SUMMARY OF IMPACTS	SIGNIFICANCE DETERMINATION	MITIGATION MEASURES (MM)	RESPONSIBLE PARTIES	MONITORING PARTIES	IMPLEMENTATION STAGE
		immediate vicinity of the site in areas underlain by the fossil-bearing rock unit, and assigning additional personnel to the PRIMP. Within 24 hours a recovery crew shall be mobilized to recover the specimen. The size of the crew shall reflect the size of the specimen and the need to recover the specimen as quickly as possible. The specimen shall be excavated with hand tools, covered with a protective plaster-impregnated burlap jacket, and recovered. If necessary and approved by the construction contractor, earth-moving equipment and an operator shall be enlisted to expedite recovery of the specimen, reduce any potential construction delay, and obviate the need for additional personnel. The construction contractor shall be allowed to have earth moving proceed through the fossil site immediately after recovery of the specimen. A temporary field number shall be assigned to the specimen; the field number, a preliminary field identification, and pertinent specimen (field number, identification by taxon and element) and geologic (particularly stratigraphic level within rock unit) and geographic site data (location, elevation) recorded in the monitor's daily monitoring log; and the field number recorded and the fossil site location plotted on a map of the site. The field supervisor and, if necessary, a crew member shall transport the fossil specimen and associated site data to a laboratory facility for further treatment. • Small-Specimen Sample Evaluation, Recovery, and Processing. If a sufficient number of smaller vertebrate fossil remains are found at one (1) site as a result of test screening by the paleontological monitor, the fossil site shall be flagged with colored survey ribbon to temporarily divert earth moving around the site. The construction contractor shall be advised to avoid the site until further notice, and if requested by the monitor			

SUMMARY OF IMPACTS	SIGNIFICANCE DETERMINATION	MITIGATION MEASURES (MM)	RESPONSIBLE PARTIES	MONITORING PARTIES	IMPLEMENTATION STAGE
		to expedite recovery of a fossiliferous rock sample reduce any potential construction delay and obviate the need for additional personnel, the construction contractor shall have earth-moving equipment and an operator acquire a rock sample from the fossil site and transport the sample, if possible, to a nearby temporary location at the site approved by the construction contractor. If a sample is recovered, the construction contractor shall be allowed to have earth moving proceed through the fossil site immediately after recovery of the sample. The Project Paleontologist or field supervisor shall be called to the fossil/storage site to determine if the fossil site/sample is sufficiently productive to warrant recovery of a large sample of fossiliferous rock to process for additional small remains. • If the site/sample is determined too unproductive or the remains too poorly preserved or insufficiently diagnostic, no further action will be taken to preserve the fossil site/sample or remains, and the construction contractor will be allowed to have earth moving proceed through the fossil/storage site immediately. • If sample recovery is warranted, the Project Paleontologist or field supervisor shall notify the construction contractor and Project developer of the necessity for implementing additional mitigation measures specified in the DC/TP and assigning additional personnel to the PRIMP. 2a) Within 24 hours, a recovery crew shall be mobilized to recover the sample. The size of the crew shall reflect the need to recover the sample as quickly as possible. The field supervisor shall record the size and supervise recovery of the sample. Up to 3 tons of fossiliferous rock shall be recovered. The sample shall be excavated with hand tools for recovery. If necessary and if approved by the construction contractor, earth-moving equipment and an operator shall be enlisted to			

SUMMARY OF IMPACTS	SIGNIFICANCE DETERMINATION	MITIGATION MEASURES (MM)	RESPONSIBLE PARTIES	MONITORING PARTIES	IMPLEMENTATION STAGE
		expedite transportation of the sample to the processing facility site, obviate the need for additional personnel, and reduce any potential construction delay and the construction contractor will be allowed to have earth moving proceed through the fossil site immediately after recovery of the sample. 2b) A temporary field number shall be assigned to the sample; the field number and pertinent specimen (field number, identification by taxon and element) and geologic (particularly stratigraphic level within rock unit) and geographic site data (location, elevation) recorded in the monitor's daily monitoring log; and the field number recorded and the fossil site location plotted on a map of the site. The field supervisor and, if necessary, a crew member will transport the sample to a location elsewhere at the site approved by the construction contractor or to an offsite location for initial/field processing (wet screening) of the sample. The total weight of all samples from each fossil-bearing rock unit at the site shall not exceed 3 tons. 2c) If warranted, the field supervisor shall setup a field processing facility for wet screening the sample at a site location approved by the construction contractor. Wet screening shall consist of sieving rock through a 20-(and/or finer) mesh box screen immersed in a tub of water to remove the smaller (clay and silt) particles from the larger (sand and rock) particles and small fossil remains, and could result in a reduction in sample weight/volume in excess of 90%. If necessary, rock shall be soaked in an environmentally safe dispersant (citrus oil) prior to screening to improve the separation of the clay particles from the rest of the sample during screening. The monitor shall conduct wet screening if screening can be accomplished without diverting the monitor from monitoring. If it is not possible to have the monitor perform the wet screening, a field technician shall be assigned to the task. Following the next site inspection, the field supervisor will transport			

SUMMARY OF IMPACTS	SIGNIFICANCE DETERMINATION	MITIGATION MEASURES (MM)	RESPONSIBLE PARTIES	MONITORING PARTIES	IMPLEMENTATION STAGE
		the concentrate (larger particles and small fossil remains) generated by initial processing to a laboratory facility for final/laboratory processing. 2d) If the fossil remains in the concentrate are sufficiently fossilized (dense), an environmentally safe heavy liquid (sodium polytungstate), if appropriate, shall be used by the senior vertebrate paleontologist to separate the remains from the remaining sand and rock particles. When added to a beaker filled with heavy liquid, the concentrate will separate, the particles floating to the surface, and the remains sinking to the bottom, from where they are retrieved. This technique can result in a further sample weight/volume reduction in excess of 90% (less than 1% of original sample size). The final concentrate shall be examined under a microscope and fossil specimens recovered from any remaining sand and rock particles. If the fossil bone in the original concentrate is not sufficiently dense for use of the heavy-liquid separation technique, the entire sample of concentrate shall be sorted under a microscope for fossil remains. Recovered fossil remains shall then be treated as outlined herein. 2e) During the final processing of a sample, the senior vertebrate paleontologist shall continually evaluate the results of field and laboratory processing. If the sample is insufficiently productive or the fossil remains are too poorly preserved, the senior vertebrate paleontologist shall have the option of discontinuing further laboratory processing of the sample, having field processing of the remainder of the sample suspended, and disposing of the remainder of the sample and unprocessed concentrate. Similarly, processing shall be discontinued if, after preliminary identification of some specimens, the remains are determined insufficiently diagnostic or diverse taxonomically, or the species represented are the same as those in another sample from the fossil-bearing rock unit. If appropriate, small splits from one or more samples shall be submitted for palynological			

SUMMARY OF IMPACTS	SIGNIFICANCE DETERMINATION	MITIGATION MEASURES (MM)	RESPONSIBLE PARTIES	MONITORING PARTIES	IMPLEMENTATION STAGE
		analysis. • Fossil Treatment. Final treatment of all fossil specimens recovered from the site as a result of the PRIMP shall be conducted at a laboratory facility. Larger vertebrate fossil specimens shall be removed from their protective jackets, prepared to the point of identification using hand tools, and hardened or stabilized with a penetrating solution by a preparator. All recovered fossil specimens shall be identified to the lowest taxonomic level possible by knowledgeable vertebrate and invertebrate paleontologists and, if required, other knowledgeable paleontologists (i.e., paleobotanists, micropaleontologists, palynologists). The specimens shall then be curated (assigned and labeled with museum specimen data and corresponding site numbers, placed in specimen trays and, if appropriate, vials with completed specimen data cards), catalogued (specimen and site numbers and specimen data and corresponding geologic and geographic site data, respectively, archived [entered into appropriate catalogs and computerized databases]), and accessioned into the museum fossil collection, where they will be permanently stored, maintained, and, along with associated data, made available for future study by qualified investigators. With the possible exception of those tasks (curation, cataloging) that might be conducted by museum staff, all treatment of the fossil specimens shall be conducted by a laboratory technician. Fossil specimen preparation, identification, curation, and cataloguing are now required before a fossil collection will be accepted by most museum repositories, including the WSC, LACM, SDNHM, SBCM, and RMM. Moreover, the scientific importance of a fossil specimen cannot be evaluated until the specimen has been identified to the lowest taxonomic level possible, and specimen identification often is not possible without prior preparation.			

SUMMARY OF IMPACTS	SIGNIFICANCE DETERMINATION	MITIGATION MEASURES (MM)	RESPONSIBLE PARTIES	MONITORING PARTIES	IMPLEMENTATION STAGE
		• Final Report. A final technical report of findings shall be prepared by the Project Paleontologist and shall describe the site's stratigraphy, summarize field and laboratory methods employed during the PRIMP, include a taxonomic list and an inventory of catalogued fossil specimens recovered as a result of the PRIMP, evaluate the scientific importance of the specimens, and discuss the relationship of the fossil assemblage from any newly recorded fossil site at the project site to relevant fossil assemblages from fossil sites in other areas. The report shall be submitted to the contractor and County Geologist. Submission of the final report will signify completion of the PRIMP and will ensure Project compliance with Public Resources Code Section 21081.6 (mitigation monitoring, reporting, and compliance). All reports shall be signed by the Project Paleontologist and all other professionals responsible for the report's content (e.g., Project Geologist), as appropriate. One original signed copy of the report(s) shall be submitted to the County Geologist along with a copy of this condition and the grading plan for appropriate case processing and tracking. These documents should not be submitted to the Project Planner, Plan Check staff, Land Use Counter or any other County office. In addition, the Project Applicant shall submit proof of hiring (i.e. copy of executed contract, retainer agreement, etc.) a Project Paleontologist for the in-grading implementation of the PRIMP.			
4.15 Population and Housing					
Threshold a.: While the Project would demolish 26 existing dwelling units on site and would displace up to 99 persons, potentially requiring the construction of replacement housing elsewhere. However, and based on *Technical Appendix P* to the County's General Plan, the 60,423 dwelling units within the County that have been fully entitled and that were previously evaluated under CEQA are more than adequate to accommodate the 40,673	No Impact	Impacts would be less than significant; therefore, no mitigation measures are required.	N/A	N/A	N/A

SUMMARY OF IMPACTS	SIGNIFICANCE DETERMINATION	MITIGATION MEASURES (MM)	RESPONSIBLE PARTIES	MONITORING PARTIES	IMPLEMENTATION STAGE
housing units (inclusive of the 26 single-family homes that would be demolished as part of the Project) that are required to be built within the County by 2029 in order to meet the County's current RHNA obligations. In addition, the Project site is not located within the Bermuda Dunes or Coronita portions of the County, and the Project therefore is not subject to the provisions of SB 330. Therefore, the Project would not result in or require construction of unplanned replacement housing units, and impacts would be less than significant. Threshold b.: The Project site is not targeted for development with affordable housing under existing conditions, as the Project site is zoned for development with large-lot single-family uses, which typically are not considered affordable housing When combined with the residents on site that would be displaced as part of the Project, the Project would generate a demand for up to 283 dwelling units. However, Riverside County currently suffers from a poor jobs-housing ratio, wherein there are not enough jobs within the County to prevent the need for County residents to travel outside the region for employment. Thus, by developing the Project site with employment-generating land uses, the Project would assist the County in improving its jobs-housing balance. Moreover, due to the poor jobs-housing balance, it is likely that a large number of the jobs that would be generated by the Project would consist of existing County residents, thereby indicating that the Project's likely demand for new dwelling units within the County would be far less than 283 dwelling units. In addition, *Technical Appendix P* to the General Plan indicates that as of April 2021, there were 60,423 dwelling units within the	Less-than-Significant Impact				

SUMMARY OF IMPACTS	SIGNIFICANCE DETERMINATION	MITIGATION MEASURES (MM)	RESPONSIBLE PARTIES	MONITORING PARTIES	IMPLEMENTATION STAGE
County that have been fully entitled and that were previously evaluated under CEQA, which would be more than adequate to accommodate the projected 40,673 housing units (inclusive of the 26 single-family homes that would be demolished as part of the Project) that are required to be built within the County by 2029 in order to meet the County's current RHNA obligations, and also would be more than adequate to accommodate the Project's potential demand for up to 257 new dwelling units. Accordingly, based on the preceding analysis, impacts due to the creation of a demand for additional housing, particularly housing affordable to households earning 80% or less of the County's median income, would be less-than-cumulatively considerable. Threshold c.: The Project would result in an increase in the number of people on the Project site by approximately 875 persons (974 new persons – 99 displaced persons = 875 net increase in persons). Although the Project would result in the generation of more population on site than anticipated by the General Plan, Riverside County currently suffers from a poor jobs-housing ratio, wherein there are not enough jobs within the County to prevent the need for County residents to travel outside the region for employment. Thus, by accommodating more employment opportunities on site than was anticipated by the General Plan, the Project would assist the County in improving its jobs-housing balance. Accordingly, the Project would not directly result in substantial unplanned population growth in the area. Furthermore, the Project's proposed roadway and other infrastructure (e.g., water, sewer, etc.) improvements have been designed and sized to serve the proposed	Less-than-Significant Impact				

SUMMARY OF IMPACTS	SIGNIFICANCE DETERMINATION	MITIGATION MEASURES (MM)	RESPONSIBLE PARTIES	MONITORING PARTIES	IMPLEMENTATION STAGE
Project, and would not indirectly induce growth in the local area. Moreover, the analysis of Thresholds a. and b. demonstrate that as of April 2021 there were 60,423 dwelling units within the County that have been fully entitled and that were previously evaluated under CEQA, which would be more than adequate to accommodate the projected 40,673 housing units (inclusive of the 26 single-family homes that would be demolished as part of the Project) that are required to be built within the County by 2029 in order to meet the County's current RHNA obligations, and also would be more than adequate to accommodate the Project's potential demand for up to 257 new dwelling units. Therefore, the Project would not induce substantial unplanned population growth in the area, either directly or indirectly, and impacts would be less than significant.					
4.16 Public Services					
Threshold a: Although the Project would contribute to a need for new or expanded fire protection facilities, it is not possible to identify environmental impacts that may be associated with such new or expanded library facilities until a specific proposal and design for such facilities are prepared by the RCFD. Accordingly, impacts due to the construction of new or expanded fire protection facilities are too speculative for evaluation in this EIR (CEQA Guidelines § 15145). Environmental effects of such fire protection facilities and associated mitigation would be identified through a future CEQA process required in association with any future proposals for new or expanded fire protection facilities. Additionally, with payment of mandatory DIF fees, the proposed Project's potential direct and cumulatively-considerable impacts to the	Less-than-Significant Impact	Impacts would be less than significant; therefore, no mitigation measures are required.	N/A	N/A	N/A

SUMMARY OF IMPACTS	SIGNIFICANCE DETERMINATION	MITIGATION MEASURES (MM)	RESPONSIBLE PARTIES	MONITORING PARTIES	IMPLEMENTATION STAGE
Riverside County Fire Department would be reduced to less-than-significant levels.					
Threshold b.: With payment of mandatory DIF fees, the proposed Project's potential direct and cumulatively-considerable impacts to the Riverside County Sheriff's Department would be reduced to less-than-significant levels, and the Project would not result in or require the construction of new police protection facilities that could result in a significant impact to the environment.	Less-than-Significant Impact				
Threshold c.: The Project would not directly generate a resident population, and thus would not directly impact school services in the local area. Although the Project may indirectly result in new residents within the service area of the VVUSD, and thus may indirectly result in an incremental increase in demand for new school facilities, there are no current publicly-available plans detailing where such facilities would be built. As such, it is not possible to identify environmental impacts that may be associated with the construction of new or expanded school facilities until a specific proposal and design for the facility is prepared by the VVUSD, and an analysis of potential physical environmental impacts resulting from the construction and operation of new or expanded school facilities would be speculative in nature (see CEQA Guidelines § 15145). Environmental effects of such school facilities and any associated mitigation would be identified through a future CEQA process required in association with any future proposals for new or expanded school facilities. Any mitigation measures required for new or expanded school facilities could be funded, in part, from property taxes and/or through	Less-than-Significant Impact				

SUMMARY OF IMPACTS	SIGNIFICANCE DETERMINATION	MITIGATION MEASURES (MM)	RESPONSIBLE PARTIES	MONITORING PARTIES	IMPLEMENTATION STAGE
payment of school impact fees. Furthermore, the payment of mandatory school impact fees would ensure that the Project would result in less-than-significant direct and cumulatively-considerable impacts to the ability of the VVUSD to provide for school services.					
Threshold d.: The Project would not directly generate a resident population; however, buildout of the Project would result in a net increase of 876 persons on site and thus would conservatively create a demand for 2,190 titles and 438 s.f. of additional library space. However, these estimates are conservative in nature because the majority of persons on site that would be generated by the Project likely would be filled by existing Riverside County residents, given the County's generally poor jobs-to-housing ratio. Although the Project may indirectly result in new residents within the local area, and thus could result in an incremental demand for increased library facilities, the County has no plans to expand or build new library facilities in the Project site vicinity. The Project would be required to contribute DIF fees, which would be used in part to provide for library space and/or new book volumes. Accordingly, with payment of DIF fees, Project impacts to library services and facilities are evaluated as less than significant on both a direct and cumulatively-considerable basis.	Less-than-Significant Impact				
Threshold e.: With payment of mandatory DIF fees, the Project would result in less-than-significant direct and cumulatively-considerable impacts to health services facilities, and the Project would not result in or require the construction of new health services facilities that could result in a significant impact to the	Less-than-Significant Impact				

SUMMARY OF IMPACTS	SIGNIFICANCE DETERMINATION	MITIGATION MEASURES (MM)	RESPONSIBLE PARTIES	MONITORING PARTIES	IMPLEMENTATION STAGE
environment.					
4.17 Recreation					
Threshold a: The physical construction of the public park, d.g. trail, and roadway improvements (i.e., sidewalks and roadways) has been addressed under the relevant issue areas identified throughout this EIR (e.g., air quality, biological resources, cultural resources, etc.). Under each of these topics, the Project impacts are determined to be less than significant, or mitigation measures have been identified to reduce impacts to the maximum feasible extent. There are no components of the public park, d.g. trail, or sidewalks on site that have not already been addressed and accounted for throughout this EIR. Accordingly, Project impacts due to proposed public park, d.g. trail, and sidewalks on site would be less than significant, requiring no mitigation beyond that which is identified in other portions of this EIR.	Less-than-Significant Impact	Impacts would be less than significant; therefore, mitigation measures are not required.	N/A	N/A	N/A
Threshold b.: The Project's proposed warehouse building would not directly or indirectly generate a population that would increase the use of existing neighborhood and regional parks or other recreational facilities, as a majority of the Project's future jobs are anticipated to be filled by existing or future planned residents within the County. Accordingly, implementation of the proposed Project would not result in the increased use or substantial physical deterioration of an existing neighborhood or regional park, and impacts would be less than significant. Additionally, to the extent that employees associated with the warehouse building would utilize local parks, it is anticipated that Project employees would utilize the proposed on-site park given its close proximity to the proposed warehouse building;	Less-than-Significant Impact				

SUMMARY OF IMPACTS	SIGNIFICANCE DETERMINATION	MITIGATION MEASURES (MM)	RESPONSIBLE PARTIES	MONITORING PARTIES	IMPLEMENTATION STAGE
thus, the Project would not be expected to utilize other local recreational facilities to the extent that physical deterioration would occur or be accelerated. Thus, impacts would be less than significant.					
Threshold c.: The Project site is not located within a county service area, nor within a service area for existing community or neighborhood parks or a service area for future and potential community or neighborhood parks. Additionally, the Project is not subject to payment of in-lieu fees (Quimby fees) for recreational facilities pursuant to § 10.35 of Riverside County Ordinance No. 460. Accordingly, impacts due to a conflict with a Community Parks and Recreation Plan and due to the need for payment of in-lieu fees for parkland acquisition and construction would be less than significant.	Less-than-Significant Impact				
Threshold d.: Based a review of the future Cajalco Road widening project, Class II bike lanes only would be implemented in select areas, which does not include the frontage of the Project site. As such, no bike lane is proposed as part of the Project along the site's frontage with Cajalco Road, although the roadway improvements (i.e., sidewalks, the d.g. trail, and roadway surfaces) planned on Cajalco Road, Seaton Avenue and Decker Road could accommodate bicycles. Although the Project would result in the construction of roadway improvements such as sidewalks and a d.g. trail, the roadway improvements, d.g. trail, and sidewalks would occur in an area already planned for physical disturbance as part of the Project, and there would be no impacts to the environment specifically related to the construction of the sidewalks that have not	Less-than-Significant Impact				

SUMMARY OF IMPACTS	SIGNIFICANCE DETERMINATION	MITIGATION MEASURES (MM)	RESPONSIBLE PARTIES	MONITORING PARTIES	IMPLEMENTATION STAGE
already been addressed throughout this EIR (e.g., for impacts to biological or cultural resources). As such, and assuming implementation of the mitigation measures identified throughout this EIR, impacts associated with the proposed sidewalks and d.g. trail would be less than significant.					
4.18 Transportation					
Threshold a.: The proposed Project would be fully consistent with or otherwise would not conflict with Connect SoCal, the Riverside County CMP, the Riverside County General Plan and General Pan Circulation Element, the WRCOG ATP, or any Riverside County ordinances adopted to address transportation. There are no components of the proposed Project that would conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, or pedestrian facilities. Impacts would be less than significant. Threshold b.: While the Project's proposed park use meets the Local Essential Services screening threshold identified by the County Guidelines, the Project's warehouse use does not meet any of the screening criteria. Project generated Work VMT per employee would exceed the County's adopted threshold by 22.5%. Accordingly, prior to mitigation, buildout of the Project's warehouse use (only) would result in a significant impact due to VMT, while buildout of the Project's proposed park use would be less than significant since it meets one of the screening thresholds identified by the County Guidelines. Although the Project would be subject to compliance with Mitigation Measures MM 4.18-2 and MM 4.18-3, the effectiveness of commute trip reduction	Less-than-Significant Impact Significant and Unavoidable Impact	**MM 4.18-1** Prior to the issuance of grading permits or improvement plans affecting Cajalco Road, Seaton Avenue, or Decker Road, the Project Applicant shall prepare and Riverside County shall approve a temporary traffic control plan. The temporary traffic control plan shall comply with the applicable requirements of the California Manual on Uniform Traffic Control Devices (CMUTD). A requirement to comply with the temporary traffic control plan shall be noted on all grading and building plans and also shall be specified in bid documents issued to prospective construction contractors. **MM 4.18-2** Feasible Transportation demand management (TDM) strategies that will contribute to reducing Project generated VMT shall be developed and implemented. Features to promote the use of alternative transportation modes such as sidewalks, bicycle lanes, and bicycle racks are included as part of the Project's design. Property owner associations and/or building occupants shall be required as a condition of final building inspection for tenant improvements to prepare and implement a TDM Plan to discourage single-occupancy vehicle trips for employees and encourage alternative modes of transportation such as carpooling, transit, walking, and biking. Trip reduction strategies applicable to the Project may include but are not limited to the following: a. Implement local hiring programs. b. Mark preferred parking spaces for vanpools and carpools. c. Provide on-site secured bike parking facilities. d. Provide information on carpooling and vanpooling opportunities to employees. e. Provide an on-site message board in each building or other comparable system to encourage and provide information about public transit, carpooling, and vanpooling, and carpool	Project Applicant, Construction Contractors Project Applicant, Future Warehouse Building Occupants	Riverside County Building & Safety Department Riverside County Planning Department	Prior to issuance of grading permits As specified by the TDM Plan

SUMMARY OF IMPACTS	SIGNIFICANCE DETERMINATION	MITIGATION MEASURES (MM)	RESPONSIBLE PARTIES	MONITORING PARTIES	IMPLEMENTATION STAGE
measures such as those listed in Mitigation Measures MM 4.18-2 and MM 4.18-3 cannot be guaranteed to reduce Project VMT to a level of less than significant. No additional feasible mitigation measures are available to measurable reduce the Project's VMT. Therefore, the Project's VMT impacts are considered significant and unavoidable.		and vanpool ride-matching services. The TDM plan shall include an estimate of the vehicle trip reduction anticipated for each strategy proposed based on published research such as California Air Pollution Control Officers Association (CAPCOA), Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity (December 2021) (CAPCOA Handbook). For TDM measures that require ongoing operational strategies, the TDM plan shall include an ongoing monitoring program to ensure the plan is implemented on an ongoing basis.			
Threshold c.: All physical improvements planned as part of the Project would be in conformance with applicable Riverside County standards. Although residential uses occur in the local area, the Project's truck traffic would be routed north on Seaton Avenue and east on Cajalco Road/Cajalco Expressway to access the I-215, and would be routed away from residential traffic, thereby resulting in less-than-significant transportation impacts due to incompatible use.	Less-than-Significant Impact	**MM 4.18-3** All owner users and future tenants shall participate in Riverside County's Rideshare Program. The purpose of this program is to encourage 2+ person occupancy vehicle trips and encourage other alternative modes of transportation. Carpooling opportunities and public transportation information shall be advertised to employees of the building tenant. Developer and all successors shall include the provisions of this obligation in all leases of the Project so that all tenants shall fulfill the terms and conditions of this mitigation measure.	Future owners/ tenants of the Project's warehouse building	Riverside County Planning Department	During long-term operation of the Project's warehouse building
Threshold d.: Although the Project would result in the increased maintenance of roadways and would increase traffic on existing and planned roadways, any incremental increase in the need to maintain public roadway facilities would be offset by tax revenue generated by the Project's proposed land uses. There are no components of the proposed Project that would result in or require a substantial increase in expenditures by Riverside County for public road maintenance such that environmental impacts would result. As such, Project impacts would be less than significant.	Less-than-Significant Impact	**MM 4.18-4** Prior to tenant building occupancy, the Project Applicant shall assure the construction of a bus stop on the northern (westbound) side of Cajalco Road north of the Project site subject to the approval of the Riverside Transit Agency (RTA) and the Riverside County Transportation Department (RCTD).	Project Applicant, Future Warehouse Building Occupants	Riverside County Planning Department	Prior to tenant building occupancy
Threshold e.: Construction activities associated with the Project have the potential to affect circulation during proposed improvements along Cajalco Road, Seaton Avenue, and Decker Road. This is conservatively evaluated as a significant	Less than Significant with Mitigation Incorporated				

SUMMARY OF IMPACTS	SIGNIFICANCE DETERMINATION	MITIGATION MEASURES (MM)	RESPONSIBLE PARTIES	MONITORING PARTIES	IMPLEMENTATION STAGE
impact of the Project for which mitigation would be required. Mitigation Measure MM 4.18-1 requires the Project Applicant to prepare and obtain Riverside County approval of a temporary traffic control plan prior to issuance of grading permits or improvement plans affecting Cajalco Road, Seaton Avenue, or Decker Road. Implementation of the required mitigation would ensure that Project-related construction activities would not substantially affect circulation during the Project's construction. With implementation of the required mitigation, impacts would be reduced to less-than-significant levels.					
Threshold f.: Under long-term operating conditions, the Project would have no effect on emergency access in the local area, and impacts would be less than significant. However, during proposed frontage improvements to Cajalco Road, Seaton Avenue, and Decker Road, there is a potential that the Project could adversely affect emergency access or access to nearby uses. This is conservatively evaluated as a significant impact for which mitigation would be required. Mitigation Measure MM 4.18-1 requires the Project Applicant to prepare and obtain Riverside County approval of a temporary traffic control plan prior to issuance of grading permits. With implementation of the required mitigation, the Project would not result in inadequate emergency access or access to nearby uses during construction of improvements along Cajalco Road, Seaton Avenue, or Decker Road. Accordingly, with implementation of the required mitigation, impacts would be reduced to less-than-significant levels.	Less than Significant with Mitigation Incorporated				
Threshold g.: There are no planned bike trails along the Project site's frontages with Cajalco	Less-than-Significant Impact				

SUMMARY OF IMPACTS	SIGNIFICANCE DETERMINATION	MITIGATION MEASURES (MM)	RESPONSIBLE PARTIES	MONITORING PARTIES	IMPLEMENTATION STAGE
Road, Seaton Avenue, and Decker Road. Notwithstanding, Cajalco Road, Seaton Avenue, and Decker Road all could accommodate bicycle traffic. However, improvements to these roadways are inherent to the Project's construction phase, and impacts associated with the Project's roadway improvements have been evaluated throughout this EIR and, where necessary, mitigation measures have been identified to reduce impacts to the maximum feasible extent. There are no impacts to the environment that would occur specifically in relation to the Project's roadway frontage improvements that have not already been addressed throughout this EIR. Accordingly, impacts associated with the construction of the proposed roadway improvements (which could accommodate bicycles) would be less than significant.					
4.19 Tribal Cultural Resources					
Threshold a.: As a result of the County's consultation efforts with local Native American tribes, a Tribal Cultural Resource was identified and the bedrock milling features found within the Project boundary in the southern portions of the Project site proposed for public park use are considered to comprise contributing elements to the landscape. As such, the Project has the potential to result in cumulatively-considerable impacts to a Tribal Cultural Resource on site in the event that no efforts were made to avoid or relocate the existing bedrock milling features within the southern portions of the Project site. In addition, there is a potential for the Project Site or off-site improvement areas to contain previously-unidentified surface or subsurface tribal cultural resources. Accordingly, Project impacts to the bedrock milling features in the southern portions of the Project site that are	Less-than-Significant Impact with Mitigation Incorporated	As specified by Mitigation Measures MM 4.5-1 and MM 4.5-9., included in EIR Subsection 4.5, *Cultural Resources*, shall apply.	As specified for Mitigation Measures MM 4.5-1 and MM 4.5-9	As specified for Mitigation Measures MM 4.5-1 and MM 4.5-9	As specified for Mitigation Measures MM 4.5-1 and MM 4.5-9

SUMMARY OF IMPACTS	SIGNIFICANCE DETERMINATION	MITIGATION MEASURES (MM)	RESPONSIBLE PARTIES	MONITORING PARTIES	IMPLEMENTATION STAGE
proposed for public park use, in addition to potential impacts to previously undiscovered Tribal Cultural Resources that may be present in the Project's on- and off-site improvement areas, would represent a potentially significant impact to Tribal Cultural Resources prior to mitigation. Implementation of Mitigation Measures MM 4.5-1 through 4.5-4 would ensure that all site grading and disturbances are subject to monitoring by a Project Archaeologist and Native American Monitor. Mitigation Measure MM 4.5-6 establishes requirements that must be undertaken in the event that previously undiscovered cultural resources, including tribal cultural resources, are uncovered during ground-disturbing activities on site and within the Project's off-site improvement areas. Mitigation Measure MM 4.5-7 establishes measures for the appropriate treatment of cultural resources, including tribal cultural resources, while Mitigation Measure MM 4.5-8 requires preparation of a Phase IV Monitoring Report to document the results of the cultural resources monitoring program. Finally, Mitigation Measure MM 4.5-9 requires compliance with the provisions of California Health and Safety Code § 7050.5 and Public Resources Code § 5097 et. seq. in the event that human remains, including human remains that may be considered tribal cultural resources, are uncovered during site grading activities. Implementation of Mitigation Measures MM 4.5-1 through MM 4.5-9 would reduce the Project's direct and cumulatively-considerable impacts to previously-undiscovered tribal cultural resources to below a level of significance. In addition, and although the resources that occur on the Project site do not meet CEQA's definition of significant					

SUMMARY OF IMPACTS	SIGNIFICANCE DETERMINATION	MITIGATION MEASURES (MM)	RESPONSIBLE PARTIES	MONITORING PARTIES	IMPLEMENTATION STAGE
archaeological resources based on the criteria listed in Section 15064.5 of the State CEQA Guidelines, the Project also would be subject to EIR Mitigation Measure 4.5-5, which would ensure that the bedrock milling features associated with Sites CA-RIV-8681/P-33-016534 and CA-RIV-8683/H/P-33-016536 are relocated on site within a permanent open space area to the extent feasible, and further requires the implementation of controlled grading to avoid impacts to these resources. Therefore, with implementation of the mitigation measures identified in EIR Subsection 4.4, Project impacts to previously-undiscovered tribal cultural resources would be less than significant.					
4.20 Utilities and Service Systems					
Threshold a.: Although the Project would require construction of new or expanded water, wastewater conveyance, and stormwater drainage systems, impacts associated with the construction of such facilities have been evaluated throughout this EIR under the appropriate subject headings (e.g., air quality, biological resources, etc.). Where significant direct or cumulative impacts are identified, mitigation measures have been imposed to reduce the Project's impacts to the maximum feasible extent. There are no environmental impacts that would occur specifically related to the Project's proposed water, sewer, and drainage improvements that have not already been addressed. As such, with the mitigation measures specified in this EIR, Project impacts due to water, sewer, and drainage improvements would be less than significant. Additionally, the Project's wastewater generation would represent approximately 1.9% of the current available treatment capacity at the	Less-than-Significant Impact	Impacts would be less than significant; therefore, mitigation measures are not required.	N/A	N/A	N/A

SUMMARY OF IMPACTS	SIGNIFICANCE DETERMINATION	MITIGATION MEASURES (MM)	RESPONSIBLE PARTIES	MONITORING PARTIES	IMPLEMENTATION STAGE
Moreno Valley RWRF. Accordingly, the Project would not result in or require the expansion of the existing facilities at the Moreno Valley RWRF, and impacts would therefore be less than significant.					
Threshold b.: Based on present information and the assurance that EMWD is engaged in identifying solutions that, when combined with the rest of its supply portfolio, will ensure a reliable long-term water supply for its member agencies, EMWD has determined that it will be able to provide adequate water supplies to meet the potable water demand for the proposed Project as part of its existing and future demands. Accordingly, sufficient water supplies are available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. The Project's effect on EMWD's regional water network would be less than significant. In addition, the Project would result in an increase in demand for potable water, which has the potential to contribute to the need for expansion of EMWD and/or MWD facilities. However, the EMWD has adequate capacity for desalination and wastewater treatment requiring no expansion of any existing facilities; the EMWD has adequate capacity to treat wastewater generated by the Project and other cumulative developments; and the MWD is implementing programs to reduce its import of water from the Colorado River and via the SWP. As such, the Project's demand for potable water sources also would not result in significant physical environmental effects.	Less-than-Significant Impact				
Threshold c.: Impacts associated with the Project's proposed sewer improvements are inherent to the Project's construction phase, and impacts have been evaluated throughout this	Less-than-Significant Impact				

SUMMARY OF IMPACTS	SIGNIFICANCE DETERMINATION	MITIGATION MEASURES (MM)	RESPONSIBLE PARTIES	MONITORING PARTIES	IMPLEMENTATION STAGE
EIR under the appropriate subject headings (e.g., air quality, biological resources, etc.). Where significant direct or cumulative impacts are identified, mitigation measures have been imposed to reduce the Project's impacts to the maximum feasible extent. There are no environmental impacts that would occur specifically related to the Project's proposed sewer improvements that have not already been addressed in pertinent sections of this EIR. As such, with the mitigation measures specified in this EIR, Project impacts due to proposed sewer improvements would be less than significant.					
Threshold d.: The Project's wastewater generation would represent approximately 1.9% of the current available daily treatment capacity at the Moreno Valley RWRF. Accordingly, the Project would not result in or require the expansion of the existing facilities at the Moreno Valley RWRF, and impacts would therefore be less than significant.	Less-than-Significant Impact				
Threshold e.: Regional solid waste facilities would have adequate capacity to handle solid waste generated by the Project's construction and operational phases. The Project would not 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. Accordingly, impacts would be less than significant.	Less-than-Significant Impact				
Threshold f.: With mandatory compliance to AB 939, AB 341, and RCDWR's programs and policies, the Project would not result in a significant impact due to noncompliance with regulations related to solid waste. A less-than-significant impact would occur.	Less-than-Significant Impact				

SUMMARY OF IMPACTS	SIGNIFICANCE DETERMINATION	MITIGATION MEASURES (MM)	RESPONSIBLE PARTIES	MONITORING PARTIES	IMPLEMENTATION STAGE
Threshold g.: Impacts associated with the construction or expansion of utility facilities would be less than significant or otherwise mitigated to the maximum feasible extent by this EIR. No additional mitigation would be required.	Less-than-Significant Impact				
4.21 Wildfire					
Threshold a.: The Project site and surrounding areas are not identified as evacuation routes, and the Project has no potential to conflict with the Riverside County LHMP. During construction and at Project build-out, the proposed Project would be required to maintain adequate access for emergency vehicles. Accordingly, the Project would not impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan, and impacts would be less than significant.	Less-than-Significant Impact	Significant impacts would not occur; therefore, mitigation measures are not required.	N/A	N/A	N/A
Threshold b and e.: The Project would accommodate on-site defensible space to limit fire hazards. Accordingly, the Project would not exacerbate wildfire risks, and thereby would not expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Additionally, the Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Impacts would be less than significant.	Less-than-Significant Impact				
Threshold c.: Improvements proposed as part of the Project would include fuel management zones that would consist of asphalt and concrete roadways, drive aisles, parking stalls, loading zones, and irrigated landscaping. Potential	Less-than-Significant Impact				

SUMMARY OF IMPACTS	SIGNIFICANCE DETERMINATION	MITIGATION MEASURES (MM)	RESPONSIBLE PARTIES	MONITORING PARTIES	IMPLEMENTATION STAGE
impacts associated with development of the Project site, including the construction of fuel management zones have been evaluated throughout this EIR under the appropriate subject heading (e.g., biological resources, etc.), and mitigation measures are identified where necessary to reduce impacts to below a level of significance. Accordingly, the Project would not exacerbate fire risk or involve improvements that may result in temporary or ongoing impacts to the environment that have not already been addressed throughout this EIR, and impacts would therefore be less than significant. Threshold d.: Under existing and proposed conditions, the Project site exhibits little topographic variation, and development on the site as proposed would not involve any uses containing natural vegetation or other features subject to wildland fire hazards. Thus, improvements proposed as part of the Project would not result in an increase in wildfire hazard-related risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.	Less-than-Significant Impact				

1.0 INTRODUCTION

1.1 PURPOSES OF CEQA AND LEGAL AUTHORITY FOR THIS EIR

This Environmental Impact Report (EIR) complies with the California Environmental Quality Act (Public Resources Code (PRC) Section (§) 2100 et. seq. ("CEQA") as amended, and the CEQA State Guidelines (Title 14 California Code of Regulations (CCR) § 15000 et. seq.) ("CEQA Guidelines") as amended. As stated by State CEQA Guidelines § 15002(a), the basic purposes of CEQA are to:

- Inform governmental decision makers and the public about the potential, significant environmental effects of proposed government actions (including the discretionary approval of land entitlement applications submitted by private parties);
- Identify the ways that environmental damage can be avoided or significantly reduced;
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if a project will be approved involving significant environmental effects.

The public agency with the principal responsibility for carrying out or approving a project or the first public agency to make a discretionary decision to proceed with a proposed project should ordinarily act as the "Lead Agency" pursuant to State CEQA Guidelines §§ 15050-15051. The County of Riverside is the Lead Agency for the proposed Project evaluated in this EIR.

Under CEQA, if a Lead Agency determines that there is substantial evidence in light of the whole record that a project may have a significant effect on the environment, the agency must prepare an EIR (State CEQA Guidelines § 15064(a)(1)). The purpose of an EIR is to inform public agency decision-makers and the public of the potentially significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project (State CEQA Guidelines § 15121(a)).

This EIR is an informational document that represents the independent judgment of the County of Riverside (as the Lead Agency) for use by the Riverside County decision-makers, responsible and trustee agencies, and members of the general public to evaluate the physical environmental effects that could result from constructing and operating the proposed Project. The County of Riverside has reviewed and, as necessary, directed revisions to all submitted drafts, technical studies, and reports supporting this EIR for consistency with County policies and requirements to ensure that this EIR reflects the County's own independent judgment. Governmental approvals requested from the County of Riverside by the Project Applicant include:

1. Adoption by resolution of a Foundation Component General Plan Amendment (GPA No. 240005);
2. Adoption by ordinance of a Change of Zone (CZ 2200062);
3. Adoption by resolution of Tentative Parcel Map No. 38601 (TPM 38601); and

4. Adoption by resolution of Plot Plan No. 220050 (PPT 220050).

Other related discretionary and administrative actions that are required to construct and operate the Project described in this EIR are listed in Section 3.0, *Project Description*. This document complies with all criteria, standards, and procedures of CEQA §§ 21000 et seq. and State CEQA Guidelines §§ 15000 et seq.

As a first step in the CEQA compliance process, Riverside County determined that implementation of the Project has the potential to result in significant environmental effects, and a Project EIR, as defined by State CEQA Guidelines § 15161, is required. As stated in State CEQA Guidelines § 15161, a Project EIR should "…focus primarily on the changes in the environment that would result from the development project" and "…examine all phases of the project including planning, construction, and operation." This EIR represents the independent judgment of Riverside County (as the Lead Agency) and evaluates the physical environmental effects that could result from constructing and operating the proposed Project. Acting as Lead Agency, Riverside County will: a) evaluate this EIR to determine if the Project's physical environmental impacts are adequately disclosed; b) assess the adequacy and feasibility of identified mitigation measures and the potential addition, modification to, or deletion of mitigation measures, standard conditions of approval, or Project design features; c) consider alternatives to the Project that would reduce or eliminate significant environmental effects of the Project; and, if necessary, d) consider Project benefits that may override the Project's unavoidable and unmitigable significant effects on the environment.

Accordingly, and in conformance with State CEQA Guidelines § 15121(a), the purposes of this EIR are to: (1) disclose information by informing public agency decision makers and the public generally of the significant environmental effects associated with all phases of the Project; (2) identify possible ways to minimize or avoid those significant effects; and (3) to describe a reasonable range of alternatives to the Project that would feasibly attain most of the basic Project objectives but would avoid or substantially lessen its significant environmental effects.

Before taking action to approve the Project, the County of Riverside (serving as the Lead Agency) has the obligation to: (1) ensure this EIR has been completed in accordance with CEQA; (2) review and consider the information contained in this EIR as part of its decision making process; (3) make a statement that this EIR reflects Riverside County's independent judgment; (4) ensure that all significant effects on the environment are avoided or substantially lessened where feasible; and, if necessary (5) make written findings for each unavoidable significant environmental effect stating the reasons why mitigation measures or project alternatives identified in this EIR are infeasible and citing the specific benefits of the proposed Project that outweigh its unavoidable adverse effects (State CEQA Guidelines §§ 15090-15093).

The roles and responsibilities of the County of Riverside Planning Commission and Board of Supervisors for Project-related approvals are as follows.

- **The Planning Commission**: The Planning Commission will recommend to the Board of Supervisors whether the Project's applications, which include a Foundation Component GPA (GPA No. 240005), CZ 2200062, PPT 220050, and TPM 38601 should be approved, modified, or denied, and will

recommend to the Board of Supervisors whether to certify the Final EIR (FEIR) with or without modifications.

- **Board of Supervisors**: The Board of Supervisors will decide whether to approve, modify, or deny the Project's Foundation Component GPA (GPA No. 240005), CZ 2200062, PPT 220050, and TPM 38601. The Project's applications for CZ 2200062 and PPT 220050 cannot be fully approved by the Board of Supervisors until and unless the County first approves the Project's Foundation Component GPA. Because General Plans can only be amended up to four times per calendar year, it is anticipated that the Project's applications would be tentatively approved by the Riverside County Board of Supervisors, with final approval of the Project's applications occurring as part the County's 8-year General Plan Amendment review cycle, which is occurring in 2024. As part of the tentative approval and during final approval pursuant to the General Plan Amendment review cycle, the Project-related approvals will be subject to noticed public hearings held before the Board of Supervisors.

This EIR and its supporting technical appendices are available for review at the Riverside County Planning Department, 4080 Lemon Street, 12th Floor, Riverside, CA 92501, during the County's regular business hours, can be requested in electronic form by contacting the County Planning Department, or can be accessed from the Planning Department's main web page (https://planning.rctlma.org/) under the "CEQA Environmental Noticing" heading during the public review period for this EIR. Website addresses for reference material citations provided in EIR Section 7.0, *References*, are for convenience. Cited reference material is available in electronic form and can be viewed at the Riverside County Planning Department and can be requested by contacting the County Planning Department.

1.2 SUMMARY OF THE PROJECT EVALUATED BY THIS EIR

Riverside County is the Lead Agency for the proposed Project, under whose authority this EIR has been prepared. For purposes of this EIR, the term "Project" refers to the Project's discretionary applications and the discretionary actions required to implement the Cajalco Commerce Center Project, as proposed, and all of the activities associated with its implementation including planning, construction, and ongoing operations.

The Project site that is the subject of this EIR comprises two noncontiguous properties comprised of several parcels of land collectively totaling 64.97 gross acres in size and that are located south of Cajalco Road, west of Seaton Avenue, and east and west of Decker Road within the Mead Valley Area Plan (MVAP) portion of unincorporated Riverside County. The Project as evaluated herein consists of application for a Foundation Component General Plan Amendment (GPA No. 240005), Change of Zone (CZ 2200062), Plot Plan (PPT 220050), and Tentative Parcel Map No. 38601 (TPM 38601) to allow for development of the 64.97 gross acre property with a 1,003,510 square-foot (s.f.) warehouse building on 44.66 net acres and a public park on approximately 13.33 net acres, along with approximately 6.98 acres of proposed right-of-way (ROW) dedications. The site proposed for development with the warehouse building is located at the southwest corner of Seaton Avenue and Cajalco Road, between Seaton Avenue and Decker Road, while the site proposed for the public park occurs both east and west of Decker Road, approximately 185 feet south of the proposed warehouse building site. Property ~~controlled~~ owned by Metropolitan Water District (MWD) separates the proposed warehouse site from the proposed public park site.

Access to the warehouse building site is proposed via two driveways planned to connect with Decker Road (from north to south, Driveways 1 and 2) and three driveways planned to connect with Seaton Avenue (from north to south, Driveways 3 through 5). Driveways 1 and 2 at Decker Road, as well as Driveway 4 at Seaton Avenue (i.e., the central driveway along Seaton Avenue), would be restricted to passenger vehicles only. Driveways 3 and 5 at Seaton Avenue (i.e., the northern and southern driveways) would serve passenger vehicles, trucks, and tractor trailers. Driveway 3 ultimately may or may not be constructed, and if constructed would be restricted to right-in/right-out access only through the construction of a raised median along this portion of Seaton Avenue. Access to the proposed public park site would be accommodated via driveways and parking lots proposed to extend east and west from the southern extension of Decker Road. In addition to on-site improvements, up to approximately ~~21.82~~19.78 acres of off-site Project-related disturbance area are anticipated for roadway and infrastructure improvements that the County may require the Project Applicant to install in whole in part associated with the Project's construction, along Cajalco Road/Cajalco Expressway, Seaton Avenue, Decker Road, and Rider Street.

Riverside County is the Lead Agency for the proposed Project, under whose authority this EIR has been prepared. The Project Applicant is requesting the following governmental approvals from Riverside County to allow for development of the Project (refer to Chapter 3.0, *Project Description*, for a complete description of the Project's construction and operational characteristics):

- **Foundation Component General Plan Amendment (GPA No. 240005):** Under existing conditions, approximately 4.7 acres in the northeastern portion of the northern portion of the Project site are designated by the Riverside County General Plan for "Community Development – Commercial Retail (CD-CR)" land uses, while the remaining +/- 60.3 acres of the Project site are designated for "Rural Community – Very Low Density Residential (RC-VLDR)" land uses. The Project Applicant is proposing a Foundation Component General Plan Amendment to re-designate the northern 44.66 net acres of the Project site to "Community Development – Light Industrial (CD-LI)" land uses, and to re-designate the southern 13.33 net acres of the Project site for "Open Space – Recreation (OS-R)" land uses. The CD-LI land use designation allows for a wide variety of industrial and related uses, including assembly and light manufacturing, repair and other service facilities, warehousing, distribution centers, and supporting retail uses, with building intensities ranging from 0.25 to 0.6 Floor Area Ratio (FAR). The OS-R land use designation allows for active and passive recreational uses such as parks, trails, campgrounds, athletic fields, golf courses, and off-road vehicle parks, along with ancillary structures that may be permitted for recreational opportunities. The Project's Foundation Component GPA would be subject to the procedures outlined in the County's General Plan Administrative Element, which requires among other items that Foundation Component General Plan Amendments be initiated by the Board of Supervisors.

