

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.

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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?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**Source:** County of Riverside General Plan, Figure S-11 "Wildfire Susceptibility"; County of Riverside 6<sup>th</sup> 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.

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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"/>

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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 6<sup>th</sup> 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

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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

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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

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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

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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,

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

	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 6<sup>th</sup> 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.

<b>MINERAL RESOURCES</b> Would the project:				
<b>25. Mineral Resources</b>				
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 6<sup>th</sup> 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?

b) For a project located within the vicinity of a private airstrip, would the project expose people residing or

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 6<sup>th</sup> 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 6<sup>th</sup> 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<sub>dn</sub> for exterior areas and 45 dBA L<sub>dn</sub> 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.

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?

**Source(s):** County of Riverside General Plan, Figure OS-8 "Paleontological Sensitivity"; County of Riverside 6<sup>th</sup> 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:				
<b>29. Housing</b>				
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 6<sup>th</sup> 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**

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**Source(s):** *County of Riverside General Plan Safety Element; County of Riverside 6<sup>th</sup> 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**

**Source(s):** County of Riverside General Plan; County of Riverside 6<sup>th</sup> 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 6<sup>th</sup> 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**

**Source(s):** *County of Riverside General Plan; County of Riverside 6<sup>th</sup> 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 6<sup>th</sup> 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
<b>RECREATION</b> Would the project:				
<b>34. Parks and Recreation</b>	<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 6<sup>th</sup> 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 6<sup>th</sup> 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:			
<b>36. Transportation</b>	<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 6<sup>th</sup> 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?*<sup>1</sup>

<sup>1</sup> 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

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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

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.

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.

**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 6<sup>th</sup> 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)?   |                          |                                     |                          |                          |
| 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 6<sup>th</sup> 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

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

**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 6<sup>th</sup> 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

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 6<sup>th</sup> 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:**

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 3.17.1 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?

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)?

**Source(s):** County of Riverside 6<sup>th</sup> 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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 6<sup>th</sup> 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,

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 12<sup>th</sup> Floor  
Riverside, CA 92501

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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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# SAN GORGONIO CHAPTER

*Regional Groups Serving Riverside and San Bernardino Counties: Los Serranos, Tahquitz, San Bernardino Mountains, Mojave, Moreno Valley, Big Bear*

**VIA ELECTRONIC MAIL** [cob@rivco.org](mailto:cob@rivco.org)

September 20, 2021

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

Re: GPA Nos. 180002 (Safety), 190006 (Housing), and 210109 (Land Use)

Honorable Supervisors:

The Sierra Club is a national non-profit organization with over 3 million members, of whom over 1,000 live in the Coachella Valley area and are members of the Tahquitz Group of the San Gorgonio Chapter. The Tahquitz Group focuses on conservation, environmental protection, and environmental and social justice issues. The Sierra Club's comments on the Draft Housing and Safety Elements, and associated amendments to the General Plan are presented in three sections in this letter and are summarized as follows:

- **As detailed in Section 1 below, the Sierra Club urges the Board of Supervisors to pursue a Regional Affordable Housing Plan.** The Plan would be comparable to the Multiple Species Habitat Conservation Plan (MSHCP) in scope, but would focus on ensuring a positive and healthy living environment for all residents of the Coachella Valley. Analogous to the MSHCP, preparation and administration of the Housing Plan could be coordinated by CVAG, and would function as a coordinated action by all Coachella Valley cities and the County, and could include CVWD, DWA, IID, and other agencies that provide necessary services and facilities to support housing. (WRCOG could spearhead a comparable planning process in western Riverside County.) Once adopted, the Plan could be incorporated by reference into each jurisdiction's Housing Element and would function as the required Action Plan, and could be designed to substantially meet the General Plan Housing Element requirements of state law.
- **Section 2 contains specific comments on the draft Housing and Safety Elements, and explains why the Sierra Club believes the County's process is not compliant with State**

**requirements and has not provided for equitable public participation.** The County should not rush. State law requires ample time for public review and participation prior to the draft's being submitted to HCD. This has not occurred. We understand that the County would prefer to be on an 8-year cycle for updating the Housing Element, but that convenience should not displace adequate public review and comment and adequate consideration and revision of the draft as a result not only of comments from the concerned public and community organizations, but also the extensive comments from the state. It is better to produce a quality plan than to meet a deadline.

- **Section 3 of this letter explains why an amendment is needed to the Eastern Coachella Valley Area Plan (ECVAP) to ensure consistency among the Housing Element, ECVAP, and other Elements of the General Plan.** We believe that it is necessary to delete Policy 2.3 in the ECVAP. This policy facilitates urban development in a remote desert area which would include affordable housing. As described in detail below, we believe that, as a matter of policy, it is inappropriate to place affordable housing in a remote location rather than in existing communities where the need and opportunity and services such as public transit already exist: communities such as Mecca, Oasis, Thermal, and North Shore.

