guidance, 36. In Riverside County, 37% of unhoused people surveyed in its most recent Point-in-Time Count reported having a disability. (Data available at <https://www.bcsd.ca.gov/hcfc/hdis/demographics.html> [www.bcsd.ca.gov].) In contrast, Census data indicate that only 7.5% of people under 65 in the County have disabilities. The Draft does not analyze the relative overrepresentation of people with disabilities among its unhoused residents nor the appropriateness and accessibility of existing shelter resources to meet the needs of the homeless population. Draft, P-70-71; see also HCD AFFH Guidance, 37.

- The Draft does not address racial disparities in homeless population. In 2019, 25.4% of unhoused people in the County were Black, but only 6.4% of people living in the County are Black. Data available at <https://www.bcsd.ca.gov/hcfc/hdis/demographics.html> [[bcsd.ca.gov](https://www.bcsd.ca.gov)].
- The Draft does not engage in racial impact or disability access analysis of Coordinated Entry System. See AFFH Guidance, 37.
- The County administers General Relief and other public benefits that unhoused individuals and families, as well as other low-income community members, rely on to secure and maintain housing. However, the Draft does not engage in any AFFH analysis of the County's public benefits administration.

Further, without adequate and accurate analysis of current needs and existing programs, the Draft also lacks adequate, concrete programs to address the needs of its unhoused residents and to ensure that the County administers services equitably.

Reasonable Accommodation Ordinance

The Housing Element must analyze “potential and actual governmental constraints upon the maintenance, improvement, or development of housing for . . . people with disabilities.” Gov. Code, § 65583(a)(5). Program H-7 commits the County to “[r]eview the County’s findings for approving reasonable accommodation requests, including, but not limited to, potential impact on surrounding uses, physical attributes of the property and structures, and any other findings that may be potential barriers to housing for persons with disabilities.” H-10. But analysis of the County’s reasonable accommodation ordinance, and whether that ordinance poses constraints to the development of housing for people with disabilities, should be part of the Housing Element. See <https://www.hcd.ca.gov/community-development/building-blocks/constraints/constraints-for-people-with-disabilities.shtml>. The Draft does not discuss whether the County has received any reasonable accommodation requests, whether any reasonable accommodation requests were granted or denied, or what the bases for denial were in the case of any denials. See P-141.

Additionally, review of the County’s reasonable accommodation ordinance and its website reveals structural barriers to obtaining reasonable accommodations, including the following:

- Riverside County Municipal Code section 17.04.115(A)(2) requires the reasonable accommodation request to be made on form provided by the Planning Department, but there is no RA request form on the Planning Department’s website: <https://planning.rctlma.org/Development-Process/Applications> [planning.rctlma.org]. Additionally, the Fair Employment and Housing Act (FEHA) prohibits the City from denying reasonable accommodation requests based on failure to use a prescribed form. 2 Cal. Code Regs., § 12176(c)(4).
-

- Section 17.04.115(A)(6) includes factors for potential denial of reasonable accommodations beyond those allowed under FEHA. See 2 Cal. Code Regs., § 12161(b)(8).
-
- The County charges a \$983.28 fee to appeal a reasonable accommodation denial, but state and federal law prohibit covered entities from charging a fee for reasonable accommodations. Draft, P-147; see 2 Cal. Code Regs., § 12180 (a)(1); HUD-DOJ Joint Statement on Reasonable Accommodations, p. 9, https://www.justice.gov/sites/default/files/crt/legacy/2010/12/14/joint_statement_ra.pdf [justice.gov] .

The Housing Element must analyze the existing reasonable accommodation ordinance for potential violations of fair housing law and constraints to the development of housing for people with disabilities; and it must include a concrete program—with a concrete deadline—to amend the ordinance to comply with the law.

Please let me know if you have any questions or would like to discuss these comments further.

Thank you,

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Please note that PILP's office is currently closed in response to the COVID-19 pandemic. I am working remotely and can be reached most easily by phone or text at 408-692-4320 or by email at mmorris@pilpca.org.

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Sent: Saturday, August 14, 2021 8:51 AM
To: Ashley Werner <awerner@leadershipcounsel.org>; Williams, Jamillah@HCD

[<Jamillah.Williams@hcd.ca.gov>](mailto:Jamillah.Williams@hcd.ca.gov)

Cc: Melissa A. Morris <mmorris@pilpca.org>; Omar Gastelum <ogastelum@leadershipcounsel.org>;

Rebecca Zaragoza <rzaragoza@leadershipcounsel.org>

Subject: RE: Comments on Riverside County Draft Housing Element

We can open it but its hard to read when you zoom in

From: Ashley Werner <awerner@leadershipcounsel.org>

Sent: Friday, August 13, 2021 6:24 PM

To: Williams, Jamillah@HCD <Jamillah.Williams@hcd.ca.gov>; McDougall, Paul@HCD

<Paul.McDougall@hcd.ca.gov>

Cc: Melissa A. Morris <mmorris@pilpca.org>; Omar Gastelum <ogastelum@leadershipcounsel.org>;

Rebecca Zaragoza <rzaragoza@leadershipcounsel.org>

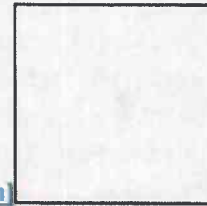
Subject: Re: Comments on Riverside County Draft Housing Element

Hi,

Our first attachment is large and is having trouble loading. Please let me know if you are able to open it. It's a FEMA flood map.

Ashley

[Attachment 1 - FEMA Flood Map - Mecca, Riversid... \[drive.google.com\]](#)



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