- **Change of Zone No. 2200062 (CZ 2200062):** The Riverside County Zoning Ordinance (Ordinance No. 348), which is part of the County's Municipal Code, assigns a zoning classification to all properties in the County boundaries. All development within the County is required, by law, to comply with the provisions of the Zoning Ordinance. Under existing conditions, approximately 4.7 acres in the

northeast portion of the Project site are zoned for "Rural Residential, Minimum ½-Acre Lot Sizes (R-R-1/2)," while the remaining +/- 60.3 acres of the Project site are zoned for "Light Agriculture, Minimum 1-acre Lot Sizes (A-1-1)." As part of CZ 2200062 the northern 44.66 net acres of the Project site would be rezoned from "A-1-1" and "R-R-1/2" to "Industrial Park (I-P)." No changes are proposed to the existing zoning classification assigned to the southern 13.33 net acres of the Project site, as the existing "A-1-1" zoning classification for this portion of the Project site already allows for the proposed public park use. The I-P zoning classification allows for a variety of industrial and manufacturing uses, along with service and commercial uses and other specialized land uses that require the approval of a conditional use permit, such as recycling processing facilities.

- **Plot Plan No. 220050 (PPT 220050):** The Project Applicant is proposing to develop approximately 44.66 net acres in the northern portions of the Project site with one light industrial warehouse building with a total building area of 1,003,510 square feet, in addition to a public park proposed on approximately 13.33 net acres in the southern portions of the Project site. Section 10.1 of Riverside County Ordinance No. 348, which establishes permitted uses within the I-P zone, allows for industrial uses with approval of an Industrial Park Plot Plan. Accordingly, Plot Plan No. 220050 (PPT 220050) is proposed to allow for the development of an industrial warehouse building. PPT 220050 also would allow for the construction of a public park in the southern portions of the site on property zoned A-1-1. Substantive components of PPT 220050 are discussed in Section 3.0, *Project Description*.

- **Tentative Parcel Map No. 38601 (TPM 38601):** Tentative Parcel Map No. 38601 (TPM 38601) is proposed to consolidate the existing parcels within the northern 50.04 gross-acres of the Project site into a single parcel on 44.66 net acres, and to accommodate approximately 6.98 acres of public ROW dedications along the Project site's frontages with Cajalco Expressway, Seaton Avenue, and Decker Road.

1.3 CEQA Process Overview

The California Environmental Quality Act (CEQA) (Public Resources Code, Sections 21000- 21177) requires that all public agencies within the State of California, having land use approval over project activities that have the potential to affect the quality of the environment, shall regulate such activities so that impacts to the environment can be prevented to the extent feasible. Such activity is reviewed and monitored through the CEQA process, as provided in the State CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387). CEQA distinguishes varied levels of documentation and public review based on a project's anticipated level of effect on the environment.

When it is determined through preliminary review that a project may likely have one or more significant effects upon the environment, then an Environmental Impact Report ("EIR") must be prepared. This document serves as an EIR for the proposed Cajalco Commerce Center project. For purposes of this EIR, the term "Project" refers to all actions associated with implementation of the Cajalco Commerce Center Project including its planning, construction, and ongoing operations. The term "Project Applicant" used herein refers to Industrial VI Enterprises LLC, which is the entity that submitted applications to Riverside County to entitle the Project. The term "Project site" refers to the property upon which the Project is proposed. The public agency with the

principal responsibility for carrying out or approving a project or the first public agency to make a discretionary decision to proceed with a proposed project should ordinarily act as the Lead Agency pursuant to State CEQA Guidelines Sections 15050-15051. The term "Lead Agency" used herein refers to the County of Riverside. Throughout this document, the terms "Draft EIR" and "Final EIR" may be used interchangeably since both are part of the ultimate EIR record; however, "Draft EIR" may be used specifically when referring to information provided in the volume made available for the CEQA-required 45-day public review period.

Under CEQA, the "scope" of the EIR may be determined through preparation of an Initial Study and a public scoping process. An Initial Study is not required, however, when the Lead Agency decides to prepare an EIR covering the full scope of a project's potential environmental effects, as the County selected to do in the case of the proposed Project and this EIR. The EIR should consider both the potential project-specific (direct and indirect) and cumulative environmental impacts that could result from implementation of the proposed project.

Pursuant to State CEQA Guidelines § 15121, the EIR is primarily an informational document intended to inform the public agency decision-makers and the general public of the potentially significant effects of a proposed project. The EIR should disclose all known potentially significant impacts; identify feasible means to minimize or mitigate those effects; and consider a number of feasible alternatives to the project that might further reduce significant impacts while still attaining the project objectives. The decision-makers must consider the information in an EIR before taking action on a proposed project. The EIR may constitute substantial evidence in the record to support the agency's action on the project.

The EIR is prepared by or under the direction of the Lead Agency, which for the proposed Project is Riverside County. Riverside County is the public agency that has the primary responsibility for approving or carrying out the Project. Further, Responsible and Trustee Agencies, which are public agencies that have a level of discretionary approval over some component of the proposed Project, may rely upon the EIR prepared by the Riverside County.

An EIR is prepared in two key stages. First, a Draft EIR is prepared and distributed for public and agency review. Once comments on the Draft EIR are received, responses to those comments and any additional relevant project information are prepared and compiled in a Final EIR. Both of these documents (i.e., the Draft EIR and the Final EIR), along with any related technical appendices, represent the complete record of the EIR. Throughout this document, the terms Final EIR or Draft EIR may be used interchangeably since both are part of the ultimate EIR record; however, "Draft EIR" may be used specifically when referring to information provided in the volume made available for the CEQA-required 45-day public review period.

In accordance with State CEQA Guidelines § 15087, this Draft EIR will be made available for review by the public and public agencies for a minimum period of 45 days to provide comments "on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated" (State CEQA Guidelines § 152049(a)). Upon request, the County also will provide interpretive services for any information requests made in languages other than English. During the 45-day review period, comments on the content of the Draft EIR can be submitted to:

County of Riverside – Planning Department
Attn: Russell Brady, Contract Planner
4080 Lemon Street, 12th Floor
Riverside, CA 92502-1409
Email: rbrady@rivco.org

Public comments should be focused "on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated" (State CEQA Guidelines Section 152049(a)).

Following the Draft EIR's 45-day public review period, the County will then respond in writing to all submitted comments pertaining to an environmental effect and publish a Final EIR. Before taking action to approve the Project, Riverside County (serving as the Lead Agency) has the obligation to: (1) ensure this EIR has been completed in accordance with CEQA; (2) review and consider the information contained in this EIR as part of its decision-making process; (3) make a statement that this EIR reflects the County of Riverside's independent judgment; (4) ensure that all significant effects on the environment are avoided or substantially lessened where feasible; and, if necessary (5) make written findings for each unavoidable significant environmental effect stating the reasons why mitigation measures or project alternatives identified in this EIR are infeasible and citing the specific benefits of the proposed Project that outweigh its unavoidable adverse effects (State CEQA Guidelines Sections 15090-15093).

Project-related decision-making hearings will be subject to noticed public hearings held before the County's Planning Commission and Board of Supervisors. During the decision-making processes, the Project and its design features, objectives, merits, environmental consequences, and socioeconomic factors, among other information contained in the Project's administrative record, will be considered by Riverside County. The Planning Commission will conduct a publicly-noticed hearing and will make a recommendation to the Board of Supervisors as to whether to approve, approve with changes, or deny approval of the Project's Foundation Component GPA No. 240005, CZ 2000062, PPT 220050, and TPM 38601. Following the Planning Commission hearing, the Board of Supervisors will subsequently hold a publicly-noticed hearing to decide whether to tentatively approve the Project, tentatively approve the Project with changes, or not approve the proposed Project. Following tentative approval of the Project by the Board of Supervisors, the Project's proposed Foundation Component GPA would be considered as part of a quarterly County General Plan Amendment Cycle. Upon full approval of the Project and certification of the Final EIR by the Board of Supervisors, Riverside County and other public agencies with permitting authority over all, or portions of, the Project would be able to rely on the Final EIR as part of their permitting and approval processes to evaluate the environmental effects of the Project as they pertain to the approval, conditional approval, or denial of applicable permits. County staff also would rely on the certified Final EIR to subsequently conduct administrative level reviews for implementing permits and approvals.

1.4 EIR Scope, Format, and Content

1.4.1 EIR Scope

As a first step in the CEQA compliance process and pursuant to the procedural requirements of CEQA, on June 30, 2023, Riverside County filed a Notice of Preparation (NOP) with the California Office of Planning and Research (State Clearinghouse) and the Riverside County Clerk to indicate that an EIR would be prepared to evaluate the Project's potential to impact the environment. The NOP also was distributed to potential responsible and trustee agencies and other interested parties for a 30-day public review period that commenced on June 30, 2023. The purpose of distributing the NOP was to solicit responses in order to assist the County in identifying the full scope and range of potential environmental concerns associated with the Project so that these issues could be fully examined in this EIR. Comments on the NOP were received from the following interested parties:

- State of California Department of Justice
- Native American Heritage Commission (NAHC)
- California Department of Fish and Wildlife (CDFW)
- South Coast Air Quality Management District (SCAQMD)
- Metropolitan Water District of Southern California (MWD)
- CARE CA
- Riverside County Department of Waste Resources
- City of Riverside Public Works Department
- Riverside Transit Agency
- Riverside Neighbors Opposing Warehouses (RNOW)
- Rural Association of Mead Valley (RAMV – Debbie Walsh)
- Center for Community Action and Environmental Justice (CCAEJ)
- Patrick Hsu
- Shanowa and Ashley De La Cruz
- Franco Pacheco
- Michael McCarthy

In addition, a publicly-noticed EIR Scoping Meeting was held at the Riverside County Administrative Center, located at 4080 Lemon Street, Riverside, California, 92501 on July 24, 2022, with public participation available in person and via Zoom login. The Scoping Meeting provided interested parties an additional opportunity to comment on the scope of environmental issues to be addressed in this EIR.

An Initial Study was not prepared for the proposed Project because the County determined that an EIR was required to evaluate all of the Project's potential environmental effects. As such, this EIR evaluates all of the environmental topics identified in Appendix G to the State CEQA Guidelines and in the County's standard Environmental Assessment Checklist form. Based on Appendix G and the County's Environmental Assessment Checklist form, and in consideration of all comments received by Riverside County on the NOP

and during the EIR Scoping Meeting, Section 4.0 of this EIR evaluates the Project's potential to cause adverse effects to the following environmental topic areas:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Paleontological Resources
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

The Project's potential to result in growth-inducing impacts is discussed in Section 5.0, *Other CEQA Considerations*, of this EIR.

The NOP, public review distribution list, and written comments received by the County of Riverside during the NOP public review period are provided in *Technical Appendix A* to this EIR. Please refer to Table 1-1, *Summary of NOP Comments*, for summarized comments received during the NOP public review period. The purpose of this table is to present a summary of the environmental topics that were expressed by public agencies and interested parties to be of primary interest. Table 1-1 is not intended to list every comment received by the County during the NOP review period. Regardless of whether or not an environmental or CEQA-related comment is listed in the table, all relevant comments received in response to the NOP and during the EIR Scoping Meeting are addressed in this EIR.

Table 1-1 Summary of NOP Comments

Commenter	Date	Comments	Location in EIR Where Comment(s) Addressed
State			
State of California Department of Justice	July 19, 2023	• Recommends use of Attorney General's Bureau of Environmental Justice best practices and mitigation measures for warehouse projects • States that trucks emit nitrogen oxide which contributes to disease and premature death • States that priority should be placed on avoiding land use conflicts between warehouses and sensitive receptors • States that priority should be placed on mitigating impacts of any unavoidable	4.3, *Air Quality;* 4.8, *Greenhouse Gas Emissions;* 4.11, *Land Use and Planning*

Table 1-1 Summary of NOP Comments

Commenter	Date	Comments	Location in EIR Where Comment(s) Addressed
		land use conflicts • Requests that measures to reduce emissions associated with the project should be considered to help the State meet its air quality goals • States that a distant warehouse may also impact sensitive receptors if trucks must pass near them to visit the warehouse	
Native American Heritage Commission	July 20, 2023	• Recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of the proposed Project • Notes AB 52 requirements, SB 18 provisions, and recommendations for the preparation of cultural resource assessments.	4.5, *Cultural Resources;* 4.19, *Tribal Cultural Resources*
California Department of Fish and Wildlife (CDFW)	July 28, 2023	• Recommends an assessment of habitat types within and around the Project site • Recommends the EIR include an assessment of flora and fauna within and adjacent to the Project site • Recommends a general biological inventory of fish, amphibian, reptile, bird, and mammal species present or have the potential to be present within each habitat type onsite and within adjacent areas that could be affected by the Project • Recommends a complete, recent inventory of rare, threatened, endangered, and other sensitive species located within the Project footprint and within offsite areas with the potential to be affected, including California Species of Special Concern (CSSC) and California Fully Protected Species • Recommends a thorough, recent, floristic-based assessment of special status plants and natural communities • Requests information on the regional setting, with special emphasis on resources rare or unique to the region • Requests a full accounting of all open space and mitigation/conservation lands within and adjacent to the Project	For all comments: 4.4, *Biological Resources*

Table 1-1 Summary of NOP Comments

Commenter	Date	Comments	Location in EIR Where Comment(s) Addressed
		• Requests a discussion of potential impacts from lighting, noise, human activity, defensible space, and wildlife-human interactions • Requests a discussion of potential indirect Project impacts on biological resources, including resources in areas adjacent to the Project footprint • Requests an evaluation of impacts to on-site and adjacent open space lands from both the construction of the Project and any long-term operational and maintenance needs • Recommends a cumulative effects analysis and appropriate mitigation • States that a CESA Incidental Take Permit (ITP) must be obtained if the Project has the potential to result in "take" of State-listed CESA species, either through construction or over the life of the Project • Recommends early consultation, as significant modification to the proposed Project and avoidance, minimization, and mitigation measures may be necessary to obtain a CESA ITP • States that the Proposed Project is within the Western Riverside County Multiple Species Habitat Conservation Plan • States that the Project is located within the MSHCP Criteria Area • States that the County is obligated to notify the Western Riverside County Regional Conservation Authority (RCA), through the Joint Project/Acquisition Review Process • Recommends the EIR identify the specific Area Plan and Area Plan Subunit within which the Project is located, and the associated Planning Species and Biological Issues and Considerations that may apply to the Project • Recommends the County demonstrate how the Project is consistent with Section 7.0 of the MSHCP • Recommends that for projects proposed	

Table 1-1 Summary of NOP Comments

Commenter	Date	Comments	Location in EIR Where Comment(s) Addressed
		inside the MSHCP Criteria Area, the EIR should include a discussion of the Project and its consistency with Covered Activities • Recommends the DEIR include a discussion of the Project and MSHCP Allowable Uses (Section 7.4) and Conditionally Compatible Uses (Section 7.4.2) in MSHCP Conservation Area such as trails • Recommends referring to the procedures described in Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools section (MSHCP Section 6.1.2) • States that the MSHCP identifies that assessment of these areas include identification and mapping of riparian/riverine areas and vernal pools • States that the Project site has the potential to provide suitable foraging and/or nesting habitat for burrowing owl • States that the County is required to implement the Urban/Wildlands Interface Guidelines (MSHCP Section 6.1.4) • States that the Project occurs within the Stephens' kangaroo rat Habitat Conservation Plan (SKR HCP) fee area boundary • States that drainage features may traverse some of the parcels within the Project's scope and it is likely that the Project applicant will need to notify CDFW per Fish and Game Code Section 1602 • Recommends incorporation of water-wise concepts in Project landscape design plans • Requests reporting of any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB) • States that the Project would have an impact on fish and/or wildlife, and assessment of filing fees is necessary	
Regional			
South Coast Air	July 27, 2023	• Recommends use of SCAQMD's CEQA	For all comments:

Table 1-1 Summary of NOP Comments

Commenter	Date	Comments	Location in EIR Where Comment(s) Addressed
Quality Management District (SCAQMD)		Air Quality handbook and website be used as guidance in preparing the air quality analysis and greenhouse gas analysis • Recommends use of CalEEMod land use emissions software • Recommends criteria pollutant emissions be compared to SCAQMD's CEQA regional pollutant emissions significance thresholds and local significant thresholds • Requests identification of air quality impacts from all phases of the Project and all air pollutant sources • Recommends a mobile source health risk assessment be prepared • Requests identification of SCAQMD as Responsible Agency should permits be required • Expresses concern about public health impacts of siting Projects within close proximity to sensitive land uses • Requests that in the event of significant air quality impacts, mitigation measures go beyond what is required by law • Recommends specific mitigation measures for operation air quality impacts • Recommends specific design considerations to reduce air quality and health risk impacts • Informs of the requirement to comply with Rule 2305	4.3, *Air Quality*
Metropolitan Water District of Southern California (MWD)	July 28, 2023	• States that MWD owns and operates the Colorado River Aqueduct (CRA) located along Decker Road within the Metropolitan fee-owned property • Expresses concern about potential impacts to the Colorado River Aqueduct • States that MWD must be allowed to maintain its rights-of-way and access to its facilities and properties at all times • Notes requirement to submit design plans to MWD's Substructures Team for review and written approval to avoid conflicts with MWD's rights-of-way • Provides copy of "Guidelines for Improvements and Construction Projects	4.10, *Hydrology and Water Quality;* 4.11 *Land Use and Planning*

Table 1-1 Summary of NOP Comments

Commenter	Date	Comments	Location in EIR Where Comment(s) Addressed
		Proposed in the Area of Metropolitan's Facilities and Rights-of-Way" • Requests that Riverside County avoid potential impacts to the CRA, or where applicable, propose mitigation measures to offset potential impacts • States that appropriate property rights must be obtained from MWD • States that no work or studies can be done within MWD's property prior to the execution of an appropriate agreement • Recommends that the EIR include reference to MWD's property and granting of an agreement • Recommends that the EIR acknowledge MWD as a potential responsible agency per State CEQA Guidelines Section 15124(d)(A) • Recommends projects within MWD's service area to include water conservation measures • Recommends mitigation measures such as water efficient fixtures, drought tolerant landscaping, and reclaimed water use	
CARE CA	July 31, 2023	• Requests clearly articulated assumptions as part of the Project Description • Expresses concern about air quality and public health; requests preparation of a Health Risk Assessment • References the California Air Resources Board (CARB) recommended design measures • Requests a mobile source Health Risk Assessment (HRA) • Requests that mitigation measures be effective and enforceable and that they incorporate modern technology • Requests imposition of all feasible mitigation and study of reasonable range of alternatives, including at least two environmentally superior alternatives to the Project • Requests discussion to offset the Project's GHG emissions, including use of white paint to cool the building and reduce the	3.0, *Project Description* 4.3 *Air Quality* 4.3 *Air Quality* 4.3 *Air Quality* Throughout Section 4.0, *Environmental Analysis* 6.0, *Alternatives* 4.8, *Greenhouse Gas Emissions*

Table 1-1 Summary of NOP Comments

Commenter	Date	Comments	Location in EIR Where Comment(s) Addressed
		need for internal air conditioning	
Local			
Riverside County Department of Waste Resources	July 6, 2023	• Recommends that the EIR consider quantitatively analyzing the Project's potential to exceed the local landfills' daily permitted capacity • Informs of El Sobrante Landfill, Lamb Canyon Landfill, and Badlands Landfill locations and disposal capacity • Informs of the requirement to comply with AB 75 • Recommends measures to help reduce the Project's anticipated solid waste impacts	For all comments: 4.20, *Utilities and Service Systems*
City of Riverside Public Works Department	July 20, 2023	• Requests additional information on truck restrictions to eliminate cut-thru traffic along Cajalco Road and La Sierra Avenue	3.0, *Project Description*, and 4.18, *Transportation*
Riverside Transit Agency	July 6, 2023	• Recommends an ADA compliant bus turnout on the southeast corner of Cajalco and Decker Road • Recommends a traffic signal and crosswalk at the southeast corner of Cajalco and Decker Road	For all comments: 4.18, *Transportation*
Organizations			
Riverside Neighbors Opposing Warehouses (RNOW)	July 24, 2023	• Expresses concern about regional oversaturation of warehouses in the 215/60 corridor • Notes that the Project site is located in an Environmental Justice Community and that the site is an SB 535 disadvantaged community • Expresses concern about displacement of residents in an area that is predominantly Hispanic • Requests that the EIR address the California Fair Employment and Housing Act (FEHA) • Requests that the EIR address SB 330 Housing Crisis Act requirements	2.0, *Environmental Setting* 4.1, *Aesthetics;* 4.3 *Air Quality*; 4.11, *Land Use and Planning*; and 4.13, *Noise* 4.15, *Population and Housing* N/A – FEHA is unrelated to the Project's physical environmental effects[1] N/A – SB 330 is not

[1] FEHA provides protection from harassment or discrimination in employment because of: age (40 and over), ancestry, color, creed, denial of family and medical care leave, disability (mental and physical) including HIV and AIDS, marital status, medical condition (cancer and genetic characteristics), national origin, race, religion, sex, and sexual orientation. As such, FEHA is unrelated to the Project's physical impacts to the environment.

Table 1-1 Summary of NOP Comments

Commenter	Date	Comments	Location in EIR Where Comment(s) Addressed
			applicable to the Project[2]
		• Requests that the EIR address cumulative impacts by using Warehouse CITY tool v1.15 (RRC, 2024)	4.0, *Environmental Analysis* (introductory section) and throughout the various Subsections within Section 4.0
		• Requests that the EIR address traffic, air quality, housing, and jobs to include the entirety of the regional footprint of warehouses • Requests that the traffic analysis include the 215 freeway if more than 50% of truck trips will use the 215 freeway	4.3, *Air Quality;* 4.18, *Transportation;* 4.15, *Population and Housing* EIR *Technical Appendix* N_2
Rural Association of Mead Valley (RAMV – Debbie Walsh)	July 22, 2023 and July 30, 2023	• Questions zoning classifications and General Plan designations, and comments on consistency of the Project with the Riverside County General Plan and Mead Valley Area Plan • Expresses concern about the Project Site being near existing housing • Expresses concern about potential noise, traffic, and health impacts • Expresses concern about increased air pollution and greenhouse gas emissions • Claims that the Project will increase brown outs for the surrounding community • Requests that the Project eliminate cold storage and add solar • Requests that a signal light be installed at Decker and Cajalco and include full width right and left turn lanes • Requests that the signal light at Seaton and Cajalco be improved to include full width right and left turn lanes	3.0, *Project Description;* 4.11, *Land Use and Planning;* 4.8, *Noise;* 4.18, *Transportation;* 4.3 *Air Quality;* 4.6 *Energy;* 4.8, *Greenhouse Gas Emissions;* 4.10 *Hydrology and Water Quality*; 4.15, *Population and Housing*; 4.20, *Utilities and Service Systems*

[2] SB 330 applies to an "affected city or county." "Affected county" means a census designated place, based on the 2013-2017 American Community Survey 5-year Estimates, that is wholly located within the boundaries of an urbanized area, as designated by the United States Census Bureau. According to a list of "affected cities and counties" published by the California Department of Housing and Community Development (HCD), the only portions of unincorporated Riverside County that are listed as "affected" communities include the communities of Coronita and Bermuda Dunes, and the Project site is not located within these portions of Riverside County.

Table 1-1 Summary of NOP Comments

Commenter	Date	Comments	Location in EIR Where Comment(s) Addressed
		• Expresses concern about the safety of trucks traveling near the park site • States that an Aqueduct is located between the proposed park and the warehouse • Acknowledges warehouses proximity to residential located to the north • Claims that warehouse facilities under-deliver on jobs • Claims that warehouses located within 1,000 feet of a sports park or school adversely affects human health	
Center for Community Action and Environmental Justice	July 31, 2023	• Requests that the EIR include analyses of cumulative impacts • Requests that the EIR identify how the Project would ensure that truck traffic is directed away from the entrance to the proposed park • Notes importance of bike and pedestrian infrastructure • Notes that the WRCOG Active Transportation Plan identifies a Corona-Perris connection and that the Project should include the construction of the portion of that connection • Requests that the Project include the use of bike-specific traffic signals where necessary • Suggests that the LOS Analysis be tabulated for bicyclists, transit, and pedestrians	3.0. *Project Description;* 4.0, *Environmental Analysis;* 4.18, *Transportation*; EIR *Technical Appendix N2*
Individuals			
Patrick Hsu	July 20, 2023	• Expresses concern about traffic circulation on Cajalco Road • Claims that westbound travel on Cajalco Road cannot remain as one lane • States that addressing the need to widen of Cajalco Road is essential to the analysis	4.18, *Transportation*; EIR *Technical Appendix N2*
Shanowa and Ashley De La Cruz	July 22, 2023	• Generally opposes the Project • Expresses concern about view of Cajalco Road being obstructed • Expresses concern about noise impacts	4.1, *Aesthetics;* 4.13 *Noise*
Franco Pacheco	August 11, 2023	• Expresses that the park will benefit the community, but opposes the proposed warehouse • Expresses concern about increase in traffic • Expresses concern about increase in air	4.18, *Transportation;* 4.3, *Air Quality*; EIR *Technical Appendix N2*

Table 1-1 Summary of NOP Comments

Commenter	Date	Comments	Location in EIR Where Comment(s) Addressed
		pollution and the impact it would have on residents and people who would visit the park	
Michael McCarthy	July 24, 2023	• Requests consideration of cumulative projects as listed in the attachment to this comment letter • Expresses opposition to the proposed Project • Requests evaluation of environmental justice • Requests analysis of residential displacement • Requests a traffic impact analysis	4.0, *Environmental Analysis*, and throughout individual subsections within Section 4.0 and Subsections 4.1, *Aesthetics;* 4.3 *Air Quality*; 4.11, *Land Use and Planning*; and 4.13, *Noise* 4.15, *Population and Housing*, and EIR *Technical Appendix N2*

1.4.2 Content and Organization of this EIR

This EIR contains all of the information required to be included in an EIR as specified by the CEQA Statutes and Guidelines (California Public Resources Code, Section 21000 et. seq. and California Code of Regulations, Title 14, Chapter 5). This EIR is organized in the following manner:

- **Section S.0, Executive Summary**, provides an overview of the EIR document and CEQA process. The Project and its objectives are described and the location and regional setting of the Project site are documented. In addition, the Executive Summary discloses potential areas of controversy related to the Project, including those issues identified by other agencies and the public, and identifies potential alternatives to the proposed Project that would reduce or avoid significant impacts, as required by CEQA. Finally, the Executive Summary provides a summary of the Project's impacts, mitigation measures, and conclusions, in a table that forms the basis of the EIR's Mitigation, Monitoring, and Reporting Program (MMRP).

- **Section 1.0, Introduction**, provides introductory information about the CEQA process and the responsibilities of Riverside County, serving as the Lead Agency for this EIR; a brief description of the Project; the purpose of this EIR; applications proposed by the Project Applicant that would require discretionary Riverside County approvals; permits and approvals required by other agencies; and an overview of the EIR format.

- **Section 2.0, Environmental Setting**, describes the environmental setting, including an overview of the regional and local setting, as well as descriptions of the Project site's physical conditions and surrounding context. The existing setting is defined as the condition of the Project site and surrounding area at the approximate date this EIR's NOP was released for public review on June 30, 2023. The

setting discussion also addresses the relevant regional planning documents that apply to the Project site and vicinity.

- **Section 3.0, Project Description**, serves as the EIR's Project Description for purposes of CEQA and contains a level of specificity commensurate with the level of detail proposed by the Project, including the summary requirements pursuant to State CEQA Guidelines Section 15123. This section provides a detailed description of the Project, including its purpose and main objectives; design features; landscaping; site drainage; utilities; grading and construction characteristics; and operational characteristics expected over the Project's lifetime. In addition, the discretionary actions required of Riverside County and other government agencies to implement the Project are discussed.

- **Section 4.0, Environmental Analysis**, provides an analysis of the potential direct, indirect, and cumulative impacts that may occur from implementing the proposed Project. The topics analyzed in this section include the topics summarized above under subsection 1.4.1. A conclusion concerning significance is reached for each discussion, and mitigation measures are presented as warranted. The environmental changes identified in Section 4.0 and throughout this EIR are referred to as "effects" or "impacts" interchangeably. The State CEQA Guidelines also describe the terms "effects" and "impacts" as being synonymous (State CEQA Guidelines Section 15358).

  In the environmental analysis subsections of Section 4.0, the existing conditions are disclosed that are pertinent to the subject area being analyzed, accompanied by a specific analysis of physical impacts that may be caused by implementing the proposed Project. Impacts are evaluated on a direct, indirect, and cumulative basis. Direct impacts are those that would occur directly as a result of the proposed Project. Indirect impacts represent secondary effects that would result from Project implementation. Cumulative effects are defined in State CEQA Guidelines Section 15355 as "…two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts."

  The analyses in Section 4.0 are based in part upon technical reports that are appended to this EIR. Information also is drawn from other sources of analytical materials that directly or indirectly relate to the proposed Project and are cited in Section 7.0, *References*. Where the analysis demonstrates that a physical adverse environmental effect may or would occur without undue speculation, feasible mitigation measures are recommended to reduce or avoid the significant effect. Mitigation measures must be fully enforceable, have an essential nexus to a legitimate governmental interest, and be "roughly proportional" to the impacts of the Project. The discussion then indicates whether the identified mitigation measures would reduce impacts to below a level of significance. In most cases, implementation of the mitigation measures would reduce the adverse environmental impacts to below a level of significance. If mitigation measures are not available or feasible to reduce an identified impact to below a level of significance, the environmental effect is identified as a significant and unavoidable adverse impact, for which a Statement of Overriding Considerations (SOC) would need to be adopted by Riverside County pursuant to State CEQA Guidelines Section 15093.

- **Section 5.0, Other CEQA Considerations**, includes specific topics that are required by CEQA. These include a summary of the Project's significant and unavoidable environmental effects, a discussion of the significant and irreversible environmental changes that would occur should the Project be implemented, as well as potential growth-inducing impacts of the proposed Project. Section 5.0 also includes a discussion of the potential environmental effects that were found not to be significant during the preparation of this EIR.

- **Section 6.0, Project Alternatives**, describes and evaluates alternatives to the proposed Project that could reduce or avoid the Project's adverse environmental effects. CEQA does not require an EIR to consider every conceivable alternative to the Project but rather to consider a reasonable range of alternatives that will foster informed decision making and public participation. A range of five (5) alternatives is presented in Section 6.0.

- **Section 7.0, References**, cites all reference sources used in preparing this EIR and lists the agencies and persons that were consulted during preparation of this EIR. Section 7.0 also lists the persons who authored or participated in preparing this EIR.

CEQA requires that an EIR contain, at a minimum, certain specified content. Table 1-2, *Location of CEQA Required Topics*, provides a quick reference in locating the CEQA-required sections within this document.

Table 1-2 Location of CEQA Required Topics

CEQA Required Topic	State CEQA Guidelines Reference	Location in this EIR
Table of Contents	§ 15122	Table of Contents
Summary	§ 15123	Section S.0
Project Description	§ 15124	Section 3.0
Environmental Setting	§ 15125	Section 2.0
Consideration and Discussion of Environmental Impacts	§ 15126	Section 4.0
Significant Environmental Effects Which Cannot be Avoided if the Proposed Project is Implemented	§ 15126.2(b)	Section 4.0 & Subsection 5.1
Significant Irreversible Environmental Impacts Which Would be Involved in the Proposed Action Should it be Implemented	§ 15126.2(c)	Subsection 5.2
Growth-Inducing Impacts of the Proposed Project	§ 15126.2(d)	Subsection 5.3
Consideration and Discussion of Mitigation Measures Proposed to Minimize Significant Effects	§ 15126.4	Section 4.0 & Table S-1
Consideration and Discussion of Alternatives to the Proposed Project	§ 15126.6	Section 6.0
Effects Not Found to be Significant	§ 15128	Subsection 5.4
Organizations and Persons Consulted	§ 15129	Section 7.0 & Technical Appendices
Discussion of Cumulative Impacts	§ 15130	Section 4.0
Energy Conservation	Appendices F and G	Subsection 4.6

1.4.3 Incorporation by Reference

State CEQA Guidelines Section 15147 states that the "information contained in an EIR shall include summarized… information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public," and that the "placement of highly technical and specialized analysis and data in the body of an EIR shall be avoided." State CEQA Guidelines Section 15150 allows for the incorporation "by reference all or portions of another document… [and is] most appropriate for including long, descriptive, or technical materials that provide general background but do not contribute directly to the analysis of a problem at hand." The purpose of incorporation by reference is to assist the Lead Agency in limiting the length of this EIR. Where this EIR incorporates a document by reference, the document is identified in the body of the EIR, citing the appropriate section(s) of the incorporated document and describing the relationship between the incorporated part of the referenced document and this EIR.

Therefore, the detailed technical studies, reports, and supporting documentation that were used in preparing this EIR are bound separately as Technical Appendices. The Technical Appendices are available for review at the Riverside County Planning Department, 4080 Lemon Street, 12th Floor, Riverside, CA 92501, during the County's regular business hours or can be accessed from the Planning Department's main web page (https://planning.rctlma.org/) under the "CEQA Environmental Noticing" heading. The individual technical studies, reports, and supporting documentation that comprise the Technical Appendices are as follows:

A. Notice of Preparation (NOP) and Written Comments on the NOP
B. Land Evaluation and Site Assessment Model
C1. Air Quality Impact Analysis
C2. Health Risk Assessment
D1. MSHCP Consistency Analysis
D2. Determination of Biologically Equivalent or Superior Preservation (DBESP)
D3. Delineation of State and Federal Jurisdiction Waters
D4. Summary of Wet Season Surveys
E1. Phase I Cultural Resources Assessment
E2. Phase II Cultural Resources Assessment
F. Energy Analysis
G. Geotechnical Investigation
H. Greenhouse Gas Analysis
I. Phase I Environmental Site Assessment (ESA)
J1. Preliminary Hydrology Study
J2. Preliminary Water Quality Management Plan (WQMP)
K. General Plan Consistency Analysis
L. Noise Impact Analysis
M. Paleontological Resources Assessment
N1. Vehicle Miles Traveled Analysis
N2. Traffic Analysis Report
N3. VMT Mitigation Assessment
N4. Supplemental Trip Generation Assessment

O. Water Supply Assessment (WSA)
P. ALUC Consistency Determination Letter
Q. Ramboll Report
R. Fire Protection Plan (FPP)

Other reference sources that are incorporated into this EIR by reference are listed in Section 7.0, *References*, of this EIR. In most cases, documents or websites not included in the EIR's Technical Appendices are cited by a link to the online location where the document/website can be viewed by the public. All references relied upon by this EIR are included as part of Riverside County's Administrative Record pertaining to the proposed Project.

1.5 RESPONSIBLE AND TRUSTEE AGENCIES

The California Public Resource Code (Section 21104) requires that all EIRs be reviewed by responsible and trustee agencies (see also State CEQA Guidelines Section 15082 and Section 15086(a)). As defined by State CEQA Guidelines Section 15381, "the term 'Responsible Agency' includes all public agencies other than the Lead Agency which have discretionary approval power over the project." A Trustee Agency is defined in State CEQA Guidelines Section 15386 as "a state agency having jurisdiction by law over natural resources affected by a project which are held in trust for the people of the State of California." The known Responsible and Trustee Agencies for the proposed Cajalco Commerce Center Project are listed below. Regardless, this EIR can be used by any Trustee Agency or Responsible Agency, whether identified in this EIR or not, as part of their decision-making processes in relation to the proposed Project.

- **Santa Ana Regional Water Quality Control Board (RWQCB)** is a Trustee Agency responsible for issuance of a Construction Activity General Construction Permit and National Pollutant Discharge Elimination System (NPDES) Permit to ensure that on-site water flows do not result in siltation, other erosional effects, or degradation of surface or subsurface water quality. The Santa Ana RWQCB also would be responsible for issuing Waste Discharge Requirements (WDR) approval for Project impacts to Santa Ana RWQCB jurisdictional areas pursuant to Section 13260 of the California Water Code (CWC).

- **California Department of Fish and Wildlife (CDFW)** is a Trustee Agency for issuance of a 1602 Streambed Alteration Agreement (SAA).

- **South Coast Air Quality Management District (SCAQMD)** is a Responsible Agency for issuance of permits and approvals to construct and operate associated with operation of stationary equipment, if any such equipment is that requires permitting is proposed for use by the warehouse building user(s).

- **Eastern Municipal Water District (EMWD)** is a Responsible Agency for approval of the Project's proposed water and sewer connections and improvements.

- **Southern California Edison** is a Responsible Agency for approval of electrical system connections.

- **Western Riverside County Regional Conservation Authority (RCA)** is a Responsible Agency for approval of the Project's Determination of Biologically Equivalent or Superior Preservation (DBESP) and Habitat Acquisition and Negotiation Strategy (HANS) pursuant to the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP).

- **Metropolitan Water District** is a Responsible Agency for the approval of physical disturbance within MWD fee-owned property.

1.6 AREAS OF CONTROVERSY

Substantive issues raised in response to the NOP were previously summarized in Table 1-1. The purpose of this table is to present the primary environmental issues of concern raised by public agencies and the general public during the NOP review period. The table is not intended to list every comment received by the County during the NOP review period. Regardless of whether or not a comment is listed in the table, all applicable comments received in responses to the NOP are addressed in this EIR. Based on comments received during the NOP review period, concerns were raised regarding potential impacts to aesthetics, air quality (including localized air quality impacts), biological resources, cultural resources, greenhouse gas emissions, land use, transportation, tribal cultural resources, cumulative effects, potential impacts to/interference with the existing Colorado River Aqueduct (CRA), and general concerns related to the Project's proposed warehouse use. No other areas of controversy were identified as part of the NOP process, beyond comments regarding the Project's potential environmental effects.

1.7 ISSUES TO BE RESOLVED BY THE DECISION-MAKING BODY

The primary issues to be resolved by the decision-making body for the proposed Project involve the Project's significant and unavoidable impact under the issue areas of Air Quality and Transportation. The Riverside County Board of Supervisors will evaluate whether the mitigation measures presented to reduce the Project's unavoidable impacts adequately reduce Project impacts to the maximum feasible extent. The Board of Supervisors also will make a determination as to whether the Project's benefits outweigh the adverse environmental effects in support of adopting a Statement of Overriding Considerations pursuant to State CEQA Guidelines § 15093. Finally, the Board of Supervisors will decide whether to approve one of the Project alternatives in lieu of the proposed Project, if it is determined that one of the alternatives is feasible and its approval would serve to substantially reduce or avoid significant environmental impacts.

2.0 ENVIRONMENTAL SETTING

This Section 2.0 is provided pursuant to CEQA Guidelines Section (§) 15125(a) and includes a description of the physical environmental conditions in the vicinity of the Project site and the maximum extent of its potential off-site improvement areas from both a local and regional perspective as environmental conditions existed at the approximate time the Notice of Preparation (NOP) was published for this EIR, which occurred on June 30, 2023. This Section provides a brief overview of resources on and surrounding the Project site; additional detail regarding existing conditions for individual environmental topic areas (e.g., biology, geology, etc.) is provided within the appropriate subsection headings within Section 4.0, *Environmental Analysis*, of this EIR.

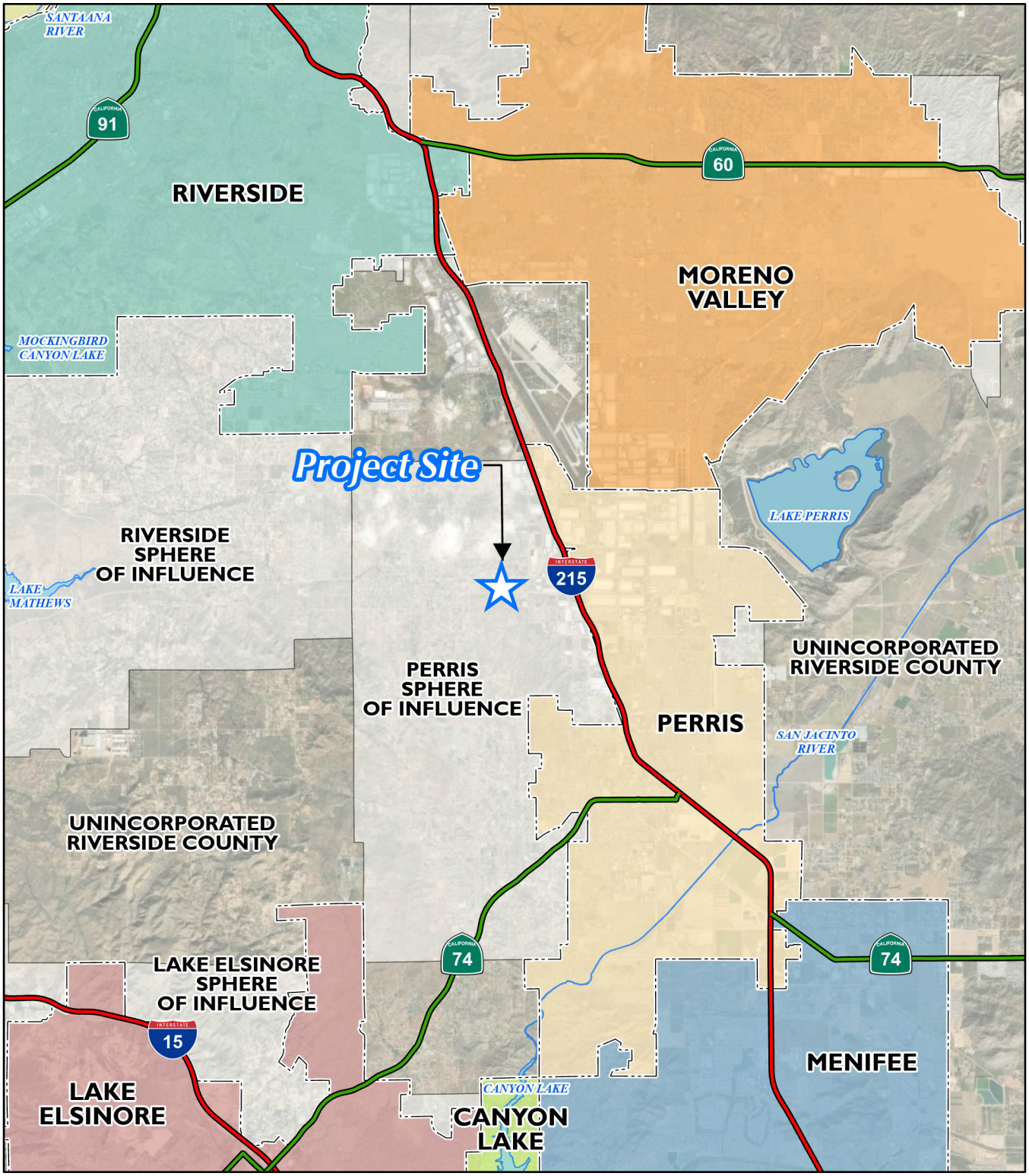
2.1 REGIONAL SETTING AND LOCATION

The 64.97-acre Project site and up to approximately ~~21.82~~19.78 acres of off-site Project-related disturbance areas are located within unincorporated western Riverside County, California. Figure 2-1, *Regional Map*, depicts the Project site's location within the regional vicinity. As shown, Riverside County abuts San Bernardino County to the north; Orange County to the west; and San Diego and Imperial Counties to the south. Riverside County is located in an urbanizing area of southern California commonly referred to as the Inland Empire. The Inland Empire is an approximate 28,000 square-mile region comprising western San Bernardino County, western Riverside County, and the eastern reaches of Los Angeles County. As of 2019, Southern California Association of Governments (SCAG) estimates that Riverside County as a whole had a population of 2,386,000 SCAG estimates that the population will increase to 2,992,000 million by 2050. (SCAG, 2023, Table 3.1)

2.2 LOCAL SETTING AND LOCATION

The Project site is located within the western region of unincorporated Riverside County, California. As depicted in Figure 2-2, *Vicinity Map*, the Project site is within the Mead Valley Area Plan (MVAP) of unincorporated Riverside County. More specifically, and as depicted in Figure 2-2, the Project site comprises two separate properties, generally located at the southwest corner of Cajalco Road and Seaton Avenue. Specifically, the northern 50.04 gross acres of the Project site are located south of Cajalco Road, west of Seaton Avenue, east of Decker Road, and north of Rider Street. The southern 14.93 gross acres of the Project site are located both east and west of Decker Road, approximately 185 feet south of the proposed warehouse building site. The Project site encompasses Assessor's Parcel Numbers (APNs) 317-080-(003 through 008, 013, 014, 019 through 023, and 027 through 029), 317-090-(002 and 008), and 317-090-(003 thru 008).

Under existing conditions, the northern 50.04 gross acres of the Project site includes undeveloped land, multiple large-lot single-family residential homes with ancillary structures and outdoor storage, and a commercial structure (Craneology, Inc.). Under existing conditions, the southern 14.93 gross acres of the Project site includes a mixture of undeveloped land and several single-family homes with a variety of ancillary structures and outdoor storage. The Project site is bordered on the north by Cajalco Road, followed by J & D Multiple Services legal services and vacant land; on the west by vacant land; on the south by Huong Sen Buddhist Temples, single-family residential structures, and vacant land; and on the east by Seaton Avenue,

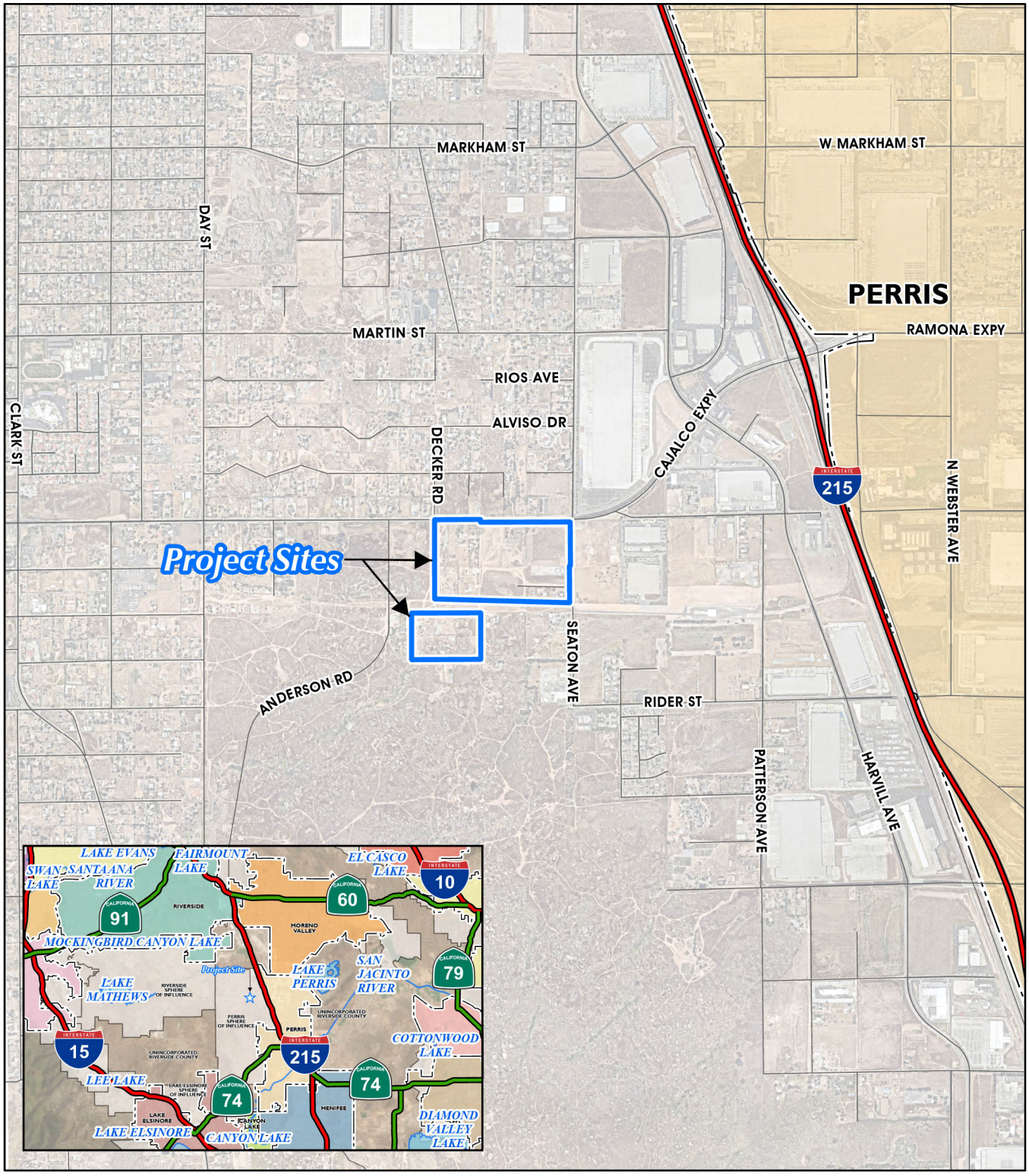


Source(s): ESRI, NearMap Imagery (May 2023), RCIT (2023)

Figure 2-1

0 0.75 1.5 3 Miles

Regional Map



Source(s): ESRI, NearMap Imagery (May 2023), RCIT (2023)

Figure 2-2

0 625 1,250 2,500 Feet

Vicinity Map

followed by commercial retail and equipment rental companies and vacant land. A warehouse is under construction east of the Project site and east of Seaton Avenue at the southeast corner of Cajalco Road and Seaton Avenue.