## ***Section 1 – Proposal for a Regional Affordable Housing Plan***

The Multiple Species Habitat Conservation Plan (MSHCP) is a 75-year plan that identifies and conserves, largely through acquisition, sufficient land to protect the sensitive species and habitats in the Coachella Valley in perpetuity. By resolving endangered species issues, the MSHCP also facilitates infrastructure and other development in the Coachella Valley. The total cost over 75 years is projected to be slightly over \$1 billion. The benefits to the Coachella Valley are immeasurable. There is a comparable plan in Western Riverside County.

The Sierra Club proposes that an analogous plan for fair and affordable housing be developed for the Coachella Valley, and one for Western Riverside County. The plan would function as a Regional Affordable Housing Plan (RAHP). The Plan would be comparable to the MSHCP in scope, but would focus on ensuring a positive and healthy living environment for all residents of the Coachella Valley. The MSHCP is essentially a Regional Action Plan to address endangered species and broader habitat conservation issues with its own funding mechanisms, implemented in part through the general plans and ordinances of the nine cities and the County and the comparable decision-making frameworks and regulations of other participating agencies. Implementation is also coordinated and administered by a Joint Powers Agency representing the local Permittees. Analogous to the MSHCP, preparation and administration of the RAHP could be coordinated by CVAG, and would function as a coordinated action by all Coachella Valley cities and the County, and could include CVWD, DWA, IID, and other agencies that provide necessary services and facilities to support housing. (WRCOG could spearhead a comparable planning process in western Riverside County.) Once adopted, it could be incorporated by reference into each jurisdiction's Housing Element and would function as the required Action Plan. Once completed, the RAHP could be designed to substantially meet the General Plan Housing Element requirements of state law.

We note that CVAG is currently taking a major step in this regard, having issued a "REQUEST FOR PROPOSALS (RFP 2021-02) COACHELLA VALLEY'S REGIONAL EARLY ACTION PLANNING (REAP) REVENUE STREAM FEASIBILITY STUDY FOR HOUSING AND ASSOCIATED TRANSPORTATION NEEDS" with proposals due October 1, 2021. The Sierra Club proposal for a RAHP sets that effort in a larger comprehensive framework.

The MSHCP has succeeded by aligning and coordinating the actions of all jurisdictions in the Plan area to resolve a regional issue in a regional context that brings more resources to bear and confers regional benefits. It analyzed the issue at a regional scale, and identified funding, regulatory and other implementing solutions at the regional level. Just as endangered species issues were not just a County issue but also issues for the nine cities and other agencies, the RAHP would address a regional issue/need by coordinating planning and implementing actions by all affected jurisdictions and bringing collective resources to bear.

The MSHCP has a 75-year lifespan; and can be amended to extend beyond that time frame as needed. Similarly, the RAHP could have an initial multi-decade time frame in order to embrace long-term solutions and actions. Just as the MSHCP is developing a long-term Endowment Fund to maintain the Reserve System over time, the RAHP could over time develop an Affordable Housing Trust Fund to be a primary future funding source for Plan implementation.

In brief, the planning process for the Coachella Valley might look like this:

- (1) CVAG develops a framework for preparation of the RAHP and secures a Planning Agreement among the member agencies and other key participating agencies.
- (2) Partners and organizations that could assist and provide input into the planning process are identified. An advisory committee (or committees) is/are established.
- (3) The requisite information is gathered to define the scope of the issue. RHNA numbers could be used, but a Plan area inventory would also be critical to define specific needs by community to ensure that all residents have safe, healthy housing and living conditions. Inventory and defined needs would identify, for example, the number of substandard units that could be rehabilitated, the number of new affordable units needed, the number of homeless people, temporary housing needs, etc. The inventory would also identify associated infrastructure needs, both upgrades of existing infrastructure and new infrastructure.
- (4) The RAHP would establish specific goals based on the inventory and needs definition. This would be the framework for the Action Plan.
- (5) Identify methods and actions for fulfilling the goals and meeting the needs. CVAG has substantially set this step in motion with the afore-mentioned RFP. [The MSHCP sets forth specific goals and objectives by geographic area, which focus and coordinate what were previously disparate efforts by various agencies and organizations, and which provide the framework for identifying the roles and capacities of different implementation mechanisms, including regulatory and fiscal mechanisms, and volunteer and partnership approaches. The RAHP could likewise better coordinate disparate

efforts and identify an array of fiscal, regulatory, and partnership approaches to meeting the needs.]

- (6) Determine the estimated cost.
- (7) Identify existing and potential funding mechanisms and sources, and non-funding (regulatory, planning, and volunteer) mechanisms. [By taking a comprehensive coordinated approach, the MSHCP was able to secure specific commitments from state and federal agencies to assist with Plan implementation; these commitments reflect a highly functional partnership approach and spread the costs well beyond local government. The MSHCP also includes a significant implementation contribution from non-government partners such as local land trusts and foundations.]
- (8) Develop an implementation timeline with milestones, and determine actions needed by individual jurisdictions as well as collective actions.
- (9) Secure approval from all participating agencies.