The Mead Valley area of Riverside County is an Environmental Justice community, meaning that the community is environmentally disadvantaged. The census tract containing the Project site (Census Tract 6065042904) is ranked by the State as being in the 55th percentile for pollution burden which, based on the Census Tract's demographic characteristics, results in the Office of Environmental Health Hazard Assessment (OEHHA) ranking the area in the 81st percentile of communities that are disproportionately burdened by multiple sources of pollution. OEHHA relies on reported demographic information of 10,637 persons living in Census Tract 6065042904. Census Tract 6065042904 encompasses areas west of I-15; south of Cajalco Road/Cajalco Expressway; east of Barton Street, Alexander Street, Brown Street, and Old Elsinore Road; and north of Rider Street, Kelly Lane, Orange Avenue, San Jacinto Avenue, West Metz Road, and Nuevo Road. (OEHHA, 2023)

OEHHA's California Communities Environmental Health Screening Tool: CalEnviroScreen 4.0, is a screening methodology that the State uses to identify California communities that are disproportionately burdened by multiple sources of pollution and relies on data collected between approximately 2016 and 2019. Although the data is several years dated, the CalEnviroScreen 4.0 indicators for the Project site's Census Tract are shown below in Table 2-1, *CalEnviroScreen Indicators for Census Tract 6065042904*.

Table 2-1 CalEnviroScreen Indicators for Census Tract 6065042904

Indicator	% Burden	Indicator	% Burden
Exposures		**Environmental Effects**	
Ozone:	95	Cleanup Sites	60
PM 2.5:	55	Groundwater Threats	14
Diesel PM:	14	Hazardous Waste	71
Pesticides:	53	Impaired Waters	0
Toxic Releases:	44	Solid Waste	0
Traffic:	90	**Sensitive Populations**	
Drinking Water Contaminants:	10	Asthma	66
Lead in Housing:	55	Low Birth Weight	49
Cleanups:	60	Cardiovascular Disease	91
Groundwater Threats:	14	**Socioeconomic Factors**	
Hazardous Waste:	71	Education	93
Impaired Water:	0	Linguistic Isolation	84
Solid Waste:	0	Poverty	84
		Unemployment	93
		Housing Burden	80

Exposure indicators are based on measurements of different types of pollution that people may come into contact with. Environmental effects indicators are based on the locations of toxic chemicals in or near

communities. Sensitive population indicators measure the number of people in a community who may be more severely affected by pollution because of their age or health. Socioeconomic factor indicators are conditions that may increase people's stress or make healthy living difficult and cause them to be more sensitive to pollution's effects. As indicated in Table 2-1, for the Project site's Census Tract, the highest environmental exposures (over 80%) are from ozone (O_3) and traffic. The highest population and socioeconomic factors (over 80%) are compromised health conditions related to cardiovascular disease and a population with high levels of poverty, linguistic isolation, poverty, unemployment, housing burden, and low levels of educational attainment.

In addition, the Project site is designated as an Environmental Justice (EJ) community by the Riverside County General Plan and is located in a SB 535 Disadvantaged Community identified by the California Environmental Protection Agency (CalEPA). The State provides California Climate Investment funding appropriated by the State Legislature from the proceeds of the State's Cap-and-Trade Program for investment in disadvantaged communities. The funding is used for programs that reduce emissions of greenhouse gases with at least 25% of the funding going to projects that provide a benefit to disadvantaged communities and at least 10 percent of the funding going to projects located within those communities (CalEPA, 2022).

2.3 SURROUNDING LAND USES AND DEVELOPMENT

Land uses in the immediate vicinity of the Project site are illustrated on Figure 2-3, *Surrounding Land Uses and Development*, and described below.

- North: Land uses to the north of the Project site include Cajalco Road to the north, beyond which are undeveloped lands, an existing office use (J&D Multiple Services), agricultural uses, rural residential uses, and an existing church (Perris Spanish Seventh Day Adventist) that also provides school services. To the northeast and north of Cajalco Road is a large warehouse occupied by Home Depot. To the north of the southern 14.93 gross acres of the Project site is a~~n undeveloped~~ utility corridor with a subterranean aqueduct owned by Metropolitan Water District of Southern California (MWD) ~~containing a subsurface aqueduct~~, beyond which are the northern portions of the Project site and undeveloped lands.
- East: Seaton Avenue abuts the northern portions of the Project site to the east, beyond which is an undeveloped parcel, a small business (JJ Rentals) and associated outdoor storage, and two large warehouse buildings. To the east of the southern 14.93 gross acres of the Project site is an existing single-family home with numerous ancillary structures and outdoor storage.
- South: Located to the south of the Project site are a Buddhist Temple (Huong Sen Buddhist Temple), several existing rural residential homes, numerous ancillary structures, and outdoor storage, with the majority of the areas south of the southern 14.93 gross acres of the Project site comprising undeveloped open space.
- West: To the west of the northern portions of the Project site is Decker Road, to the west of which are undeveloped land, a water tank, and numerous rural residential homes. To the west of the southern

Source(s): ESRI, NearMap Imagery (May 2023), RCIT (2023)

Figure 2-3

Surrounding Land Uses and Development

14.93 gross acres of the Project site are several existing rural residential uses and associated ancillary structures, beyond which is undeveloped open space.

2.4 LOCAL PLANNING CONTEXT

CEQA Guidelines § 15125(d) requires that EIRs identify the general plans and regional plans that are applicable to the project under evaluation and recognize potential inconsistencies. Plans that are applicable to the Project evaluated in this EIR and related to use of the land are summarized below. Additional information is provided about these plans and other applicable regional plans in the corresponding subsections of Section 4.0, *Environmental Analysis*.

2.4.1 SCAG REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY

SCAG is a regional agency established pursuant to California Government Code § 6500, also referred to as the Joint Powers Authority law. SCAG is designated as a Council of Governments (COG), a Regional Transportation Planning Agency (RTPA), and a Metropolitan Planning Organization (MPO). The Project site is within SCAG's regional authority. In April 2024, SCAG's Regional Council approved and adopted the 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy ("Connect SoCal"). Connect SoCal is the applicable Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) for the Project. Connect SoCal embodies a collective vision for the region's future, prepared with input by local governments, county transportation commissions (CTCs), tribal governments, non-profit organizations, businesses, and stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. Connect SoCal plans for a large number of transportation projects, ranging from highway improvements, railroad grade separations, bicycle lanes, new transit hubs, and replacement bridges. These future investments were included in county plans developed by the six CTCs and seek to reduce traffic bottlenecks, improve the efficiency of the region's network, and expand mobility choices. The goals of Connect SoCal are to: 1) build and maintain an integrated multimodal transportation network; 2) develop, connect and sustain communities that are livable and thriving; 3) create a healthy region for the people of today and tomorrow; and 4) support a sustainable, efficient and productive regional economic environment that provides opportunities for all residents. (SCAG, 2024)

2.4.2 SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT AIR QUALITY MANAGEMENT PLAN (AQMP)

Currently, the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) are exceeded in most parts of the South Coast Air Basin (SCAB). In response, and in conformance with California Health and Safety Code Section 40702 et seq. and the California Clean Air Act, the South Coast Air Quality Management District (SCAQMD) has adopted a series of Air Quality Management Plans (AQMPs) to meet the State and federal ambient air quality standards. AQMPs are updated regularly in order to more effectively reduce emissions, accommodate growth, and to minimize any negative fiscal impacts of air pollution control on the economy. Each version of the plan is an update of the previous plan and has a 20-year horizon with a revised baseline. In December 2022, the SCAQMD released the Final 2022 AQMP (2022 AQMP). The 2022 AQMP continues to evaluate current integrated strategies and control measures to meet the NAAQS, as well as explore new and innovative methods to reach its goals. Some of these approaches include utilizing incentive programs, recognizing existing co-benefit programs from other sectors, and

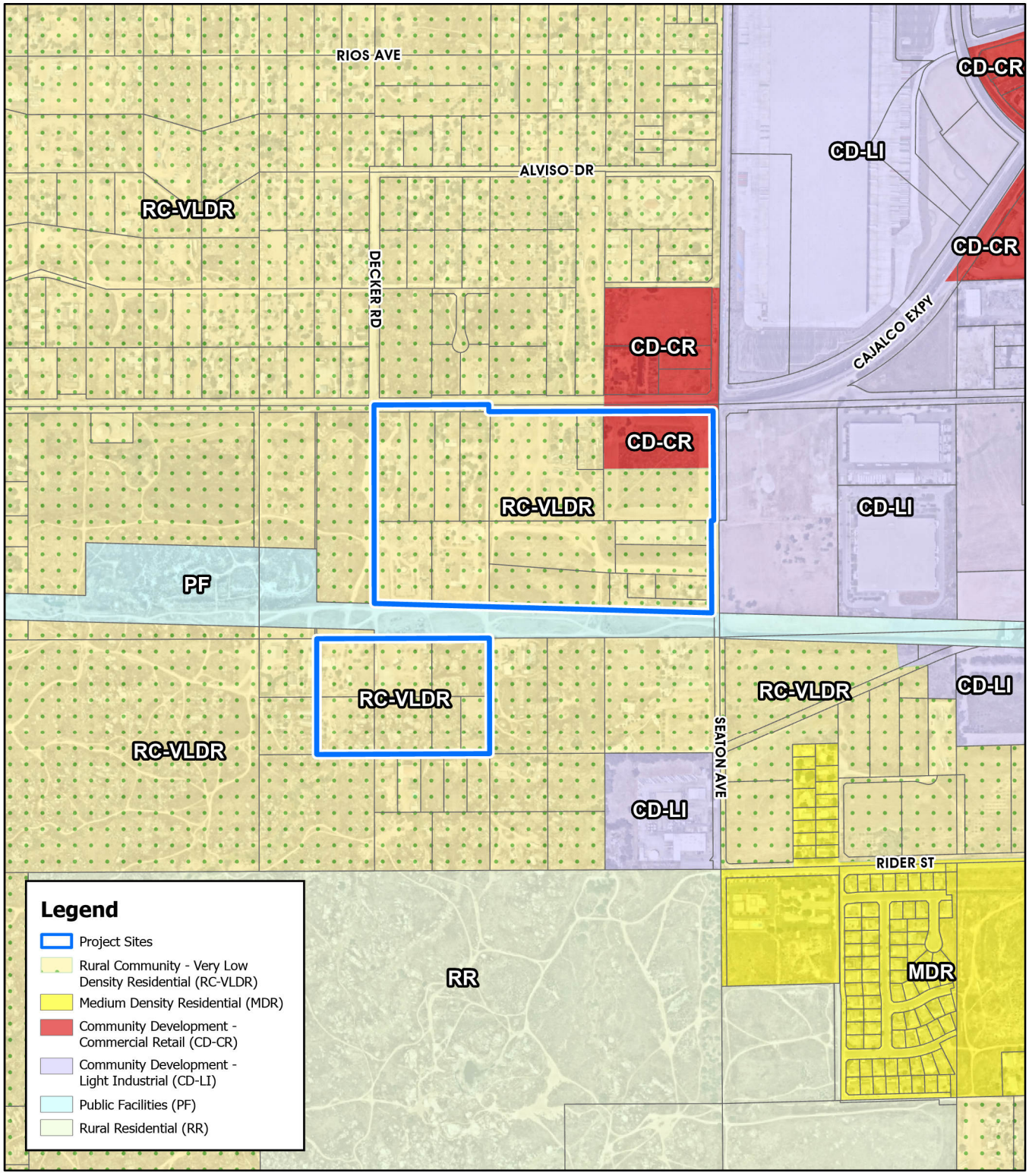
developing a strategy with fair-share reductions at the federal, State, and local levels. Similar to the 2016 AQMP, the 2022 AQMP incorporates scientific and technological information and planning assumptions, including the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020 RTP/SCS), a planning document that supports the integration of land use and transportation to help the region meet the federal Clean Air Act (CAA) requirements. The 2022 AQMP is based on assumptions provided by the EMission FACtor model (EMFAC) developed by the California Air Resources Board (CARB) for motor vehicle information and assumptions provided by SCAG for demographics. The air quality levels projected in the 2022 AQMP are based on the assumption that development associated with general plans, specific plans, residential projects, and wastewater facilities will be constructed in accordance with population growth projections identified by SCAG in its 2020 RTP/SCS. The 2022 AQMP also assumes that such development projects will implement strategies to reduce emissions generated during the construction and operational phases of development. (SCAQMD, 2022)

2.4.3 County of Riverside General Plan and Mead Valley Area Plan

The prevailing planning document for the Project site and its surrounding area is the Riverside County General Plan. The Project site is located within the Mead Valley Area Plan (MVAP) portion of the Riverside County General Plan. As depicted on Figure 2-4, *Existing General Plan Land Use Designations*, the County's General Plan designates approximately 4.7 acres in the northeastern portion of the northern portion of the Project site for "Community Development – Commercial Retail (CD-CR)" land uses, while the remaining +/- 60.3 acres of the Project site are designated for "Rural Community – Very Low Density Residential (RC-VLDR)" land uses. The CD-CR land use designation allows for local and regional serving retail and service uses. The RC-VLDR land use designation allows for single-family detached residences on large parcels of 1 to 2 acres, along with limited agriculture, with intensive equestrian and animal keeping uses are expected and encouraged. (Riverside County, 2021a, Table LU-4; RCIT, n.d.)

2.4.4 Zoning

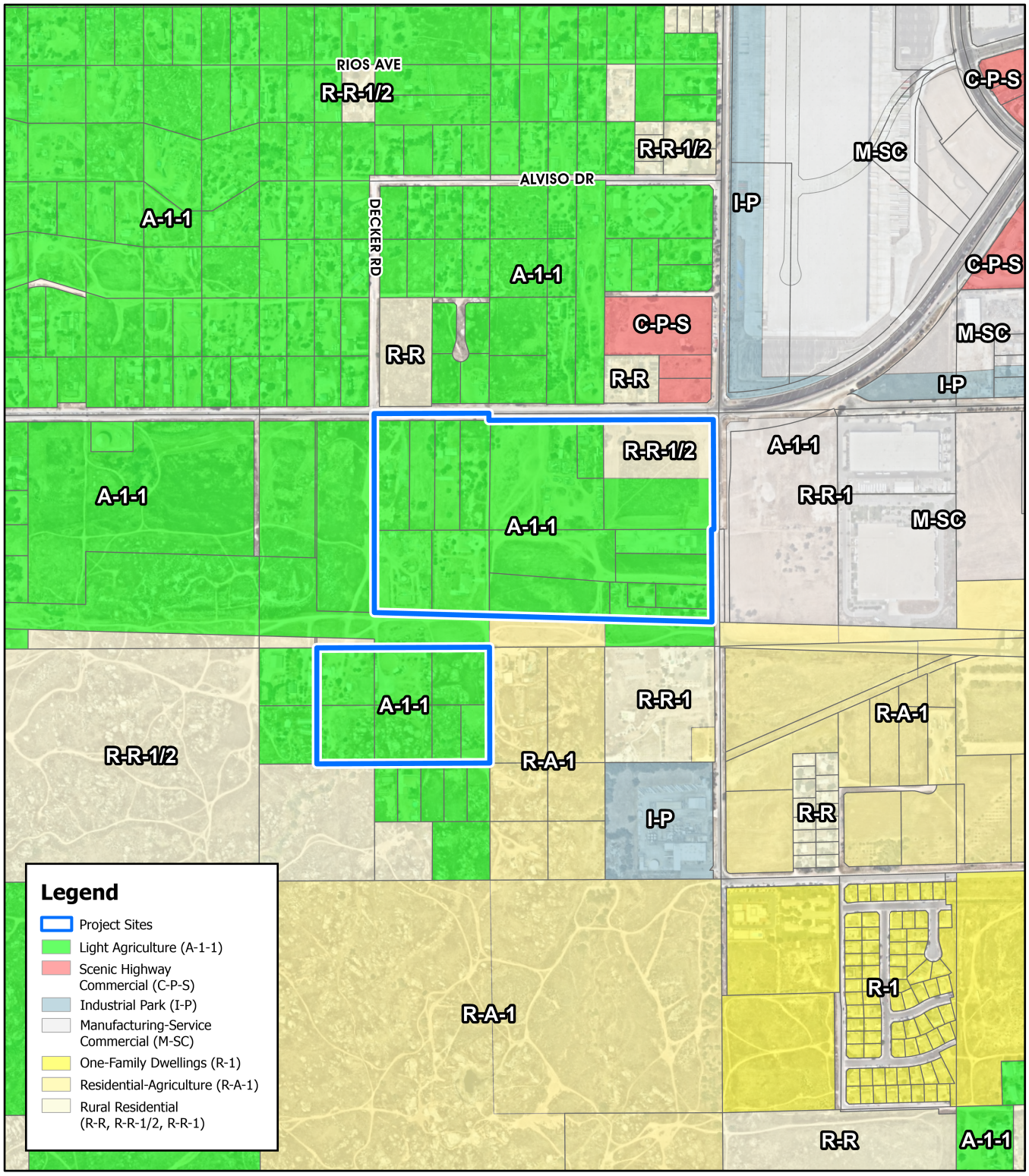
The Riverside County Zoning Ordinance is intended to implement the Riverside County General Plan's land use plan. As shown on Figure 2-5, *Existing Zoning Classifications*, under existing conditions, approximately 4.7 acres in the northeast portion of the Project site are zoned for "Rural Residential, Minimum ½-Acre Lot Sizes (R-R-1/2)," while the remaining approximately 60.3 acres of the Project site are zoned for "Light Agriculture (A-1-1)." The R-R zoning classification is intended to accommodate single-family dwellings, public facilities, limited agricultural activities (including intensive equestrian and animal keeping uses). The A-1 zoning classification is intended to accommodate single-family dwellings and public facilities, with limited agricultural activities (including intensive equestrian and animal keeping uses). (Riverside County, 2021c; RCIT, n.d.)



Source(s): ESRI, NearMap Imagery (May 2023), RCIT (2023)

Figure 2-4

Existing General Plan Land Use Designations



Source(s): ESRI, NearMap Imagery (May 2023), RCIT (2023)

Figure 2-5

Existing Zoning Classifications

2.4.5 Western Riverside County Multiple Species Habitat Conservation Plan

The Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), a regional Habitat Conservation Plan (HCP), was adopted on June 17, 2003, and an Implementing Agreement (IA) was executed between the United States Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW), and participating entities. The intent of the Western Riverside County MSHCP is to preserve native vegetation and meet the habitat needs of multiple species, rather than focusing preservation efforts on one species at a time. The MSHCP identifies Criteria Areas, in which habitat conservation efforts are targeted. As shown on Figure 2-6, *MSHCP Cell Groups and Criteria Cells*, the Project site is located within the northern portion of Criteria Cell 2334 and is not located within an MVAP Cell Group. According to the MSHCP, conservation within Criteria Cell 2334 is intended to include approximately 5% of the Cell focusing in the southern portion of the Cell. (Riverside County, 2003, Table 3-10)

In addition to conservation criteria within areas designated to be included within the MSHCP Reserve System, the MSHCP also identifies a number of additional survey and conservation requirements. The Project site is not located within an MSHCP Survey area for amphibians or mammals, although the entire Project site occurs within an MSHCP burrowing owl survey area. The Project site is not located within a narrow endemic plant species survey area or a criteria species survey area, and also is not located within a Delhi Sands Flower-loving Fly survey area. (RCA, n.d.)

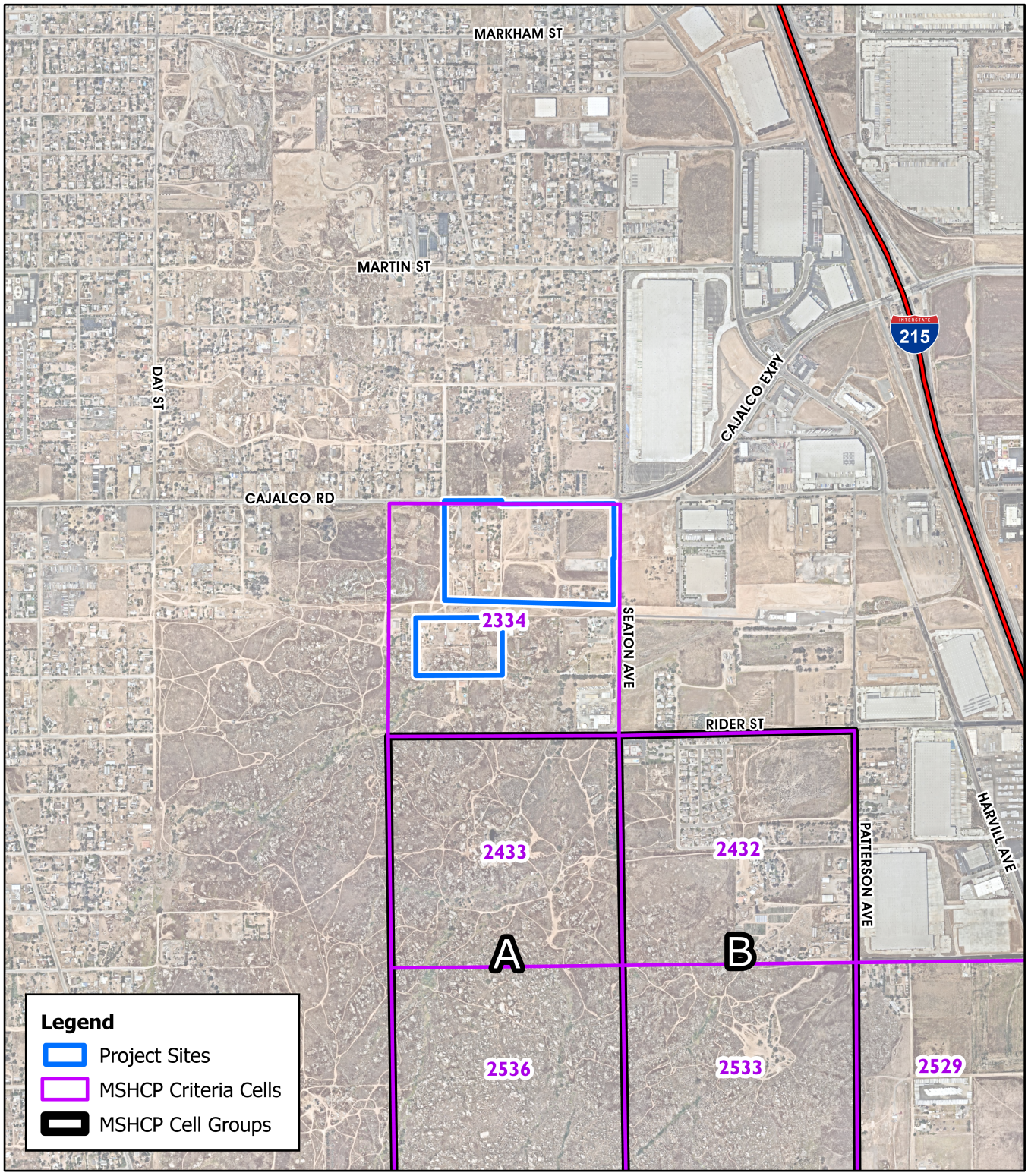
Refer to EIR Subsection 4.4, *Biological Resources*, for a complete description of applicable MSHCP requirements and an evaluation of the Project's consistency with the MSHCP.

2.5 Existing Physical Site Conditions

Pursuant to CEQA Guidelines § 15125, the physical environmental condition for purposes of establishing the setting of an EIR is the environment as it existed at the time the EIR's NOP was released for public review. The NOP for this EIR was released for public review on June 30, 2023. The following subsections provide a description of the Project site's physical environmental condition ("existing conditions") as of that approximate date. The site's physical conditions and surrounding areas are shown on Figure 2-7, *Aerial Photograph*. More detailed information regarding the Project's site's environmental setting as it relates to a specific environmental issue area is provided in the various subsections of EIR Section 4.0, *Environmental Analysis*.

2.5.1 Land Use

As shown on Figure 2-7, the northern 50.04 acres of the Project site includes undeveloped land, multiple large-lot single-family residential homes with ancillary structures and outdoor storage, and a commercial structure (Craneology, Inc.). The southern 14.93 acres of the Project site primarily consists of a mixture of undeveloped land and multiple single-family homes with a variety of ancillary structures and outdoor storage. (Group Delta, 2022, Table 3)



Source(s): ESRI, NearMap Imagery (May 2023), RCIT (2023)

Figure 2-6

MSHCP Cell Groups and Criteria Cells

Source(s): ESRI, NearMap Imagery (May 2023)

Figure 2-7

Aerial Photograph

2.5.2 Site Topography

Figure 2-8, *USGS Topographic Map*, depicts the topography of the overall 64.97-acre Project site. As shown, the topography of the northern portions of the Project site slope gently in a west-to-east orientation, with elevations in this portion of the Project site ranging from approximately 1,535 feet above mean sea level (amsl) at the northeast corner of this portion of the Project site to approximately 1,600 feet amsl along the central portion of the western site boundary. As also shown on Figure 2-8, the southern portions of the Project site also slope gently in a west-to-east orientation, with elevations in this portion of the Project site ranging from approximately 1,569 feet amsl near the southeastern corner to 1,622 feet amsl near the southwestern corner. It should be noted that the southern portions of the Project site contain several large rock outcroppings in the southern and eastern portions of the site, which exhibit variable topography.

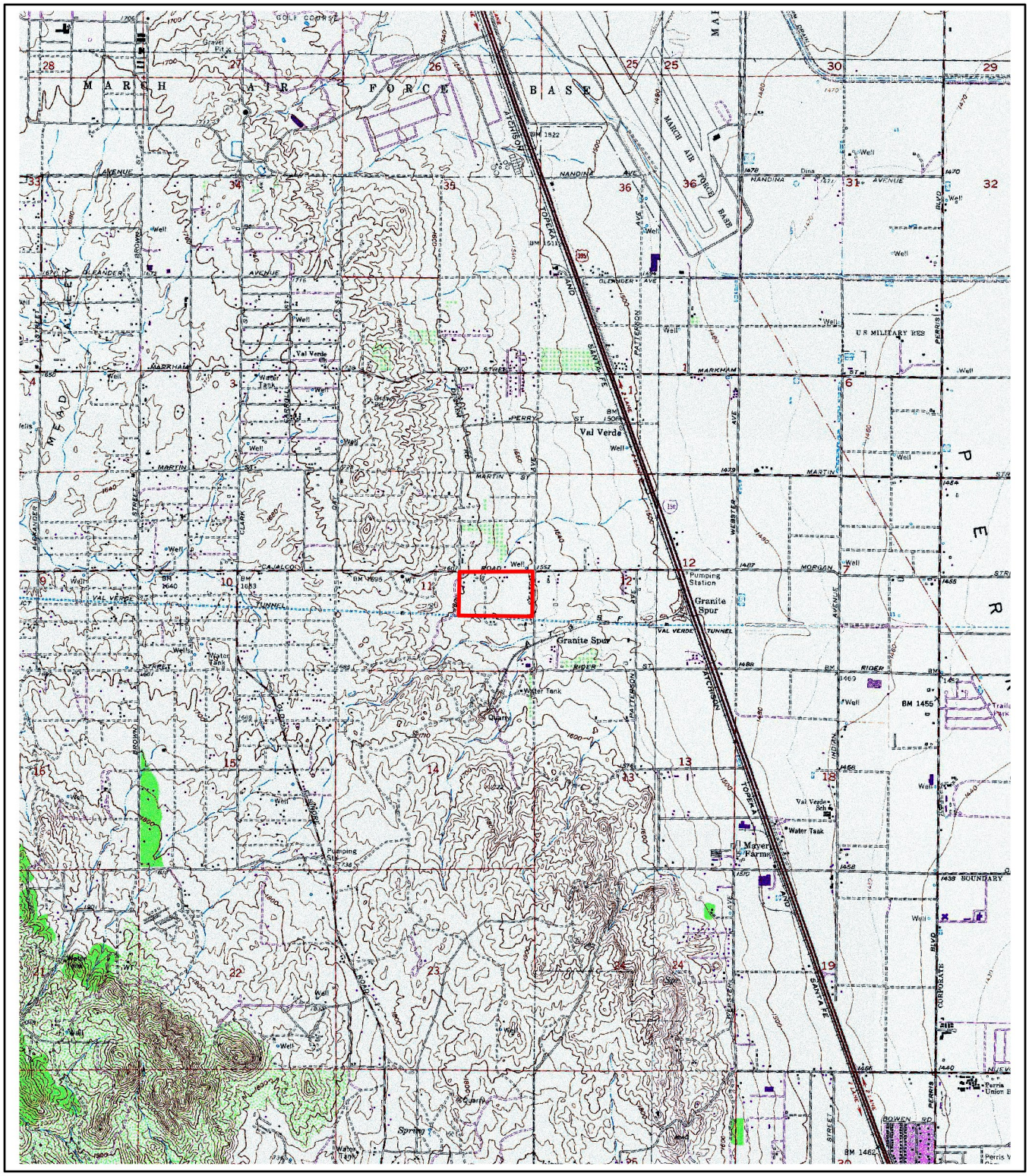
2.5.3 Air Quality and Climate

The Project site is located in the 6,745-square-mile South Coast Air Basin (SCAB), which includes portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County. The SCAB is bound by the Pacific Ocean to the west, the San Gabriel, San Bernardino, the San Jacinto Mountains to the north and east, and San Diego County to the south. The SCAB is within the jurisdiction of the SCAQMD, the agency charged with bringing air quality in the SCAB into conformity with federal and State air quality standards. As documented in the Project's Air Quality Impact Analysis ("AQIA"; *Technical Appendix C1* to this EIR), although the climate of the SCAB is characterized as semi-arid, the air near the land surface is quite moist on most days because of the presence of a marine layer. More than 90% of the SCAB's rainfall occurs from November through April. Temperatures during the year range from an average minimum of 36°F in January to over 100°F maximum in the summer. During the late autumn to early spring rainy season, the SCAB is subjected to wind flows associated with the traveling storms moving through the region from the northwest. This period also brings five to ten periods of strong, dry offshore winds, locally termed "Santa Ana[s]" each year. (Urban Crossroads, 2023a)

The Mead Valley area of Riverside County is an Environmental Justice community, meaning that the community is environmentally disadvantaged. The census tract containing the Project site (Census Tract 6065042904) is ranked by the State as being in the 55th percentile for pollution burden, which, based on the Census Tract's demographic characteristics results in the Office of Environmental Health Hazard Assessment (OEHHA) ranking the area in the 81st percentile of communities that are disproportionately burdened by multiple sources of pollution. Refer to Subsection 2.2 for a more complete description of existing pollution burdens within the Mead Valley community under existing conditions. (SCAQMD, 2022)

2.5.4 Agriculture and Forestry Resources

As more fully discussed in EIR Subsection 4.2, *Agriculture and Forestry Resources*, the California Department of Conservation (CDC) Farmland Mapping and Monitoring Program (FMMP) identifies "Important Farmland" to include lands mapped as "Prime Farmland," "Farmland of Statewide Importance," and "Unique Farmland." According to the FMMP maps, the northern 50.04 acres of the Project site contain approximately 19.84 acres of "Farmland of Local Importance," while the remaining portions of the Project site (including the southern



Source(s): Albert A. Webb Associates (05-25-2023)

Figure 2-8

Not to Scale

USGS Topographic Map

portions) are mapped as containing approximately 45.13 acres of "Other Land" (CDC, 2021). As previously indicated, under existing conditions, approximately 4.7 acres in the northeast portion of the Project site are zoned for "Rural Residential, Minimum ½-Acre Lot Sizes (R-R-1/2)," while the remaining approximately 60.3 acres of the Project site are zoned for "Light Agriculture (A-1-1)." According to Riverside County Ordinance No. 625 (Right-To-Farm Ordinance), the A-1 zoning classification is identified as "land zoned for primarily agricultural purposes," while the site's existing R-R zoning classification is not considered to comprise agriculturally-zoned land. Accordingly, under existing conditions the Project site contains approximately 60.3 acres of lands zoned primarily for agricultural purposes. The Project site is not used for agricultural production under existing conditions, and is not subject to any Williamson Act contracts or County Agricultural Preserves. Additionally, no forestry resources occur on site under existing conditions. (Riverside County, 2015a, Figure 4.5.2; RCIT, n.d.)

2.5.5 Biological Resources

Under existing conditions, the Project site supports the following vegetation/land cover types: Disturbed/Developed, Nonnative Grassland, Ornamental, Disturbed Southern Willow Scrub, and Disturbed Riversidian Sage Scrub. Table 4.4-1 in EIR Subsection 4.4., *Biological Resources*, provides a summary of the vegetation types and their corresponding acreage. Photographs depicting the Project site are shown in Exhibit 12 of the Project's Biological Technical Report (*Technical Appendix D1*).

The Project site occurs within Multiple Species Habitat Conservation Plan (MSHCP). The Project site is located within Subunit 1 (Motte-Rimrock) of the Mead Valley Area Plan of the MSHCP, with approximately 65.00 acres of the Project's onsite development areas within Criteria Cell 2334 and offsite road improvement areas adjacent to or along the borders of Cells 2432 and 2433. The Project site is not located within a Narrow Endemic Plant Species Survey Area (NEPSSA). The Project site occurs the burrowing owl survey area but does not occur within a Criteria Area Plant Species Survey Area (CAPSSA) or a special species survey area for amphibians or mammals.

No special-status plants were detected within the Study Area. One special-status animal was detected at the Project site: Cooper's hawk (*Accipiter cooperii*). In addition, focused surveys conducted for the proposed Project during the 2023 breeding season determined that the burrowing owl is absent from the Study Area. (GLA, 2023, pp. 26, 28)

The Project site does not contain any waters considered jurisdictional by the United States Army Corps of Engineers (Corps). Santa Ana Regional Water Quality Control Board (RWQCB) jurisdiction associated with Project site totals 0.0~~98~~-acre, none of which is State wetland or riparian. A total of 985 linear feet of ephemeral stream is present. California Department of Fish and Wildlife (CDFW) jurisdiction associated with the Project site totals approximately 0.2~~87~~-acre and includes all areas within Regional Board jurisdiction. (GLA, 2023, pp. 38, 40)

Refer to EIR Subsection 4.4, *Biological Resources*, for a detailed description of the vegetation communities that occur on site.

2.5.6 GEOLOGY

The Project site is located in the Peninsular Ranges geomorphic province of California. The Peninsular Ranges province extends from the Los Angeles Basin southeast to Baja California and from the Pacific Ocean eastward to the Coachella Valley and Colorado Desert. The province consists of numerous northwest to southeast-trending mountain ranges and valleys that are geologically controlled by several major active faults. The Project site is located within and near the central part of the Perris block, which is bounded on the northeast by the San Jacinto fault zone, on the north by the Sierra Madre-Cucamonga fault zone, and on the west by the Elsinore Fault zone.

The Project site is underlain by several geologic units, as follows:

- Younger Alluvium. Younger alluvium was encountered at the ground surface of 16 boring locations conducted by Southern California Geotechnical (SCG), extending to depths ranging from 2½ to 8± feet below existing site grades. The younger alluvium consists of loose to medium dense silty sands and sandy silts with varying clay and fine gravel content. (SCG, 2022, p. 6)

- Older Alluvium. Older alluvium was encountered at the ground surface or beneath the younger alluvium at 12 boring locations conducted by SCG, extending to depths ranging from the ground surface to 20 feet below existing site grades. The older alluvium consists of medium dense to very dense silty sands, medium dense sands, and medium dense to very dense sandy silts. Varying quantities of clay were occasionally encountered in the older alluvium. (SCG, 2022, pp. 6-7)

- Bedrock. Val Verde Tonalite (Kvt) bedrock was encountered at the ground surface or beneath the alluvium at each boring locations except for two boring locations, extending to depths ranging from the ground surface to at least the maximum depth explored of 30± feet below existing site grades. The bedrock consists of fine to coarse-grained Tonalite which is phaneritic, friable, weathered, and weakly cemented. (SCG, 2022, p. 7)

In addition, SCG did not identify any groundwater in the borings conducted on site. Based on the lack of water within the borings and the moisture contents of the recovered soil samples, the static groundwater is considered to have existed at a depth in excess of 30± feet. (SCG, 2022, p. 7)

2.5.7 SOIL TYPES AND EROSION POTENTIAL

Table 2-2, *Summary of On-Site Soil Characteristics*, provides a summary of the soils present on the Project site, and identifies the attendant rate of runoff and erosion susceptibility. As shown, approximately 25.9% of the Project site contains soils with a slight rate of runoff and a slow slight to moderate susceptibility to erosion. Approximately 4.3% of the soils on the Project site have a slow rate of runoff and a slight susceptibility to erosion. Approximately 0.2% of the soils on site have a slow to medium rate of runoff, and a slight to moderate susceptibility to erosion. Approximately 60.3% of the Project site contains soils with a medium rate of runoff and a moderate susceptibility to erosion. Approximately 9.2% of the Project site contains soils with a rapid

rate of runoff and a high susceptibility to erosion hazards. (USDA, 1971, pp. 24, 33, 46-47, 53-54, and 65; USDA, n.d.)

Table 2-2 Summary of On-Site Soil Characteristics

Map Symbol	Map Unit Name	Rate of Runoff	Erosion Susceptibility	Acres in AOI[1]	Percent of AOI[1]
CkD2	Cieneba rocky sandy loam, 8 to 15 percent slopes, eroded	Medium	Moderate	6.8	10.5%
CkF2	Cieneba rocky sandy loam, 15 to 50 percent slopes, eroded	Rapid	High	6.0	9.2%
FbC2	Fallbrook sandy loam, shallow, 5 to 8 percent slopes, eroded	Medium	Moderate	4.5	6.9%
FcD2	Fallbrook rocky sandy loam, shallow, 8 to 15 percent slopes, eroded	Medium	Moderate	1.9	2.9%
HcC	Hanford coarse sandy loam, 2 to 8 percent slopes	Slow to Medium	Slight to Moderate	0.1	0.2%
MmB	Monserate sandy loam, 0 to 5 percent slopes	Slight	Slow	16.8	25.9%
MmC2	Monserate sandy loam, 5 to 8 percent slopes, eroded	Medium	Moderate	0.1	0.2%
MmD2	Monserate sandy loam, 8 to 15 percent slopes, eroded	Medium	Moderate	7.0	10.8%
RaB2	Ramona sandy loam, 2 to 5 percent slopes, eroded	Medium	Moderate	13.6	20.9%
VsC	Vista coarse sandy loam, 2 to 8 percent slopes	Slow	Slight	2.8	4.3%
VsD2	Vista coarse sandy loam, 8 to 15 percent slopes, eroded	Medium	Moderate	4.7	7.2%
VtF2	Vista rocky coarse sandy loam, 2 to 35 percent slopes, eroded	Medium	Moderate	0.6	0.9%
Totals for Area of Interest:		--	--	**64.97[1]**	**100.0%**

1. AOI = Area of Interest. Totals reflect rounding.

(USDA, 1971, pp. 24, 33, 46-47, 53-54, and 65; USDA, n.d.)

2.5.8 HYDROLOGY

The existing hydrologic conditions of the Project site are depicted on Figures 4.10-2 and 4.10-3 in EIR Subsection 4.10, *Hydrology and Water Quality*. As shown on Figure 4.10-2, the northern 64.97 acres of the Project site currently slopes down at approximately 1% to 8% grade to the east. The existing drainage pattern for the site and the general area is characterized by sheet flows that follow the slope to the east towards Seaton Avenue. Existing flows for the site sheet flow to existing Seaton Avenue and Cajalco Road, eventually draining to storm drain Line E-9.1 of the Perris Valley Master Drainage Plan. In addition, and as shown on Figure 4.10-3, the existing drainage pattern for the southern 14.93 acres of the Project site slopes down at approximately 1% to 8% grade from west to east, and as such the existing drainage pattern for the site and the general area is characterized by sheet flows that follow the slope to the east towards an existing stream that flows easterly along the south end to the site. Refer to EIR Subsection 4.10, *Hydrology and Water Quality*, for additional information regarding the site's existing drainage conditions.

2.5.9 NOISE

The most common and significant source of noise in Riverside County is mobile noise generated by transportation-related sources. Other sources of noise are the various land uses (i.e., residential, commercial, and institutional) that generate stationary-source noise. The background ambient noise levels in the Project

area are dominated by the transportation-related noise associated with surface streets (including Cajalco Road) and I-215. Within the Project area, and based on noise measurements conducted by Urban Crossroads, Inc., ambient noise levels range from approximately 64.2 dBA CNEL to approximately 81.9 dBA CNEL (Urban Crossroads, 2024a, Table 5-1)

2.5.10 TRANSPORTATION

The primary transportation facility in the Project area is Interstate 215 (I-215), which occurs approximately 0.7-mile east of the Project site. The Project site also is located approximately 7.2 miles south of State Route 60 (SR-60), while State Route 91 (SR-91) occurs approximately 10.5 miles to the northwest of the Project site. Access to the Project site primarily is accommodated via Cajalco Road to the north and Seaton Avenue to the east, while Decker Road along the western site boundary currently exists as an unimproved dirt roadway. As shown on Figure 2-9, *MVAP Circulation Plan*, Cajalco Road is classified as an "Expressway (220' ROW)," and Decker Road and Seaton Avenue along the Project site's boundary are classified as "Secondary (100' ROW)" roadways. None of the other roadways that would serve the Project site are classified as General Plan roadways. (Riverside County, 2021b, Figure 8)

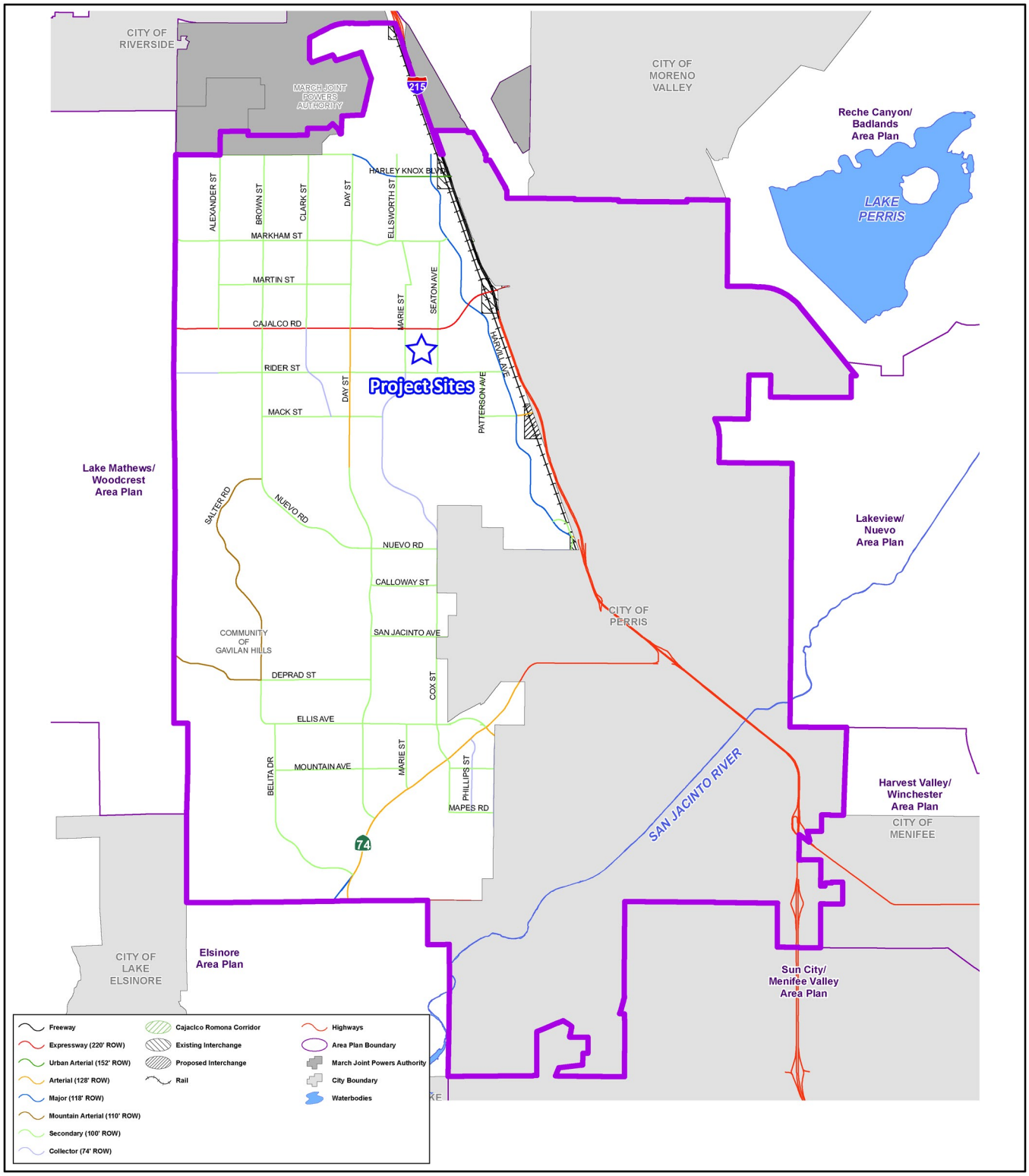
The Project area is currently served by Riverside Transit Agency (RTA) with bus service along Cajalco Road. RTA Route 41 runs along Cajalco Road, with the closest stop occurring at the corner of Seaton Avenue and Cajalco Road. Transit service is reviewed and updated by RTA periodically to address ridership, budget, and community demand needs. (Urban Crossroads, 2023h, p. 31)

The County of Riverside bike network is shown on Figure 2-10, *MVAP Trails and Bikeway System*. As shown, there is a planned Class II (on-street, striped) bike lane along Cajalco Road west of Harvill Avenue. However, based on a review of the future Cajalco Road widening project, Class II bike lanes only would be implemented in select areas, which does not include the portion of Cajalco Road that abuts the Project site. There are limited pedestrian facilities in place in the vicinity of the Project site under existing conditions. (Urban Crossroads, 2023h, p. 31)

As stated by the Riverside County *Transportation Analysis Guidelines for Level of Service, Vehicle Miles Traveled* (herein, "County Guidelines"), dated December 2020, under existing conditions, the existing Countywide average Vehicle Miles Traveled (VMT) per employee is 14.2 work VMT per employee, while for residential uses the existing Countywide average VMT per capita is 15.2 VMT/capita. (Riverside County, 2020, Figure 6)

2.5.11 PUBLIC FACILITIES

Fire protection services for the Project site are provided by the Riverside County Fire Department (RCFD). The RCFD provides a full range of fire services within the County and contracting cities. The level of service provided is dependent on response times, travel distance, and staffing workload levels established in the Riverside County Fire Protection and Emergency Medical Aid Plan. The Fire Protection Master Plan contains

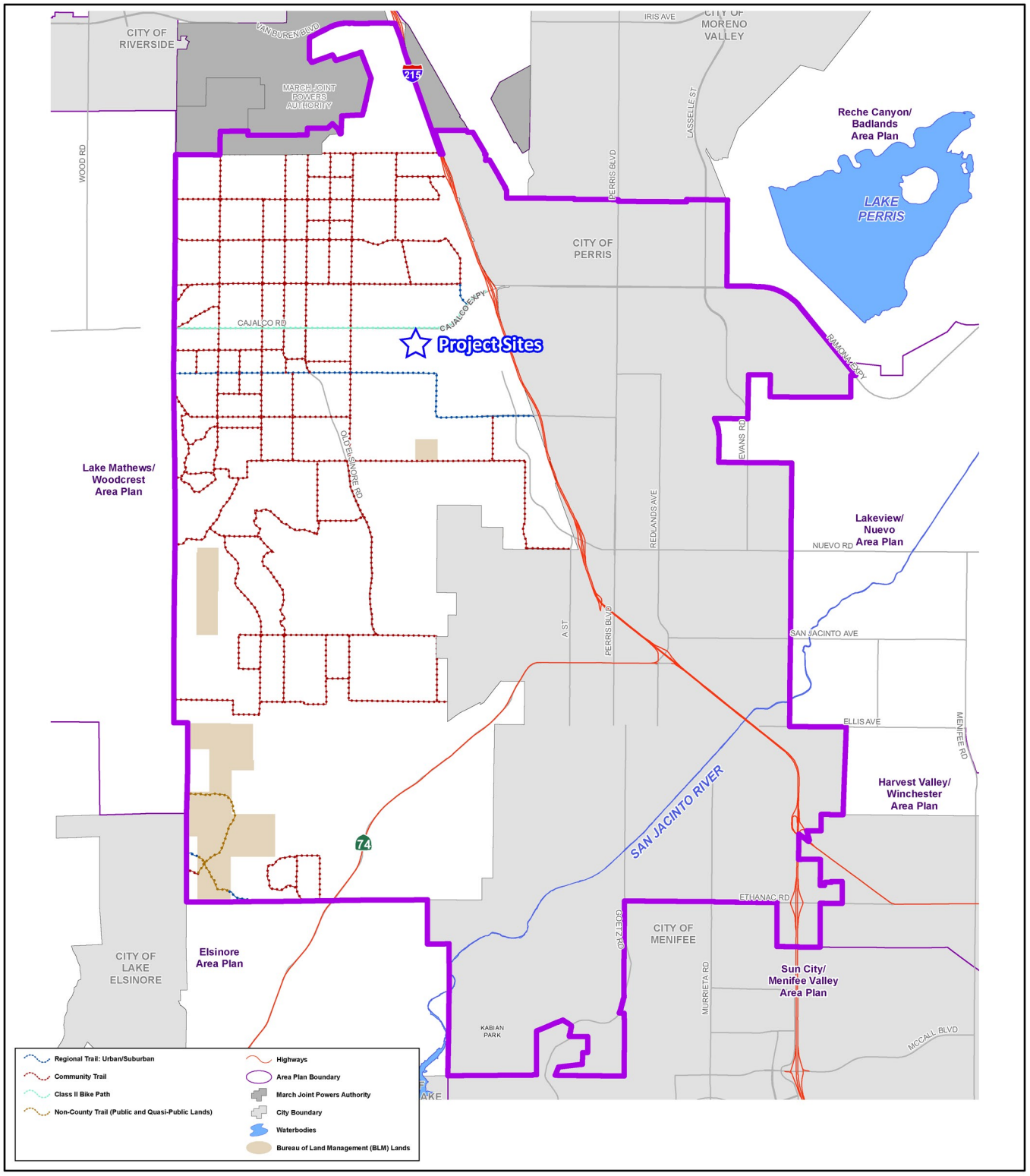


Source(s): Riverside County (09-28-2021)

Figure 2-9

Not to Scale

MVAP Circulation Plan



Source(s): Riverside County (09-28-2021)

Figure 2-10

Not to Scale

MVAP Trails and Bikeway System

four fire response categories that are used to determine the response times/travel distances for primary and secondary fire stations. The response categories are based on the amount of community build-out presumed in the Master Fire Plan. The Fire Department assumes in any given region that three or more fire engines respond to any reported fire. The fire station that would serve the Project is Station 59 (Mead Valley), which is located approximately 1.6 roadway miles southwest of the Project site. The Project site also could be served by Station 90 (North Perris City), which is located approximately 3.3 roadway miles southeast of the Project site. (Google Earth, 2024) The fire stations that could serve the Project site are staffed full-time, 24 hours per day, 7 days per week with a minimum three-person crew, including paramedics, operating a "Type 1" structural firefighting apparatus. According to Riverside County Geographic Information Systems (GIS), the southeast corner of the proposed warehouse site and the southern portions of the proposed park site are classified as having a "Very High" susceptibility to wildfire hazards. Areas surrounding the Project site, particularly to the south, east, west, and northwest of the proposed park site and to the south, southeast, and southwest of the proposed warehouse site also are identified as having a "Very High" susceptibility to wildfire hazards. (RCIT, n.d.).

The Riverside County Sheriff's Department (RCSD) provides community policing for the Project area. The Sheriff Station serving the Project area is the Perris Station, located at 137 North Perris Boulevard in Perris, CA, 92570, approximately 3.8 miles southeast of the Project site (Google Earth, 2018). In addition to community policing, other services provided by the Sheriff's Department include, but are not limited to, operating of the emergency 911 system, operating correctional facilities, performing traffic control, and providing crime prevention education. Also, the Sheriff's Department coordinates with volunteer groups such as Neighborhood Watch Programs and the Community Oriented and Policing Problem Solving (COPPS) Program and the Community Oriented Policing (COP) Program. COPPS shifts the focus of police work from a solely reactive mode by supplementing traditional law enforcement methods with proactive problem-solving approaches that involve the community as well as the police.

The Project site is located within the Val Verde Unified School District (VVUSD). The nearest schools to the Project site include the Columbia Elementary School and the Manuel L Real Elementary Schools, located approximately 1.1 mile west and 1.1 mile northwest of the Project site, respectively; the Thomas Rivera Middle School, located approximately 1.0 mile northwest of the Project site; and the Val Verde High School and Academy, located approximately 0.8-mile east of the Project site. As of the 2017/2018 school year (the most recent year for which capacity data has been reported by the VVUSD), the VVUSD had a total capacity of 22,016 students, including 11,482 elementary school students, 3,094 middle school students, and 7,440 high school students (VVUSD, 2018). In the 2022-2023 school year, the VVUSD had a total enrollment of 19,379 students (DOE, n.d.1).

Under existing conditions, there are no parks within a two-mile radius of the Project site. The nearest park is Paragon Park is located approximately 2.5 miles east of the Project site in the City of Perris. (Google Earth, 2024)

The Project site is located within the Riverside County Public Library System (RCPLS) service area. The nearest library servicing the proposed Project site is the Mead Valley Library, located at 21580 Oakwood Street, Perris, CA 92570, or approximately 1.0 mile west of the Project site. (Google Earth, 2024)

2.5.12 Utilities and Service Systems

A. Water Service

The Project site is located in the service area of the Eastern Municipal Water District (EMWD). EMWD provides potable water, recycled water, and wastewater services to an area of approximately 555 square miles in western Riverside County. The service area includes seven incorporated cities in addition to unincorporated areas of Riverside County. EMWD provides both retail and wholesale water service covering a total population of over 800,000. EMWD is both a retail and wholesale agency. EMWD's local supplies include groundwater, desalinated groundwater, and recycled water. (EMWD, 2021a, pp. E-2, 3-2, and 3-23)

In addition to the potable water system, EMWD maintains a regional recycled water system that provides tertiary-treated recycled water to customers for agricultural, landscape irrigation, environmental, and industrial use. EMWD's recycled water system consists of four regional water reclamation facilities (RWRFs) that treat municipal sewage and produce water for recycling. The five RWRFs, the San Jacinto Valley RWRF, the Moreno Valley RWRF, the Temecula Valley RWRF, the Sun City RWRF, and the Perris Valley RWRF, are spread throughout EMWD's service area. A network of pipelines connects the five RWRFs, as well as several distribution storage ponds, to manage the delivery of recycled water. (EMWD, 2021a. p. 3-3)

Water service is currently provided to the existing residential uses located on the southern portion of the Project site. Under existing conditions, there is an 18-inch water main located within the existing improved right-of-way (ROW) of Cajalco Road, and an 8-inch water line located within the existing improved ROW of Seaton Avenue.

B. Sewer Service

EMWD is responsible for all wastewater collection and treatment in its service area. It has five operational RWRFs located throughout EMWD. Inter-connections between the local collection systems serving each treatment plant allow for operational flexibility, improved reliability, and expanded deliveries of recycled water. All of EMWD's RWRFs produce tertiary effluent, suitable for all permitted uses, including irrigation of food crops and full-body contact. The five RWRFs currently have a combined capacity of 78,000,000 gallons per day (gpd), or approximately 87,371 acre-feet per year (AFY). Collectively, the RWRFs within EMWD collect and treat approximately 50.4 million gpd of wastewater, and have a capacity to treat approximately 78.0 million gpd. Sewer flows from the Project area are treated by either the Moreno Valley RWRF or the Perris Valley RWRF, which have a combined daily capacity of 38.0 million gpd and typical daily flows of 27.0 million gpd. (EMWD, n.d.)

Under existing conditions, there is an existing sewer main within the improved ROW of Cajalco Road along the Project site's frontage with this roadway.

C. *Solid Waste Services*

The Riverside County Department of Waste Resources (RCDWR) is responsible for the efficient and effective landfill disposal of non-hazardous county waste within the County, and operates five active landfills in addition to holding a contract agreement to dispose of waste at the private El Sobrante Landfill (Riverside County, 2015a, p. 4.17-36). Solid waste generated in the Project area is disposed of at either the El Sobrante Landfill, Lamb Canyon Landfill, or Badlands Landfill. The El Sobrante Landfill is currently permitted to receive 16,054 tons per day (tpd), while the average daily tonnage in May 2023 was 10,844.51 tpd (CalRecycle, 2023a). The Lamb Canyon Landfill is permitted to receive 5,000 tpd, while data from June 2023 shows that the Lamb Canyon Landfill received a daily average of approximately1,869.42 tpd (CalRecycle, 2023b). The Badlands Landfill is permitted to receive 4,800 tpd, while in May 2023 the Badlands Landfill received an average of 2,883.10 tpd (CalRecycle, 2023c).

D. *Other Services*

The Project site also is located in the service territories of the Southern California Gas Company (natural gas) and Southern California Edison (electricity) (CEC, 2020a; CEC, 2020b).

2.5.13 Rare and Unique Resources

As required by CEQA Guidelines § 15125(c), the environmental setting should identify any inconsistencies between a proposed project and applicable general, specific, or regional plans, and place special emphasis on resources that are rare or unique to that region and would be affected by the project. The principal discretionary actions required of Riverside County to implement the Project are described in detail in Section 3.0, *Project Description*, and are listed in Table 3-2, *Matrix of Project Approvals/Permits*. Based on the existing conditions of the Project site and surrounding area described above and discussed in more detail in Section 4.0, *Environmental Analysis*, there is an existing stream in the southeast portion of the southern portions of the Project site that contains riparian habitat, including black willow, mule fat, tamarisk, and a sporadic presence of invasive tree tobacco and castor bean adding to the canopy layer. There are no other rare or unique biological resources on the Project site under existing conditions.

3.0 PROJECT DESCRIPTION

This section provides all of the information required of an EIR Project Description by California Environmental Quality Act (CEQA) Guidelines § 15124, including a description of the Project's precise location and boundaries; a statement of the Project's objectives; a description of the Project's technical, economic, and environmental characteristics; and a description of the intended uses of this EIR, including a list of the government agencies that are expected to use this EIR in their decision-making processes; a list of the permits and approvals that are required to implement the Project; and a list of related environmental review and consultation requirements.

3.1 SUMMARY OF THE PROPOSED PROJECT

The Project as evaluated herein consists of application for a Foundation General Plan Amendment (GPA No.240005), Change of Zone (CZ 2200062), Plot Plan (PPT 220050), and Tentative Parcel Map No. 38601 (TPM 38601) to allow for future development of a 64.97 gross acre property with a 1,003,510 square-foot (s.f.) warehouse building on 44.66 net acres and a public park on approximately 13.33 net acres, along with approximately 6.98 acres of proposed right-of-way (ROW) dedications. The site proposed for development with the warehouse building is located at the southwest corner of Seaton Avenue and Cajalco Road, between Seaton Avenue and Decker Road, while the site proposed for the public park occurs both east and west of Decker Road, approximately 185 feet south of the proposed warehouse building site. Under existing conditions, the Project site is occupied by 26 single-family homes and a commercial structure. As part of the Project, all of the dwelling units and commercial building would be demolished to accommodate the proposed warehouse and park uses on site. The governmental approvals requested from Riverside County to implement the Project consist of the following:

1. Adoption by resolution of a Foundation General Plan Amendment (GPA No. 240005);
2. Adoption by ordinance of a Change of Zone (CZ 2200062);
3. Adoption by resolution of a Plot Plan (PPT 220050);
4. Adoption by resolution of a Tentative Parcel Map (TPM 38601); and
5. Certification of this EIR.

The Project's applications, as submitted to the County of Riverside by the Project Applicant, are herein incorporated by reference pursuant to State CEQA Guidelines § 15150 and are available for review at the Riverside County Planning Department, 4080 Lemon Street, 12th Floor, Riverside, CA 92501. All other discretionary and administrative approvals that would be required of the County of Riverside or other government agencies also are within the scope of the Project analyzed in this EIR.

3.2 REGIONAL SETTING

The Project site encompasses 64.97 acres and is located within the western portion of Riverside County. Figure 2-1 (previously presented) depicts the Project site's location within the regional vicinity. As shown, Riverside County abuts San Bernardino County to the north; Orange County to the west; and San Diego and Imperial Counties to the south. Riverside County is located in an urbanizing area of southern California commonly

referred to as the Inland Empire. The Inland Empire is an approximate 28,000 square-mile region comprising western San Bernardino County, western Riverside County, and the eastern reaches of Los Angeles County.

3.3 PROJECT LOCATION AND SETTING

The 64.97-acre Project site that is the subject of this EIR is located within the Mead Valley community of unincorporated Riverside County, west of Interstate 215 (I-215), south of State Routes 91 (SR 91) and 60 (SR 60), and north of State Route 74 (SR 74). More specifically, and as previously depicted on Figure 2-2, the Project site comprises two disjointed parcels of land. The northern portion of the Project site, which is proposed for development with warehouse use as part of the Project, comprises 50.04 gross acres and is located south of Cajalco Road, west of Seaton Avenue, east of Decker Road, and north of Rider Street. The southern portion of the Project site, which is proposed for development with a public park as part of the Project, comprises 14.93 gross acres located both east and west of Decker Road, approximately 185 feet south of the proposed warehouse building site. The 64.97-gross-acre Project site encompasses Assessor's Parcel Numbers (APNs) 317-080-(003 through 008, 013, 014, 019 through 023, and 027 through 029), 317-090-(002 and 008), and 317-090-(003 thru 007).

Under existing conditions, the northern portion of the Project site (proposed for development with warehouse use) includes undeveloped land, multiple large-lot single-family residential homes with ancillary structures and outdoor storage, and a commercial structure (Craneology, Inc.). Land uses in the vicinity of the northern portion of the Project site include Cajalco Road to the north, beyond which are undeveloped lands, an existing office use (J&D Multiple Services), agricultural uses, and rural residential uses; Seaton Avenue to the east, beyond which are undeveloped land, several residential structures, a small businesses (JJ Rentals) and associated outdoor storage, and two large warehouse buildings; a~~n undeveloped~~ parcel owned by Metropolitan Water District (MWD) that consists of a developed utility corridor with a subterranean aqueduct, the southern portion of the Project site, a Buddhist temple (Huong Sen Buddhist Temple), an existing residence, several ancillary structures, and outdoor storage to the south; and undeveloped lands to the west.

Under existing conditions, the southern portion of the Project site (proposed for development with a public park) includes a mixture of undeveloped land and multiple single-family homes with a variety of ancillary structures and outdoor storage. Land uses in the vicinity of the southern portion of the Project site include an undeveloped parcel owned by MWD and the northern portion of the Project site to the north; undeveloped land, a Buddhist temple (Huong Sen Buddhist Temple), an existing residence, several ancillary structures, and outdoor storage to the east; undeveloped lands, large-lot single family uses, and several ancillary structures to the south; and large-lot single-family uses with several ancillary structures and outdoor storage to the west, beyond which is undeveloped land.

3.4 STATEMENT OF OBJECTIVES

The underlying purpose and goal of the proposed Project is to accomplish the development of underutilized property with a public park as well as an economically viable, employment-generating use that is compatible with the surrounding area. The Project's proposed warehouse use aligns with various aspects of the SCAG's 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS; also referred to as

"Connect SoCal"), particularly the facilitation of goods movement industries and the generation of local employment opportunities that can reduce the need for long commutes to and from work. The following objectives are intended to achieve these underlying purposes:

A. To serve the recreational needs of the local Mead Valley community by developing a public park that includes a variety of amenities, such as play fields, hard surface sport courts, playground, and walking paths.

B. To expand employment uses in the Mead Valley community of Riverside County to supply jobs and support the growing goods movement supply chain.

C. To develop supply chain uses in close proximity to designated truck routes and the State highway system to avoid or shorten vehicular trip lengths on other roadways.

D. To expand economic development, facilitate job creation, and increase the tax base for Riverside County by accommodating and diversifying facilities needed to support the goods movement supply chain.

E. To develop a Class A light industrial building in the Mead Valley community of unincorporated Riverside County that is designed to meet contemporary industry standards and be economically competitive with similar industrial buildings in the local area and region.

F. To attract a new employment-generating business in unincorporated Riverside County, thereby growing the economy and providing a more equal jobs-housing balance in the local area that will reduce the need for members of the local workforce to commute outside the area for employment.

G. To diversify the economy of western unincorporated Riverside County by developing a large property with employment-generating land uses with long-term economic viability.

H. To develop a building that has architectural design and operational characteristics that are compatible with other existing and planned developments in the local area.

I. To develop a property that has access to available infrastructure, including roads and utilities.

3.5 PROJECT'S COMPONENT PARTS AND DISCRETIONARY APPROVALS

The Project evaluated in this EIR involves applications for a Foundation General Plan Amendment (GPA No. 240005), Change of Zone (CZ 2200062), Plot Plan (PPT 220050), and a Tentative Parcel Map (TPM 38601). The principal discretionary actions required of Riverside County to implement the Project are described in detail on the following pages. Additional discretionary and administrative actions that would be required of other agencies in order to implement the Project are listed in Table 3-3, *Matrix of Project Approvals/Permits*, at the end of this Section.

3.5.1 Foundation General Plan Amendment (GPA No. 240005)

As shown on Figure 3-1, *Proposed General Plan Foundation Amendment*, under existing conditions, approximately 4.7 acres in the northeastern portion of the northern portion of the Project site are designated by the Riverside County General Plan for "Community Development – Commercial Retail (CD-CR)" land uses, while the remaining +/- 60.2 acres of the Project site are designated for "Rural Community – Very Low Density Residential (RC-VLDR)" land uses. The Project Applicant is seeking to re-designate the northern 44.66 net acres of the Project site to instead allow for "Community Development – Light Industrial (CD-LI)" land uses, and to re-designate the southern 13.33 net acres of the Project site for "Open Space – Recreation (OS-R)" land uses. The CD-LI land use designation allows for a wide variety of industrial and related uses, including assembly and light manufacturing, repair and other service facilities, warehousing, distribution centers, and supporting retail uses, with building intensities ranging from 0.25 to 0.6 Floor Area Ratio (FAR). The OS-R land use designation allows for active and passive recreational uses such as parks, trails, campgrounds, athletic fields, golf courses, and off-road vehicle parks, along with ancillary structures that may be permitted for recreational opportunities.

Pursuant to Chapter 11 (Administration Element) of the Riverside County General Plan, the Project Applicant's proposal to re-designate the southern 13.33 net acres of the Project site for OS-R land uses would comprise an "Entitlement/Policy Amendment," which would be subject to the County's normal processes for approval of amendments to the General Plan, wherein amendments to the General Plan may be approved up to four (4) times per year in accordance with State law. However, the Project Applicant's proposal to re-designate the northern 44.66 net acres of the Project site to allow for "CD-LI" land uses represents a Foundation Amendment to the General Plan and is subject to special procedures as outlined in the General Plan Administration Element. As noted by the General Plan, "[t]he premise for a Foundation Amendment is that the General Plan will only be amended in any fundamental way for significant cause." There are two ways that Foundation Amendments may occur: 1) as part of a regular General Plan Review cycle, or 2) as a result of extraordinary events ("Extraordinary Amendment"). Extraordinary Amendments may be approved as part of the County's regular procedures for approving amendments to the General Plan. However, a regular General Plan Review cycle amendment only may be approved once every eight (8) years, with the next General Plan Review cycle occurring in 2024. The Project's GPA would entail a regular General Plan Review cycle amendment, and the Project's proposed GPA is expected to be included in the list of amendments to the General Plan to be considered as part of the 2024 General Plan Review cycle.

3.5.2 Change of Zone (CZ 2200062)

The Riverside County Zoning Ordinance (Riverside County Ordinance No. 348), which is part of the County's Municipal Code, assigns a zoning classification to all properties within unincorporated Riverside County. Development is required by law to comply with the provisions of the Zoning Ordinance. As shown on Figure 3-2, *Change of Zone No. 2200062*, under existing conditions, approximately 4.7 acres in the northeast portion of the Project site are zoned for "Rural Residential, Minimum ½-Acre Lot Sizes (R-R-1/2)," while the remaining approximately +/- 60.2 acres of the Project site are zoned for "Light Agriculture (A-1-1)." The Project Applicant is proposing a Change of Zone (CZ 2200062), which would amend the County of Riverside

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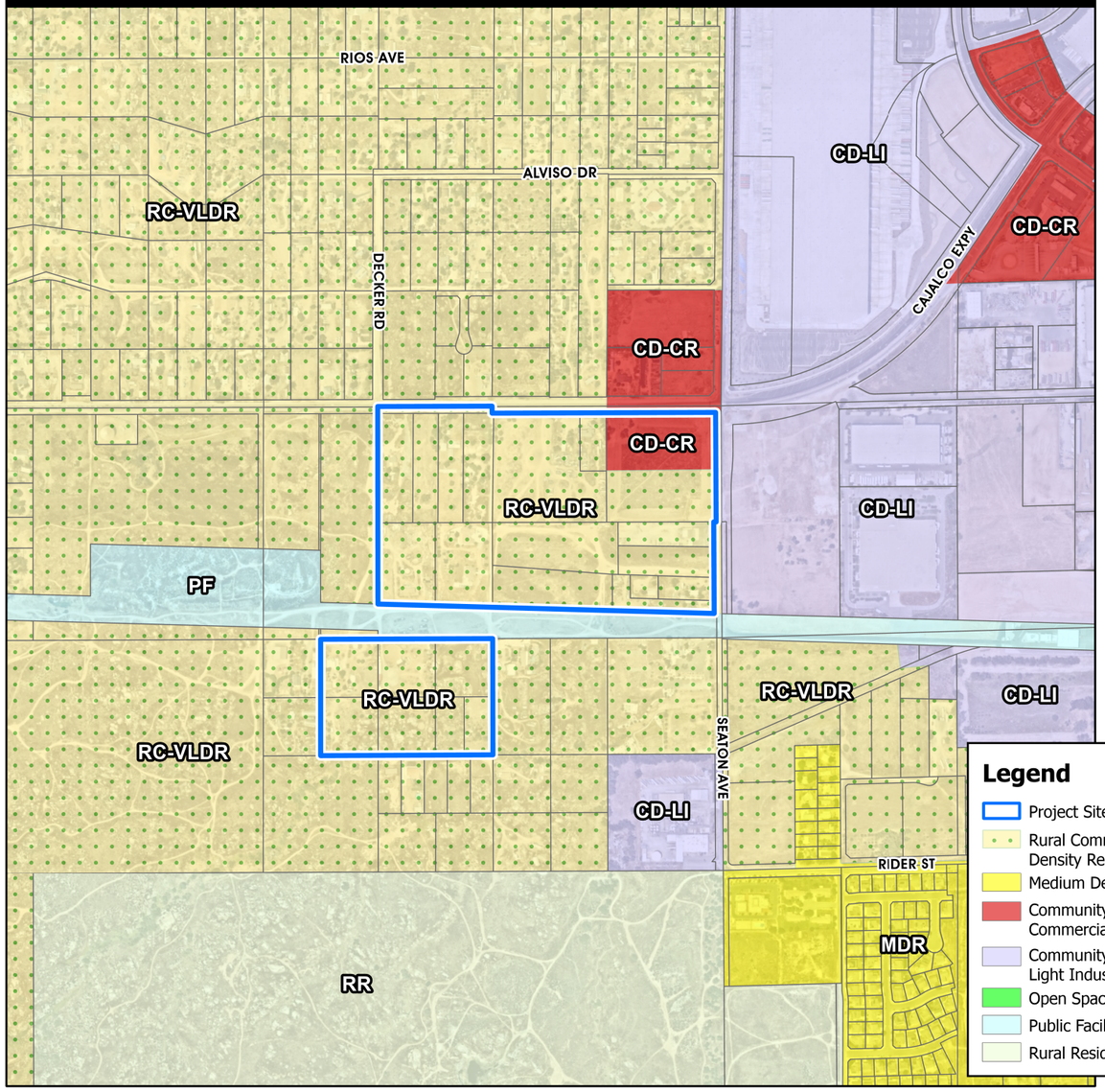

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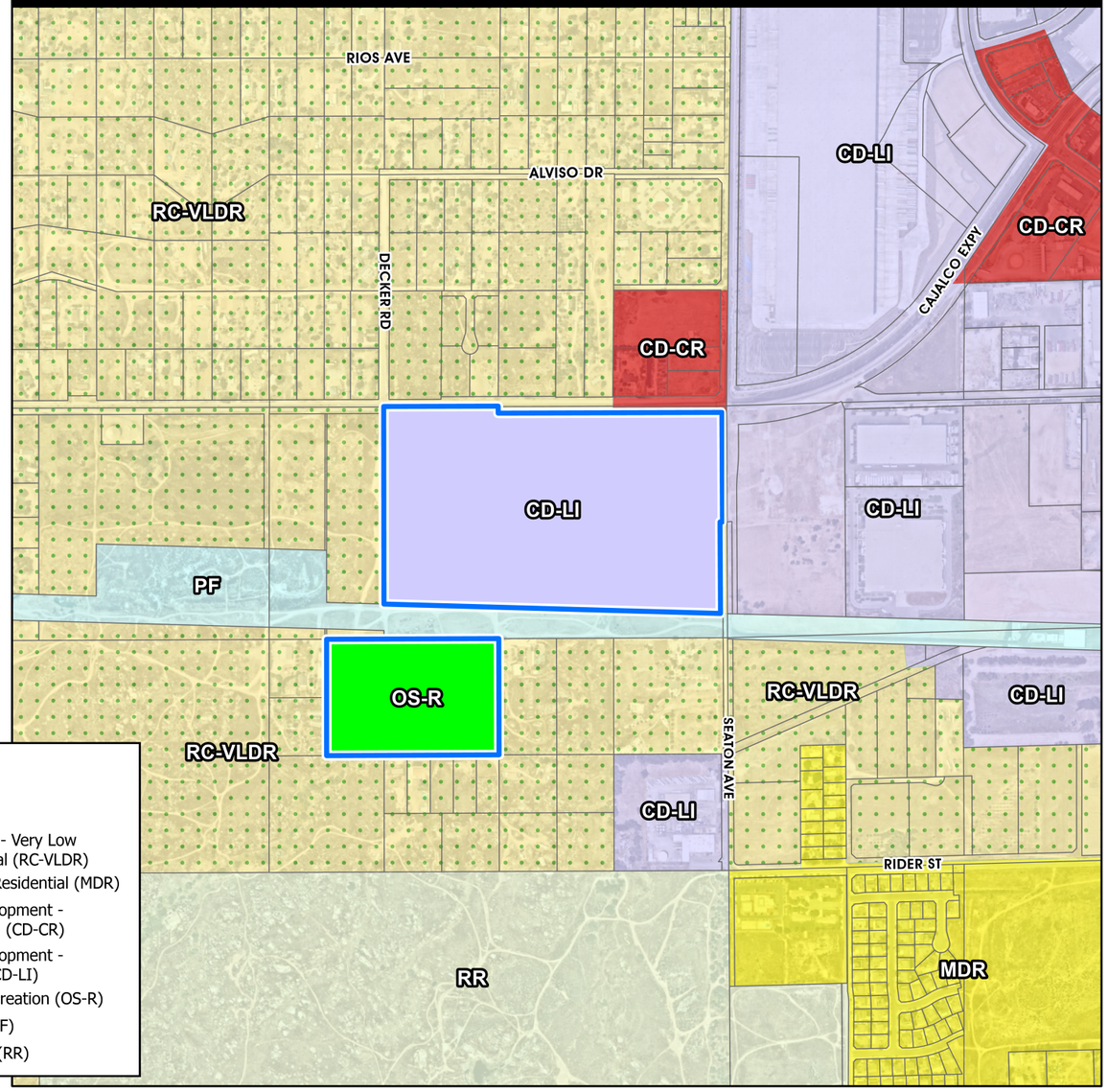


Legend

- Project Sites
- Rural Community - Very Low Density Residential (RC-VLDR)
- Medium Density Residential (MDR)
- Community Development - Commercial Retail (CD-CR)
- Community Development - Light Industrial (CD-LI)
- Open Space - Recreation (OS-R)
- Public Facilities (PF)
- Rural Residential (RR)

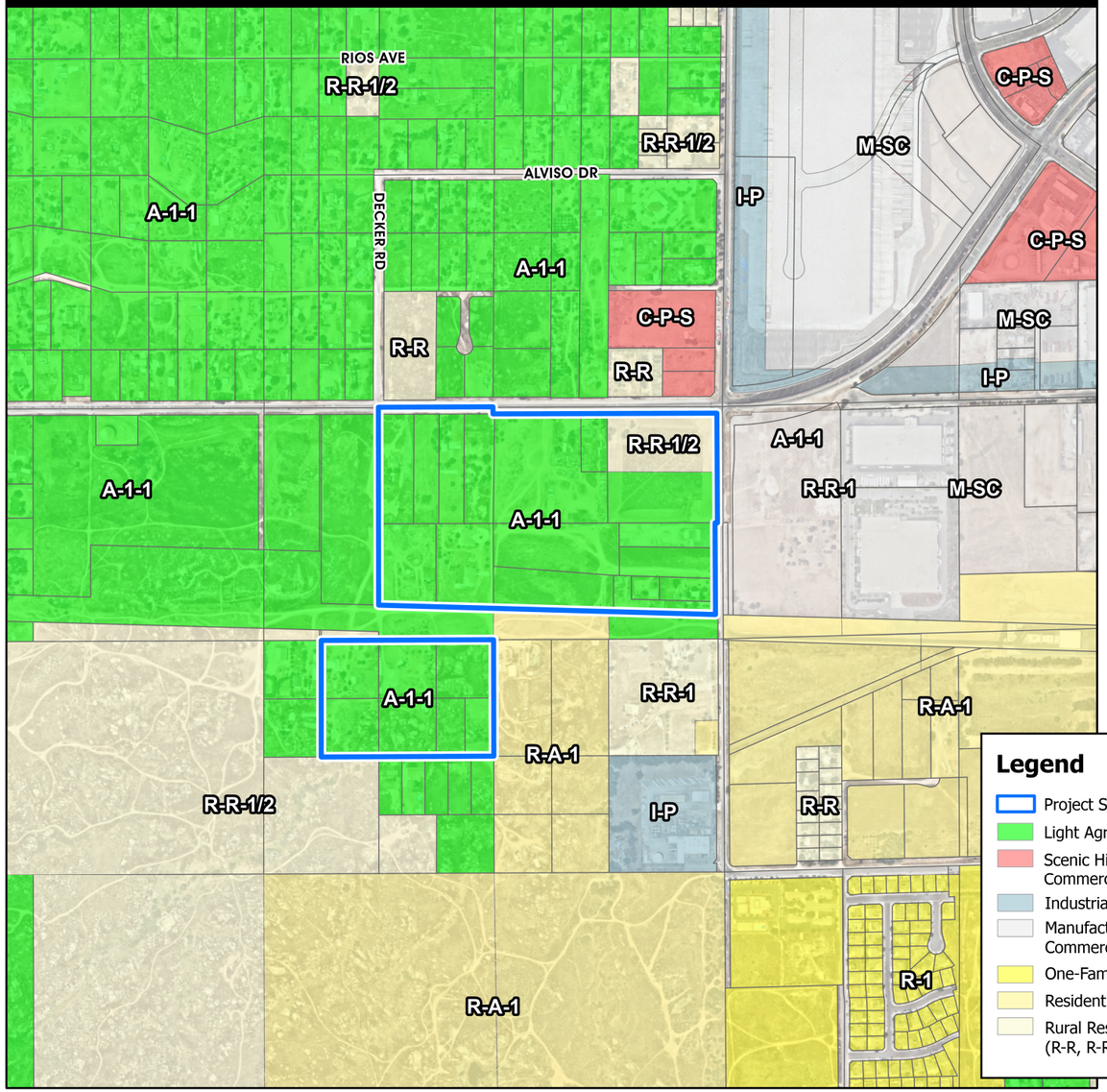
Source(s): ESRI, NearMap Imagery (May 2023), RCIT (2023)

0 250 500 1,000 Feet

Figure 3-1

Proposed General Plan Foundation Amendment

EXISTING



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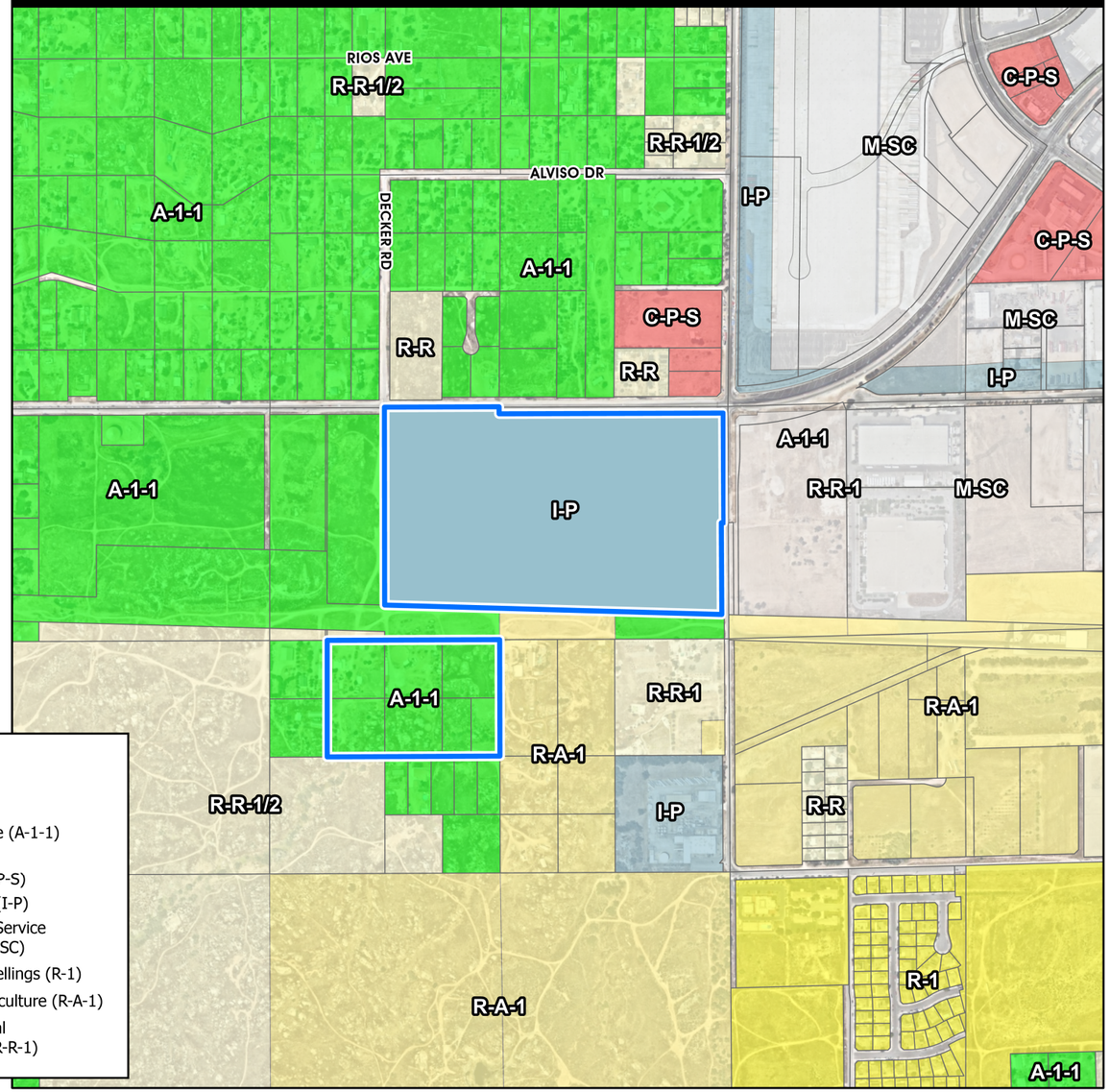


Legend

- Project Sites
- Light Agriculture (A-1-1)
- Scenic Highway Commercial (C-P-S)
- Industrial Park (I-P)
- Manufacturing-Service Commercial (M-SC)
- One-Family Dwellings (R-1)
- Residential-Agriculture (R-A-1)
- Rural Residential (R-R, R-R-1/2, R-R-1)

Source(s): ESRI, NearMap Imagery (May 2023), RCIT (2023)

0 250 500 1,000 Feet

Figure 3-2

Change of Zone No. 2200062

zoning classifications for the Project site. As shown on Figure 3-2, as part of CZ 2200062 the northern 44.66 net acres of the Project site would be rezoned from "A-1-1" and "R-R-1/2" to "Industrial Park (I-P)." No changes are proposed to the existing zoning classification assigned the southern 13.33 net acres of the Project site, as the existing "A-1-1" zoning classification for this portion of the Project site already allows for the proposed public park use. The purpose of the I-P zoning designation is to provide area for a broad range of industrial uses, manufacturing, utilities, and related use.

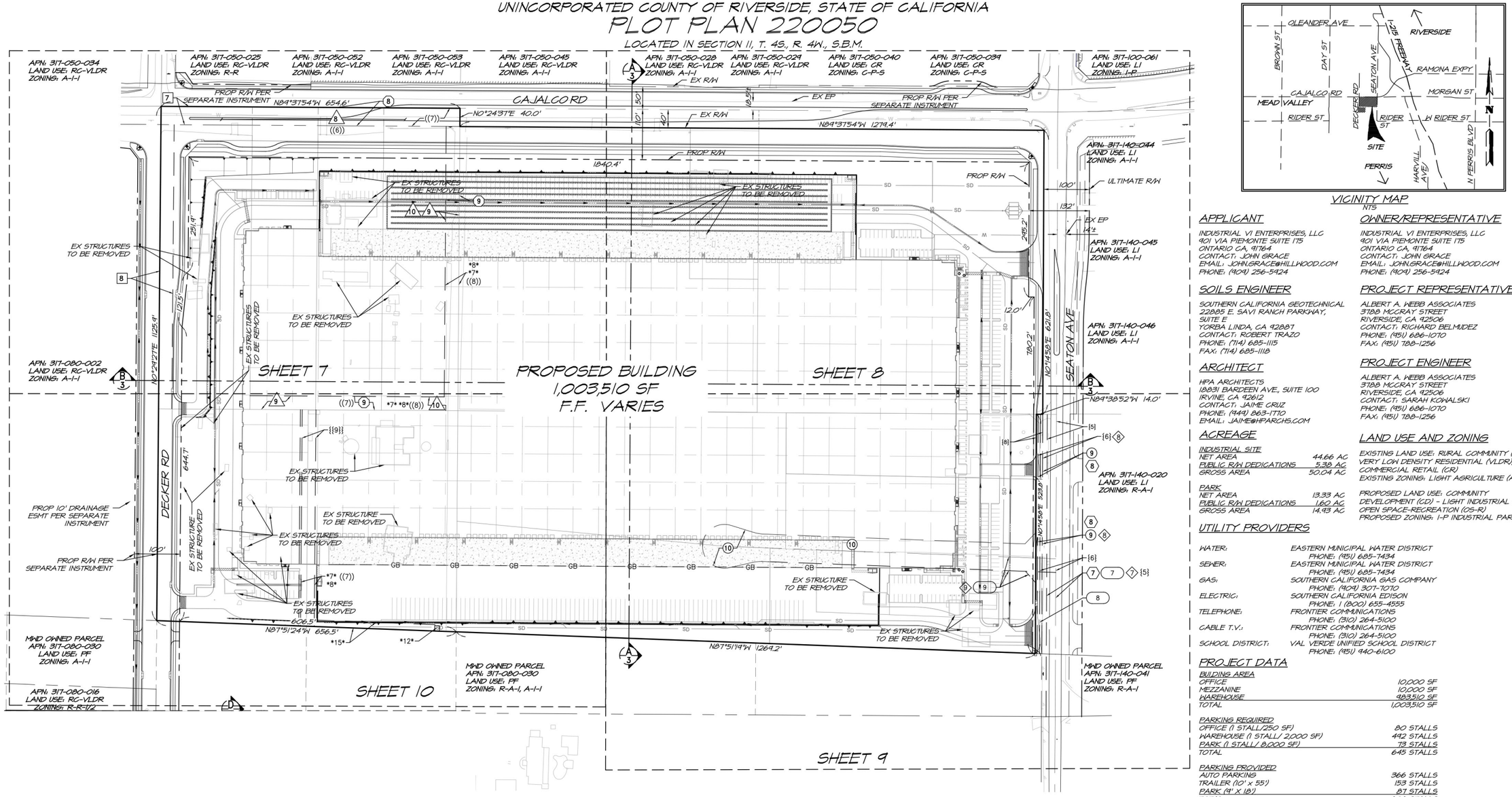
3.5.3 Plot Plan No. 220050 (PPT 220050)

The Project Applicant is proposing to develop approximately 44.66 net acres of the northern portions of the Project site with one light industrial warehouse building with a total building area of 1,003,510 square feet, in addition to a public park proposed on approximately 13.33 net acres. Section 10.1 of Riverside County Ordinance No. 348, which establishes permitted uses within the I-P zone, allows for industrial uses with approval of an Industrial Park Plot Plan. Accordingly, Plot Plan No. 220050 (PPT 220050) is proposed to allow for the development of an industrial warehouse building and to allow for the future construction of a public park in the southern portions of the site. Figure 3-3, *Plot Plan No. 220050 Site Plan* (Warehouse Building), depicts the PPT 220050 conceptual site plan for the northern portions of the Project site, while Figure 3-4, *Plot Plan No. 220050 Site Plan (Park Site)*, depicts the conceptual site plan for the park site. Major components of PPT 220050 are discussed below.

B. Site Plan and Building Configuration

As depicted on Figure 3-3, the Project Applicant is proposing to develop the northern 44.66 net acres of the Project site with one (1) light industrial warehouse building at the southwest corner of Seaton Avenue and Cajalco Road, while the remaining 13.33 net acres in the southern portions of the Project site would be developed as a public park.

The proposed light industrial warehouse building would include 983,510 s.f. of warehouse space, 10,000 s.f. of office space, and 10,000 s.f. of mezzanine space for a total of 1,003,510 s.f. of building area. Office spaces may be located at each of the corners of the building. For purposes of analysis in this EIR, up to 150,526 s.f. of the warehouse building (15% of the building space) is assumed to consist of high-cube cold storage warehouse uses, with the remaining 852,984 s.f. of the building space consisting of high-cube fulfillment center uses. Although 15% of the building is evaluated as potentially containing a high-cube cold storage warehouse use, mitigation is presented in EIR Subsection 4.13, *Noise*, that prohibits high-cube cold storage warehouse uses from occupying the building until or unless it can be demonstrated through a subsequent noise analysis that nighttime operational-related noise levels would not exceed the County's Noise Ordinance nighttime standard of 45 dBA Leq at offsite residential receptor locations. Under current conditions and the existing locations of offsite residential uses, cold storage uses would not be permitted. A total of 76 dock doors are proposed along the north side of the building and a total of 76 dock doors are proposed along the south side of the building. A total of 366 automobile parking spaces are proposed, including 286 standard parking spaces, two Americans with Disabilities Act (ADA) van parking stalls, six ADA standard parking stalls, 49 electric vehicle (EV) capable stalls (without electric vehicle supply equipment [EVSE]), 18 EV capable



VICINITY MAP
NTS

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YORBA LINDA, CA 92887
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FAX: (951) 788-1256

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PHONE: (951) 686-1070
FAX: (951) 788-1256

ACREAGE

INDUSTRIAL SITE	
NET AREA	44.66 AC
PUBLIC R/W DEDICATIONS	5.38 AC
GROSS AREA	50.04 AC
PARK	
NET AREA	13.33 AC
PUBLIC R/W DEDICATIONS	1.60 AC
GROSS AREA	14.93 AC

LAND USE AND ZONING

EXISTING LAND USE: RURAL COMMUNITY (RC) - VERY LOW DENSITY RESIDENTIAL (VLDR), COMMERCIAL RETAIL (CR)
EXISTING ZONING: LIGHT AGRICULTURE (A-1)

PROPOSED LAND USE: COMMUNITY DEVELOPMENT (CD) - LIGHT INDUSTRIAL (LI), OPEN SPACE-RECREATION (OS-R)
PROPOSED ZONING: I-P INDUSTRIAL PARK

UTILITY PROVIDERS

WATER:	EASTERN MUNICIPAL WATER DISTRICT PHONE: (951) 685-7434
SEWER:	EASTERN MUNICIPAL WATER DISTRICT PHONE: (951) 685-7434
GAS:	SOUTHERN CALIFORNIA GAS COMPANY PHONE: (909) 307-7070
ELECTRIC:	SOUTHERN CALIFORNIA EDISON PHONE: 1 (800) 655-4555
TELEPHONE:	FRONTIER COMMUNICATIONS PHONE: (310) 264-5100
CABLE T.V.:	FRONTIER COMMUNICATIONS PHONE: (310) 264-5100
SCHOOL DISTRICT:	VAL VERDE UNIFIED SCHOOL DISTRICT PHONE: (951) 940-6100

PROJECT DATA

BUILDING AREA	
OFFICE	10,000 SF
MEZZANINE	10,000 SF
WAREHOUSE	983,510 SF
TOTAL	1,003,510 SF
PARKING REQUIRED	
OFFICE (1 STALL/250 SF)	80 STALLS
WAREHOUSE (1 STALL/ 2,000 SF)	492 STALLS
PARK (1 STALL/ 8,000 SF)	73 STALLS
TOTAL	645 STALLS
PARKING PROVIDED	
AUTO PARKING	366 STALLS
TRAILER (10' x 55')	153 STALLS
PARK (9' X 18')	87 STALLS
TOTAL	606 STALLS

Source(s): Albert A. Webb Associates (09-12-2024)

Figure 3-3

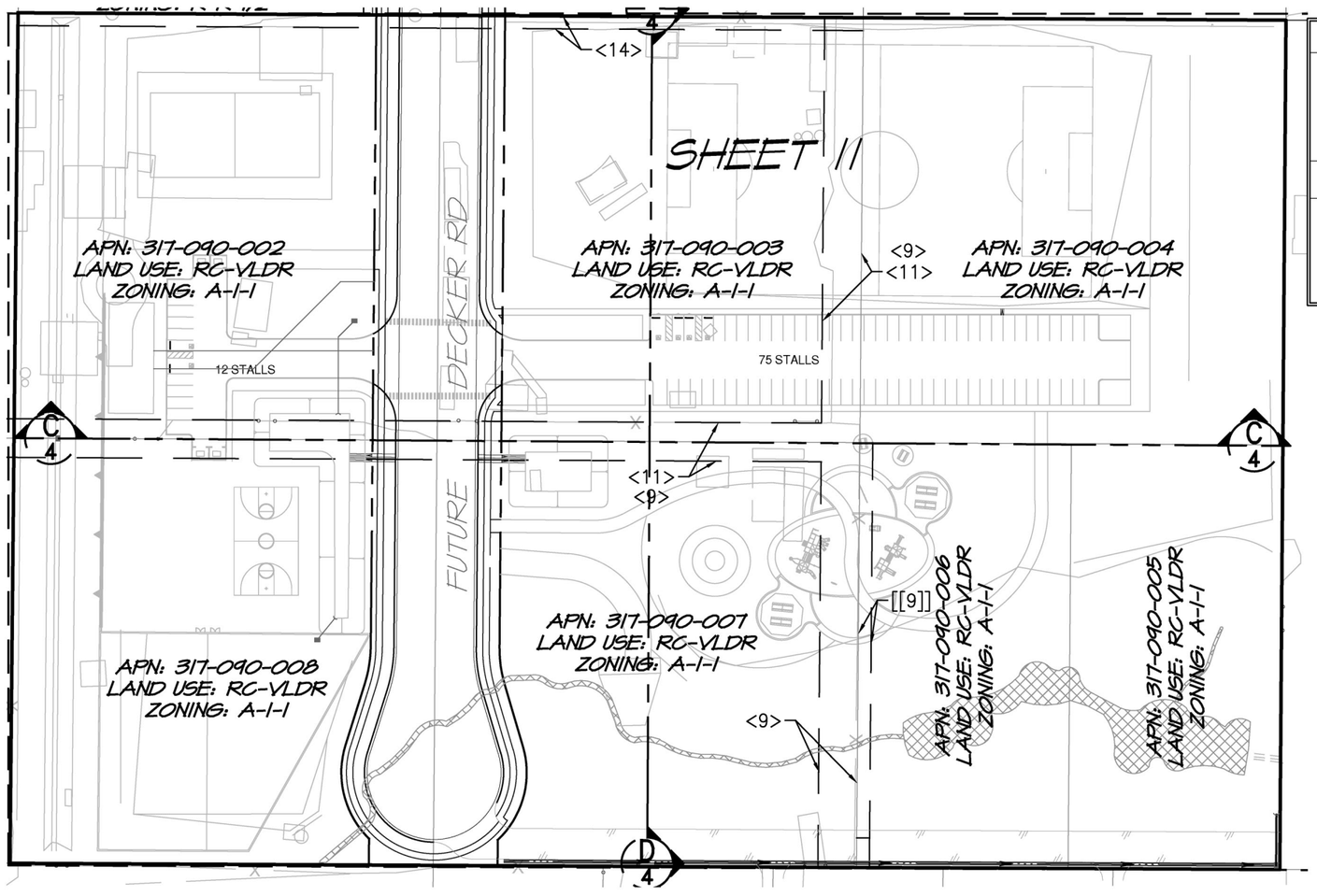
Not to Scale

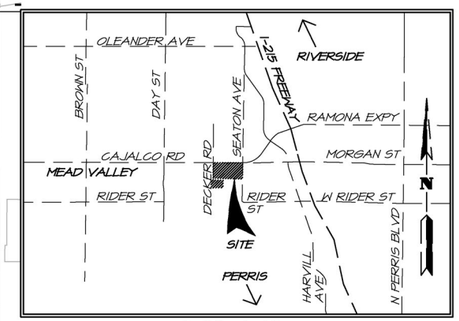
Plot Plan No. 220050 Site Plan (Warehouse Building)

UNINCORPORATED COUNTY OF RIVERSIDE, STATE OF CALIFORNIA

PLOT PLAN 220050

LOCATED IN SECTION 11, T. 4S., R. 4W., S.B.M.