## ***Section 2 – Comments on the Draft Housing and Safety Elements***

- **The Process is Not Compliant with State Requirements and Has Not Provided for Equitable Public Participation.**

The County should not rush. State law requires ample time for public review and participation prior to the draft's being submitted to HCD. This has not occurred. We understand that the County would prefer to be on an 8-year cycle for updating the Housing Element, but that convenience should not displace adequate public review and comment and adequate consideration and revision of the draft as a result not only of comments from the concerned public and community organizations, but also the extensive comments from the state. It is better to produce a quality plan than to meet a deadline. Being on a four-year update schedule could also be a positive in that it increases accountability and increases incentives for expeditiously implementing programs and policies. In its September 1 comment letter, the State Department of Housing and Community Development (HCD) stated:

“HCD understands the County did not make the element available to the public with sufficient time to comment prior to submittal to HCD. By not providing an opportunity for the public to review and comment on a draft of the element in advance of submission, the County has not yet complied with statutory mandates to make a diligent effort to encourage the public participation in the development of the element and it reduces HCD's ability to consider public comments in its review. The availability of the document to the public and opportunity for public comment prior to submittal to HCD is essential to the public process and HCD's review.”

Our own experience of trying to engage concerning the Housing Element consisted of numerous emails from one of the below-signed in 2020 and 2021 requesting information about the status of the Housing Element and requests to be notified of its availability and to be placed on a list to be notified of hearings scheduled regarding it. Notification was never provided and

periodic searches of the County's website did not locate the Draft Housing Element. We finally found it incidental to checking the recent Planning Commission agenda; it was then too late to review the Draft in time to prepare comments for the Commission. The Sierra Club urges the Board of Supervisors to re-initiate the public review and comment period and direct staff to seek a meeting or meetings with community groups and representatives from HCD to discuss and seek to resolve the issues that have been raised, and then circulate a revised draft before action by the Board.

- **The Goals, Policies, and Actions Are Deficient.**

The section on goals, policies, and actions is at the heart of the of the Housing Element. It is, however, more aspirational than a clear commitment to actions that will make a difference and produce a clear beneficial result. It is revealing that in the 29 policies associated with the 5 Housing Goals, the words "encourage", "strive" "promote", "incentivize", "facilitate" and "support" are the operative words in 10 of the policies; "should" is an operative word in 11 of the policies; only 6 policies utilize "shall" as the operative word.

Further, regarding the Housing Actions, the thirty-two actions often lack specificity and are too often exploratory rather than results oriented. Consider the contrast between an action (H-8) that states (with emphasis added) "Continue biannual review of the building code, zoning ordinance, subdivision ordinance, and processing procedures to identify and modify process requirements, approval of criteria, and/or fees that could create an impediment to the cost of housing. Specifically, the County will review the processes and procedures in the Desert Office and consider hiring a permanent staff person(s) to ensure that processing and procedures are not a constraint on development or permitting" and an action ((H-14) that states, "Continue to provide up to \$10,000 for home repair services in the form of a deferred loan. The HRLP provides one-time loans to qualified low-income homeowners to address health and safety issues, Housing Quality Standards and improve substandard living conditions within the scope of eligible program repairs." The latter is results-oriented and is specific; the former has potential, but commits to no specific result. There are too many such examples among the proposed "actions": good intentions that may or may not be realized and result in an actual beneficial impact.

For those actions that list a "Quantified Objective" our concerns are:

1. In every instance, information and analysis are lacking to support the objectives. For example, Action H-3 cites a Quantified Objective of 700 low-income, 700 very low-income, and 332 extremely low-income units; but the action consists solely of giving priority to certain types of developments and providing incentives on a case-by-case basis. There is no factual information, no data from previous successful examples, and no analysis or detailed explanation that supports the County's ability to achieve the objective.
2. In every instance, there are no milestones setting forth how it is anticipated the objectives will be achieved within the planning period.
3. In every instance, along with the lack of specific milestones, there is no articulation of an adaptive response or follow-up action to be taken if a milestone is missed.

The quantified objectives, therefore, are at best aspirational; there is no commitment to accomplish the objectives, and no ongoing accountability for not achieving them; nor milestones and a provision for an annual accounting of progress, or lack thereof, towards achieving the objectives.

The Housing Element itself acknowledges the uncertainty that the objectives will be met, and, one might argue, excuses failure at the outset. Page H-21 states, with emphasis added:

“State Housing Law requires that each jurisdiction establish the maximum number of housing units that will be constructed, rehabilitated, and preserved over the planning period. The Quantified Objectives for the Housing Element reflect the planning period from October 15, 2021, through October 15, 2029. Refer to **Table H-3**.

*It is important to note that while the Quantified Objectives are required to be part of the Housing Element and the County will strive to obtain these objectives, the County cannot guarantee that these needs will be met given limited financial and staff resources, the foreseeable product development climate in the county with a current bias toward low and medium density housing, and the changing gap in the affordability of housing resources and incomes.* Satisfaction of the County’s share of regional housing needs will depend heavily on the cooperation of private funding sources and developers, as well as resources of state, federal, and County programs that are used to support the needs of the lower-income and special-needs households. *The Quantified Objectives assume optimum conditions for the production of housing;* however, environmental, physical, and market conditions exert influence on the timing, type, and cost of housing production in a community. State law recognizes that a locality may not be able to accommodate its regional fair-share housing need.”

In its September 1 comment letter, HCD stated:

“To have a beneficial impact in the planning period and address the goals of the housing element, programs must be revised with discrete timelines, specific commitment and lessons learned from the prior planning period. For example, programs needing revisions with discrete timelines include but are not limited to H20 (Persons with Disabilities) and H28 (Homeless Collaboration). Programs needing revisions with specific commitment or based on lessons learned from the prior planning period include but are not limited to H13 (Code Enforcement) which should explicitly link rehabilitation financing and other resources to mitigate displacement.”

The Sierra Club suggests that the County consider a different approach to identifying and meeting objectives. Frame and develop the Action Plan by beginning with the statement, “The County will improve people’s living conditions by...” Hopefully, this would lead to articulating a series of action commitments that are results-oriented and specifically designed to improve living conditions. It might also be useful to better define the issue and the needs in the Housing Element by adding a section in the Introduction that graphically (not statistically) describes the living conditions of a good many Riverside County residents in terms of the size and physical characteristics and condition of the housing; the condition of the area streets, water and sewer systems; and the issues and challenges faced by the residents. A few illustrative photos and

“stories” would not be amiss to create a real picture of the conditions that the Housing Element is designed to alleviate and produce a beneficial impact. In that context, a process to which the County might commit to enhance the chances of developing and implementing specific actions to improve housing and living conditions are:

1. Ask community organizations and housing advocacy groups to submit a list of what they perceive as the greatest priorities for improving conditions as well as a list of potential actions that would have maximum beneficial impact and a list of potential existing and new funding sources.
2. If there currently isn't one, create a line-item in the budget specifically for improving housing conditions.
3. Quantify the cost of improving housing conditions to a minimally acceptable level.
4. Each Supervisorial District should have one of its staff members function at least half time as a community liaison for fair, adequate, and affordable housing so that there is always a point person actively working on the issue. That staff person should meet regularly with community organizations and housing advocacy groups to discuss actions being taken, progress being made, and potential adaptive responses if adequate progress towards meeting milestones is not being made.
5. The Board should review progress towards implementing specific actions that result in beneficial impacts at least every six months to adjust strategies and actions as needed.

The Sierra Club believes that the proposed action plan could be clarified and expanded to achieve more beneficial impacts with clear milestones and adaptive responses when milestones are not being met in the above context.

- **The Discussion of Implementation and Results of the 5<sup>th</sup> cycle Housing Element is inadequate.**

The discussion of implementation and results of the 5<sup>th</sup> cycle Housing Element lacks required detail and does not provide an assessment of the extent to which 5<sup>th</sup> cycle goals were met, or not met. There is little or no discussion of lessons learned. The Housing Background Report lists an array of programs and actions the County pursued to address special housing needs and includes a 36-page matrix of “Programs”, “Implementation Status”, and “Status” (pertaining to the 6<sup>th</sup> Cycle Draft Housing Element) that purports to explain what the 5<sup>th</sup> Cycle accomplished. The quantity of disparate information, however, does not succinctly summarize the actual results of the 5<sup>th</sup> Cycle actions and programs, and there is no discussion of shortcomings and lessons learned, and how those lessons informed the 6<sup>th</sup> Cycle Housing Element to rectify the deficiencies of the 5<sup>th</sup> Cycle. It is not at all clear as to whether the goals of the 5<sup>th</sup> Cycle were achieved, or how large the gap was between the goals and the actual results. That deficiency is not persuasive that the 6<sup>th</sup> Cycle Housing Element will prove adequate to have tangible and sufficient beneficial impacts.

- **The Site Inventory to Meet the RHNA Goals is not Demonstrated to be Realistic and Feasible to Meet the Defined Needs**

Among the sources of affordable housing on which the County relies in the Housing Element is the Travertine Specific Plan. The Element states, “To determine the affordability breakdown,

the County assumed that 50 percent of the remaining affordable unit requirements would be affordable to very low- and low-income households and 50 percent would be affordable to moderate income households. This breaks down to 916 units allocated toward moderate income, and 750 allocated toward very low and low income.” There is no explanation, however, as to the basis for that assumption. In its September 1 letter, HDC noted that:

“Affordability for Travertine has not yet been determined, so the element should either (1) include additional information or policies to demonstrate current affordability assumptions, (2) rescale affordability assumptions to be conservative, or (3) count the affordability based on approved densities and list sites according to statutory requirements.”