VICINITY MAP
NTS

Source(s): Albert A. Webb Associates (06-07-2024)

Figure 3-4

Not to Scale

Plot Plan No. 220050 Site Plan (Park Site)

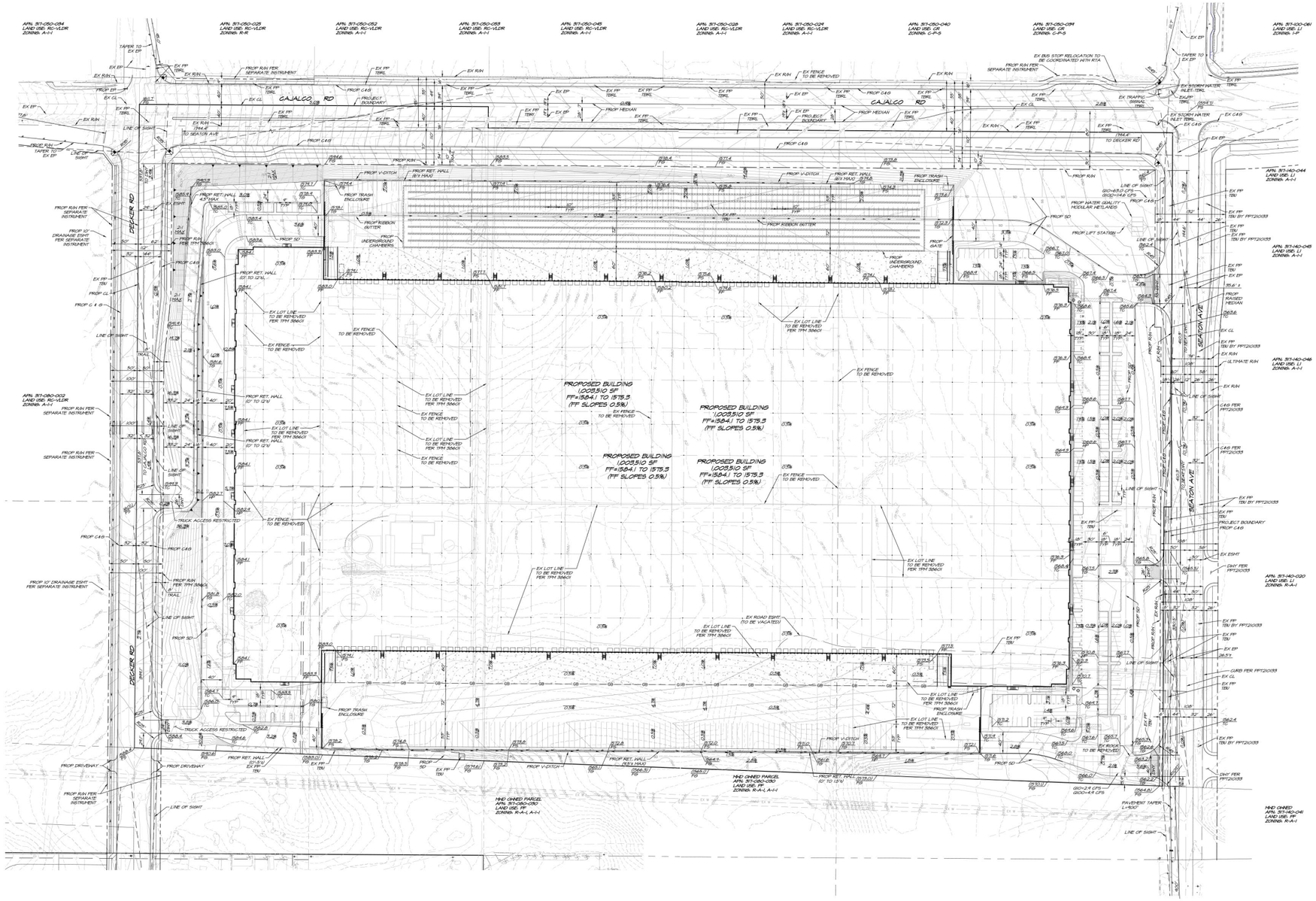
stalls (with EVSE), one ADA EV van parking stall, two ADA EV standard parking stalls, and two EV ambulatory stalls. Access to the light industrial warehouse building site is proposed via 2 driveways along Decker Road (from north to south, Driveways 1 and 2) and three driveways along Seaton Avenue (from north to south, Driveways 3 through 5). Driveways 1 and 2 along Decker Road, as well as Driveway 4 along Seaton Avenue (i.e., the central driveway along Seaton Avenue), would be restricted to passenger vehicles only. Driveways 3 and 5 along Seaton Avenue (i.e., the northern and southern driveways) would serve both passenger cars and trucks. As shown on Figure 3-3, PPT 220050 also would accommodate a public park on approximately 13.33 acres in the southwest portion of the Project site along the eastern and western sides of Decker Road. The public park is designed to include a play field, hard surfaces sport courts, a playground, walking paths, dog parks, and other amenities. Access to the park site would be accommodated via Decker Road, with two parking lots extending east and west from Decker Road. The parking lots would include a total of 81 standard parking stalls, two ADA van parking stalls, and four standard ADA stalls (87 parking spaces total).

C. *Grading and Site Work*

1. *PPT 220050 Grading Plan*

Figure 3-5, *Plot Plan No. 220050 Grading Plan (Warehouse Site)*, depicts the proposed grading plan for the northern 50.04 gross acres of the Project site that are proposed for development with warehouse uses. As previously noted, prior to commencement of grading the existing 26 single family homes and the existing commercial structure on site would be demolished. As shown on Figure 3-5, following demolition activities the northern portions of the Project site would be graded in a manner that largely approximates the site's existing topographic conditions. Grading of the northern 50.04 gross acres of the Project site would require a total of 246,100 cubic yards (cy) of cut and 79,400 cy of fill, resulting in the net export of approximately 166,700 cy of material. As shown on Figure 3-5, manufactured slopes are proposed primarily around the northern and western edges of the proposed light industrial building site. Within the northwestern corner of this portion of the Project site, a 2:1 (horizontal:vertical) slope is proposed measuring up to 22 feet in height. Slopes along the northern side of the proposed warehouse building site would measure up to eight feet in height and would be supported by a retaining wall measuring up to six feet in height. Slopes in the western portion of the warehouse building site would measure up to 15 feet in height, and a portion of this slope in the central part of the western boundary would be supported by a retaining wall measuring up to 12 feet in height, with the size of proposed slopes generally decreasing from north to south. No major manufactured slopes are proposed along the eastern portion of the warehouse building site, while the southern edge of the industrial building site would include minimal areas of manufactured slopes and a proposed retaining wall measuring up to 9.5 feet in height. In addition, as a component of grading activities in the northern portions of the Project site, the existing overhead power lines would be undergrounded, and the existing power poles would be removed.

Figure 3-6, *Plot Plan No. 220050 Grading Plan (Park Site)*, depicts the proposed grading plan for the southern 14.93 gross acres of the Project site that are proposed for development with park uses. As shown, following completion of demolition activities, the 14.93 gross acres in the southwestern portion of the Project site would

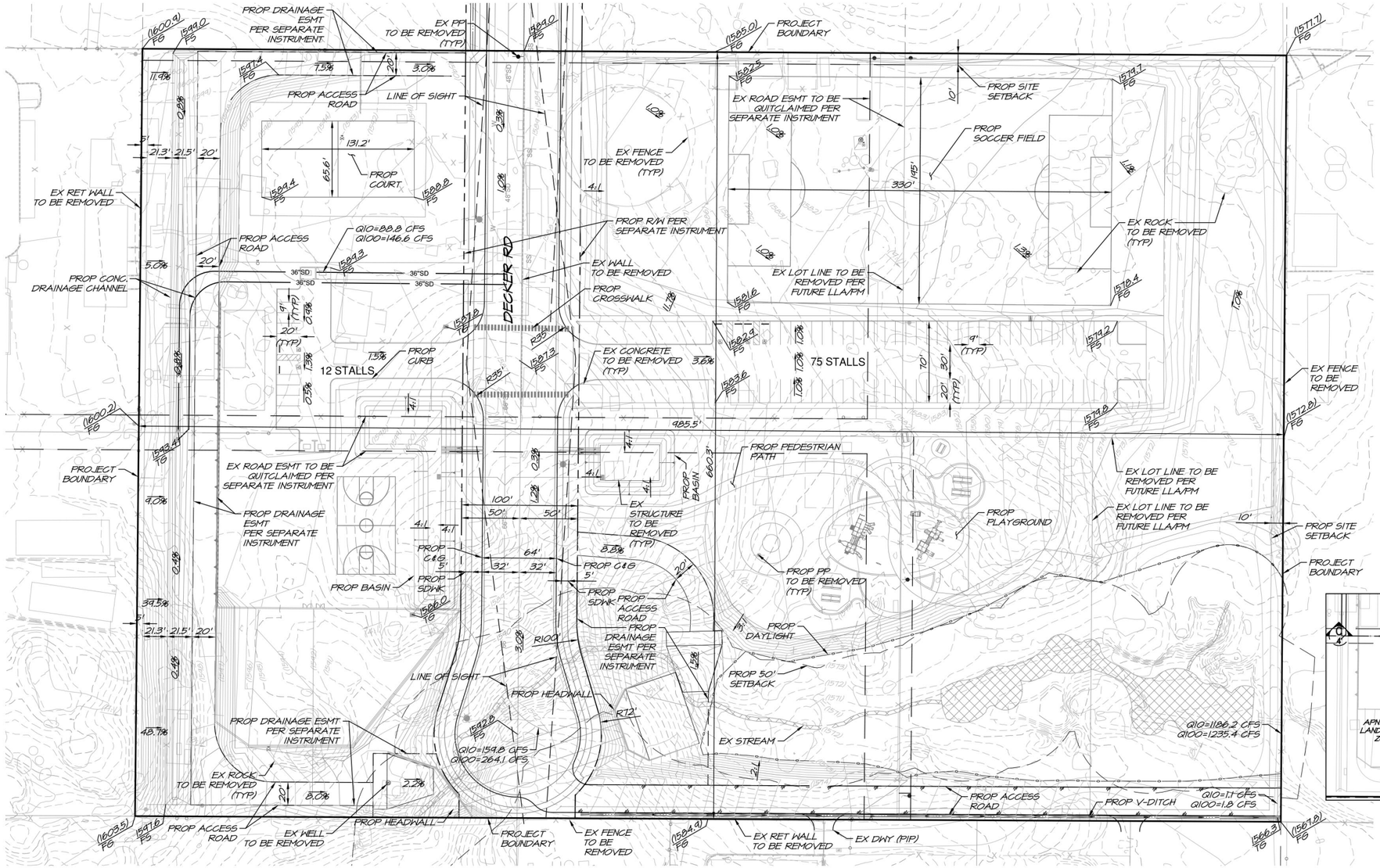


Source(s): Albert A. Webb Associates (09-12-2024)

Figure 3-5

Not to Scale

Plot Plan No. 220050 Grading Plan (Warehouse Site)



Source(s): Albert A. Webb Associates (09-12-2024)

Figure 3-6

Not to Scale

Plot Plan No. 220050 Grading Plan (Park Site)

require a total of 74,700 cy of cut and 22,600 cy of fill, resulting in the net export of approximately 52,100 cy of material; however, for purposes of evaluation within this EIR, and in order to provide a conservative estimate of the Project's potential impacts due to site grading activities, it is assumed that grading within the park site would require a total of 84,000 cy of cut and 32,600 cy of fill, resulting in the net export of approximately 51,400 cy of material. No retaining walls are proposed at the park site, and existing retaining walls along the southern and western boundaries of the park site would be removed as part of the Project. Manufactured slopes are proposed in the western portion of the park site measuring up to 14 feet in height, with smaller slopes proposed along the southern extent of Decker Road and within the southeastern portion of the park site. In addition, as a component of grading activities in the southern portions of the Project site, the existing overhead power lines would be undergrounded, and the existing power poles would be removed.

Overall, grading of both portions of the Project site would require approximately 218,100 cy of export to an off-site location. Soils that would be exported from the Project site would require haul trucks to travel approximately 7 miles from the Project site to an export site located in the City of Perris. The haul route would be Cajalco Expressway to the I-215 South, the I-215 South to Redlands Avenue, and Redlands Avenue to San Jacinto Avenue. The APNs for the anticipated receiver site for the exported material are as follows: 310-200-005, -014, 310-220-003, -022, -029, -047, -048, -055, and -056. Approximately 3,462 cy of dirt is anticipated to be exported from the Project site to the Perris site per day. At this rate, it would take 63 business days or approximately 3.2 months to complete the exporting of soils.

D. Architectural Design

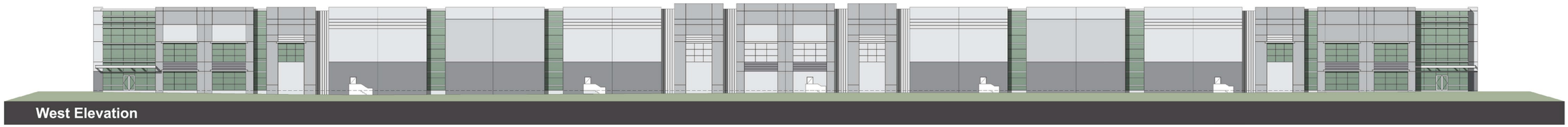
The proposed building elevations are depicted on Figure 3-7, *Conceptual Building Elevations*, while additional detail regarding the building façades is provided on Sheets DAB-A3.1 and DAB-A3.2 of the Project's Plot Plan application materials. As previously noted, the building is designed to include 76 dock doors on the southern façade of the building and 76 dock doors on the northern portion of the building, and office uses may be located at each of the four corners of the building. As shown, the building would consist of a concrete tilt-up panel building. The building would be painted with a mixture of dark and light grey colors and would be highlighted with areas of green clear glass with clear anodized aluminum mullions, particularly around the proposed office spaces. The heights of the proposed building would be variable and would measure up to a maximum of 44 feet at the corners of the building proposed to include office spaces.

In addition, a majority of the park site would be developed with recreational resources, with structures limited to playground equipment, shade structures, bleachers, etc. However, a recreation building is proposed within the western portion of the western parking lot for the park site. This building would measure approximately 3,000 s.f. in size and would include restrooms, conference rooms, and a concession stand.

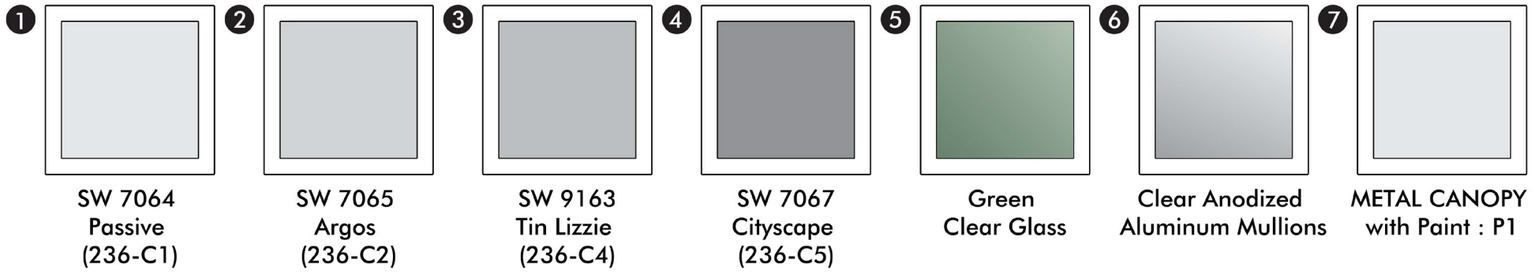
E. Circulation

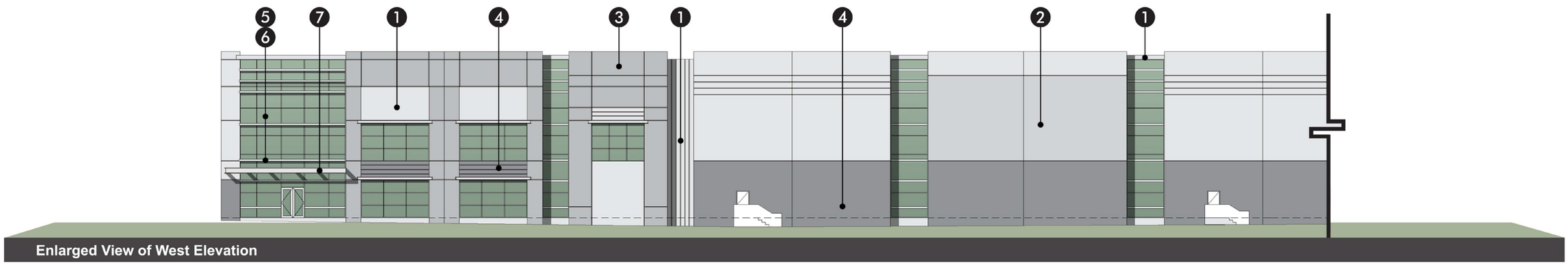
As previously shown on Figure 3-3, access to the Project site would be accommodated via Decker Road and Seaton Avenue via Cajalco Road. As part of the Project, improvements would be constructed along roadways abutting the Project site, including Cajalco Road, Seaton Avenue, and Decker Road. Figure 3-8, *Roadway Cross-Sections*, depicts the proposed roadway improvements, which are described below.

North Elevation



West Elevation





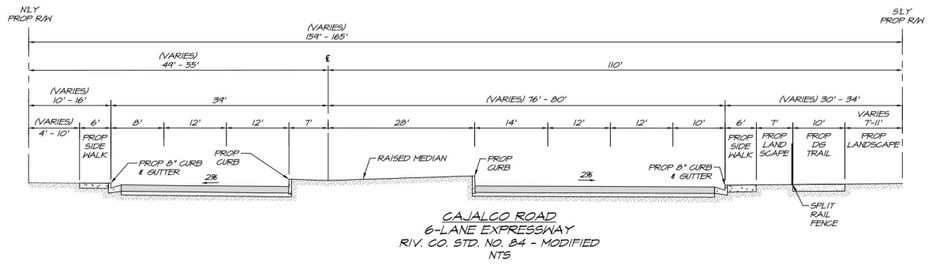
Enlarged View of West Elevation

Source(s): HPA (06-19-2023)

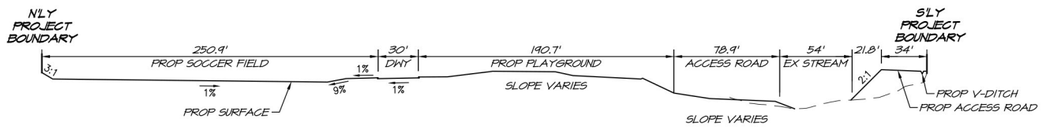
Figure 3-7

Not to Scale

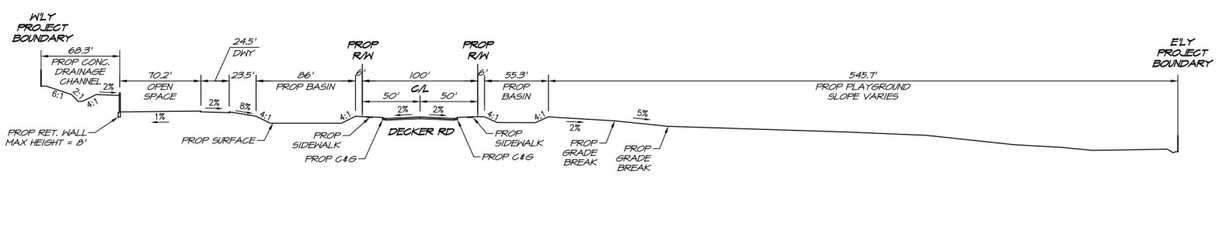
Conceptual Building Elevations



CAJALCO ROAD
6-LANE EXPRESSWAY
RIV. CO. STD. NO. 84 - MODIFIED
NTS



SECTION D-D
1"=50'



SECTION C-C
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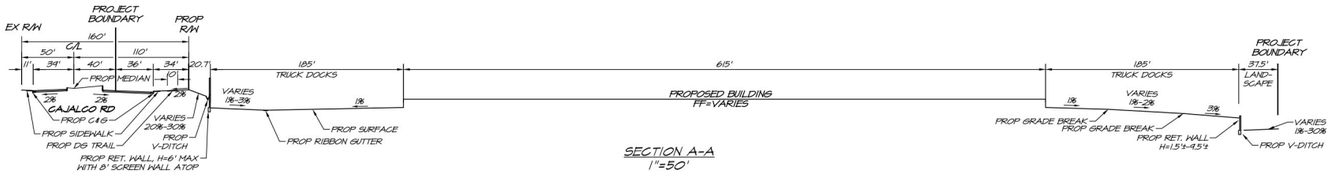

SECTION A-A
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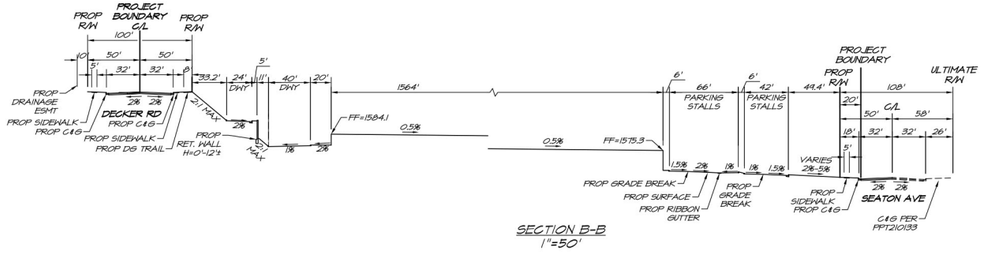

SECTION B-B
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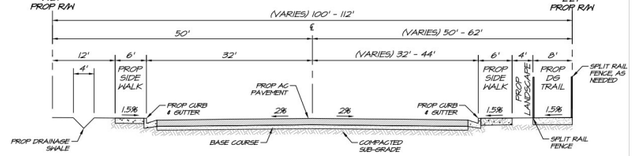
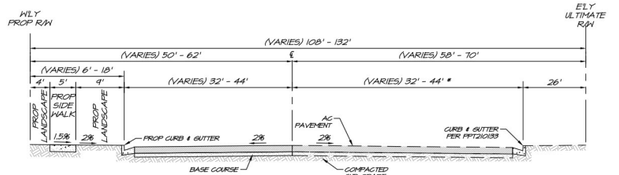


DECKER ROAD
SECONDARY HIGHWAY
RIV. CO. STD. NO. 94
NTS



SEATON AVENUE
SECONDARY HIGHWAY
RIV. CO. STD. NO. 94
NTS

Source(s): Albert A. Webb Associates (09-12-2024)

Figure 3-8

Not to Scale

Roadway Cross-Sections

- **Cajalco Road**. Under existing conditions, Cajalco Road along the Project site's frontage currently is partially improved as a two-lane roadway with between 40 to 55 feet of existing pavement. As part of the Project, the Project Applicant would dedicate approximately 70 feet of ROW along the Project's frontage and would improve the portion of Cajalco Road between Decker Road and Seaton Avenue to its ultimate half-width standard as a 6-Lane Modified Expressway. The remaining ultimate 49 to 110 feet of ROW planned along the northern edge of this roadway would be dedicated via parcel map or separate instrument as needed. Improvements planned as part of the Project include the addition of approximately 80 feet of paved travel lanes, a 35- to 56-foot-wide raised median, the installation of a 6-foot-wide curb adjacent sidewalks within a 10-foot-wide parkway along the northern edge of the roadway, and the provision of an expanded landscaped parkway along the southern side of the roadway that would range in width from 30 to 34 feet and would include a 6-foot-wide curb-adjacent sidewalk, a 7-foot-wide landscaped area, a split-rail fence, a 10-foot-wide decomposed granite (d.g.) trail, and an 11-foot-wide landscaped area.

- **Seaton Avenue**. Under existing conditions, Seaton Avenue along the Project site's frontage includes approximately 16 to 30 feet of paved travel lanes. As part of the Project, the segment of Seaton Avenue between Cajalco Road and the southern Project boundary would be improved to its ultimate part-width standard as a Secondary Highway. Improvements proposed as part of the Project would include paved travel lanes ranging in width from 62 feet to 88 feet, along with the installation of curb and gutter along the Project site's frontage, and the installation of a landscaped parkway along the Project site's frontage that would vary in width between six and 18 feet and that would include a five-foot-wide curb-separated sidewalk. In addition, a 12-foot-wide raised median is proposed to the south of the proposed northern driveway along Seaton Avenue as it approaches Cajalco Road, where the width of travel lanes would be reduced to 52 feet in width. Ultimate improvements to the eastern half of this segment of Seaton Avenue are anticipated to occur in conjunction with future development along the eastern side of this roadway.

- **Decker Road**. Under existing conditions, Decker Road exists as an unimproved informal roadway along the western boundary of the Project site, and no ROW previously has been dedicated along this segment of Decker Road. As part of the Project, the segment of Decker Road between the proposed southerly terminus at the site proposed as a public park and Cajalco Road would be improved to its ultimate full-width standard as a Secondary Highway. Improvements to this segment of Decker Road would include the dedication of 100 feet of ROW and 64 feet of pavement (with an additional ±12 feet of pavement and ROW near the intersection with Cajalco Road to accommodate a right-turn lane). The western parkway would measure 18 feet in width, and would include a five-foot curb-separated sidewalk with the remaining areas consisting of landscaped areas. The eastern parkway would include an 18-foot-wide parkway that would include a six-foot-wide curb-adjacent sidewalk, four feet of landscaping, a split-rail fence, and an eight-foot-wide d.g. trail. A cul-de-sac would be constructed at the southern terminus of the roadway within the proposed park site.

As previously noted, access to the light industrial warehouse building site is proposed via 2 driveways along Decker Road (from north to south, Driveways 1 and 2) and three driveways along Seaton Avenue (from north

to south, Driveways 3 through 5). Driveways 1 and 2 along Decker Road, as well as Driveway 4 along Seaton Avenue (i.e., the central driveway along Seaton Avenue) would be restricted to passenger vehicles only. Driveways 3 and 5 along Seaton Avenue (i.e., the northern and southern driveways) would serve both passenger cars and trucks. Driveway 3 ultimately may or may not be constructed, and if constructed would be restricted to right-in/right-out access only through the construction of a raised median along this portion of Seaton Avenue. All other driveways (Driveways 1, 2, 4, and 5) would afford full turn movements into and out of the Project site.

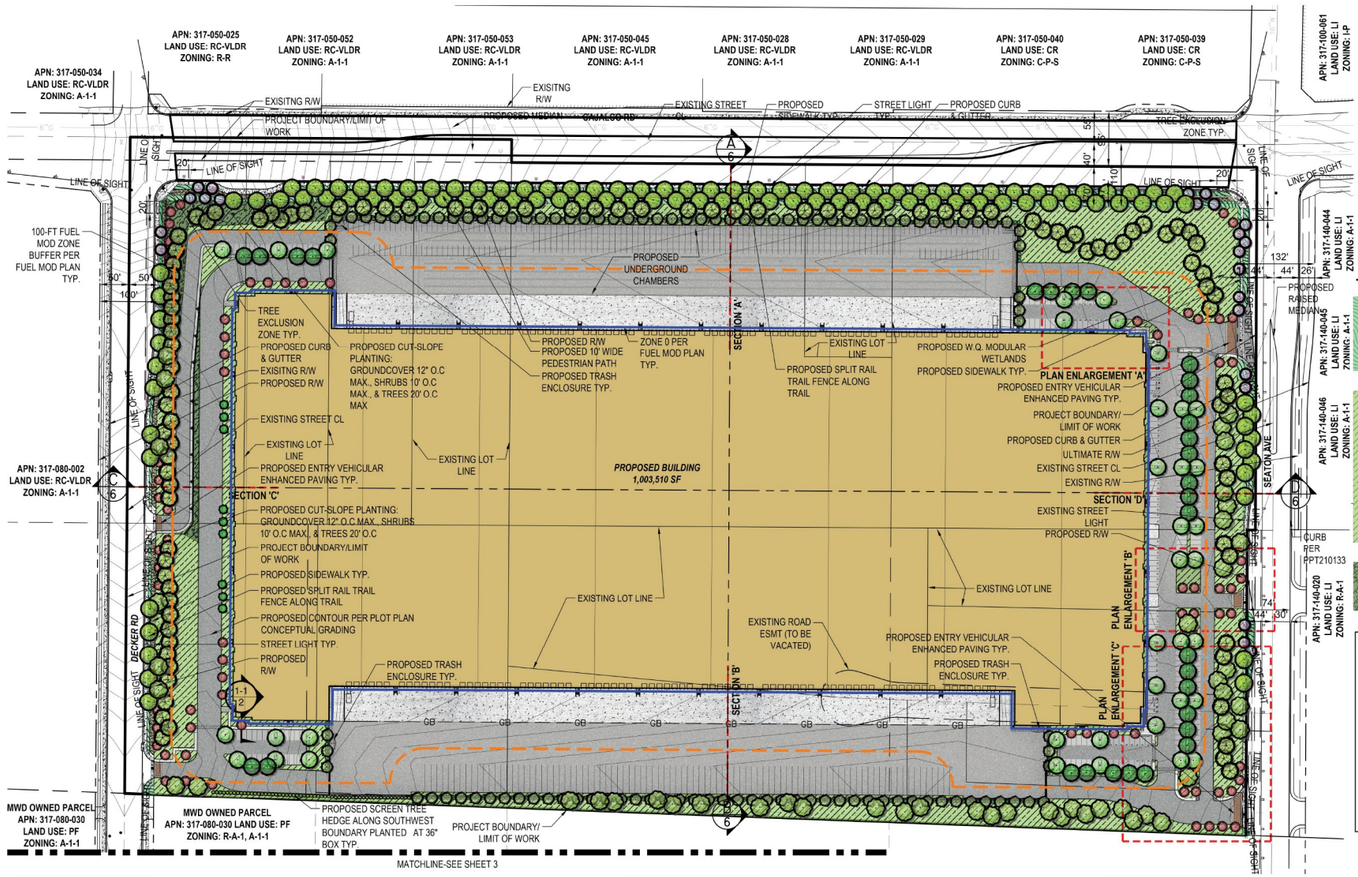
F. Landscaping

Figure 3-9, *Conceptual Landscape Plan (Warehouse Building Site)*, depicts the Project's conceptual landscape plan for both the light industrial warehouse building. As shown, landscaping for the proposed light industrial warehouse building in the northern portions of the Project site would consist of a variety of trees, shrubs, and groundcover. Trees are proposed along the Project site's frontages with Cajalco Road, Seaton Avenue, and Decker Road, with some trees also proposed along the southern property line of the light industrial building site. Tree species would include marina strawberry tree (*Arbutus* x. '*Marina*'), Natchez crape myrtle (*Lagerstroemia indica* x *fauriei 'Natchez'*), pink dawn chitalpa (*Chitalpa tashkentensis 'pink dawn'*), Australian willow (*Geijera parviflora*), Afghan pine (*Pinus eldarica*), London plane tree (*Platanus* x *acerifolia* 'Bloodgood'), drake elm (*Ulmus parvifolia* 'Drake'), California sycamore (*Platanus racemosa*), coast live oak (*Quercus agrifolia*), holly oak (*Quercus ilex*), cork oak (*Quercus suber*), African sumac (*Rhus lancea*), honey locust (*Gleditsia triacanthos*), lacebark elm (*Ulmus parvifolia*), blue Italian cypress (*Cupressus sempervirens* 'Glauca'), maidenhair tree (*Ginkgo biloba*), maki podocarpus (*Podocarpus macrophyllus* 'Maki'), sweet bay (*Laurus nobilis*), holly leaf cherry (*Prunus ilicifolia*), and fern pine (*Podocarpus gracilior*).

As shown on Figure 3-10, *Conceptual Landscape Plan (Park Site*), landscaping at the proposed park site in the southern portion of the Project site also would consist of trees, shrubs, and groundcover. Tree species proposed for the park site include Australian willow, London plane tree, drake elm, marina strawberry tree, Natchez crape myrtle, pink dawn chitalpa, lacebark elm, honey locust, southern magnolia (*Magnolia grandiflora*), California sycamore, coast live oak, and holly oak.

G. Walls and Fencing

As part of the Project, 14-foot-tall concrete screen walls are proposed along the southern edge of the truck court to the south of the building and along the northern edge of the truck court on the north side of the building. As shown on Figure 3-11, *Conceptual Screen Wall*, the screen walls have been designed to provide both vertical and horizontal articulation in order to reduce the visual effects of the wall, particularly along Cajalco Road. The screen wall along Cajalco Road also would be screened by a dense row of trees proposed on-site and within the Cajalco Road parkway. In addition, split rail fences are proposed along Decker Road and Cajalco Road to provide a separation between the proposed sidewalks and the proposed d.g. trails. In addition, and as previously noted, several retaining walls also are proposed to support site grading, and would include a retaining wall along the northern site boundary measuring up to six feet in height, a retaining wall along the southern boundary of the light industrial building site measuring up to 9.5 feet in height, and a retaining wall



NOTES

1. WUCOLS/ PLANT FACTOR IN PLANTING LEGEND IS SELECTED PER WUCOLS ZONE 4 - SOUTH INLAND VALLEY
2. SLOPE PLANTING NOTE:
   -SLOPES OVER 3' VERTICAL - GROUNDCOVER PLANT MATERIAL MAXIMUM 12" O.C
   -SLOPES OVER 15' VERTICAL - SHRUBS MAXIMUM 10' ON CENTER, TREES 20' MAXIMUM ON CENTER, OR A COMBINATION THERE OF.
3. SIGHT DISTANCE NOTE: SIGHT DISTANCES IN PROJECT SHALL BE PER RIVERSIDE COUNTY STANDARD 821
4. NO TREES AND SHRUBS OVER 12" MAX HEIGHT IN SIGHT DISTANCE ZONE

PLANTING NOTES

-PROVIDE 3 INCH LAYER OF MULCH (MIN.) IN SHRUBS BEDS AND UNPLANTED AREAS; 2 INCH LAYER OF MULCH IN GROUNDCOVER AREAS; 3 INCH LAYER OF SHREDDED, STABILIZING MULCH FOR SLOPES

-TREES SHALL BE STAKED WITH 2-3 STAKES AND 6 TREE TIES PER COUNTY STANDARD DETAILS. USE TRIPLE STAKING WITH 3 INCH DIAMETER STAKES IN HIGH WIND AREAS.

-ROOT BARRIERS SHALL BE INSTALLED FOR TREES WITHIN 8 FT (MIN) OF HARDSCAPE PER COUNTY STANDARD DETAILS. ROOT BARRIER SHALL NOT ENCIRCLE THE TREE ROOTBALL BUT SHALL BE LOCATED AT THE EDGE OF HARDSCAPE AND EXTEND BEYOND CENTER OF TREE A MINIMUM OF 5 FT IN EACH DIRECTION.

-TREES SHALL HAVE BREATHER TUBES PER COUNTY STANDARD DETAILS.

-PLANTER ISLANDS ADJACENT TO PARKING SPACES SHALL HAVE 12 INCH WIDE CONCRETE WALKWAY STRIP INSTALLED ADJACENT TO AND INTEGRAL WITH OR DOWELED INTO THE 6 INCH WIDE CURB.

CONCEPT PLANT SCHEDULE

	OFF-SITE SHRUBS & GROUNDCOVERS	**42,066 SF**	
	BACCHARIS PILULARIS 'PIGEON POINT' / COYOTE BRUSH	2,732	5 GAL, LOW(0.2), 1'-2"H X 5'-6"W
	CALLISTEMON VIMINALIS 'LITTLE JOHN' / DWARF WEEPING BOTTLEBRUSH	4,858	1 GAL, LOW(0.2), 2'-3"H X 2'-3"W
	ELYMUS CONDENSATUS 'CANYON PRINCE' / CANYON PRINCE WILD RYE	2,732	1 GAL, LOW(0.2), 3'-4"H X 3'-4"W
	MUHLENBERGIA CAPILLARIS / PINK MUHLY GRASS	4,858	1 GAL, LOW(0.2), 3'-4"H X 3'-4"W
	WESTRINGIA FRUTICOSA 'SMOKEY' / SMOKEY WESTRINGIA	2,732	5 GAL, LOW(0.2), 4'H X 5'-6"W
	ON-SITE SHRUB AND GROUNDCOVER	**268,929 SF**	
	AGAVE AMERICANA / CENTURY PLANT	2,515,312	5 GAL, LOW (0.2), 3'-5"H X 3'-5"W
	AGAVE DESMETIANA / SMOOTH AGAVE	4,471,664	5 GAL, LOW (0.2), 3'-4"H X 3'-4"W
	CAESALPINIA MEXICANA / MEXICAN BIRD OF PARADISE	1,117,915	15 GAL, LOW (0.2), 4'-6"H X 4'-6"W
	KNIPHOFIA UVARIA 'FLAMENCO' / FLAMENCO RED HOT POKER	4,471,660	5 GAL, LOW (0.2), 2'-3"H X 4'-5"W
	PENSTEMON EATONII / FIRECRACKER PENSTEMON	27,947,875	5 GAL, LOW (0.2), 1'-2"H X 1'-2"W
	CALLISTEMON VIMINALIS 'LITTLE JOHN' / DWARF WEEPING BOTTLEBRUSH	31,054	5 GAL, LOW(0.2), 2'-3"H X 2'-3"W
	ELYMUS CONDENSATUS 'CANYON PRINCE' / CANYON PRINCE WILD RYE	17,467	5 GAL, LOW(0.2), 3'-4"H X 3'-4"W
	HESPERALOE PARVIFLORA / RED YUCCA	31,051	5 GAL, LOW(0.2), 2'-3"H X 2'-3"W
	MUHLENBERGIA CAPILLARIS / PINK MUHLY GRASS	31,051	1 GAL, LOW(0.2), 3'-4"H X 3'-4"W
	WESTRINGIA FRUTICOSA 'SMOKEY' / SMOKEY WESTRINGIA	17,467	5 GAL, LOW(0.2), 3'-4"H X 3'-4"W
	WESTRINGIA FRUTICOSA 'WYNABBIE GEM' / WYNABBIE GEM COAST ROSEMARY	17,465	5 GAL, LOW(0.2), 4'H X 5'-6"W
	ON-SITE CUT SLOPE PLANTING	**19,584 SF**	
	BACCHARIS PILULARIS 'PIGEON POINT' / PIGEON POINT COYOTE BRUSH	20,352	1 GAL, LOW(0.2), 1'-2"H X 5'-6"W
	ELYMUS CONDENSATUS 'CANYON PRINCE' / CANYON PRINCE WILD RYE		1 GAL, LOW(0.2), 3'-4"H X 3'-4"W
	JUNCUS PATENS / CALIFORNIA GRAY RUSH		1 GAL, LOW(0.2), 2'-3"H X 2'-3"W

SCREEN TREE FRONTAGE BOX SIZE TABULATION

REQUIRED:		24" BOX (50% OR LESS)/ 36" BOX OR LARGER (50% MIN.) @ 25' O.C
PROVIDED:		
OFF-SITE STREETSCAPE ACCENT TREE:	23	@ 36" BOX TREE
OFF-SITE STREETSCAPE TREES:	102	@ 24" BOX TREE
ON-SITE ACCENT FLOWERING TREES:	66	@ 24" BOX TREE
ON-SITE TREES:	21/17	@ 24" BOX TREE/36" BOX TREE
LOADING/UNLOADING AREA SCREEN TREE:	90	@ 36" BOX TREE
EVERGREEN SCREEN TREE:	100	@ 48" BOX TREE
TOTAL:	189	24" BOX TREE (45%)
	230	36" BOX TREE OR LARGER (55%)
	419	24" BOX TREE (45%) / 36" BOX TREE OR LARGER (55%)

CONCEPT PLANT SCHEDULE

	OFF-SITE STREETSCAPE ACCENT TREE	**23**	
	ARBUTUS X 'MARINA' / MARINA STRAWBERRY TREE MULTI-TRUNK		36" BOX, MED (0.5), 20'H X 20'W
	LAGERSTROEMIA INDICA X FAURIEI 'NATCHEZ' / NATCHEZ CRAPE MYRTLE MULTI-TRUNK		36" BOX, MED (0.5), 20'H X 20'W
	OFF SITE - STREETSCAPE TREES	**104**	
	GEIJERA PARVIFLORA / AUSTRALIAN WILLOW		24" BOX, MED. (0.5), 20'-35'H X 20'-35'W
	PLATANUS X ACERIFOLIA 'BLOODGOOD' / LONDON PLANE TREE		24" BOX, LOW (0.2), 30'-40'H X 40'-50'W
	ULMUS PARVIFOLIA 'DRAKE' / DRAKE ELM		24" BOX, MED (0.5), 30'-40'H X 40'-50'W
	ON-SITE ACCENT FLOWERING TREES	**71**	
	ARBUTUS X 'MARINA' / MARINA STRAWBERRY TREE MULTI-TRUNK		24" BOX, MED (0.5), 20'H X 20'W
	LAGERSTROEMIA X 'NATCHEZ' / CRAPE MYRTLE		24" BOX, MED (0.5), 20'-25'H X 20'-25'W
	X CHITALPA TASHKENTENSIS 'PINK DAWN' / PINK DAWN CHITALPA		24" BOX, LOW (0.2), 25'-35'H X 25'-35'W

NOTE: APPROVAL BY THE TRANSPORTATION DEPARTMENT IS FOR WORK WITHIN THE ROAD RIGHT-OF-WAY ONLY.

CONCEPT PLANT SCHEDULE

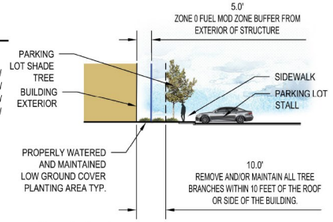
	ON-SITE TREES	**50**	
	GEIJERA PARVIFLORA / AUSTRALIAN WILLOW		24" BOX, MED (0.5), 20'-35'H X 20'-35'W
	PLATANUS RACEMOSA / CALIFORNIA SYCAMORE		24" BOX, MED (0.5), 40'-80'H X 30'-50'W
	PLATANUS X ACERIFOLIA / LONDON PLANE TREE		24" BOX, MED (0.5), 70'-85'H X 50'-70'W
	QUERCUS AGRIFOLIA / COAST LIVE OAK		48" BOX, LOW (0.2), 40'-60'H X 40'-60'W
	QUERCUS ILEX / HOLLY OAK		36" BOX, LOW (0.2), 35'-50'H X 30'-55'W
	QUERCUS SUBER / CORK OAK		24" BOX, LOW (0.2), 50'-70'H X 30'-50'W
	RHUS LANCEA / AFRICAN SUMAC		24" BOX, LOW (0.2), 25'-35'H X 25'-35'W
	PARKING LOT SHADE ACCENT TREES	**37**	
	GLEDITSIA TRIACANTHOS / HONEY LOCUST		24" BOX, LOW (0.2), 30'-40'H X 40'-50'W
	PARKING LOT SHADE TREES	**30**	
	ULMUS PARVIFOLIA / LACEBARK ELM		24" BOX, MED (0.5), 40'-60'H X 40'-60'W
	VERTICAL BUILDING ENTRY ACCENT TREE	**9**	
	GINKGO BILOBA / MAIDENHAIR TREE		24" BOX, MED (0.5), 35'-45'H X 25'-35'W
	PODOCARPUS MACROPHYLLUS 'MAKI' / MAKI PODOCARPUS		15 GAL, MED (0.5), 8'-15'H X 4'-5'W
	LOADING/UNLOADING AREA SCREEN TREE	**104**	
	PODOCARPUS GRACILIOR / FERN PINE		36" BOX/15 GALLON, LOW (0.2), 15'-30'H >

CONCEPT PLANT SCHEDULE

	EVERGREEN SCREEN TREE	**100**	
	PLATANUS RACEMOSA / CALIFORNIA SYCAMORE		48" BOX, MED (0.5), 40'-80'H X 30'-50'W
	QUERCUS AGRIFOLIA / COAST LIVE OAK		48" BOX, LOW (0.2), 40'-60'H X 40'-60'W
	QUERCUS ILEX / HOLLY OAK		48" BOX, LOW (0.2), 35'-50'H X 30'-55'W
	ULMUS PARVIFOLIA 'DRAKE' / DRAKE LACEBARK ELM		48" BOX, MED (0.5), 40'-60'H X 40'-60'W
	SCREEN TREE HEDGE	**58**	
	LAURUS NOBILIS / SWEET BAY MULTI-TRUNK		36" BOX, LOW (0.2), 6'-8'H X 6'-8'W
	PRUNUS ILICIFOLI / HOLLY LEAF CHERRY		36" BOX, LOW (0.2), 8'-12'H X 8'-12'W
	SCREEN HEDGE	**446**	
	LAURUS NOBILIS / SWEET BAY MULTI-TRUNK		15 GAL, LOW (0.2), 6'-8'H X 6'-8'W
	PRUNUS ILICIFOLI / HOLLY LEAF CHERRY		15 GAL, LOW (0.2), 8'-12'H X 8'-12'W

FUEL MODIFICATION ZONE LEGEND

- ZONE 0 - 5-FT FUEL MOD ZONE BUFFER FROM EXTERIOR OF STRUCTURE
- ZONE 1 - 100-FT FUEL MOD ZONE BUFFER FROM EXTERIOR OF STRUCTURE



TYPICAL SECTION 1-1
FUEL MOD ZONE 0 & PARKING LOT SHADE TREE CONDITION

Source(s): Albert A. Webb Associates (10-02-2024)

Figure 3-9

Not to Scale

Conceptual Landscape Plan (Warehouse Building Site)

ROPE PLAY STRUCTURE

DOG PARK

SOCCER FIELDS

BASKETBALL COURT

SWINGS

SLIDES

SHADE STRUCTURES

SPLASH PAD WATER FEATURE

GATHERING PLAY

BALANCE PLAY

AMPHITHEATER

TOT LOT - PLAY STRUCTURES

INSPIRATIONAL AMENITIES IMAGERY

NOTES

1. WUCOLS/ PLANT FACTOR IN PLANTING LEGEND IS SELECTED PER WUCOLS ZONE 4 - SOUTH INLAND VALLEY
2. SLOPE PLANTING NOTE:
   -SLOPES OVER 3' VERTICAL - GROUNDCOVER PLANT MATERIAL MAXIMUM 12" O.C
   -SLOPES OVER 15' VERTICAL - SHRUBS MAXIMUM 10' ON CENTER, TREES 20' MAXIMUM ON CENTER, OR A COMBINATION THERE OF.
3. SIGHT DISTANCE NOTE: SIGHT DISTANCES IN PROJECT SHALL BE PER RIVERSIDE COUNTY STANDARD 821

PLANTING NOTES

-PROVIDE 3 INCH LAYER OF MULCH (MIN.) IN SHRUBS BEDS AND UNPLANTED AREAS; 2 INCH LAYER OF MULCH IN GROUNDCOVER AREAS; 3 INCH LAYER OF SHREDDED, STABILIZING MULCH FOR SLOPES

-TREES SHALL BE STAKED WITH 2-3 STAKES AND 6 TREE TIES PER COUNTY STANDARD DETAILS. USE TRIPLE STAKING WITH 3 INCH DIAMETER STAKES IN HIGH WIND AREAS.

-ROOT BARRIERS SHALL BE INSTALLED FOR TREES WITHIN 6 FT (MIN) OF HARDSCAPE PER COUNTY STANDARD DETAILS. ROOT BARRIER SHALL NOT ENCIRCLE THE TREE ROOTBALL BUT SHALL BE LOCATED AT THE EDGE OF HARDSCAPE AND EXTEND BEYOND CENTER OF TREE A MINIMUM OF 5 FT IN EACH DIRECTION.

-TREES SHALL HAVE BREATHER TUBES PER COUNTY STANDARD DETAILS.