- **The Safety Element Should Better Address Climate Change Vulnerability**

The Safety Element discusses climate change related hazards and vulnerabilities, but would benefit from stronger policies that proactively and directly seek to ameliorate the extent to which climate change will occur so as to reduce vulnerability to climate change and enhance resilience. Such policies could either be included in the Safety Element or could be added to other General Plan Elements through the amendment process. Suggested policies include:

- The County shall require rooftop solar on new commercial buildings.
- The County shall encourage and develop financial and other incentives for retrofitting solar onto existing buildings.
- New land uses shall be designed to minimize Vehicle Miles Travelled (VMT); projects that substantially increase VMT are prohibited unless there are compelling reasons that justify a CEQA Findings of Fact and Statement of Overriding Considerations.

### ***Section 3 – Amendment Needed to the Eastern Coachella Valley Area Plan to Ensure Internal Consistency***

#### **OVERVIEW**

The County is currently considering General Plan updates to the Housing Element and the Safety Element. As part of this effort, other elements of the General Plan need to be amended to ensure internal consistency. We believe that among the necessary amendments is the deletion of Policy 2.3 in the Eastern Coachella Valley Area Plan (ECVAP). This policy facilitates urban development in a remote desert area which would include affordable housing. As described in detail below, we believe that, as a matter of policy, it is inappropriate to place affordable housing in a remote location rather than in existing communities where both the need and opportunity (in terms of land use designations and county policies) already exist, communities such as Mecca, Oasis, Thermal, and North Shore. There are numerous other reasons for deleting ECVAP Policy 2.3, including issues related to long-term water supply; inconsistency with the CVMSHCP; provision of public services and facilities in a remote area when there is a clear need for, instead, improving public services and facilities in underserved

areas; consistency with the Climate Action Plan; and safety issues associated with large scale urban development in a remote area subject to natural and human-made hazards. The update to the Safety Element already identifies various safety related amendments necessary for the ECVAP. We believe that deletion of Policy 2.3 should be included among those amendments.

### **HOUSING ELEMENT - reasons to delete ECVAP Policy 2.3**

The current Housing Element states, “A specific plan is an important planning tool as it establishes the permitted number of dwelling units; accommodates a variety of housing types including attached and multifamily uses; and fosters clustering concepts, leaving room for open space and other amenities.” (page H-104). The draft Housing Element update, now proposed for adoption, continues this reliance on specific plans in Action H-1 of Table H-2 Eight Year Housing Action Plan, which states, “Continue to identify existing and potential community cores that can, through regulations and policies, evolve into new communities or Specific Plans, or modification of existing community plans or Specific Plans, which would allow sufficient densities and intensities of residential and non-residential products to meet the socioeconomic needs of the communities, including those designated as economically and environmentally disadvantaged communities.”

There is no doubt that specific plans can be a useful tool for achieving affordable housing goals; however, the location of a specific plan is critical as only those specific plans in areas where the need for affordable housing is matched by the availability of the public services and facilities, and job opportunities for the residents of the affordable housing will be beneficial. The action statement does acknowledge this by noting that the goal is meeting the socioeconomic needs of communities, including those designated as economically and environmentally disadvantaged communities. For this reason, we believe that the Board of Supervisors in adopting the Housing Element update should also delete Policy 2.3 from the Eastern Coachella Valley Area Plan (ECVAP) in order to maintain internal consistency within the General Plan. ECVAP Policy 2.3 provides that “Lands adjacent to Interstate 10, from the easterly edge of the Coachella Valley to the Chiriaco Summit, also known as the Shavers Valley, offer unique opportunities for self-sustaining development provided that such development is limited and can provide for a full complement of infrastructure and services. Clearly the availability and assurance of a long term and reliable water supply will be the pivotal issue for development in this area. Proposed planned communities in this area are not subject to the eight-year limit and other procedural requirements applicable to Foundation Component amendments as provided above” contingent upon the proposal meeting various criteria.

- ***ECVAP Policy 2.3 sites affordable housing in the wrong area.***

One of the criteria in ECVAP Policy 2.3 is “The proposed community must be consistent with, and advance the goals of, the Riverside County Housing Element and provide for a range of housing opportunities including low and moderate-income housing.” As a matter of policy, it is inappropriate to place affordable housing in a remote location rather than in existing communities where both the need and opportunity already exist. It is in existing communities, such as Mecca, Oasis, Thermal, and North Shore, where affordable housing would:

- Strengthen and maintain community identity.
- Site housing near job opportunities.
- Site housing near transportation facilities.

Even if the developer of the area described in ECVAP Policy 2.3 were to offer increased affordable housing, providing affordable housing in remote areas where the residents of those units might be located far from family and social/support networks, and might not have job opportunities and access to services and facilities that meet their needs, is simply not good public policy. It is better public policy, as the current General Plan Housing Element (Page H-74) states, “to promote compact development in strategically located activity centers, along with infill opportunities within existing urban areas, in order to minimize development pressures on vacant land on the urban fringe.”

Public resources that would be expended to provide and maintain public services and facilities in the remote area where new town development is countenanced by ECVAP Policy 2.3 would be better spent providing services and infrastructure to existing communities in proximity to existing transportation corridors, water systems, and electricity systems, where such investment continues to be desperately needed around the Coachella Valley. Affordable housing should be provided in existing communities where the need is and where the facilities, services, and employment opportunities needed by the people in search of affordable housing exist or could be more efficiently provided, rather than in remote areas where affordable housing residents would have difficulty accessing services and facilities and would likely lose the sense of community that would only be available in existing communities. Policy 2.3 in the ECVAP, which allows a leapfrog “new town” development in a remote area, is counterproductive and does not help the County implement its affordable housing goals. ECVAP Policy 2.3, therefore, is inconsistent with the Housing Element Update and should be deleted in conjunction with the General Plan Amendment to adopt the Housing Element.

- ***ECVAP Policy 2.3 facilitates leapfrog development inconsistent with the efficient provision of public services and facilities.***

Another criterion of ECVAP Policy 2.3 is “The proposed community must provide for all relevant public facilities and services, including public protection, road maintenance, library services, education facilities, and waste disposal; and, it must be demonstrated that such service can be efficiently delivered within the proposed community.” Yet, the General Plan Vision Statement provides that: “Communities are focused around existing urban areas with transit opportunities.” Shavers Valley is not an existing urban area with transit opportunities. Moreover, providing all necessary facilities and services “efficiently” to a “new town” so far from existing communities and existing services and facilities is a contradiction in terms. It is unrealistic to expect that all the sheriff’s deputies, firefighters, teachers, park staff, librarians, waste disposal and recycling truck drivers, etc. would live in the new community. Therefore, of necessity, many of them would be commuting significant distances each day, adding significantly and unnecessarily to transportation-related greenhouse gas emissions and increased traffic burdens. Similarly, the provision of everything from fuel to groceries and other goods in the “new town” would entail constant long-distance truck trips, generating further greenhouse gas emissions as a result of the inefficiency of trying to meet all the needs and

requirements of a remote community. Moreover, in the event of an emergency that closes I-10, the remoteness of the area would make it exceedingly difficult for the necessary personnel and equipment to reach the site to ensure that emergency public facilities and services were provided.

When a “new town” facilitated by ECVAP Policy 2.3 was considered by the Board of Supervisors in 2019, the Resolution that was adopted by the Board denying the project stated: *“Because the Project design does not allow for alternate methods to access or evacuate this isolated site, the project lacks the ability to realize the intended vision for a ‘self-sustaining development’ and lacks the provision for a ‘full complement of infrastructure and services,’ as necessary for Shavers Valley.”* This is instructive as it points to the fact that any project large enough to be “self-sustaining”, as required by ECVAP Policy 2.3, will inherently pose the same problems regarding transportation infrastructure and safety.

Further, the Resolution denying the project stated: *“The ultimate condition of what is proposed by the Project is to develop within an undeveloped area, with a large development footprint within a conservation area, which places the development far from existing public and commercial services, over 15 miles east of the nearest access to the City of Coachella Valley. As proposed, the Project does not ensure consistency with environmental policies or fiscal stability or provide evidence that a development of this type and at this scale is appropriate in this particular area. For this reason, the Project, as proposed, potentially conflicts with the Riverside County Vision.”*

As discussed above, any new town project in remote Shavers Valley would inherently conflict with the Riverside County Vision and other General Plan goals and policies. Therefore, ECVAP Policy 2.3 should be deleted.

- ***ECVAP Policy 2.3 conflicts with long-term water supply goals and needs***

Another criterion of ECVAP Policy 2.3 is “The plan must include a comprehensive water service program that addresses the long-term requirements of the project, conservation, and reliability.” Since 2003 the state has experienced periods of severe drought. As more has been learned about the effects of climate change on long-term weather patterns, California’s Fourth Climate Change Assessment forecasts have projected that by 2100 the annual average temperature will increase by 5.6 – 8.8 degrees Fahrenheit and the water supply from snow-pack is expected to decline by two-thirds. Thus, ensuring long-term reliable water service for a new town in the desert is an extremely dubious and risky prospect.

As acknowledged by the EIR, this new town proposal enabled by ECVAP Policy 2.3 would include some reliance on ground-water pumping in Shavers Valley. Even though the ostensible intent is to recharge the groundwater basin from time to time as imported water became available (by no means a certain proposition), during the periods of downdraft there would be a serious adverse impact on the upstream or up-gradient water table and actual springs in Joshua Tree National Park that are critical to support the wildlife and plant communities there. This would be inconsistent with the General Plan Vision Statement on the topic of Natural Environment, which states: *“We value the unusually rich and diverse natural environment with which we are blessed and are committed to maintaining sufficient areas of natural open space*

*to afford the human experience of natural environments as well as sustaining the permanent viability of the unique landforms and ecosystems that define this environment.”*

The Multipurpose Open Space Element (page OS-7) states: *“Projected 2020 water use and population levels indicate an expected water shortage for the two hydrologic regions that comprise Riverside County: the South Coast and Colorado River regions.”* It is clear from the improved understanding of the effects of climate change and the increased expectations of water supply shortages, combined with the conflicts with General Plan policies and the Vision Statement, that ECVAP Policy 2.3 is not consistent with the requirement that any project in the Shavers Valley area “must include a comprehensive water service program that addresses the long-term requirements of the project, conservation, and reliability.”