-PLANTER ISLANDS ADJACENT TO PARKING SPACES SHALL HAVE 12 INCH WIDE CONCRETE WALKWAY STRIP INSTALLED ADJACENT TO AND INTEGRAL WITH OR DOWELED INTO THE 6 INCH WIDE CURB.

CONCEPT PLANT SCHEDULE

OFF SITE - STREETSCAPE TREES	**33**		
GEIJERA PARVIFLORA / AUSTRALIAN WILLOW			24" BOX, MED. (0.5)
PLATANUS X ACERIFOLIA 'BLOODGOOD' / LONDON PLANE TREE			24" BOX, MED (0.5)
QUERCUS AGRIFOLIA / COAST LIVE OAK			24" BOX, LOW (0.2)
OFF-SITE STREETSCAPE ACCENT TREE	**9**		
ARBUTUS X 'MARINA' / MARINA STRAWBERRY TREE MULTI-TRUNK			36" BOX, MED (0.5)
LAGERSTROEMIA INDICA X FAURIEI 'NATCHEZ' / NATCHEZ CRAPE MYRTLE MULTI-TRUNK			36" BOX, MED (0.5)
PARKING LOT SHADE TREES	**9**		
ULMUS PARVIFOLIA / LACEBARK ELM			24" BOX, MED (0.5)
PARKING LOT SHADE ACCENT TREES	**6**		
GLEDITSIA TRIACANTHOS / HONEY LOCUST			24" BOX, LOW (0.2)
ON-SITE ACCENT FLOWERING TREES	**27**		
ARBUTUS X 'MARINA' / MARINA STRAWBERRY TREE MULTI-TRUNK			36" BOX, MED (0.5)
CHILOPSIS LINEARIS / DESERT WILLOW			24" BOX, LOW (0.2)
X CHITALPA TASHKENTENSIS 'PINK DAWN' / PINK DAWN CHITALPA			24" BOX, LOW (0.2)
PARK SHADE TREES	**77**		
PLATANUS RACEMOSA / CALIFORNIA SYCAMORE			24" BOX, MED (0.5)
QUERCUS AGRIFOLIA / COAST LIVE OAK			24" BOX, LOW (0.2)
QUERCUS ILEX / HOLLY OAK			36" BOX, LOW (0.2)
ULMUS PARVIFOLIA 'DRAKE' / DRAKE LACEBARK ELM			24" BOX, MED (0.5)
PERIMETER PARK TREES	**32**		
KOELREUTERIA BIPINNATA / CHINESE FLAME TREE			24" BOX, MED (0.5)
PLATANUS RACEMOSA / CALIFORNIA SYCAMORE			24" BOX, LOW (0.2)
QUERCUS AGRIFOLIA / COAST LIVE OAK			24" BOX, LOW (0.2)
QUERCUS ILEX / HOLLY OAK			24" BOX, LOW (0.2)
RHUS LANCEA / AFRICAN SUMAC			24" BOX, LOW (0.2)
OFF-SITE SHRUBS & GROUNDCOVERS	**15,742 SF**		
BACCHARIS PILULARIS 'PIGEON POINT' / COYOTE BRUSH	1,022		5 GAL, LOW(0.2)
CALLISTEMON VIMINALIS 'LITTLE JOHN' / DWARF WEEPING BOTTLEBRUSH	1,816		1 GAL, LOW(0.2)
ELYMUS CONDENSATUS 'CANYON PRINCE' / CANYON PRINCE WILD RYE	1,022		1 GAL, LOW(0.2)
MUHLENBERGIA CAPILLARIS / PINK MUHLY GRASS	1,816		1 GAL, LOW(0.2)
WESTRINGIA FRUTICOSA 'SMOKEY' / SMOKEY WESTRINGIA	1,022		5 GAL, LOW(0.2)
ON-SITE SHRUB AND GROUNDCOVER	**203,418 SF**		
AGAVE AMERICANA / CENTURY PLANT	1,902,584		5 GAL, LOW (0.2)
AGAVE DESMETIANA / SMOOTH AGAVE	3,382,374		5 GAL, LOW (0.2)
BACCHARIS PILULARIS 'AL'S BLUE' / AL'S BLUE COYOTE BRUSH	1,217,653		1 GAL, LOW (0.2)
CAESALPINIA MEXICANA / MEXICAN BIRD OF PARADISE	845,590		15 GAL, LOW (0.2)
DASYLIRION WHEELERI / GREY DESERT SPOON	1,902,584		15 GAL, LOW (0.2)
KNIPHOFIA UVARIA 'FLAMENCO' / FLAMENCO RED HOT POKER	3,382,371		5 GAL, LOW (0.2)
PENSTEMON EATONII / FIRECRACKER PENSTEMON	21,139,816		5 GAL, LOW (0.2)
CALLISTEMON VIMINALIS 'LITTLE JOHN' / DWARF WEEPING BOTTLEBRUSH	23,493		5 GAL, LOW(0.2)
ELYMUS CONDENSATUS 'CANYON PRINCE' / CANYON PRINCE WILD RYE	13,216		5 GAL, LOW(0.2)
HESPERALOE PARVIFLORA / RED YUCCA	23,495		5 GAL, LOW(0.2)
MUHLENBERGIA CAPILLARIS / PINK MUHLY GRASS	23,495		1 GAL, LOW(0.2)
WESTRINGIA FRUTICOSA 'SMOKEY' / SMOKEY WESTRINGIA	13,216		5 GAL, LOW(0.2)
WESTRINGIA FRUTICOSA 'WYNABBIE GEM' / WYNABBIE GEM COAST ROSEMARY	13,216		5 GAL, LOW(0.2)
DALEA GREGGII / TRAILING INDIGO BUSH	13,216		1 GAL, LOW(0.2)
TEUCRIUM COSSONII / CREEPING GERMANDER	23,495		1 GAL, LOW(0.2)
ON-SITE BASIN & CUT SLOPE PLANTING	**8,561 SF**		
BACCHARIS PILULARIS 'PIGEON POINT' / PIGEON POINT COYOTE BRUSH	8,897		1 GAL, LOW(0.2)
MUHLENBERGIA CAPILLARIS / PINK MUHLY GRASS	989		1 GAL, LOW(0.2)
HYDROSEED MEADOW GRASS MIX (12" MAX HIGH)	**4,807 SF**		
S&S SEEDS / RIPARIAN RESCUE MIX			SEED, LOW
TURF	**137,599 SF**		
TURF SOD / DROUGHT TOLERANT FESCUE BLEND			SOD

FUEL MODIFICATION ZONE LEGEND

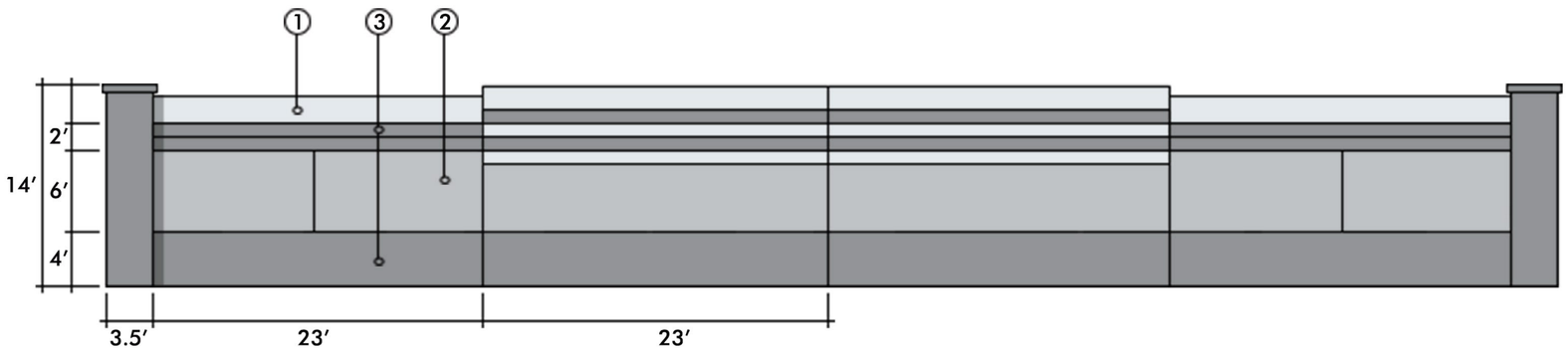
- ZONE 0 - 5-FT FUEL MOD ZONE BUFFER FROM EXTERIOR OF STRUCTURE
- ZONE 1 - 100-FT FUEL MOD ZONE BUFFER FROM EXTERIOR OF STRUCTURE

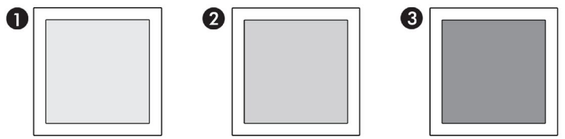
Source(s): Albert A. Webb Associates (10-02-2024)

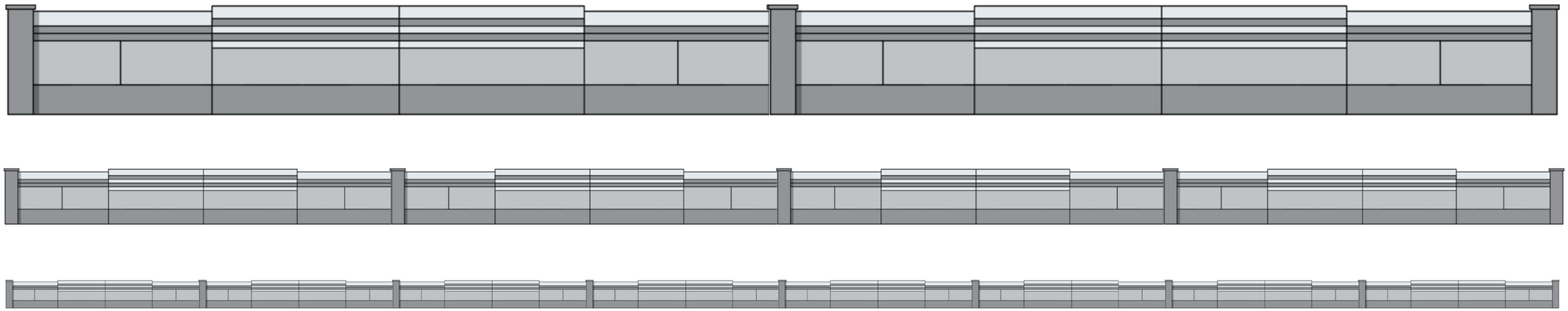
Figure 3-10

Not to Scale

Conceptual Landscape Plan (Park Site)







Source(s): HPA (07-10-2024)

Figure 3-11

Not to Scale

Conceptual Screen Wall

along the western edge of the light industrial building site measuring up to 12 feet in height. All retaining walls have been designed such that they would not be prominently visible from Cajalco Road, Seaton Avenue, or Decker Road. Retaining walls are proposed at the park site along a private driveway for adjacent owners and along the proposed drainage channel in the western portion of the park site, and existing retaining walls along the southern and western portion of the park site would be removed as part of the Project, while existing fences within the eastern and southern portions of the park site also would be removed.

H. Water, Sewer, and Drainage

Figure 3-12, *Conceptual Utility Plan*, and Figure 3-13, *Conceptual Utility Plan – Park Site*, depict the Project's proposed water, sewer, and drainage improvements, which are described below.

1. Water Service

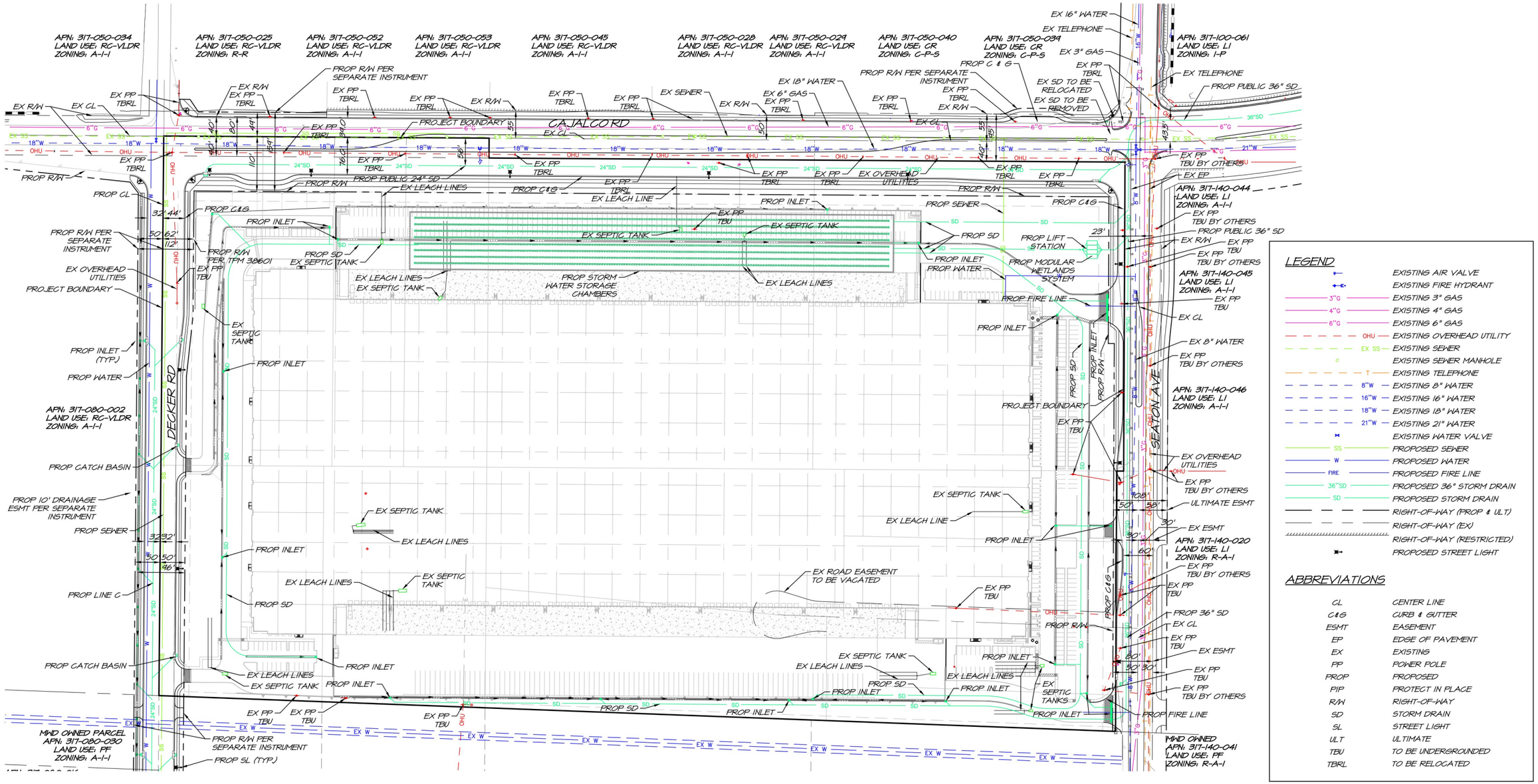
As shown on Figure 3-12, under existing conditions, for the northern portions of the Project site that are proposed for warehouse uses, there is an existing 18-inch water main within Cajalco Road and an 8-inch water line within Seaton Avenue along the Project site's frontages with these roadways. As part of the Project, a potable water line is proposed to extend on site between the northeast corner of the light industrial building and the existing 8-inch water main located within Seaton Avenue. For fire water service, two additional water lines are proposed on site that would connect to the existing 8-inch water line in Seaton Avenue near the southeast and northeast corners of the proposed light industrial building site. A series of water lines also are proposed along the site's perimeter to provide fire water service to the proposed fire hydrants. As shown on Figure 3-13, a proposed water main (at least 8 inches in diameter) would be installed within Decker Road and the western parking lot of the proposed park to provide water service to the proposed recreation building proposed within the western portion of the park site.

2. Sewer Service

As shown on Figure 3-12, under existing conditions, there is an existing sewer main within Cajalco Road. As part of the Project, a sewer lateral would be constructed between the northeastern corner of the building and the existing sewer main within Cajalco Road. As shown on Figure 3-12 and Figure 3-13, the Project Applicant also would install a sewer line within Decker Road between Cajalco Road and the western parking lot proposed for the park site. The sewer line would extend west within the parking lot in order to provide sewer service to the restrooms planned for the proposed recreation building. Wastewater generated by the Project would be conveyed to either the Moreno Valley Regional Water Reclamation Facility (RWRF) or the Perris Valley RWRF for treatment.

3. Drainage

Under existing conditions, runoff from the northern 50.04 gross acres of the Project site sheet flows to the east towards Seaton Avenue. Existing drainage lines within Cajalco Road drain to storm drain Line E-9.1 and to Seaton Basin of the Perris Valley Master Drainage Plan. The runoff from the Project site under existing conditions already exceeds the capacity of Line E-9.1, and due to the Project's proposed intensification of development and introduction of impervious surfaces on-site, it is expected that runoff from the Project site

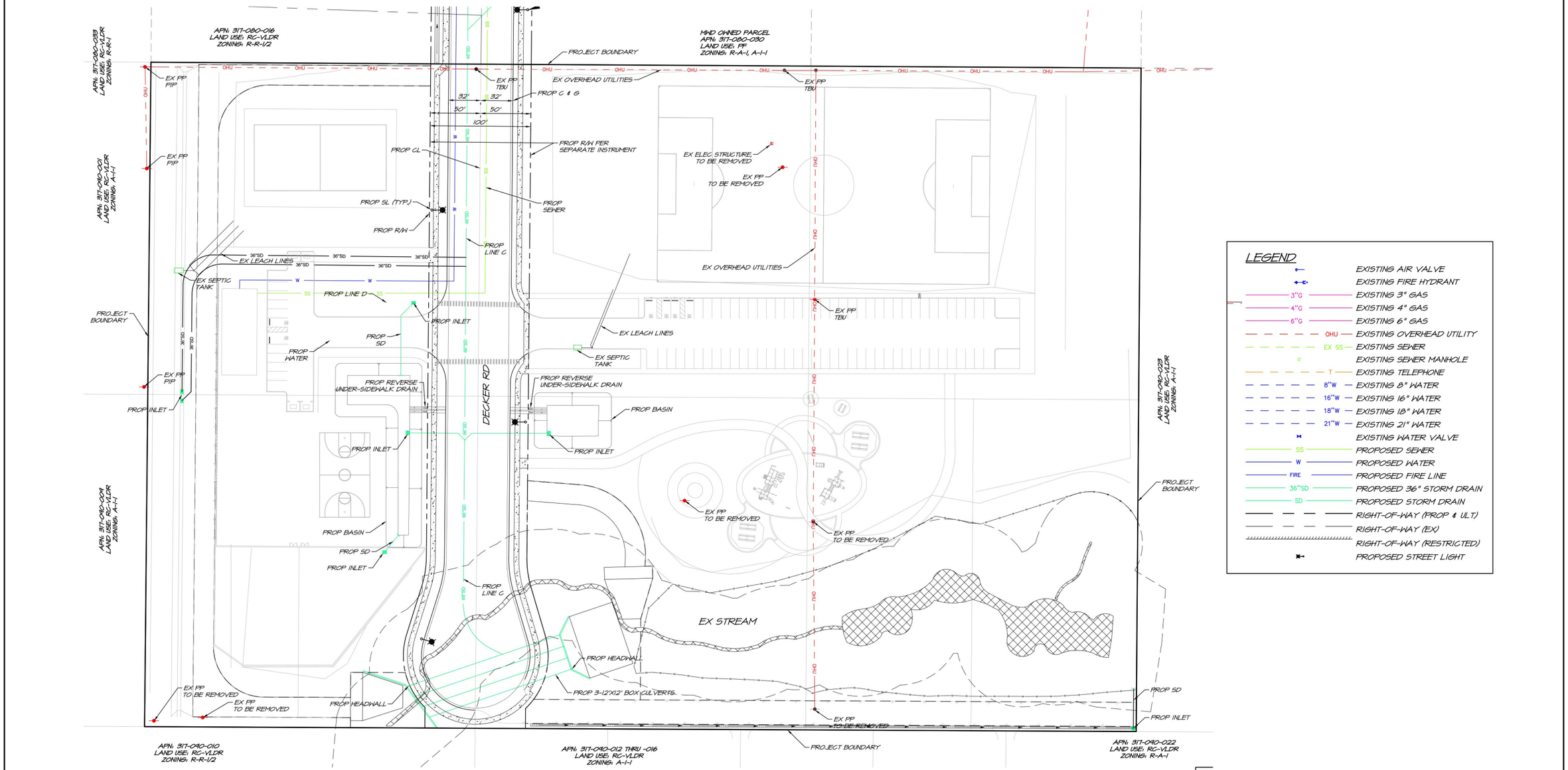


Source(s): Albert A. Webb Associates (09-12-2024)

Figure 3-12

Not to Scale

Conceptual Utility Plan - Warehouse Building Site



Source(s): Albert A. Webb Associates (09-12-2024)

Figure 3-13

Not to Scale

Conceptual Utility Plan - Park Site

would continue to exceed the capacity of Line E-9.1 without appropriate detention. As shown on Figure 3-12, following implementation of the Project, runoff generated on the northern portions of the Project site would be conveyed via ribbon gutters and curbs and gutters proposed throughout the site towards a network of drainage inlets provided at low points throughout this portion of the Project site. Private underground storm drain lines are proposed to convey captured flows towards an underground storage chamber before being pumped to a proposed biotreatment device for water quality treatment. A lift station for drainage flows is proposed in the northeastern portion of the site. Following detention and water quality treatment, flows would be conveyed via a proposed 36-inch storm drain line within Seaton Avenue that would be constructed as part of the Project and that would extend off-site to the east within Cajalco Road to an existing point of connection near the intersection of Cajalco Expressway and Harvill Avenue. Following development, peak flows from the northern portions of the Project site that are proposed for warehouse uses would be limited in order to ensure peak runoff from the warehouse portion of the Project site does not exceed the capacity of the existing downstream facilities. All treated flows would then be conveyed offsite to a proposed 36-inch extension of MDP Lateral E-9.1.1 in Seaton Avenue and Cajalco Road, which would provide a connection to Perris Valley MDP Line E-9.1 at the Cajalco Road Station.

The 44.66 net acres of the Project site that are proposed for warehouse uses also would intercept offsite flows from off-site areas. This portion of the Project site intercepts offsite flows along a small portion of the southern boundary generated on the MWD-owned parcel to the south, and these flows are planned to be conveyed to a 0.7-acre landscape area on the northern 50.04 acres of the Project site and that would consist of a self-retaining area. Larger storm event for this area would be conveyed through the northern portions of the Project site via a proposed 12-inch storm drain Line A that would outlet to the proposed extension of Perris Valley MDP Line E-9.1.1. Existing flows that travel east on Cajalco Road approaching Decker Road, to the west of the Project site's frontage with Cajalco Road, would be collected via a proposed catch basin at the southeast corner of the Cajalco Road and Decker Road intersection and then would be conveyed via a proposed public 18-inch storm drain (Line B), which would connect to the proposed extension of Perris Valley MDP Lateral E-9.1 at the intersection of Cajalco Road and Seaton Avenue.

Approximately 1.9 acres to the west of the Project site within Cajalco Road also are tributary to the proposed warehouse site. These flows would be captured by a proposed catch basin at the southeast corner of Cajalco Road and Decker Road and would then be conveyed via a proposed 24-inch storm drain line in Cajalco Road (Line B), which would connect to the proposed extension of MDP Lateral E-9.1 in the intersection of Cajalco Road and Seaton Avenue. Flows within Decker Road would be collected via proposed catch basins and conveyed through proposed Line C, which ranges in size from 24" RCP to 66" RCP. Line C would connect to three proposed 12'x12' RCB culverts that would convey the existing stream underneath the Decker Road cul-de-sac.

Under existing conditions, the existing drainage pattern for the southern 14.93 gross acres proposed for park uses slopes down at approximately 1% to 8% grade from west to east, and the existing drainage pattern for the site and the general area is characterized by sheet flows that follow the slope to the east towards an existing stream that flows easterly along the south end to the site. Existing flows for the site sheet flow to existing drainage facilities within Seaton Avenue and Cajalco Road. As previously shown on Figure 3-13, following

implementation of the Project, runoff generated on site would be conveyed through surface flows, with larger storm flows eventually draining towards the existing stream that runs through the southeast portion of the park. The park is split into multiple Drainage Management Areas (DMAs), DMA-E1 through E3 and DMA-W1, which divide water quality treatment in areas that drain to depressed self-retaining areas. This offers treatment of the proposed improvements through Low Impact Development (LID) principles, while allowing larger storm events to continue towards the existing stream.

The Project Applicant also proposes a private, stabilized access road along the south property line of the park, east of Decker Road, to provide vehicular access to existing residences south of the park. This area is considered DMA-E4 for water quality purposes. In an effort to minimize impact, an earthen swale containing gravel is proposed along this access road to capture road runoff and convey it via proposed storm drain line and outlet it to easternmost part of the stream on the park site, at a localized point.

The 13.33 net acres of the Project site that are proposed for public park uses also would intercept offsite flows from off-site areas. There is approximately 1,200 acres of offsite area to the west and south of the Project site that are tributary to the southern portions of the Project site. The three primary areas collecting this offsite stormwater proposed with development of the Project are Decker Road, between Cajalco and the north side of the park site; a proposed channel located along the west side of the park site; and the south side of the park site where a box culvert is proposed to convey the existing stream. The offsite flows that are tributary to Decker Road would be intercepted by a shotcrete swale, proposed to parallel the parkway improvements. Multiple inlets are proposed within the swale and would be connected to Line C. The shotcrete swale and inlets would require maintenance and would be accessed from Decker Road.

Offsite flows that drain easterly to the western boundary of the southern portions of the Project site would be accepted by a proposed drainage channel that would parallel the property line. This 22-foot wide concrete channel would have a slope with rip-rap on the western side to slow down flows as they enter the channel. The channel would drain to proposed Line D, a 48-inch RCP storm drain that would convey flows through the park, connecting to Line C in Decker Road. The proposed concrete channel and inlet would require maintenance. The channel would have a 20-foot access road for maintenance. The channel and maintenance access road would be separated from the park with a retaining wall and fencing.

Offsite flows that drain northerly to the southern portions of the Project site generally would follow the existing stream. These flows would be accepted into the three proposed 12'x12' RCB that would continue the stream underneath the Decker Road cul-de-sac. As these flows exit the box, they would dissipate over a design rock rip rap outlet structure to address any increase in velocities prior to continuing in their existing stream condition. The three proposed 12'x12' RCB culvert and headwalls would require maintenance to maintain flow progression. The headwalls can be accessed via access road on either side of Decker Road. The headwalls and inlet and outlet structures would be accessed via maintenance access roads and turnaround areas. Maintenance activities would be regular, with a minimum of once per year.

3.5.4 Tentative Parcel Map No. 38601

As shown in Figure 3-14, *Tentative Parcel Map No. 38601 (TPM No. 38601)*, Tentative Parcel Map No. 38601 (TPM 38601) is proposed in order to consolidate the existing parcels within the northern 50.04-gross-acre Project site into a single parcel on 44.66 net acres, and to accommodate approximately 6.98acres of public ROW dedications along the Project site's frontages with Cajalco Expressway, Seaton Avenue, and Decker Road.

3.6 Scope of Environmental Analysis

3.6.1 Construction Characteristics

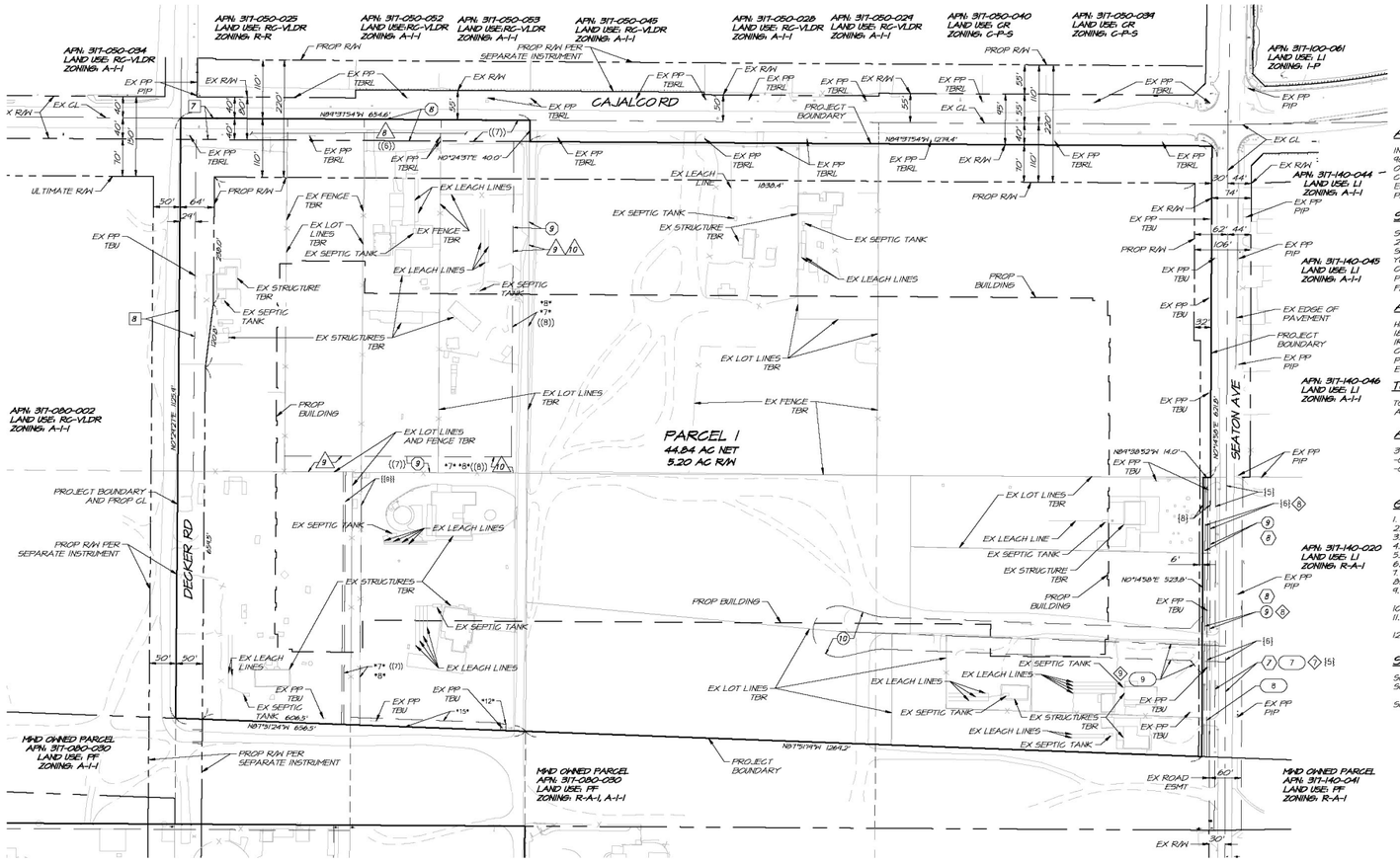
A. Proposed Physical Disturbances

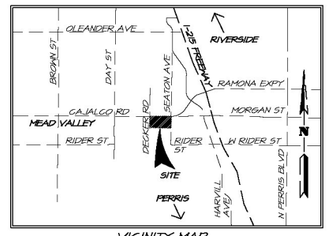
For purposes of analysis throughout this EIR, it is assumed that implementation of the Project would result in disturbances to all portions of the 50.04 gross acres in the northern portion of the Project site. In addition, ~~although~~ grading within the public park site in the southern portions of the Project site ~~only~~ is anticipated to result in disturbances to approximately ±~~13.61~~12.94 acres of the total 14.93 gross acres proposed for park uses, while the remaining 1.99 acres within the park site would not be impacted and would be placed in a conservation easement for long-term preservation~~for purposes of analysis throughout this EIR and unless otherwise noted it is assumed that the Project would result in full impact to the entire ± 14.94 acres of the park site because the area that is not currently proposed for disturbance would have no permanent protection mechanism, and future direct or indirect impacts have a reasonable possibility to occur due to on-going maintenance of the drainage and the box culvert proposed beneath Decker Road, and/or due to potential indirect impacts from human intrusion~~. In addition, it is anticipated that the Project would result in full disturbance of areas planned for roadway and infrastructure improvements along Cajalco Road/Cajalco Expressway, Seaton Avenue, Decker Road, and Rider Street (±19.78~~21.76~~ acres off site). The ±19.78~~21.76~~ acres of off-site roadway and infrastructure improvements includes proposed improvements to a short segment of Decker Road that would be constructed off-site between the Project's proposed light industrial warehouse building site and the proposed public park site. Additionally, as part of the Project's drainage plan, a 36-inch storm drain line is proposed to be constructed off-site within the existing alignment of Cajalco Road/Cajalco Expressway between the northeast corner of the Project site and Harvill Avenue to the east; impacts associated with the Project's off-site storm drain improvements also are included in the Project's ±19.78~~21.76~~ acres of off-site impact areas. For purposes of analysis in this EIR, the maximum extent of ground disturbance, including on- and off-site improvements, includes full disturbance to the 50.04 acres proposed for warehouse use in the northern portions of the Project site, ~~full~~ disturbance of 12.94 acres of the 14.934 gross-acre park site, and disturbances associated with offsite roadway and infrastructure improvement totaling ±19.78~~21.76~~ acres. Refer to Figure 3-15, *Limits of Disturbance*, which shows the limits of physical disturbance evaluated throughout this EIR.

UNINCORPORATED COUNTY OF RIVERSIDE, STATE OF CALIFORNIA

TENTATIVE PARCEL MAP NO. 38601

LOCATED IN SECTION 11, T. 4S., R. 4W., S.B.M.





VICINITY MAP
NTS

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EMAIL: JOHNGRACE@HILLWOOD.COM
PHONE: (909) 256-5424

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TOPOGRAPHY SOURCE

TOPOGRAPHY FLOWN BY INLAND AERIAL SURVEYS, INC. ON 08/02/2022

LAND USE

EXISTING LAND USE: RURAL COMMUNITY (RC) - VERY LOW DENSITY RESIDENTIAL (VLDR), COMMERCIAL RETAIL (CR)
EXISTING ZONING: LIGHT AGRICULTURE (A-1)

PROPOSED LAND USE: COMMUNITY DEVELOPMENT (CD) - LIGHT INDUSTRIAL (I.I), PROPOSED ZONING: I-P INDUSTRIAL PARK

A.P.N.

317-080-003 THRU -008, -013 & -014, -019 THRU -023, AND -027 THRU -029

GENERAL INFORMATION

1. ALL IMPROVEMENTS SHALL BE PER SCHEDULE "E" SUBDIVISION, ORDINANCE 460.
2. THOMAS BROS. MAP BOOK PAGE: 771, GRID: B3, C3
3. THIS MAP INCLUDES THE ENTIRE CONTIGUOUS OWNERSHIP OF THE LAND DIVIDER.
4. PROJECT IS NOT WITHIN A SPECIFIC PLAN.
5. EASEMENTS OF RECORD ARE PLOTTED HEREON.
6. PROJECT IS WITHIN EASTERN MUNICIPAL WATER DISTRICT
7. THERE ARE NO EXISTING WELLS ON THE PROPERTY.
8. LAND IS NOT WITHIN A SPECIAL STUDIES ZONE.
9. LAND HAS LOW SUSCEPTIBILITY TO LIQUEFACTION PER SOCAL GEO PROJECT NO. 22613-1
10. NO SUBSURFACE SEPTIC SEWAGE DISPOSAL IS INTENDED.
11. ALL STRUCTURES AND/OR DWELLINGS EXISTING ON SITE ARE PROPOSED TO BE DEMOLISHED.
12. FLOOD ZONE X, AREA OF LOW FLOODING PER FEMA PANEL 06065C1410G.

SHEET INDEX

SHEET 1 - TENTATIVE PARCEL MAP
SHEET 2 - EASEMENT AND STREET SECTIONS
SHEET 3 - LEGAL DESCRIPTION

EASEMENT NOTES

SEE SHEET 2

LEGAL DESCRIPTION

SEE SHEET 3

PROJECT DATA

BUILDING AREA	
OFFICE	10,000 SF
MEZZANINE	10,000 SF
WAREHOUSE	983,510 SF
TOTAL	1,003,510 SF
AUTO PARKING REQUIREMENTS	
OFFICE (1 STALL/250 SF)	80 STALLS
WAREHOUSE (1 STALL/ 2,000 SF)	492 STALLS
TOTAL	572 STALLS
PARKING PROVIDED	
AUTO PARKING	357 STALLS
TRAILER PARKING (10'X55')	153 STALLS
TOTAL	510 STALLS

UTILITY PROVIDERS

WATER:	EASTERN MUNICIPAL WATER DISTRICT PHONE: (951) 685-7434
SEWER:	EASTERN MUNICIPAL WATER DISTRICT PHONE: (951) 685-7434
GAS:	SOUTHERN CALIFORNIA GAS COMPANY PHONE: (909) 307-7070
ELECTRIC:	SOUTHERN CALIFORNIA EDISON PHONE: 1 (800) 655-4555
TELEPHONE:	FRONTIER COMMUNICATIONS PHONE: (310) 264-5100
CABLE T.V.:	FRONTIER COMMUNICATIONS PHONE: (310) 264-5100
SCHOOL DISTRICT:	VAL VERDE UNIFIED SCHOOL DISTRICT PHONE: (951) 940-6100

EASEMENT NOTE KEY (NOTES ON SHEET 2):

- ○ PTR 00867944-488-0NI (CHON & HU)
- ○ PTR 00846544-488-0NI (EVANS)
- □ PTR 00846098-488-0NI (MARTADO)
- △ PTR 00846093-488-0NI (JO LET)
- ○ PTR 00868003-488-0NI (SEVILLA & PORRAS)
- PTR 00867997-488-0NI (RIGAS)
- ▭ PTR 00868004-488-0NI (BARGENA)
- ◇ PTR 00867994-488-0NI (SANCHEZ)
- PTR 00867984-488-0NI (STEPHENS)
- ¡ ¡ PTR 00868007-488-0NI (TREVINO)
- ** PTR 00901984-488-0NI (DUENAS)
- (( )) PTR 00904008-488-0NI (RITZ)
- \# # PTR 00846547-488-0NI (MARTINEZ)

LEGEND

- EXISTING CENTER LINE
- EXISTING EDGE OF PAVEMENT
- EXISTING EASEMENT
- EXISTING FENCE
- EXISTING GAS LINE
- EXISTING PARCEL LINE
- EXISTING POWER POLE
- EXISTING / PROPOSED R/W
- EXISTING WATER LINE
- PROPERTY LINE
- PROPOSED BUILDING OUTLINE

ABBREVIATIONS

AC	ACRE
CL	CENTER LINE
EX	EXISTING
PIP	PROTECT IN PLACE
PP	POWER POLE
PROP	PROPOSED
R/W	RIGHT-OF-WAY
TBR	TO BE REMOVED
TBRL	TO BE RELOCATED
TBU	TO BE UNDERGROUNDED

ACREAGE

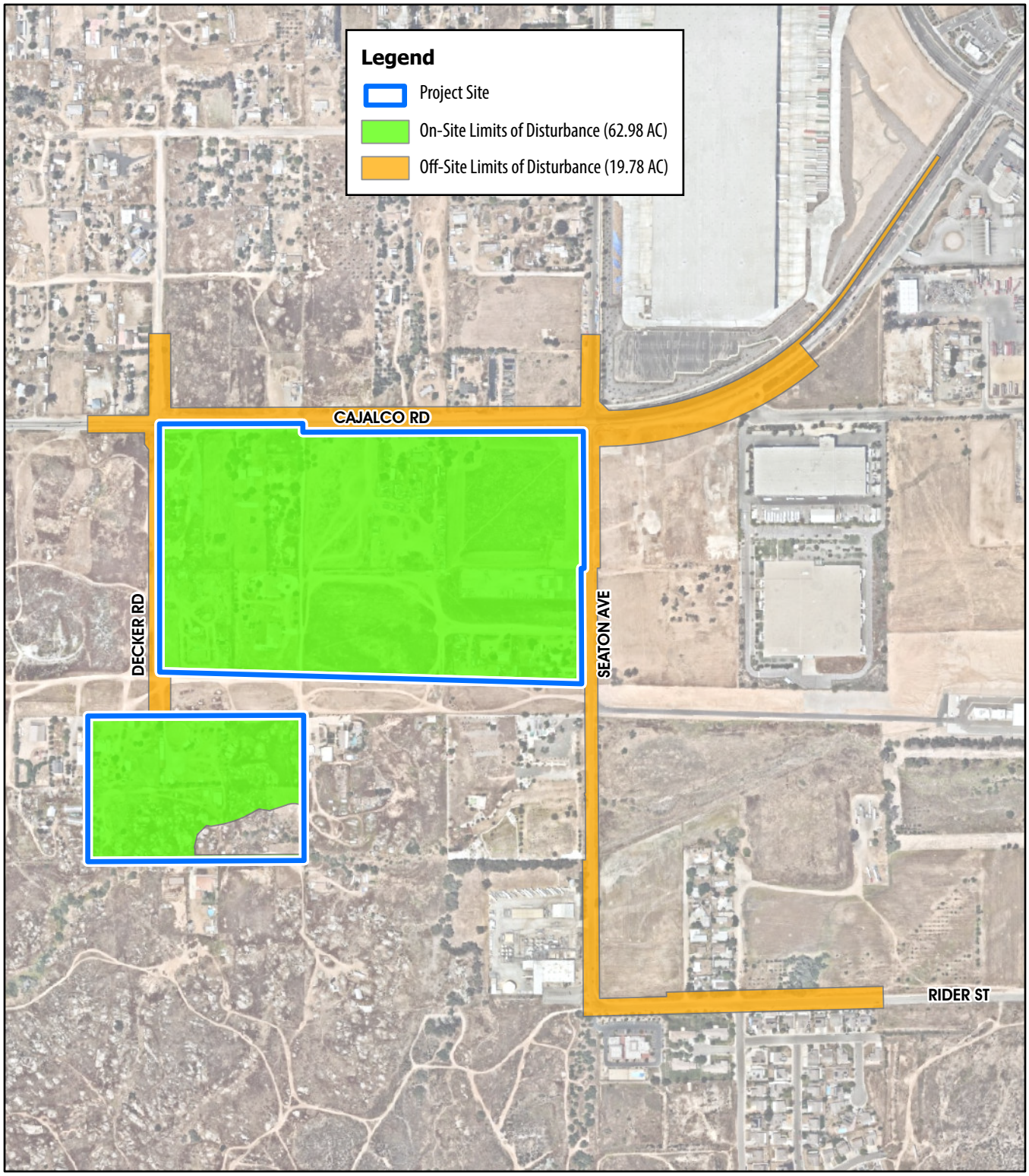
	PARCEL 1
NET AREA	44.66 AC
R/W DEDICATION	5.38 AC
GROSS AREA	50.04 AC

Source(s): Albert A. Webb Associates (03-13-2024)

Figure 3-14

Not to Scale

Tentative Parcel Map No. 38601 (TPM No. 38601)



Source(s): ESRI, NearMap Imagery (May 2023)

Figure 3-15

Limits of Disturbance

B. Construction Activities Schedule and Equipment Fleet

For purposes of analysis, construction of Project is expected to commence in September 2024 and would last through December 2025. The construction schedule utilized in the analysis, shown in Table 3-1, *Construction Duration*, represents a "worst-case" analysis scenario should construction occur any time after the respective dates since emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent[1]. The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet. (Urban Crossroads, 2023a, p. 44)

Table 3-1 Construction Duration

Construction Activity	Start Date	End Date	Working Days
Demolition	9/2/2024	11/15/2024	55
Site Preparation	11/18/2024	12/17/2024	22
Grading	12/18/2024	3/14/2025	63
Building Construction	3/17/2025	12/12/2025	195
Paving	10/2/2025	10/22/2025	15
Architectural Coating	8/11/2025	12/12/2025	90

(Urban Crossroads, 2023a, Table 3-3)

Consistent with industry standards and typical construction practices, with the exception of the equipment needed for building construction (which was increased), each piece of equipment listed in Table 3-2, *Construction Equipment Assumptions*, would operate up to a total of eight (8) hours per day, or more than two-thirds of the period during which construction activities are allowed pursuant to the County's Noise Ordinance (Ordinance No. 847, *Regulating Noise*). In accordance with the County of Riverside Good Neighbor Policy for Logistics and Warehouse/Distribution uses, it is assumed that equipment rated 50 or less horsepower would meet at least CARB Tier 3 emissions standards, and equipment rated more than 50 horsepower would meet at least CARB Tier 4 Interim emissions standards. (Urban Crossroads, 2023a, p. 44)

1. Demolition Activities

Under existing conditions, the Project site is occupied by 26 single-family homes and a commercial structure, with the total existing building area comprising approximately 43,858 s.f. As part of the Project, all of these dwelling units and the commercial building would be demolished to accommodate the proposed warehouse and park uses on site. Demolition activities are anticipated to occur over approximately 55 working days, as summarized in Table 3-1. Table 3-2 identifies the list of construction equipment anticipated during demolition activities. The CALGreen Code, which is implemented through the Riverside County Ordinance No. 457, requires that at least 65% of construction and demolition debris be diverted from landfills through recycling, reuse, and/or salvage. The non-recyclable construction debris generated during Project construction and

[1] As shown in the CalEEMod User's Guide Version 2022.1, Section 4.3 "Off-Road Equipment" as the analysis year increases, emission factors for the same equipment pieces decrease due to the natural turnover of older equipment being replaced by newer less polluting equipment and new regulatory requirements.

demolition activities would be disposed of at El Sobrante Landfill, Lamb Canyon Landfill, or Badlands Landfill.

Table 3-2 Construction Equipment Assumptions

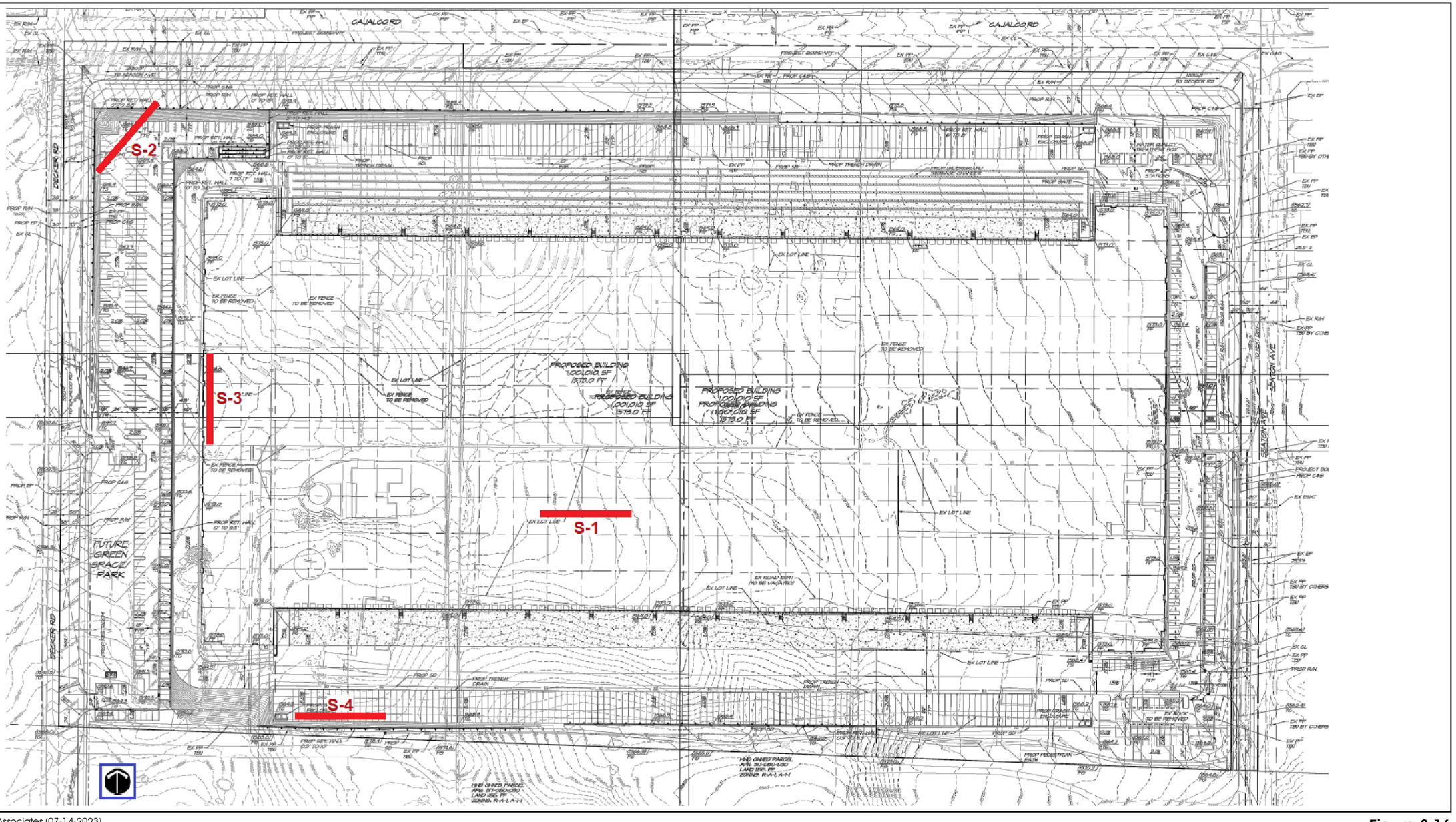
Construction Activity	Equipment[1]	Amount	Hours Per Day
Demolition	Concrete/Industrial Saws	1	8
	Excavators	3	8
	Rubber Tired Dozers	2	8
Site Preparation	Rubber Tired Dozers	3	8
	Crawler Tractors	4	8
Grading	Excavators	2	8
	Graders	2	8
	Rubber Tired Dozers	2	8
	Scrapers	5	8
	Crawler Tractors	3	8
	Generator Sets	1	8
	Bore/Drill Rigs	1	8
	Crushing/Proc. Equipment	1	8
Building Construction	Cranes	1	8
	Forklifts	4	8
	Generator Sets	3	8
	Tractors/Loaders/Backhoes	3	8
	Welders	3	8
Paving	Pavers	2	8
	Paving Equipment	2	8
	Rollers	2	8
Architectural Coating	Air Compressors	2	8

[1] In order to account for fugitive dust emissions, Crawler Tractors were used in lieu of Tractors/Loaders/Backhoes during the site preparation and grading phases of Project construction.