- ***ECVAP Policy 2.3 is inconsistent with the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP).***

An additional criterion of ECVAP Policy 2.3 is “The proposed community must be compatible with the achievement of the goals of the Coachella Valley Multiple Species Habitat Conservation Plan, as determined by the County of Riverside in consultation with the Coachella Valley Association of Governments, the California Department of Fish and Wildlife, and the United States Fish and Wildlife Service.” ECVAP Policy 2.3 requires both that the planned community or “new town” be a “self-sustaining Development” and that it “further the goals of the CVMSHCP”. These two requirements inherently contradict one another; i.e., the policy lacks internal consistency. The same scale of a “new town” that would be required for it to be self-sustaining would severely impede the goals of the CVMSHCP by negating some of the Conservation Goals and Objectives of the Desert Tortoise and Linkage Conservation Area (DTLCA). Indeed, When the County approved the CVMSHCP in 2008 and signed the Implementing Agreement (IA), it committed itself, pursuant to IA Section 13.2A, to “Adopt and maintain ordinances or resolutions as necessary, and amend their general plans as appropriate, to implement the requirements and to fulfill the purposes of the Permits, the CVMSHCP and this Agreement for private and public projects.” Because the preceding analysis makes evident the inherent inconsistency between ECVAP Policy 2.3 and the CVMSHCP, the County is obligated by the IA to amend its general plan to delete ECVAP Policy 2.3. The CVMSHCP, it should be borne in mind, is extremely important to the Coachella Valley as it facilitates development, including development containing affordable housing, in the Take Authorization area, which encompasses the most appropriate areas for affordable housing; i.e., within or adjacent to existing urban areas.

Further, Policy OS 17.1 of the Multipurpose Open Space Element of the General Plan states: “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...” The adoption and implementation of the CVMSHCP subsequent to the 2003 General Plan’s inclusion of ECVAP Policy 2.3, and related policies in the Multipurpose Open Space Element, as well as the General Plan Vision Statement make clear that the scale of development of a self-sustaining development in Shavers Valley, in

the heart of the Desert Tortoise and Linkage Conservation Area, renders any such development in conflict with the provision of Policy 2.3 that requires consistency with the CVMSHCP.

ECVAP Policy 2.3 conflicts with the CVMSHCP and is internally inconsistent with the Riverside County General Plan and should be deleted.

- ***ECVAP Policy 2.3 conflicts with the County's Climate Action Plan (CAP).***

The CAP addresses climate change in part by referencing the General Plan Land Use Element policy that states "Concentrate growth near community centers that provide a mixture of commercial, employment, entertainment, recreation, civic, and cultural uses to the greatest extent possible." (Land Use Policy 2.1d) Clearly, ECVAP Policy 2.3 contradicts this Land Use policy designed to reduce climate change impacts.

### **SAFETY ELEMENT - reasons to delete ECVAP Policy 2.3**

ECVAP Policy 2.3 exacerbates risk from natural and human-caused hazards, including seismic and geologic, flood, extreme heat, severe weather, fire, hazardous materials, and climate change vulnerability, and exponentially increases the difficulty in preparing and implementing disaster preparedness plans.

As the proposed updated Safety Element states:

One of the fundamental values of the Vision for Riverside County highlights the importance of safety to the people of unincorporated Riverside County: "We acknowledge security of person and property as one of the most basic community needs and commit to designing our communities so that vulnerability to natural and human made hazards, as well as criminal activities, is anticipated and kept to a minimum." This "value" underlies the policy direction of the Safety Element and is further defined by the following Vision statement: "Considerable protection from natural hazards such as earthquakes, fire, flooding, slope failure, and other hazardous conditions is now built into the pattern of development authorized by the General Plan."

Section 65302(g) of the California Government Code. State law requires that the Safety Element address the following (among other items):

- Develop goals, policies, and objectives to reduce the risks associated with climate change impacts, including locating new public facilities outside of at-risk areas, providing adequate infrastructure in at-risk areas, and supporting natural infrastructure for climate adaptation, as required by California Government Code Section 65302(g)(4).
- Identify residential developments in any hazard area identified that do not have at least two emergency evacuation routes, as required by California Government Code Section 65302(g)(5).

The area facilitated for large scale urban development by ECVAP Policy 2.3 would, however, locate new public facilities in a highly at-risk area, and would place residential development in a hazard area lacking at least two functional emergency evacuation routes. Similarly, Land Use Policy 2.1g states "Prevent inappropriate development in areas that are environmentally sensitive or subject to severe natural hazards." ECVAP Policy 2.3 facilitates large scale development in an area subject to numerous significant hazards and is thus inconsistent with both the proposed Safety Element and the Land Use Element and should be deleted.

The proposed updated Safety Element also states:

"Crucial relationships exist between the Safety Element and the other General Plan elements. How land uses are determined in areas prone to natural hazards, what regulations limit development in these areas, and how hazards are mitigated for existing development, are all issues that tie the elements together. For instance, Land Use Element diagrams and policies must consider the potential for various hazards identified in the Safety Element and must be consistent with the policies to address those hazards. The Multipurpose Open Space Element is also closely tied to the Safety Element. Floodplains, for example, are not only hazard areas, but often serve as sensitive habitat for threatened or endangered species or provide recreation or passive open space opportunities for residents and visitors. As such, flood and inundation policies balance the need to protect public health and safety with the need to protect habitat and open space. Safety Element policies, especially those concerning evacuation routes and critical facilities, must also be consistent with those of the Circulation Element."

Again, it is clear that ECVAP Policy 2.3 is inconsistent with and conflicts with an array of policies in the Safety, Housing, Land Use and other General Plan Elements regarding affordable housing; reducing risks; addressing climate change; water supply; efficient provision of public services and facilities, including transportation; and conserving crucial habitat. This warrants the deletion of Policy 2.3.

Sincerely,



Bill Havert, Co-Chair  
Environmental Justice Committee  
Tahquitz Group  
San Gorgonio Chapter



Gary Gray, Co-Chair  
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cc: Robert Flores, Principal Planner [rflores@RIVCO.ORG](mailto:rflores@RIVCO.ORG)  
Shannan West, Land Use & Planning Unit Chief, HCD [Shannon.West@hcd.ca.gov](mailto:Shannon.West@hcd.ca.gov)  
Jamillah Williams, Housing Policy Analyst II, HCD [Jamillah.Williams@hcd.ca.gov](mailto:Jamillah.Williams@hcd.ca.gov)

Leadership Council  
Eastern Coachella Valley - Safety Element  
12:24  
**Riverside County Board of Supervisors**  
**Request to Speak**

Submit request to Clerk of Board (right of podium), Speakers are entitled to three (3) minutes, subject to Board Rules listed on the reverse side of this form.

SPEAKER'S NAME: Rebecca Zaragoza

Address: \_\_\_\_\_

City: \_\_\_\_\_ Zip: \_\_\_\_\_

Phone #: \_\_\_\_\_

Date: 09/28/21 Agenda # 21-2

**PLEASE STATE YOUR POSITION BELOW:**

**Position on "Regular" (non-appealed) Agenda Item:**

\_\_\_\_\_ Support    X Oppose    \_\_\_\_\_ Neutral

**Note:** If you are here for an agenda item that is filed for "Appeal", please state separately your position on the appeal below:

\_\_\_\_\_ Support    \_\_\_\_\_ Oppose    \_\_\_\_\_ Neutral

I give my 3 minutes to: \_\_\_\_\_

# BOARD RULES

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12:210

# Riverside County Board of Supervisors Request to Speak

Submit request to Clerk of Board (right of podium), Speakers are entitled to three (3) minutes, subject to Board Rules listed on the reverse side of this form.

SPEAKER'S NAME: Teresa Lora Rodriguez  
(Spanish Speaker)

Address: \_\_\_\_\_

City: Davis Zip: \_\_\_\_\_

Phone #: \_\_\_\_\_

Date: 09/28/21 Agenda # 21.2

### PLEASE STATE YOUR POSITION BELOW:

Position on "Regular" (non-appealed) Agenda Item:

\_\_\_\_\_ Support     \_\_\_\_\_ Oppose    \_\_\_\_\_ Neutral

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I give my 3 minutes to: \_\_\_\_\_

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unincorporated areas especially  
the Coachella Valley not getting  
needed infrastructure 12:30

### Riverside County Board of Supervisors Request to Speak

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SPEAKER'S NAME: Karina Andalon

Address: \_\_\_\_\_

City: \_\_\_\_\_ Zip: \_\_\_\_\_

Phone #: \_\_\_\_\_

Date: \_\_\_\_\_ Agenda # 21.2

**PLEASE STATE YOUR POSITION BELOW:**

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\_\_\_\_\_ Support     \_\_\_\_\_ Oppose    \_\_\_\_\_ Neutral

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### Riverside County Board of Supervisors Request to Speak

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SPEAKER'S NAME: Omar Gastelum

Address: \_\_\_\_\_

City: \_\_\_\_\_ Zip: \_\_\_\_\_

Phone #: \_\_\_\_\_

Date: \_\_\_\_\_ Agenda # 21.2

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Leadership Council

## Riverside County Board of Supervisors Request to Speak

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SPEAKER'S NAME: Nataly Eswebedo Garcia

Address: \_\_\_\_\_

City: \_\_\_\_\_ Zip: \_\_\_\_\_

Phone #: \_\_\_\_\_

Date: \_\_\_\_\_ Agenda # 21.2

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