(Urban Crossroads, 2023a, Table 3-4)

2. Construction-Related Blasting Activities

As shown in Figure 3-16, *Anticipated Blasting Locations*, portions of the Project site are underlain by non-rippable bedrock materials that are not conducive to standard grading techniques. In these areas, it is anticipated that blasting would be required during grading in order to break up the existing bedrock. A blasting contractor would be required to complete all blasting-related activities in compliance with applicable regulations of the Riverside County Sheriff's Department, the U.S. Bureau of Mines, the California Division of Occupational Safety and Health (Cal-OHSA), the Department of Homeland Security, and the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF). As required by law a licensed blasting contractor would be responsible for performing and supervising all blasting activities, including the following:



Source(s): Albert A. Webb Associates (07-14-2023)

Figure 3-16

Not to Scale

Anticipated Blasting Locations

- Drill pattern design;
- Pre-blast inspection;
- Loading of explosives;
- Pre-blast notifications and warning signaling;
- Blasting safety procedures;
- Blasting site security;
- Post-blast inspections and re-entry procedures; and
- Blast log and history.

Explosives used for blasting usually consist of a primer, secondary explosive, and an initiator. The blasting contractor would most likely use a high explosive Ammonia Gelatin as a primer for each shot and ammonium nitrate mixed with fuel oil (ANFO) as the primary blasting agent. Nonelectric blasting caps are typically used to initiate the blasting agent. The charges are time delayed by at least 8-milliseconds. Delays between charges are used to decouple changes and reduce vibration.

Pattern blasting is a common technique used in blasting for construction. This method is used when rock materials occur over a wide area. Pattern blasting involves drilling holes in a pre-designed pattern. The depth and spacing of holes are controlled to provide the maximum fracture with the minimum amount of ground shaking.

Blasting patterns typically consist of drill holes between two and five inches in diameter. Depth of the drill holes would be determined by the blasting contractor and is specific to each application. Blasting patterns on construction sites typically range from three feet by three feet to 12 feet by 12 feet.

The Blasting Engineer would control blasting-induced vibration and noise. General control measures include:

- Stemming shall be of uniform size in order to ensure consistency between individual shots;
- The weight of explosives used per delay shall be determined by adherence to the Scaled Distance Equation;
- Independent delays shall be used for each blast hole to control vibration; and
- Blasting shall not take place when wind velocity equals or exceeds 15 miles per hour. A licensed blasting contractor will determine wind speed through the use of a recording anemometer located a minimum of ten feet above ground level.

In addition, ground vibrations and air overpressure shall be monitored during each blast for compliance with the limits by the U.S. Bureau of Mines. Following each blast, seismographs shall be checked to ensure that the blasting has not exceeded relevant standards. The relevant standards are as follows:

- Pursuant to 30 CFR Ch. VII, § 816.67(b)(1)(i) of U.S. Bureau of Mines publication RI8485, airblasts shall not exceed 133 dB at the location of any dwelling, public building, school, church, or community or institutional building outside the permit area. Pursuant to 30 CFR Ch. VII, § 816.67(d)(2)(i) of U.S.

Bureau of Mines publication RI8508, the maximum ground vibration shall not exceed the limits in said section at the location of any dwelling, public building, school, church, or community or institutional building outside the permit area.

Refer to EIR Subsection 4.13, *Noise*, for additional discussion and an evaluation of potential noise and vibration impacts related to blasting activities during construction.

3.6.2 Operational Characteristics

At the time this EIR was prepared, the future tenant(s) of the proposed warehouse buildings were unknown. For the purposes of this EIR, the Project is assumed to be operational 24 hours per day, seven days per week, with exterior loading and parking areas illuminated at night. The proposed public park would include a variety of amenities, such as playfields, hard surface sport courts, playground, a dog park, and walking paths. The public park would be limited to daytime hours and would be closed during the nighttime hours of 10:00 p.m. to 7:00 a.m.

B. Projected Employment

Based on employment generation rates specified in Appendix E to the Riverside County General Plan, Light Industrial land uses generate approximately one employee per 1,030 s.f. of building area (Riverside County, 2021a, Appendix E, Table E-5). Accordingly, the 1,003,510 s.f. of light industrial building area proposed as part of the Project would generate approximately 974 new, recurring jobs (1,003,510 s.f. ÷ 1,030 s.f./employee = 974.3 employees). A nominal number of employees also would be generated by the proposed public park site due to maintenance activities at the park and operation of the concession stand.

C. Vehicle Trip Generation

For purposes of analysis in this EIR, up to 150,526 s.f. of the warehouse building (15% of the building space) is assumed to consist of high-cube cold storage warehouse uses, with the remaining 852,984 s.f. of the building space consisting of high-cube fulfillment center uses. Although 15% of the building is evaluated as potentially containing a high-cube cold storage warehouse use, mitigation is presented in EIR Subsection 4.13, *Noise*, that prohibits high-cube cold storage warehouse uses from occupying the building until or unless it can be demonstrated through a subsequent noise analysis that nighttime operational-related noise levels would not exceed the County's Noise Ordinance nighttime standard of 45 dBA Leq at offsite residential receptor locations. Under current conditions and the existing locations of offsite residential uses, cold storage uses would not be permitted.

As more fully discussed in Section 4 of the Project's Traffic Analysis ("TA"; EIR *Technical Appendix N2*), and based on direction from the Riverside County Transportation Department and the operational characteristics described above (inclusive of 150,526 s.f. of high-cube cold storage warehouse uses), the proposed Project (including both the warehouse and park components) is anticipated to generate 2,886 two-way trip-ends per day with 150 AM peak hour trips and 218 PM peak hour trips in terms of actual vehicles. In addition, Passenger Car equivalent (PCE) factors were applied to the trip generation rates for heavy trucks (large 2-axles, 3-axles, 4+-axles). PCEs allow the typical "real-world" mix of vehicle types to be represented

as a single standardized unit, such as the passenger car, to be used for the purposes of capacity and level of service analyses. Using PCEs, the proposed Project is anticipated to generate approximately 3,550 PCE trip ends per day, including 183 PCE trips during the AM peak hour and 252 PCE trips during the PM peak hour. (Urban Crossroads, 2023x, Tables 4-2 and 4-3)

3.6.3 Summary of Requested Actions

Riverside County has primary approval responsibility for the proposed Project. As such, Riverside County serves as the Lead Agency for this EIR pursuant to State CEQA Guidelines § 15050. The role of the Lead Agency was previously described in detail in Section 1.0 of this EIR. As part of the approval process for the proposed Project, the County's Planning Commission will hold a public hearing to consider this EIR and the Project's Foundation General Plan Amendment, Change of Zone (CZ 2200062), Plot Plan (PPT 220050), and Tentative Parcel Map No. 38601 (TPM 38601) applications. The Planning Commission will make advisory recommendations to the Board of Supervisors on whether to approve, approve with changes, or deny the Project's Foundation General Plan Amendment, CZ 2200062, PPT 220050, and TPM 38601, and whether to certify this EIR. A public hearing will then be held before the Board of Supervisors, which will consider the information contained in the Project's EIR and the EIR's Administrative Record in its decision-making processes, certify or decline to certify this EIR, and approve, approve with changes, or deny approval of proposed Foundation Component General Plan Amendment, CZ 2200062, PPT 220050, and TPM 38601. As previously described, it is not anticipated that the Project's applications will be considered by the Riverside County Board of Supervisors until the County undertakes its regular 8-year cycle for a comprehensive review and update to the Riverside County General Plan (refer to the discussion in subsection 3.5.1), at which time the Project's applications will be considered for approval as part of the General Plan Update approval hearings.

3.6.4 Related Environmental Review and Consultation Requirements

Subsequent to approval of the Project's Foundation General Plan Amendment No. 240005, CZ 2000062, PPT 220050, and TPM 38601, additional discretionary applications would be required to implement the Project. Table 3-3, *Matrix of Project Approvals/Permits*, lists the agencies that are expected to use this EIR and provides a summary of the subsequent actions associated with the Project. This EIR covers all federal, State, and local government and quasi-governmental approvals which may be needed to construct and implement the Project, whether or not they are explicitly listed in Table 3-3 or elsewhere in this EIR (CEQA Guidelines § 15124(d)).

Table 3-3 Matrix of Project Approvals/Permits

Public Agency	Approvals and Decisions
Riverside County Discretionary Approvals (Proposed Project)	
Riverside County Planning Commission	• Provide recommendations to the Riverside County Board of Supervisors whether to approve, conditionally approve, or deny the Project's Foundation General Plan Amendment No. 240005, CZ 2000062, PPT 220050, and TPM 38601.
Riverside County Board of Supervisors	• Approve, conditionally approve, or deny the Project's Foundation General Plan Amendment No. 240005, CZ 2000062, PPT 220050, and TPM 38601. • Reject or certify the Final EIR along with appropriate CEQA Findings.
Subsequent Riverside County Approvals	
Riverside County Subsequent Implementing Approvals: Planning Department and/or Building and Safety	• Issue Demolition Permits • Issue Grading Permits. • Issue Building Permits. • Approve Road Improvement Plans. • Issue Encroachment Permits. • Accept public right-of-way dedications. • Approve street vacations, if required. • Authorize nighttime construction activities, if proposed.
Other Agencies – Subsequent Approvals and Permits	
California Department of Fish and Wildlife	• Issuance of a Section 1602 Streambed Alteration Agreement (SAA).
Santa Ana Regional Water Quality Control Board	• Issuance of a Construction Activity General Construction Permit. • Compliance with National Pollutant Discharge Elimination System (NPDES) Permit and Waste Discharge Requirements.
Western Riverside County Regional Conservation Authority (RCA)	• Approval of Multiple Species Habitat Conservation Plan (MSHCP) Habitat Acquisition and Negotiation Strategy (HANS) determination • Approval of MSHCP Determination of Biologically Equivalent or Superior Preservation (DBESP)
Riverside County Flood Control and Water Conservation District (RCFCWCD)	• Approval of proposed drainage infrastructure and improvements.
South Coast Air Quality Management District (SCAQMD)	• Permits and approvals associated with operation of stationary equipment, if proposed
Eastern Municipal Water District (EMWD)	• Approval of proposed water and sewer connections and improvements.
Southern California Edison (SCE)	• Approval of electrical system connections
Metropolitan Water District (MWD)	• Approval of physical disturbance within MWD fee-owned property.

4.0 ENVIRONMENTAL ANALYSIS

4.0.1 SUMMARY OF EIR SCOPE

In accordance with California Environmental Quality Act (CEQA) Guidelines Sections 15126-15126.4, this EIR Section 4.0, *Environmental Analysis*, provides analyses of potential direct, indirect, and cumulatively-considerable impacts that could occur from planning, constructing, and operating the proposed Project.

In compliance with the procedural requirements of CEQA, a Notice of Preparation (NOP) was prepared and distributed for a 30-day public review period on June 30, 2023, in accordance with State CEQA Guidelines Section 15082. An Initial Study was not prepared for the Project, and as such the NOP indicated that the required EIR will evaluate all of the topics listed in Appendix G to the State CEQA Guidelines, as implemented by Riverside County and the County's standard Environmental Assessment (EA) Form. Public comment on the scope consisted of written comments received by the Riverside County in response to the NOP issued for this EIR. A publicly-noticed Scoping Session also was held as part of a Riverside County Planning Director's Hearing on July 24, 2023 at the Riverside County Administrative Building (4080 Lemon Street, Riverside, CA 92501), although no comments resulting in an expansion of the scope of the EIR were provided as part of the Scoping Session. Pursuant to Appendix G to the State CEQA Guidelines and the County's standard EA form, this EIR evaluates 21 primary environmental subject areas, as listed below. Each Subsection evaluates several specific subject matters related to the general topic of the Subsection. The title of each Subsection is not limiting; therefore, refer to each Subsection for a full account of the subject matters addressed therein.

4.1	Aesthetics	4.12	Mineral Resources
4.2	Agriculture and Forest Resources	4.13	Noise
4.3	Air Quality	4.14	Paleontological Resources
4.4	Biological Resources	4.15	Population and Housing
4.5	Cultural Resources	4.16	Public Services
4.6	Energy	4.17	Recreation
4.7	Geology and Soils	4.18	Transportation
4.8	Greenhouse Gas Emissions	4.19	Tribal Cultural Resources
4.9	Hazards and Hazardous Materials	4.20	Utilities and Service Systems
4.10	Hydrology and Water Quality	4.21	Wildfire
4.11	Land Use and Planning		

4.0.2 SCOPE OF CUMULATIVE EFFECTS ANALYSIS

CEQA requires that an EIR contain an assessment of the cumulative impacts that may be associated with a proposed project. As noted in State CEQA Guidelines § 15130(a), "an EIR shall discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable." "[A] cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects creating related impacts" (State CEQA Guidelines §15130(a)(1)). As defined in State CEQA Guidelines § 15355:

'Cumulative Impacts' refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.

(a) The individual effects may be changes resulting from a single project or a number of separate projects.

(b) The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

State CEQA Guidelines § 15130(b) describes two acceptable methods for identifying a study area for purposes of conducting a cumulative impact analysis. These two approaches include: 1) a list of past, present, and probable future projects producing related or cumulative impacts, including if necessary, those projects outside the control of the agency ('the list of projects approach'), or 2) a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative impact ('the summary of projections approach').

The summary of projections approach is used in this EIR, except for the evaluation of near-term vehicular traffic-related noise impacts, which relies instead on the list of projects approach. This methodology was determined to be appropriate by Riverside County because long-range planning documents contain a sufficient amount of information to enable an analysis of cumulative effects for all subject areas, with exception of vehicular-related noise effects, which requires a greater level of detailed study.

Under this approach, the cumulative analysis under most sections considers impacts to each issue area based on the presumed buildout of the Riverside County General Plan as well as the general plans of any nearby jurisdictions that occur within the cumulative study area for each subject area. For most issue areas, this would encompass nearby areas within unincorporated Riverside County, nearby portions of the City of Perris, and the City of Moreno Valley, although the cumulative study area may be smaller or larger depending on the issue area under evaluation. For example, for the issue area of aesthetics, the cumulative study area is defined by the Project's viewshed (i.e., off-site areas with views of the Project site), which encompasses lands within the immediate Project vicinity (i.e., within approximately two miles of the Project site). For the issue of hydrology and water quality, by contrast, the cumulative study area is defined as the Santa Ana River Watershed, which encompasses portions of San Bernardino, Riverside, Orange, and Los Angeles Counties. For the issue of biology, the cumulative study area corresponds to the boundaries of the Western Riverside County Multiple Habitat Species Conservation Plan (MSHCP), as the MSHCP provides for the conservation of a wide variety of special status plant and animal species and encompasses a broad region that generally represents biological conditions associated with the Project area; thus, the cumulative study area for biological resources includes all future land uses within western Riverside County as called for by the general plans of the County and the various cities that are included in the MSHCP region. Refer to the individual Subsections within EIR Section 4.0 for a description of the specific cumulative study area used for each subject area evaluated in this EIR.

As noted, for most issue areas, nearby portions of unincorporated Riverside County and nearby portions of the City of Perris, and the City of Moreno Valley are used as the Project's cumulative study area. This cumulative study area encompasses a large area surrounding the Project site that has similar environmental characteristics as the Project area. This area generally contains a variety of residential, light industrial, agricultural, and commercial land uses, with portions of the area comprising undeveloped lands and open space. This study area exhibits similar characteristics in terms of climate, geology, and hydrology. This study area also encompasses the service areas of the Project site's primary public service and utility providers. Areas outside of this study area either exhibit topographic, climatological, or other environmental circumstances that differ from those of the Project area, or are simply too far from the proposed Project site to produce environmental effects that could be cumulatively considerable.

The analysis of near-term cumulatively-considerable traffic-related impacts due to noise uses a combined approach, utilizing the list of projects approach for the near-term analysis of cumulatively-considerable impacts, and the summary of projections approach for the evaluation of long-term cumulatively-considerable impacts. With the combined approach, the cumulative impact analysis for the analysis of traffic-related impacts due to noise overstates the Project's (and Project-related components') potential cumulatively-considerable impacts as compared to an analysis that would rely solely on the list of projects approach or solely on the summary of projections approach; therefore, the combined approach provides a conservative, "worst-case" analysis for cumulative traffic-related noise impacts.

For near-term conditions, the analyses of cumulatively-considerable vehicular-related noise impacts are based on existing traffic conditions plus ambient growth and the manual addition of traffic from past, present, and reasonably foreseeable projects, and includes approved and pending development projects in proximity to the Project site that would contribute traffic to the same transportation facilities as the Project, as well as large, traffic-intensive projects farther from the Project site that have the potential to affect regional transportation facilities. This methodology recognizes development projects that have the potential to contribute measurable traffic to the same intersections, roadway segments, and/or State highway system facilities as the proposed Project and have the potential to be made fully operational in the foreseeable future. As shown on Table 4.0-1, *Cumulative Projects List*, and as depicted on Figure 4.0-1, *Cumulative Development Location Map*, the near-term cumulative impact analysis of traffic-related and noise impacts includes 34 other past, present, and reasonably foreseeable projects within this study area in addition to the summary of projections (Urban Crossroads, 2023h, Table 4-4) The analysis of long-term cumulatively-considerable traffic-related impacts to noise considers full buildout of nearby portions of unincorporated Riverside County, based on buildout of the County's General Plan land use plan.

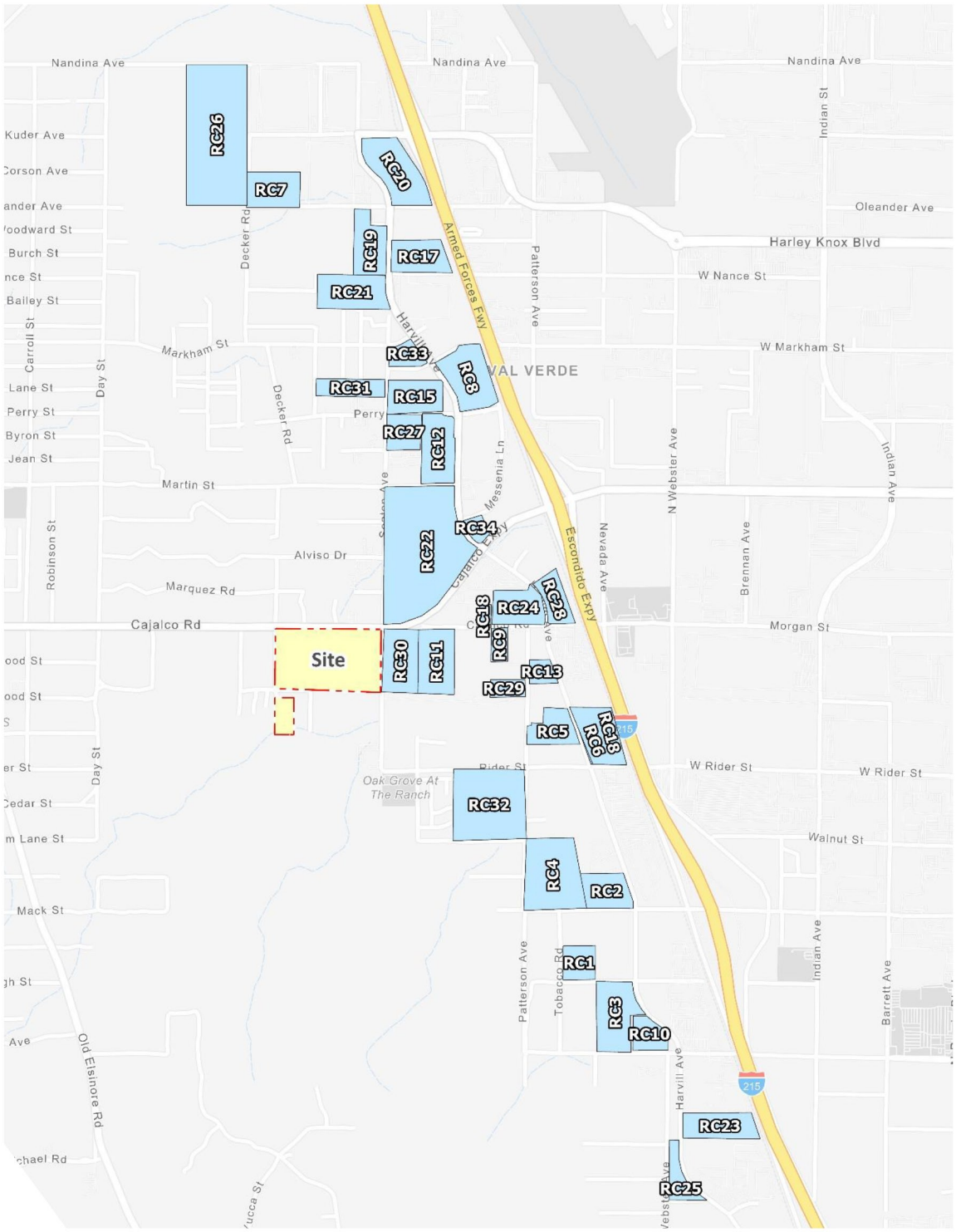
In addition, Figure 4.0-2, *Warehouse Development Location Map*, depicts the locations of existing, planned/approved, and proposed warehouse developments within the Project vicinity. The warehouse developments shown as "Existing Warehouse Use" on Figure 4.0-2 includes those warehouse developments that were constructed and fully operational as of February 2023, when the traffic counts were collected in the local area as part of the Project's Traffic Analysis ("TA"; *Technical Appendix N2*). Because the "Existing

Table 4.0-1 Cumulative Projects List

No.	Project Name	Address/Location	Land Use[1]	Quantity	Units[2]
County of Riverside:					
RC1	PPT220047	NEC of Tobacco Rd. & Water Av.	Warehousing	192.249	TSF
RC2	Placentia Truck Drop Lot	NWC of Harvill Av. & Placentia Av.	Truck Trailer Storage	8.06	AC
RC3	Harvill & Water Logistics	SWC of Harvill Av. & Water St.	High-Cube Fulfillment Center Warehouse	304.376	TSF
			High-Cube Cold Storage Warehouse	130.447	TSF
RC4	Barker Logistics	NWC of Patterson Av. & Placentia Av.	High-Cube Fulfillment Center Warehouse	699.630	TSF
RC5	Dedeaux Harvill Truck Terminal	North of Rider St., west of Harvill Av.	Truck Terminal	55.700	TSF
RC6	Harvill & Rider Warehouse	NEC of Harvill Av. & Rider St.	General Light Industrial	50.249	TSF
			High-Cube Transload Short-Term Warehouse	284.746	TSF
RC7	Building 21 & 22	NEC of Decker Rd. & Oleander Av.	Warehousing	215.424	TSF
RC8	Majestic Freeway Busines Center Building 11	SEC of Harvill Ave./Commerce Center Dr.	High-Cube Fulfillment Center Warehouse	391.045	TSF
RC9	PPT190029	South of Old Cajalco Rd., west of Patterson Av.	Warehousing	36.000	TSF
RC10	PPT210021	NWC of Harvill Av. & Orange Av.	Trailer Maintenance Facility/Storage	16.200	TSF
RC11	PPT210133	SEC of Seaton Av. & Cajalco Exwy.	Warehousing	350.481	TSF
RC12	Majestic Freeway Busines Center (Building 13)	SWC of Harvill Av. & Perry St.	High-Cube Fulfillment Center Warehouse	322.997	TSF
RC13	Patterson & Harvill Warehouse	East of Patterson Av., South of Old Cajalco Rd.	Warehousing & Cold Storage	100.190	TSF
RC14	Majestic Freeway Busines Center Building 12	NEC Harvill Ave./Commerce Center Dr.	Warehousing	155.000	TSF
RC15	Majestic Freeway Busines Center (Buildings 14A,14B)	SWC of Harvill Av. & Commerce Center Dr.	Warehousing	354.583	TSF
RC16	Cajalco Road Commercial Center	SWC of Clark St. & Cajalco Rd.	Convenience Store/Gas Station	16	VFP
			High-Turnover Sit-Down Restaurant	4.998	TSF
			Car Wash	1.481	TSF
			Restaurant w/ Drive-Thru	1.632	TSF
RC17	Majestic Freeway Business Center Building 17	East of Harvill, South of Old Oleander Av.	General Light Industrial	256.148	TSF
RC18	28840 Rider Street	East of Harvill, North of Rider	Animal Production Facility	54.450	TSF
RC19	Majestic Freeway Business Center Building 18	SWC of Harvil Av. & Old Oleander Av.	Warehousing	333.648	TSF
RC20	PPT190031	SEC of Harvill Av. & Harley Knox Bl.	Industrial Manufacturing Building (Warehousing)	418.000	TSF
RC21	Majestic Freeway Business Center Building 19 & 20	South of Old Oleander, West of Harvill Av.	Warehousing	754.168	TSF
RC22	Majestic Freeway Business Center Buildings 1, 3, & 4	NEC of Seaton Av. & Cajalco Rd.	High-Cube Warehouse/Warehousing	1244.670	TSF
RC23	PPT190005	NEC of Harvill Av. & Lemon St.	Warehousing	333.553	TSF
RC24	PPT190006	NWC of Harvill Av. & Cajalco Rd.	Warehousing	289.556	TSF
RC25	PPT190028	NWC of Harvill Av. & Citrus Av.	Warehousing	197.856	TSF
RC26	Oleander Business Park	SWC of Harley Knox Bl. & Nandina Av.	Warehousing	711.734	TSF
RC27	Seaton Commerce Center	SEC of Seaton Av. & Perry St.	High-Cube Fulfillment Center Warehouse	210.800	TSF
RC28	Harvill & Cajalco Warehouse	NEC of Harvill Av. & Old Cajalco Rd.	General Light Industrial & Truck Yard	99.770	TSF
RC29	Patterson & Cajalco Warehouse	West of Patterson Av., South of Old Cajalco Rd.	Warehousing & Cold Storage	107.968	TSF
RC30	Seaton & Cajalco High Cube Warehouse	SEC of Seaton Av. & Cajalco Rd.	Warehousing & Cold Storage	350.481	TSF
RC31	PPT210022	NWC of Harvill Av. & Orange Av.	General Light Industrial	98.940	TSF
RC32	Rider & Patterson Business Center	SWC Patterson Ave./Rider St.	High-Cube Fulfillment Center Warehouse	591.203	TSF
RC33	Majestic Freeway Business Center Building 15	SEC of Seaton Av. & Markham St.	Warehousing	90.000	TSF
RC34	Retail	NEC of Harvill Av. & Cajalco Rd.	Retail	16.306	TSF

[1] TSF = Thousand Square Feet; AC = Acres; VFP = Vehicle Fueling Postions

(Urban Crossroads, 2023h, Table 4-4)

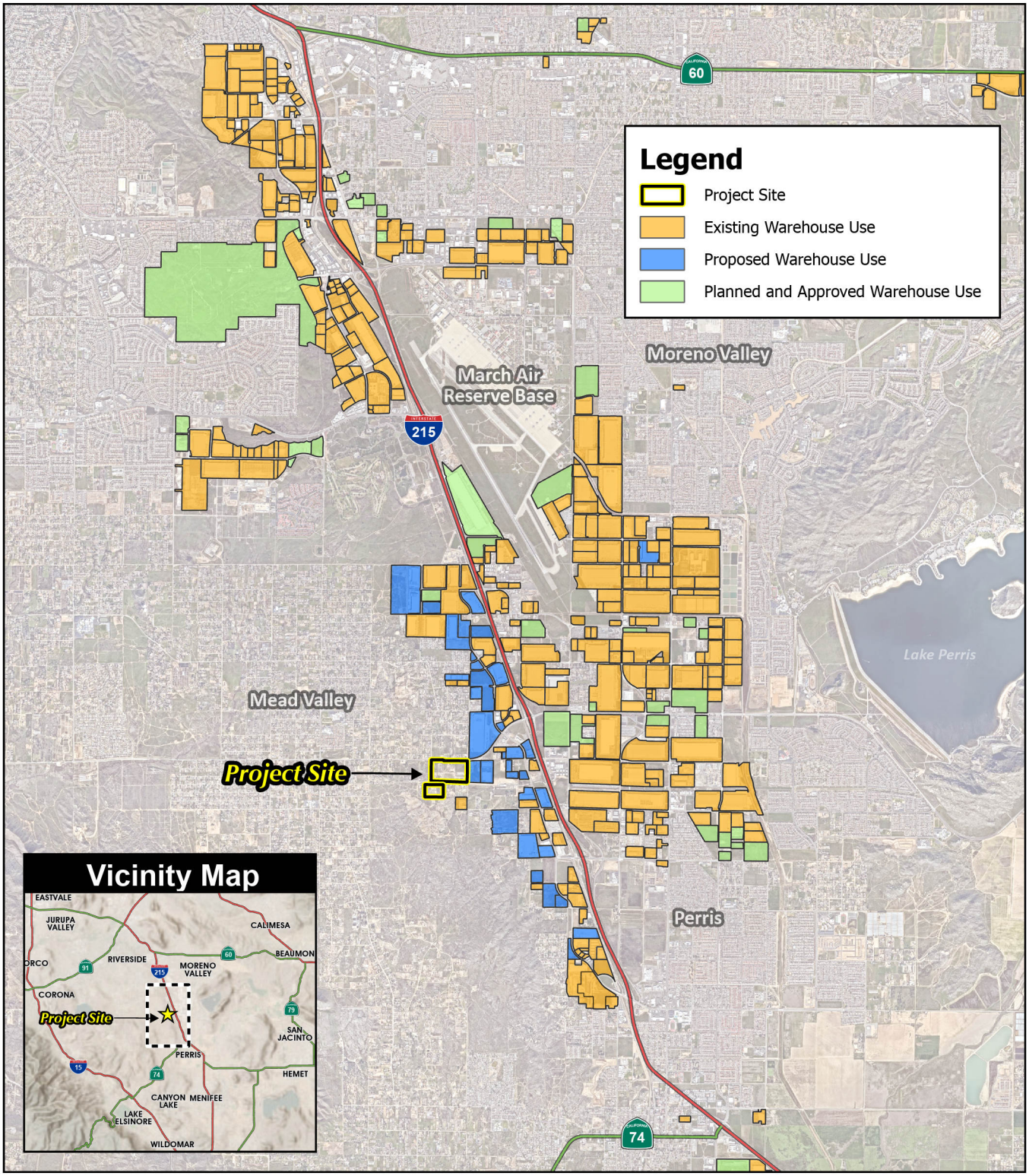


Source(s): Urban Crossroads (05-17-2023)

Figure 4.0-1

Not to Scale

Cumulative Development Location Map



Source(s): ESRI, Nearmap Imagery (March 2024), RCIT (2024), Pitzer College (2024)

Figure 4.0-2

Warehouse Development Location Map

Warehouse Use" developments were fully constructed and operational as of February 2023, traffic from these developments already is accounted for as part of the traffic counts collected as part of the Project's TA. Thus, the "Existing Warehouse Use" developments depicted on Figure 4.0-2 are accounted for as part of the analysis of the Project's traffic-related noise impacts (refer to EIR Subsection 4.13, *Noise*, and EIR *Technical Appendix L*). For those warehouse developments identified as "Planned and Approved Warehouse Use" on Figure 4.0-2 and that are not also listed in Table 4.0-1 or shown on Figure 4.0-1, the Project's traffic consultant (Urban Crossroads, Inc.) reviewed the anticipated traffic patterns from these developments, and determined that none of these developments would contribute 50 or more peak hour trips to any of the Project's study area intersections[1]. Those warehouse developments identified as "Proposed Warehouse Use" on Figure 4.0-2 include all of the cumulative developments identified in Table 4.0-1 and shown on Figure 4.0-1, as these developments were not operational as of February 2023 and were determined to contribute 50 or more peak hour trips to the Project's study area intersections.

For the issue of air quality, the cumulative study area comprises the South Coast Air Basin (SCAB), while the cumulative impact analysis relies on guidance from the South Coast Air Quality Management District (SCAQMD). The SCAQMD published a report giving direction on how to address cumulative impacts from air pollution: *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution* (SCAQMD, 2003). In this report the AQMD states on page D-3:

> *"…the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR. The only case where the significance thresholds for project specific and cumulative impacts differ is the Hazard Index (HI) significance threshold for toxic air contaminant (TAC) emissions. The project specific (project increment) significance threshold is HI > 1.0 while the cumulative (facility-wide) is HI > 3.0. It should be noted that the HI is only one of three TAC emission significance thresholds considered (when applicable) in a CEQA analysis. The other two are the maximum individual cancer risk (MICR) and the cancer burden, both of which use the same significance thresholds (MICR of 10 in 1 million and cancer burden of 0.5) for project specific and cumulative impacts.*
>
> *Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant."*

The cumulative analysis provided in EIR Subsection 4.3 assumes that individual projects that do not generate emissions that exceed the SCAQMD's recommended daily thresholds for project-specific impacts would also not cause a cumulatively considerable increase in emissions for those pollutants for which the South Coast Air Basin (SCAB) is in nonattainment, and, therefore, would not be considered to have a significant, adverse air

[1] The "50 peak hour trip" criteria represent a minimum number of trips at which a typical intersection would have the potential to be substantively affected by a given development proposal. The 50 peak hour trip criterion is a traffic engineering rule of thumb that is accepted and widely used within Riverside County for estimating a potential area of influence (i.e., study area).

quality impact. Alternatively, individual project-related emissions that exceed SCAQMD thresholds for Project-specific impacts would be considered cumulatively considerable.

Compliance with the SCAQMD guidelines for evaluating direct and cumulatively-considerable impacts due to air quality emissions has been shown to result in a demonstrable reduction in air quality pollutants within the SCAB. As more thoroughly discussed in EIR Subsection 4.3, regulations promulgated by the SCAQMD have led to a dramatic reduction in the level of air quality pollutants within the SCAB, including levels of ozone, particulate matter (PM_{10} and $PM_{2.5}$), carbon monoxide (CO), and oxides of nitrogen (NO_X). As noted in the SCAQMD's 2016 AQMP, "the remarkable historical improvement in air quality since the 1970s is the direct result of Southern California's comprehensive, multiyear strategy of reducing air pollution from all sources as outlined in its AQMPs" (SCAQMD, 2017). Improvements also have been seen in ozone levels. Part of the control processes of the SCAQMD's duty to greatly improve the air quality in the SCAB is the uniform CEQA review procedures required by SCAQMD's CEQA Handbook (SCAQMD, 2019). The single threshold of significance used to assess Project direct and cumulative impacts has in fact been successful, as evidenced by the track record of the air quality in the SCAB dramatically improving over the course of the past decades (refer to EIR Subsection 4.3 for an additional discussion on the improvement of air quality within the SCAB).

Environmental impacts associated with buildout of the cumulative study area were evaluated in previously-approved CEQA-compliance documents. The location where each of these CEQA compliance documents is available for review is provided below. All of the CEQA compliance documents listed below are herein incorporated by reference pursuant to State CEQA Guidelines § 15150.

- Riverside County General Plan Program EIR No. 521 (SCH No. 2009041065), available for review at the Riverside County Planning Department, located at 4080 Lemon Street, 12th Floor, Riverside, California 92501.

- City of Moreno Valley General Plan Update EIR (SCH No. 2020039022), available for public review at the City of Moreno Valley Planning Division, located at 14177 Frederick St., Moreno Valley, California 92552.

- City of Perris General Plan 2030 Final EIR (SCH No. 2004031135), available for public review at the City of Perris Planning Division, 101 N. D Street, Perris, California 92570.

4.0.3 Identification of Impacts

Subsections 4.1 through 4.21 of this EIR evaluate the 21 environmental subjects warranting analysis pursuant to CEQA. The format of discussion is standardized as much as possible in each Subsection for ease of review. The environmental setting is discussed first, followed by a discussion of the Project's potential environmental impacts based on specified thresholds of significance used as criteria to determine whether potential environmental effects are significant.

The thresholds of significance used in this EIR are based on the thresholds presented in State CEQA Guidelines Appendix G and as applied by Riverside County to create the County's standard Environmental Assessment

Form. The thresholds are intended to assist the reader of this EIR in understanding how and why this EIR reaches a conclusion that an impact would or would not occur, is significant, or is less than significant.

Serving as the CEQA Lead Agency for this EIR, Riverside County is responsible for determining whether an adverse environmental effect identified in this EIR should be classified as significant or less than significant. While Riverside County has generally elected to use the thresholds presented in State CEQA Guidelines Appendix G, it should be noted that CEQA affords the County discretion to formulate standards of significance, and recognizes that the significance of a particular impact may vary with the setting (14 Cal. Code Regs., § 15064(b)). The standards of significance used in this EIR are based on the independent judgment of Riverside County, taking into consideration the current State CEQA Guidelines Appendix G, Riverside County's Municipal Code, and adopted County policies and ordinances; the judgment of the technical experts that prepared this EIR's Technical Appendices; performance standards adopted, implemented, and monitored by regulatory agencies; significance standards recommended by regulatory agencies; and the standards in CEQA that trigger the preparation of an EIR. As required by State CEQA Guidelines § 15126.2(a), impacts are identified in this EIR as direct, indirect, cumulative, short-term, long-term, on-site, and/or off-site impacts of the proposed Project. A summarized "impact statement" is provided in each Subsection following the analysis.

The following terms are used to describe the level of significance related to the physical conditions within the area affected by the proposed Project:

- No Impact: An adverse change in the physical environment would not occur.

- Less-than-Significant Impact: An adverse change in the physical environment would occur but the change would not be substantial or potentially substantial and would not exceed the threshold(s) of significance presented in this EIR.

- Significant Impact: A substantial or potentially substantial adverse change in the physical environment would occur and would exceed the threshold(s) of significance presented in this EIR, requiring the consideration of mitigation measures.

Each Subsection also includes a discussion or listing of the applicable regulatory criteria (laws, policies, regulations, etc.) that the Project is required to comply with (if any). If impacts are identified as significant after mandatory compliance with regulatory criteria, feasible mitigation measures are presented that would either avoid the impact or reduce the magnitude of the impact. The following terms are used to describe the level of significance following the application of recommended mitigation measures:

- Less-than-Significant Impact with Mitigation: A substantial or potentially substantial adverse change in the physical environment would occur that would exceed the threshold(s) of significance presented in this EIR; however, the impact can be avoided or reduced to a less-than-significant level through the application of feasible mitigation measure(s).

- Significant and Unavoidable Impact: A substantial or potentially substantial adverse change in the physical environment would occur that would exceed the threshold(s) of significance presented in this EIR. Feasible and enforceable mitigation measure(s) that have a proportional nexus to the Project's impact are either not available or would not be fully effective in avoiding or reducing the impact to below a level of significance.

For any impact identified as significant and unavoidable, Riverside County would be required to adopt a statement of overriding considerations pursuant to State CEQA Guidelines § 15093 in order to approve the Project despite its significant impact(s) to the environment. The statement of overriding considerations would list the specific economic, legal, social, technological, and other benefits of the Project, supported by substantial evidence in the Project's administrative record, that outweigh the unavoidable impacts.

4.1 AESTHETICS

This Subsection 4.1 describes the aesthetic qualities and visual resources present on the Project site and in the site's vicinity and evaluates the potential effects that the Project may have on these resources. Descriptions of existing visual characteristics, both on site and in the vicinity of the Project site, and the analysis of potential impacts to aesthetic resources are based, in part, on site photographs collected by T&B Planning in June 2023, analysis of aerial photography (Google Earth, 2024), and Project application materials related to the proposed development that were submitted to Riverside County and described in Section 3.0, *Project Description*, of this EIR. This Subsection also is based in part on information and policies contained in the Riverside County General Plan (Riverside County, 2021a), Riverside County GIS database (RCIT, n.d.), Riverside County Ordinance No. 348 (Riverside County, 2021c), Riverside County Ordinance No. 655 (Riverside County, 1988), and Riverside County Ordinance No. 915 (Riverside County, n.d.3). Refer to Section 7.0, *References*, for a complete list of these and other reference sources.

4.1.1 EXISTING CONDITIONS

A. Existing Aesthetic Conditions

The Project site comprises approximately 64.97 gross acres located at the southwest corner of Cajalco Road and Seaton Avenue in the Mead Valley community of unincorporated Riverside County. Under existing conditions, the northern portion of the Project site (proposed for development with warehouse use) includes undeveloped land, multiple large-lot single-family residential homes with ancillary structures and outdoor storage, and a commercial structure (Craneology, Inc.), while the southern portion of the Project site (proposed for development with a public park) includes a mixture of undeveloped land and multiple single-family homes with a variety of ancillary structures and outdoor storage.

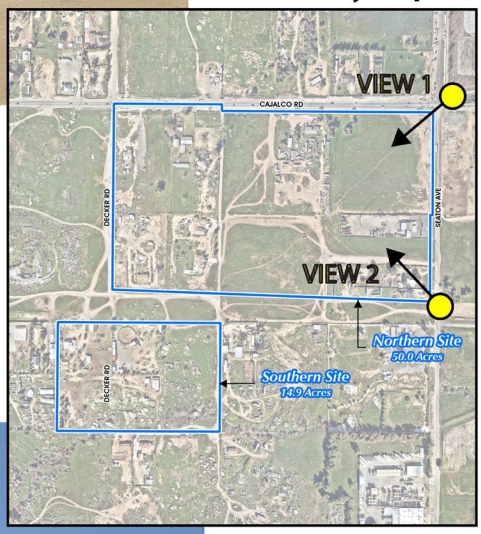
The Project site generally is characterized by relatively flat topography that slopes gently in a west-to-east orientation. Elevations within the northern 50.04 acres of the Project site range from approximately 1,535 feet above mean sea level (amsl) at the northeast corner of this portion of the Project site to approximately 1,600 feet amsl along the central portion of the western site boundary. Elevations within the southern 14.93 acres of the Project site range from approximately 1,569 feet amsl near the southeastern corner to 1,622 feet amsl near the southwestern corner. It should be noted that the southern portions of the Project site contain several large rock outcroppings in the southern and eastern portions of the site, which exhibit variable topography.

To illustrate the existing visual conditions of the Project site in more detail, a photographic inventory was prepared. A total of six (6) photographs were collected in June 2023 and are shown on Figure 4.1-1 through Figure 4.1-3, *Site Photographs*. These photographs provide a representative visual inventory of the site's visual characteristics as seen from surrounding public viewing areas.

- Site Photograph 1 (Figure 4.1-1): Site Photograph 1 was taken from the northeastern corner of the northern 50.04 acres of the Project site at the intersection of Cajalco Road and Seaton Avenue looking southwest. As shown from this location, a majority of the Project site consists of vacant land that is covered by low lying vegetation. From this vantage, highly disturbed lands with little to no vegetative cover dominate the foreground, beyond which is sparse low-lying vegetation. In the right portion of

View 1: View from the northeastern corner of the northern Project site at the intersection of Cajalco Road and Seaton Avenue looking southwest.

Key Map



View 2: View from the southeastern corner of the northern Project site along Seaton Avenue looking northwest.

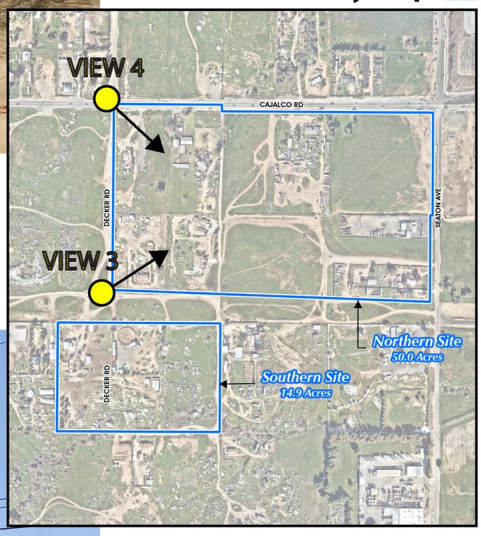
Figure 4.1-1

Not to Scale

Site Photographs 1 and 2

View 3: View from the southwestern corner of the northern Project Site along the future alignment of Decker Road looking northeast.

Key Map



View 4: View from the northwestern corner of the northern Project Site at the intersection of Decker Road and Cajalco Road looking southeast.

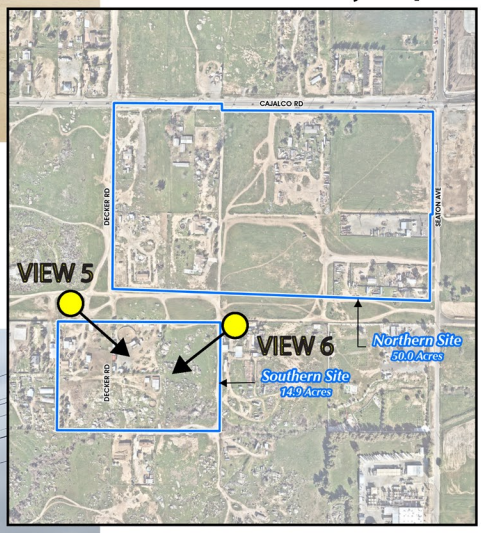
Figure 4.1-2

Not to Scale

Site Photographs 3 and 4

View 5: View from the northwestern corner of the southern Project Site looking southeast.

Key Map



View 6: View from the northeast corner of the southern Project Site looking southwest.

Figure 4.1-3

Not to Scale

Site Photographs 5 and 6

the photo are Cajalco Road and several existing power and telephone poles along the southern side of Cajalco Road. In the distance in the right portion of the photo, a stand of trees is visible, to the left of which is an existing on-site single-family residence with outdoor storage of cars, recreational vehicles, and truck trailers. Also in the distance are existing outdoor storage areas associated with the existing commercial use on site (Craneology, Inc.), with a large tall crane clearly visible from this location. In the left portion of the photo in the distance are the Huong Sen Buddhist Temple and several rural residences, along with ornamental trees and chain link fencing that are visible along the southern boundary of the existing Metropolitan Water District (MWD) ~~easement~~ fee-owned parcel that occurs between the northern and southern portions of the Project site. In the distance along the horizon large hills associated with the Temescal Mountains and Gavilan Hills are visible.

- Site Photograph 2 (Figure 4.1-1): Site Photograph 2 was taken from the southeastern corner of the northern 50.04 acres of the Project site along Seaton Avenue looking northwest. From this vantage, Seaton Avenue is visible in the foreground, with the Project site visible in the right portion of the photo. As shown, from this location views of the Project site are dominated by the existing single family residence and associated fencing and ornamental vegetation, including several large trees. In the distance in the horizon beyond the single family home is the existing tall crane associated with the existing commercial use on site (Craneology, Inc.). Remaining portions of the Project site are scarcely visible along the horizon in the right portion of the photo. An existing access road associated with the existing MWD ~~easement~~ fee-owned parcel that is located between the northern and southern portions of the Project site is visible in the central portion of the photo, and consists of a fully disturbed dirt roadway with a variety of low-lying ruderal vegetation occurring to the north and south of the access road. Existing power and telephone poles also are visible along the Project site's eastern boundary and along the western side of Seaton Avenue. In the left portion of the photo, a Buddhist Temple (Huong Sen Buddhist Temple) is visible along with associated fencing, parking areas, and ornamental landscaping.

- Site Photograph 3 (Figure 4.1-2): Site Photograph 3 was taken from the southwestern corner of the northern 50.04 acres of the Project Site along the future alignment of Decker Road looking northeast. In the foreground, the existing dirt access road associated with the MWD fee-owned parcel ~~easement~~ is visible in the right portion of the photo, while Decker Road is visible in the left portion of the photo as an unpaved dirt roadway. Low-lying vegetation located off site also is visible in the foreground, and appears to consist of heavily disturbed/distressed vegetation. In the middle ground of the photo is the Project site, which is delineated at this location by a chain link fence. An existing on-site residence, ancillary structures, and associated ornamental vegetation that occur in the southwest corner of the northern portion of the Project site clearly are visible from this location. In the distance along the horizon in the central and right portions of the photo are the San Bernardino Mountains, which scarcely are visible from this location.

- Site Photograph 4 (Figure 4.1-2): Site Photograph 4 was taken at the northwestern corner of the northern 50.04 acres of the Project site at the intersection of Decker Road and Cajalco Road looking southeast. Cajalco Road clearly is visible in the foreground, and appears as a fully-improved roadway with the southern edge of the roadway consisting of unvegetated dirt, ruderal vegetation, and existing telephone/power poles. The Project site as visible in the middle ground, and is delineated with chain

link and other types of fencing. The existing single-family residence that occurs in the northwest corner of the Project site is visible, along with ruderal vegetation, gravel roadways, and ornamental vegetation. In the left portion of the photo, ornamental vegetation, a horse stable, and several structures associated with an additional rural residential home are visible, with the existing residence scarcely visible in the far left portion of the photo. In the distance in the middle portion of the photograph, an additional single-family residence located in the southern portions of the 50.04-acre site is visible along with its associated ornamental vegetation. In the far-right portion of the photo beyond Cajalco Road is Decker Road, which appears from this location as an unpaved roadway that is surrounded on either side by disturbed/ruderal vegetation. In the distance along the horizon, rolling hills with prominent rock outcroppings associated with the Motte Rimrock State Reserve and surrounding areas are visible. In addition, in the left portion along the horizon the Lakeview Mountains scarcely are visible.

- Site Photograph 5 (Figure 4.1-3): Site photograph 5 was taken from the northwestern corner of the southern 14.93 acres of the Project site looking southeast. From this vantage, the existing unpaved dirt access roadway associated with the existing MWD fee-owned parcel ~~easement~~ is clearly visible, along with an additional informal dirt roadway visible in the right portion of the photo. Decker Road is visible in the middle ground of the photo, and also appears as an unimproved dirt roadway. Along the edges of the unimproved dirt roadways is a variety of disturbed ruderal vegetation. In the distance in the middle portion of the photo, to the right of the MWD access roads and above Decker Road, is the Project site. As shown, this portion of the Project site contains several existing rural residences (including the Sands Motel), ancillary structures, fencing, and ornamental vegetation that is interspersed with disturbed lands that contain very little ruderal vegetation. An existing telephone/power line is visible in the middle portion of the photo. An existing rural residence located off site to the west of the Project site also is visible in the middle ground in the right portion of the photo, along with several ancillary structures, ornamental vegetation, and fencing. A block wall also is visible in the middle ground, which separates the on-site land uses from the existing off-site rural residential use. In addition, the Lakeview Mountains scarcely are visible along the horizon in the left-center portion of the photo, while hills associated with Lake Perris barely are visible along the horizon in the far left portion of the photo.

- Site Photograph 6 (Figure 4.1-3): Site photograph 6 was taken from the northeast corner of the southern 14.93 acres of the Project site, looking southwest. In the foreground of the photo is the existing dirt access roadway associated with the existing MWD fee-owned parcel~~easement~~. The Project site from this location is visible beyond an existing telephone/power pole. An existing north-south unimproved dirt access road that occurs along the eastern boundary of the proposed park site also is scarcely visible in the middle ground. From this location, the Project site appears to contain a mixture of ruderal and natural vegetation, with several rock outcroppings visible. Further in the distance in the central portion of the photo are several rural residential homes with associated ancillary structures. Several additional telephone/power poles also are visible in the distance within the Project site. In the distance along the horizon large hills associated with the Temescal Mountains and Gavilan Hills are visible.

B. Scenic Highways

According to Figure 10 of the Riverside County General Plan's Mead Valley Area Plan (MVAP), and as shown on Figure 4.1-4, *Mead Valley Area Plan Scenic Highways*, there are no State- or County-designated scenic highways within the Project vicinity. The nearest State-designated scenic highway is a segment of State Route 74 (SR 74), located approximately 26.4 miles southeast of the Project site. The nearest State-eligible scenic highway is State Route (SR) 74, located approximately 3.7 miles south of the Project site. The nearest County-eligible scenic highway is Interstate 215 (I-215), located approximately 0.7-mile east of the Project site. (Riverside County, 2021a, Figure 10; Google Earth, 2024)

4.1.2 Applicable Regulatory Requirements

A. Riverside County General Plan

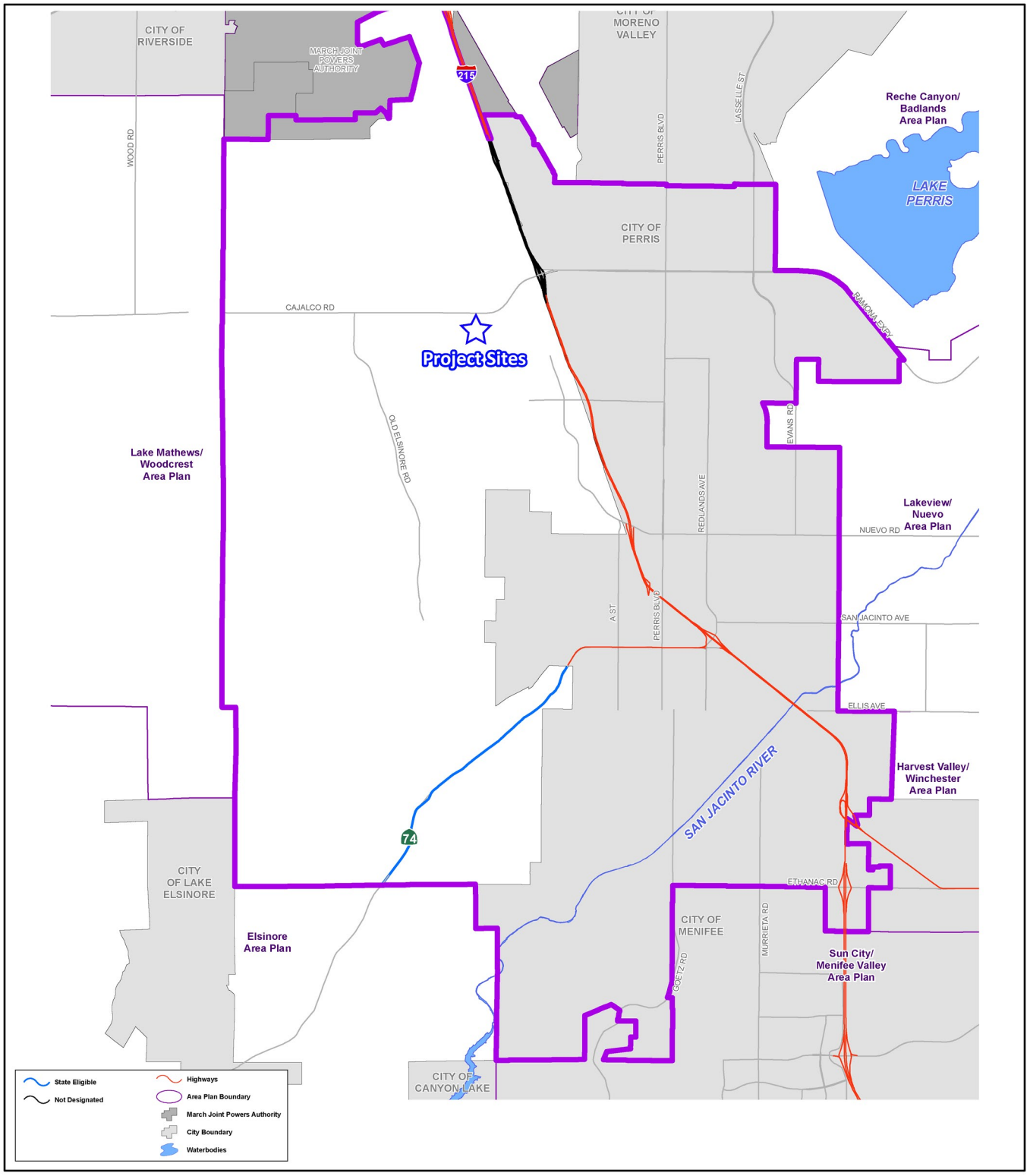
The Riverside County General Plan does not have any specific sections related to aesthetics and visual resources. However, the Land Use Element of the Riverside County General Plan includes policies related to Land Use Compatibility, Community Design, and Scenic Corridors, which have applicability to the topic of aesthetics. The Land Use Element provides direction related to how future development is intended to build out, such as the intensity/density and character of new development. The Land Use Element also addresses the relationship between development, community enhancement, and natural resource management.

The Multipurpose Open Space Element of the Riverside County General Plan also addresses open space and scenic resources in Riverside County. According to the Multipurpose Open Space Element, scenic resources include: "…areas that are visible to the general public and considered visually attractive" and "…natural landmarks and prominent or unusual features of the landscape." Hillsides and ridges that rise above urban or rural areas or highways can also be considered scenic backdrops. Additionally, the Multipurpose Open Space Element defines scenic vistas as "…points, accessible to the general public, that provide a view of the countryside." Riverside County General Plan Policy OS 21.1 intends to "[i]dentify and conserve the skylines, view corridors, and outstanding scenic vistas within Riverside County" (Riverside County, 2021a, pp. OS-52 to OS-53)

The Circulation Element, Land Use Element, and Multipurpose Open Space Element of the Riverside County General Plan also identify scenic corridors, which are roadways (including State and County eligible and designated scenic highways) that traverse scenic resources, and identify policies that are intended to protect and maintain the scenic resources within these corridors (Riverside County, 2021a, pp. OS-52 to OS-53). Scenic highways in the Project vicinity are depicted on Figure 4.1-4. As noted in the MVAP, Policy MVAP 12.1 seeks to "Protect the scenic highways in the Mead Valley planning area from change that would diminish the aesthetic value of adjacent properties in accordance with the Scenic Corridors sections of the General Plan Land Use, Multipurpose Open Space, and Circulation Elements" (Riverside County, 2021b, p. 46).

B. Riverside County Ordinance No. 348, Land Use Ordinance

Riverside County's Land Use Ordinance No. 348 establishes allowable uses of land and sets standards for what and how land may be developed. The ordinance protects the people and property of Riverside County from development of unsuitable land uses and aims to ensure that built areas are developed safely and with minimal



Source(s): Riverside County (09-28-2021)

Figure 4.1-4

Not to Scale

Mead Valley Area Plan Scenic Highways

conflict with surrounding lands. Ordinance No. 348 also identifies requirements for landscaping associated with development proposals. The landscaping of development projects should enhance the visual character and aesthetic quality of a site and its surroundings. (Riverside County, 2021c)

C. *Riverside County Ordinance No. 655, Regulating Light Pollution*

Riverside County has adopted an ordinance regulating light pollution (Ordinance No. 655). Ordinance No. 655 is intended to restrict the permitted use of certain light fixtures emitting light into the night sky, which could have a detrimental effect on astronomical observation and research. Ordinance No. 655 sets forth requirements for lamp source and shielding of light emissions for outdoor fixtures to reduce "skyglow" or light pollution that affects day or nighttime views from the Mt. Palomar Observatory, which is located approximately 63.9 miles southeast of the Project site. As shown on MVAP Figure 7 (Mead Valley Area Plan Mt. Palomar Nighttime Lighting Policy Area), the Project site is located within the limits of "Zone B" of the Mt. Palomar Observatory Lighting Policy Area (Riverside County, 2021b, Figure 7). As such, the Project site is subject to the outdoor lighting policies and requirements applicable to Zone B that are stated in Riverside County Ordinance No. 655. This Ordinance includes specific standards for lighting fixtures installed along public roadways and in other common areas and applies to all new development. The use of low-pressure sodium lamps is encouraged where possible by Ordinance No. 655, and the Ordinance also requires the shielding of all nonexempt outdoor lighting fixtures, specifies the hours of operation for non-exempt outdoor lighting fixtures, and regulates lighting fixtures used to illuminate an outdoor advertising display. (Riverside County, 1988)

D. *Riverside County Ordinance No. 915, Regulating Outdoor Lighting*

The County of Riverside has adopted an ordinance regulating outdoor lighting (Ordinance No. 915). Ordinance No. 915 is intended to provide minimum requirements for outdoor lighting in order to reduce light trespass. Ordinance No. 915 provides regulations on adequate lighting shielding, glare, and light trespass in order to ensure all development in Riverside County installs lighting in a way that does not jeopardize the health, safety, or general welfare of Riverside County residents and degrade their quality of life (Riverside County, n.d.3).

4.1.3 Basis for Determining Significance

Section I of Appendix G to the California Environmental Quality Act (CEQA) Guidelines addresses typical adverse effects to aesthetics and includes the following threshold questions to evaluate a project's impacts to aesthetic resources (OPR, 2018a):

- Would the project have a substantial adverse effect on a scenic vista?
- Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?
- Would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible

vantage point). If the project is in an urbanized area, conflict with applicable zoning and other regulations governing scenic quality?

- Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Additionally, the following thresholds are derived from Riverside County's Environmental Assessment Checklist, as revised to reflect the December 2018 updates to the State CEQA Guidelines. As such, the following thresholds are used to evaluate the significance of the proposed Project's impacts on aesthetics. The proposed Project would result in a significant impact to aesthetics if the Project or any Project-related component would:

a. *Have a substantial effect upon a scenic highway corridor within which it is located;*

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

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

d. *Interfere with the nighttime use of the Mt. Palomar Observatory, as protected through Riverside County Ordinance No. 655;*

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

f. *Expose residential property to unacceptable light levels.*

The significance thresholds set forth in Riverside County's Environmental Assessment Checklist, which are based on Appendix G to the CEQA Guidelines, were used to evaluate the significance of the proposed Project's impacts on aesthetics.

4.1.4 Impact Analysis

Threshold a.: ***Would the Project have a substantial effect upon a scenic highway corridor within which it is located?***

As previously indicated and as depicted on Figure 4.1-4, there are no officially-designated scenic highway corridors within the Project's viewshed. The nearest State-eligible scenic highway is SR 74, located approximately 3.7 miles south of the Project site. Based on a viewshed analysis conducted using Google Earth Pro, and due to distance, intervening topography (including several existing hill forms to the south of the Project site), and intervening development, the Project site is not visible from SR 74. However, the Project site

is located approximately 0.7-mile west of I-215, a County-eligible scenic highway. Although the Project would result in the conversion of the Project site from rural residential, commercial, and vacant land uses to that of a proposed warehouse development with a park site, only brief and intermittent views of the Project site would be available from I-215, and where visible the Project site would appear as a continuation of existing light industrial development patterns to the north and east of the Project site. Moreover, development on site would be required to comply with the various design measures included within the Project's plot plan application materials, which include requirements related to site design, building design, grading, landscaping, and walls/fencing. In addition, it should be noted that I-215 is not officially designated as a State scenic highway. Based on the foregoing analysis, and assuming mandatory compliance with the Project's plot plan application materials, Project impacts to scenic highways would be less than significant.

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

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

Under existing conditions, the northern 50.04 gross acres of the Project site contains a variety of rural residential uses, ancillary structures, and includes numerous ornamental trees associated with the rural residences. Development on the northern 50.04 gross acres of the Project site would result in the conversion of the site from a largely undeveloped property that contains several existing rural residences and associated ancillary structures to a proposed warehouse development consisting of a proposed 1,003,510 s.f. building. Under existing conditions, the only potential scenic resources within the northern portions of the Project site are ornamental trees, and the Project's Plot Plan application materials include a landscape plan that includes ornamental trees, the planting of which would more than compensate for the loss of the existing ornamental trees on site. As such, development of the proposed warehouse building in the northern 50.04 gross acres of the Project site would not substantially damage any scenic resources, resulting in a less-than-significant impact. Additionally, and as demonstrated by the site photos presented on Figure 4.1-1 through Figure 4.1-3, the northern 50.04 gross acres of the Project site do not offer any prominent scenic vistas or views of scenic resources, and views of scenic resources would continue to be available in the surrounding area, including along Cajalco Road, Decker Road, and/or Seaton Avenue. Accordingly, development of the northern 50.04 gross acres of the Project site would not obstruct any prominent scenic vista or view open to the public, and impacts would be less than significant. Furthermore, development within the northern 50.04 gross acres of the Project site would be required to comply with the various design measures included within the Project's plot plan applications, which include requirements related to site design, building design, grading, landscaping, and walls/fencing. In addition, the Project's plans include 14-foot-high concrete screen walls that would be constructed around the truck courts proposed to the north and south of the building. As conceptually depicted on EIR Figure 3.-11, the screen walls as depicted on the Project's application materials have been designed to provide both vertical and horizontal articulation in order to reduce the visual effects of the wall, particularly

along Cajalco Road. The screen wall along Cajalco Road also would be screened by a dense row of trees proposed on-site and within the Cajalco Road parkway. Figure 4.1-5, *Proposed Screen Wall Treatment*, provides a rendering of the screen wall with the vertical and horizontal articulation along with the proposed landscaping, as viewed from Cajalco Road. As shown, views of the screen wall from Cajalco Road largely would be obstructed by the proposed trees and due to the elevation difference between Cajalco Road and the proposed warehouse building. With implementation of the screen walls as designed and shown on the Project's application materials, the proposed screen wall would not substantially degrade the existing visual character or quality of public views of the site and its surroundings. Therefore, with mandatory compliance with the Project's plot plan application materials, development on the northern 50.04 gross acres of the Project site would not result in the creation of an aesthetically offensive site open to public view, and therefore impacts would be less than significant.

Under existing conditions, the 14.93 gross acres in the southern portion of the Project site that are proposed for development with park uses contains several rural residences and ancillary structures. This portion of the Project site also contains a variety of rock outcroppings, trees that appear to be associated with an ephemeral drainage in the southeastern portion of the Project site, and ornamental trees associated with the existing rural residential uses. With implementation of the Project, minor amounts of grading would be required in order to accommodate the extension of Decker Road through this portion of the Project site, and the construction of the two proposed parking lots and the sports field/amenities. However, the southeastern portion of the site, which includes the existing ephemeral drainage and associated trees, would not be impacted and would be left in its natural condition. Although development of the park site as proposed would result in the removal of existing rock outcroppings, particularly in the northeastern and southwestern portion of the park site, the largest rock outcroppings would be preserved on site within the open space associated with the existing ephemeral drainage. Furthermore, development of the park site would be required to comply with the Project's plot plan application materials, which includes a landscaping plan for the park site, which would compensate for the loss of the existing ornamental trees on site. Accordingly, development of the park site as proposed would result in less-than-significant impacts to scenic resources (i.e., rock outcroppings and trees). Additionally, because structures at the park site would be limited to the proposed recreation building and recreational amenities, development of the park site as proposed has no potential to obstruct any prominent scenic vista or view open to the public. On the contrary, because the park site consists of private property under existing conditions, development of this site as a public park would provide for new public opportunities for views of scenic resources within the viewshed. Moreover, mandatory compliance with the Project's plot plan application materials would ensure that the park site is improved in a manner so as not to create an aesthetically offensive site open to public view. Accordingly, impacts would be less than significant.

According to mapping information from the United States Census Bureau (USCB), the Project site is located in an urbanized area (USCB, 2010). The proposed Project is designed to conform with all components of the County's zoning regulations and ordinances that address visual quality, and the Project Applicant is not seeking any waivers or reductions of requirements as set forth in the County's Municipal Code. Accordingly, the Project would not conflict with applicable zoning and other regulations governing scenic quality, and impacts would be less than significant.

Source(s): HPA (10-23-2023)

Figure 4.1-5

Not to Scale

Proposed Screen Wall Treatment

Threshold d.: ***Would the Project interfere with the nighttime use of the Mt. Palomar Observatory, as protected through Riverside County Ordinance No. 655?***

As shown on MVAP Figure 7 (Mead Valley Area Plan Mt Palomar Nighttime Lighting Policy Area), the Project site is located within the limits of "Zone B" of the Mt. Palomar Observatory Lighting Policy Area (Riverside County, 2021b, Figure 7). All development projects within Zone B of the Mt. Palomar Nighttime Lighting Policy Area are required to adhere to the requirements of Riverside County Ordinance No. 655, which controls artificial lighting sources to protect the Observatory. Ordinance No. 655 states that low-pressure sodium lamps are the preferred illuminating source, and that outdoor lighting fixtures are required to be shielded. Pursuant to Section 7 of Ordinance No. 655, future building permits would be required to include specific information with regards to lighting, as follows: 1) the location of the site where outdoor light fixtures would be installed; 2) plans indicating the location and type of fixtures of the premises; and 3) a description of the outdoor light fixtures, including, but not limited to, manufacturer's catalog cuts and drawings. The required plans and descriptions would enable the County to determine whether compliance with the requirements of the ordinance is met. No building permits would be issued by the County unless the building permit applications demonstrate consistency with the applicable provisions of Ordinance No. 655. As such, the Project has no potential to interfere with the nighttime use of the Mt. Palomar Observatory, as protected through Riverside County Ordinance No. 655, and impacts would be less than significant. (Riverside County, 1988)

Threshold e.: ***Would the Project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?***

Threshold f.: ***Would the Project expose residential property to unacceptable light levels?***

Construction Activities

Construction activities associated with the Project primarily would occur during the daytime hours pursuant to Riverside County Ordinance No. 847 (Regulating Noise), and as such lighting is not anticipated in association with the majority of Project-related construction activities. However, nighttime concrete pouring activities likely would occur as a part of Project building construction activities. Nighttime concrete pouring activities often are used to support reduced concrete mixer truck transit times and lower air temperatures than during the daytime hours and are generally limited to the actual building pad area. Thus, nighttime lighting would be required during the construction of the proposed building. Due to the temporary nature of building construction activities, impacts to nighttime views in the area would be less than significant. However, under existing conditions there are existing residences to the north, east, and south of the Project site. Accordingly, during nighttime building construction activities, the Project has the potential to expose nearby residential property to unacceptable light levels. This is evaluated as a potentially significant impact for which mitigation would be required.

Long-Term Operations

Development of the Project site would be subject to Riverside County Ordinance No. 915. Ordinance No. 915 requires that all outdoor luminaires shall be located, adequately shielded, and directed such that no direct light falls outside the parcel of origin, or onto the public right-of-way. In order to conceptually demonstrate compliance with Ordinance No. 915, a photometric plan is included as part of the Project's plot plan application materials, which demonstrate that proposed lighting would not expose neighboring properties to spillover

lighting, including the existing residential uses in the immediate Project vicinity. Accordingly, the Project would not expose neighboring properties to unacceptable light levels and would not adversely affect day or nighttime views in the area, and impacts would be less than significant.

Furthermore, none of the Project's proposed building materials would consist of reflective materials, except for the proposed windows which would consist of green, clear glass and would be located on the north, south, east, and west sides of the building. The windows would not be mirrored and would have similar low-potential glare characteristics as do other glass windows on buildings in the Project vicinity. The proposed Project does not include any components that would generate substantial amounts of reflective surfaces. Accordingly, implementation of the Project would result in a less-than-significant impact related to new sources of light or glare.

Based on the foregoing analysis, and because the Project would be required to comply with the lighting provisions of Riverside County Ordinance No. 915, under long-term operations impacts due to Project lighting and glare would be less than significant.

4.1.5 Cumulative Impact Analysis

For purposes of analysis, the Project's cumulative study area includes all areas within the Project's viewshed, as the Project does not have the potential to result in cumulatively-considerable impacts to visual quality outside of areas in which the Project site is visible.

As discussed under the analysis of Threshold a., there are no officially-designated scenic highway corridors within the Project's viewshed. Although the Project site is located approximately 0.7-mile west of I-215, a County-eligible scenic highway, only brief and intermittent views of the Project site would be available from I-215, and where visible the Project site would appear as a continuation of existing development patterns to the north and east of the Project site. Although the Project would contribute to on-going changes within the Project's viewshed associated with light industrial, commercial, and residential developments, because the Project site would not be prominently visible from I-215 the Project's impacts to views available from I-215 would be less-than-cumulatively considerable. Moreover, development on site would be required to comply with the various design measures included within the Project's plot plan applications, which include requirements related to site design, building design, grading, landscaping, and walls/fencing. In addition, it should be noted that I-215 is not officially designated as a State scenic highway. As such, the Project would not have a substantial effect on a scenic highway corridor, and impacts would be less-than-cumulatively considerable.

As indicated under the analysis of Thresholds b. and c., the only scenic resources that occur on the Project site under existing conditions are scattered ornamental trees, rock outcroppings in the southern portions of the Project site, and several existing trees associated with the existing ephemeral drainage within the southeastern portion of the park site. Development on the northern 50.04 acres only would result in the removal of existing ornamental trees, which would be replaced with ornamental trees in accordance with the Project's plot plan application materials. As there are no other scenic resources present within the northern 50.04 acres of the Project site, and assuming landscaping of this portion of the site in accordance with the landscape plan included as part of the Project's plot plan application materials, development within the northern 50.04 acres has no potential to damage scenic resources, resulting in a less-than-significant impact on a cumulatively-considerable

basis. While development of the proposed park in the southern portion of the Project site would result in the elimination of rock outcroppings and ornamental trees, the most prominent rock outcroppings on this portion of the Project site would be preserved as natural open space in association with the existing ephemeral drainage. Additionally, the park site is proposed to be landscaped in accordance with the Project's plot plan application materials. As other cumulative developments similarly would be required to demonstrate that proposed developments would not adversely affect scenic resources, development of the park site as proposed would result in less-than-significant cumulatively-considerable impacts to scenic resources. Additionally, all development on site would be required to comply with the Project's application materials and all applicable County ordinances, which further would ensure that the Project site is not developed in a manner that is aesthetically offensive. As other non-residential developments in the areas similarly would be required to demonstrate through application materials that impacts to scenic resources or due to the creation of aesthetically offensive sites would not occur and/or would be required to comply with all applicable ordinances and other regulations, Project impacts to scenic resources and visual character and quality would be less than significant on a cumulatively-considerable basis.

As indicated under the analysis of Threshold d., the Project and other cumulative developments within the Project's viewshed would be required to comply with Riverside County Ordinance No. 655 requirements pertaining to Zone B. Compliance with Ordinance No. 655 would be assured through future County review of building permit applications. As such, cumulatively-considerable impacts due to a conflict with Ordinance No. 655 would not occur.

As indicated under the analysis of Thresholds e. and f., during construction of the Project's proposed buildings, nighttime concrete pouring activities are anticipated, which would in turn require the use of nighttime lighting that could adversely affect nearby residential properties. As other light industrial buildings in the local area, include planned light industrial uses to the east and northeast, also could be under simultaneous construction, the Project's potential impacts due to nighttime lighting associated with concrete pouring activities would be potentially cumulatively considerable. Under long-term operating conditions, the proposed Project as well as other cumulative developments within the Project's viewshed would be subject to compliance with Riverside County Ordinance Nos. 655 and 915. In order to conceptually demonstrate compliance with Ordinance No. 915, a photometric plan was prepared as part of the Project's application materials (refer to Sheet A 1.3), which demonstrates that proposed lighting would not expose neighboring properties to spillover lighting, including the existing residential uses in the immediate surrounding area. Other cumulative developments similarly would be required to demonstrate compliance with Ordinance Nos. 655 and 915. Although the Project and cumulative developments may incorporate building materials with the potential to create glare, only limited building materials such as glass would have the potential to create glare impacts, and such impacts would be minor and would not adversely affect day or nighttime views in the area. Accordingly, impacts due to light and glare would be less-than-cumulatively considerable.

4.1.6 Significance of Impacts Before Mitigation

Threshold a.: Less-than-Significant Impact. The Project site is not located within the viewshed of any officially-designated State or County scenic highways, and is not visible from any State-Eligible scenic highways. Although the Project site is located approximately 0.7-mile west of I-215, a County-eligible scenic highway, only brief and intermittent views of the Project site would be available from I-215, and where visible the Project site would appear as a continuation of existing development patterns to the north and east of the

Project site. Moreover, development on site would be required to comply with the various design measures included within the Project's plot plan application materials, which include requirements related to site design, building design, grading, landscaping, and walls/fencing. In addition, it should be noted that I-215 is not officially designated as a State scenic highway. Based on the foregoing analysis, and assuming mandatory compliance with the Project's plot plan application materials, Project impacts to scenic highways would be less than significant.

Thresholds b. and c.: Less-than-Significant Impact. The only scenic resources that occur on the Project site under existing conditions are scattered ornamental trees, rock outcroppings in the southern portions of the Project site, and several existing trees associated with the existing ephemeral drainage within the southeastern portion of the park site. Development on the northern 50.04 acres only would result in the removal of existing ornamental trees; however, and assuming landscaping of this portion of the site would occur in accordance with the landscape plan included in the Project's plot plan application materials, development within the northern 50.04 acres has no potential to damage scenic resources, resulting in a less-than-significant impact. While development of the proposed park in the southern 14.93 acres of the Project site would result in the elimination of rock outcroppings and ornamental trees, the most prominent rock outcroppings on this portion of the Project site would be preserved as natural open space in association with the existing ephemeral drainage. Additionally, the park site would be landscaped in accordance with the Project's plot plan application materials. In addition, all development on site would be required to comply with all applicable County ordinances as well as the Project's application materials, including requirements related to landscaping and the design of the proposed screen walls, which would ensure that the Project site is not developed in a manner that is aesthetically offensive. Therefore, Project impacts to scenic resources and visual character and quality would be less than significant.

Threshold d.: Less-than-Significant Impact. Project compliance with the provisions of County Ordnance No. 655 would be assured through future County review of building permits. Impacts due to a conflict with Ordinance No. 655 would be less than significant.

Thresholds e. and f.: Significant Direct and Cumulatively-Considerable Impact. During long-term operational conditions, mandatory compliance with Riverside County Ordinance Nos. 655 and 915 would ensure that Project-related lighting and glare would not adversely affect day or nighttime views in the area, and also would ensure the Project does not expose residential property to unacceptable light levels. However, lighting would be required during nighttime construction-related concrete pouring activities, which has the potential to adversely affect nearby residential properties. Accordingly, the use of nighttime lighting during construction represents a significant impact of the Project for which mitigation would be required.

4.1.7 County Regulations, Design Requirements, and Mitigation

Applicable Regulations and Design Requirements

The following are regulations and design requirements that apply to the proposed Project and that reduce or preclude aesthetic impacts. Although compliance with mandatory regulatory requirements does not technically meet CEQA's definition for mitigation, they are specified herein as requirements for the Project.

- The Project is required to comply with Riverside County Ordinance No. 655, which sets forth requirements for lamp source and shielding of light emissions for outdoor fixtures to reduce "skyglow" or light pollution that affects day or nighttime views from the Mount Palomar Observatory (located approximately 63.9 miles south of the Project site in northern San Diego County). Pursuant to the requirements of Ordinance No. 655, all lighting shall consist of low-pressure sodium lighting, or other lamp types that emit 4050 lumens or less. If light fixtures are proposed above 4050 lumens, then the lighting shall be fully shielded in conformance with the requirements of Ordinance No. 655.

- The Project is required to comply with Riverside County Ordinance No. 915, which provides minimum requirements for outdoor lighting to reduce light trespass. Ordinance No. 915 provides regulations for adequate lighting shielding, glare, and light trespass in order to ensure all development in Riverside County installs lighting in a way that does not jeopardize the health, safety, or general welfare of Riverside County residents and degrade their quality of life.

Mitigation

MM 4.1-1 Prior to issuing a Construction-Related Exception authorizing nighttime construction and associated noise pursuant to Section 7.a.1 of Riverside County Ordinance No. 847 (Regulating Noise), the Project Applicant shall provide the Director of the Building and Safety Department with a plan depicting the location of all nighttime lighting elements in relation to the nearest sensitive residential receptors. The Director shall review the nighttime lighting plan to ensure that all lighting elements are directed away from the nearest sensitive residential receptors, and only shall issue an exception to the provisions of Ordinance No. 847 upon verification that nighttime lighting elements would not significantly and adversely affect nearby residential receptors. During building construction, the Project's construction contractors shall allow County Building & Safety officials access to the site to verify compliance with the nighttime lighting plan.

4.1.8 Significance of Impacts After Mitigation

Thresholds e. and f.: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.1-1 would ensure that nighttime lighting plans are prepared and implemented during Project nighttime construction activities. The Director of the Building and Safety Department would review the nighttime lighting plan to verify that all lighting elements are directed away from nearby sensitive residential receptors. Accordingly, implementation of the required mitigation would reduce the Project's nighttime lighting impacts to less-than-significant levels.

4.2 AGRICULTURE AND FOREST RESOURCES

The information and analysis in this Subsection 4.2 are based in part on a Project-specific technical study prepared by T&B Planning, entitled, "Land Evaluation and Site Assessment Model for the Mead Valley Commerce Center Project" (herein, "LESA Analysis"), dated July 25, 2023, and included as EIR *Technical Appendix B* (T&B Planning, 2023). The analysis in this Subsection also is based on information obtained from the California Department of Conservation (CDC) Farmland Mapping & Monitoring Program (FMMP) (CDC, 2021), Riverside County GIS (RCIT, n.d.), and the Riverside County General Plan Amendment 960 Final EIR (Riverside County, 2015b). Refer to Section 7.0, *References*, for a complete list of these and other reference sources.

4.2.1 EXISTING CONDITIONS

A. Forestry Resources

The Project site is located in the Mead Valley portion of unincorporated Riverside County, a rapidly urbanizing region that generally contains dry, sparsely-vegetated terrain in the natural condition. As shown in Figure 4.5.2 of the Riverside County General Plan Update Draft EIR No. 521, aside from sparsely scattered lowland forests/woodlands, there are no forestry resources in the Project's vicinity under existing conditions. The nearest forest land to the Project site occurs within the Cleveland National Forest, located approximately 12.2 miles west of the Project site. (Riverside County, 2015a, Figure 4.5.2)

B. Agricultural Resources

1. Regional Agricultural Setting

According to information available from the Riverside County Agricultural Commissioner's Office, the top three categories of agricultural resources cultivated in Riverside County (by value) are nursery stock, milk, and alfalfa. In 2020 (the most recent year for which data is available), the total gross value of agricultural production in Riverside County was approximately $1.42 billion, which represents a 7.3% increase from 2019 when total values were $1.32 billion. (Agricultural Commissioner, 2021)

The CDC reports that agricultural lands face continuing pressure from urbanization and rising production costs. The CDC's "2014-2016 California Farmland Conversion Report" summarizes land use conversion between 2014 and 2016 (the most recent years for which information has been reported by the CDC), and states that Riverside County as a whole experienced a net loss of 3,635 acres of Important Farmland between 2014 and 2016, representing a decline of 0.9% (CDC, n.d.10, Table A-25). Important Farmlands include Prime Farmland, Statewide Important Farmland, and Unique Farmland.

2. Historic and Existing Site Conditions

According to aerial photographs reviewed by Group Delta, aerial photographs from between 1938 and 1959 show that the northern 50.04 gross acres of the Project site were used for agricultural uses (row crops), while there is no evidence that the southern 14.93 gross acres were ever used for agricultural purposes. According to aerial photography, agricultural activities on the northern portions of the Project site had ceased by 1990. Since

1990, the Project site has consisted of primarily rural residential uses interspersed with undeveloped open space, along with a commercial structure (Craneology, Inc.). (Group Delta, 2022, Table 3)

3. Zoning

As described in EIR subsection 2.4.4, under existing conditions, approximately 4.7 acres in the northeast portion of the Project site are zoned for "Rural Residential, Minimum ½-Acre Lot Sizes (R-R-1/2)," while the remaining approximately 60.3 acres of the Project site are zoned for "Light Agriculture (A-1-1)." According to Riverside County Ordinance No. 625 (Right-To-Farm Ordinance), the A-1 zoning classification is identified as "land zoned for primarily agricultural purposes," while the site's existing R-R zoning classification is not considered to comprise an agricultural zoning classification. Accordingly, under existing conditions the Project site contains approximately 60.3 acres of lands zoned primarily for agricultural purposes. (Riverside County, 1994; RCIT, n.d.)

4. Agricultural Land Classifications

The goal of the CDC's FMMP is to provide consistent, timely, and accurate data to decision makers for use in planning for the present and future of California's agricultural land resources. To meet this goal, the FMMP's objective is to provide maps and statistical data to the public, academia, and local, State, and federal governments to assist them in making informed decisions for the best utilization of California's farmland. The FMMP was established in 1982 in response to what was by then a critical need for data on the nature, location, and extent of farmland, grazing land, and urban built-up areas in the State. California Government Code § 65570 mandates the FMMP to biennially report to the Legislature on the conversion of farmland and grazing land, and to provide maps and data to local governments and the public. The FMMP also was directed to prepare and maintain an automated map and database system to record and report changes in the use of agricultural lands. It was the intent of the Legislature and a broad coalition of building, business, government, and conservation interests that the FMMP be non-regulatory, and provide a consistent and impartial analysis of agricultural land use and change in California. With this in mind, the FMMP provides basic data from which observations and analyses can be made in the land use planning process. (CDC, 2004, p. 3)

Pursuant to the FMMP, all lands within California are classified into one of seven map categories. The minimum mapping unit is generally 10 acres, except as otherwise noted (CDC, 2004, p. 6). Provided below is a description of the various map categories established by the FMMP:

- **Prime Farmland (P)**: Farmland with the best combination of physical and chemical features able to sustain long-term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date. (CDC, 2004, p. 6)

- **Farmland of Statewide Importance (S)**: Farmland similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date. (CDC, 2004, p. 6)

- **Unique Farmland (U)**: Farmland of lesser quality soils used for the production of the state's leading agricultural crops. This land is usually irrigated, but may include non-irrigated orchards or vineyards as found in some climatic zones in California. Land must have been cropped at some time during the four years prior to the mapping date. (CDC, 2004, p. 6)

- **Farmland of Local Importance (L)**: Land of importance to the local agricultural economy as determined by each county's board of supervisors and a local advisory committee. (CDC, 2004, p. 6)

- **Grazing Land (G)**: Land on which the existing vegetation is suited to the grazing of livestock. This category was developed in cooperation with the California Cattlemen's Association, University of California Cooperative Extension, and other groups interested in the extent of grazing activities. The minimum mapping unit for Grazing Land is 40 acres. (CDC, 2004, p. 6)

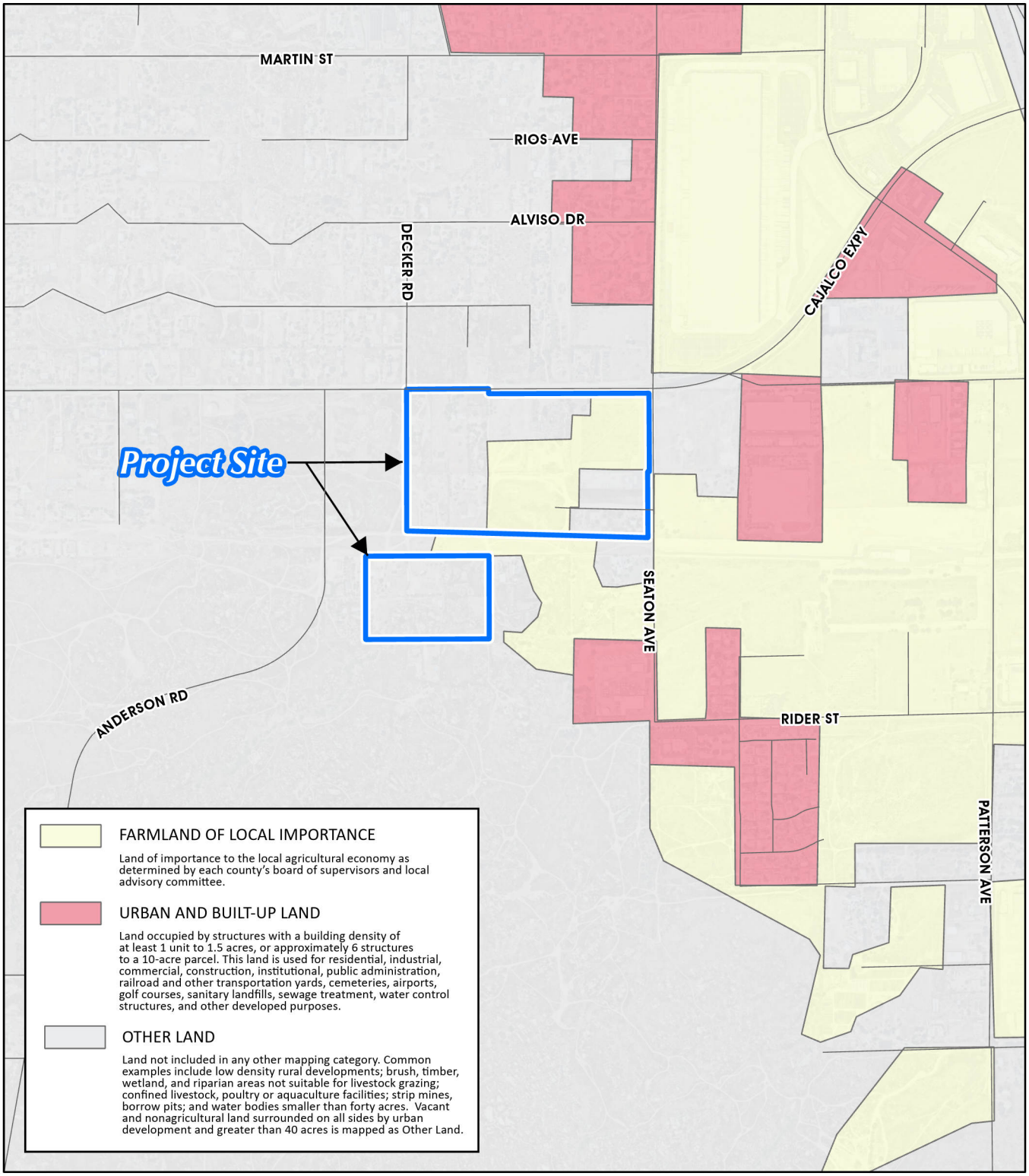
- **Urban and Built-Up Land (D)**: Land occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel. This land is used for residential, industrial, commercial, institutional, public administrative purposes, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes. (CDC, 2004, p. 6)

- **Other Land (X)**: Land not included in any other mapping category. Common examples include low density rural developments; brush, timber, wetland, and riparian areas not suitable for livestock grazing; confined livestock, poultry, or aquaculture facilities; strip mines, borrow pits; and water bodies smaller than 40 acres. Vacant and nonagricultural land surrounded on all sides by urban development and greater than 40 acres is mapped as Other Land. (CDC, 2004, p. 6)

As shown on Figure 4.2-1, *FMMP Farmland Map*, the northern 50.04 gross acres of the Project site contain approximately 19.84 acres of "Farmland of Local Importance," while the remaining approximately 45.13 gross acres of the Project site (including the southern portions) are mapped as containing "Other Land" (CDC, 2021). "Farmland" is defined in Section II (a) of Appendix G of the California Environmental Quality Act (CEQA) Guidelines and by Riverside County to mean "Prime Farmland," "Farmland of Statewide Importance," and "Unique Farmland." Thus, the Project site does not contain any areas of "Farmland" as mapped by the FMMP.

5. Williamson Act Land Preserves and Agricultural Preserves

Agricultural preserves are the result of Riverside County's participation in the California Land Conservation Act (CLCA) of 1965, also known as the Williamson Act, CA Gov. Code § 51200, et seq. This program allows owners of agricultural land to have their properties assessed for tax purposes on the basis of agricultural production rather than current market value. The main purpose of the Act is to encourage property owners to continue to farm their land, and to prevent the premature conversion of farmland to urban uses. According to Riverside County GIS, the Project site is not included in any agricultural preserves, and is not subject to a Williamson Act Contract. The nearest agricultural preserve and Williamson Act contracted land occurs approximately 1.6 miles southeast of the Project site (Perris Valley 3 Agricultural Preserve). (RCIT, n.d.)



Source(s): ESRI, NearMap Imagery (May 2023), California Department of Conservation (2023)

Figure 4.2-1

0 350 700 1,400 Feet

FMMP Farmland Map

4.2.2 Applicable Regulatory Requirements

The following is a brief description of the state and local environmental laws and related regulations governing the protection of agricultural and forest resources.

A. State Regulations

1. California Land Conservation Act (CLCA)

The California Land Conservation Act (CLCA) of 1965, also known as the Williamson Act (CA Gov. Code § 51200, et seq.), enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space use. In return, landowners receive property tax assessments that are much lower than normal because they are based upon farming and open space uses as opposed to full market value. Pursuant to California Government Code § 51230, counties and cities may establish Agricultural Preserves, which define boundaries of those areas within which the city or county will be willing to enter into contracts pursuant to the CLCA. Contracts pursuant to the CLCA are only allowed for areas within established Agricultural Preserves. Agricultural Preserves generally must be at least 100 acres in size; however, a city or county may allow for lesser acreage if a finding is made that the characteristics of the agricultural enterprises in the area are unique and that the establishment of preserves of less than 100 acres is consistent with the general plan of the county or city. Once established, land uses within an Agricultural Preserve must be agricultural in nature, or other such uses that are not incompatible with agricultural uses. For lands within Agricultural Preserves, individual landowners may enter into a Contract with a county or city, which would provide for the exclusion of uses other than agricultural, and other than those compatible with agricultural uses, for the duration of the Contract, even if the land is sold to a new owner. In return for entering into a Contract, the landowner is granted preferential taxes that are based upon agricultural and related land uses rather than fair market value. Contracts may be exited at the option of the landowner or local government by initiating the process of term nonrenewal. Under this process, the remaining contract term (nine years in the case of an original term of ten years) is allowed to lapse, with the contract null and void at the end of the term. During the nonrenewal process, the annual tax assessment continually increases each year until it is equivalent to current tax rates at the end of the nonrenewal period. Under a set of specifically defined circumstances, a Contract may be cancelled without completing the process of term nonrenewal. Contract cancellation, however, involves a comprehensive review and approval process, and the payment of a fee by the landowner equal to 12.5 percent of the full market value of the property in question. (CDC, 2019; CA Legislative Info, n.d.35)

2. Farmland Mapping and Monitoring Program (FMMP)

The goal of the CDC's FMMP is to provide consistent, timely, and accurate data to decision makers for use in planning for the present and future of California's agricultural land resources. To meet this goal, the FMMP's objective is to provide maps and statistical data to the public, academia, and local, state, and federal governments to assist them in making informed decisions for the best utilization of California's farmland. The FMMP was established in 1982 in response to what was by then a critical need for data on the nature, location, and extent of farmland, grazing land, and urban built-up areas in the State. California Government Code § 65570 mandates FMMP to biennially report to the Legislature on the conversion of farmland and grazing land, and to provide maps and data to local government and the public. The FMMP was also directed to prepare

and maintain an automated map and database system to record and report changes in the use of agricultural lands. It was the intent of the Legislature and a broad coalition of building, business, government, and conservation interests that FMMP be non-regulatory, and provide a consistent and impartial analysis of agricultural land use and change in California. With this in mind, FMMP provides basic data from which observations and analyses can be made in the land use planning process. Pursuant to the FMMP, all lands within California are classified into one of seven map categories, as previously summarized in subsection 4.2.1. (CDC, 2004, p. 3)

3. California Forest Practice Act

The California Department of Forestry and Fire Protection (CAL FIRE) enforces the laws that regulate logging on privately-owned lands in California. The Forest Practice Act was enacted in 1973 to ensure that logging is done in a manner that will preserve and protect fish, wildlife, forests and streams. The State Board of Forestry and Fire Protection (BFFP) enacts and enforces additional rules to protect these resources. (CAL FIRE, n.d.)

CAL FIRE ensures that private landowners abide by these laws when harvesting trees. Although there are specific exemptions in some cases, compliance with the Forest Practice Act and BFFP rules apply to all commercial harvesting operations for landowners of small parcels, to ranchers owning hundreds of acres, and large timber companies with thousands of acres. (CAL FIRE, n.d.)

The Timber Harvesting Plan (THP) is the environmental review documents submitted by landowners to CAL FIRE outlining what timber they want to harvest, how it will be harvested, and the steps that will be taken to prevent damage to the environment. THPs are prepared by Registered Professional Foresters (RPFs) who are licensed to prepare these comprehensive, detailed plans. THPs can range from about 100 pages to more than 500 pages. (CAL FIRE, n.d.)

CAL FIRE does not have the authority to deny a THP that is in compliance with state and federal rules and laws simply because the logging plan is unpopular with the public. The Department reviews and approves between 500 to 1,400 THPs each year. A THP that does not comply with all forestry and environmental regulations is returned to the RPF. It is only approved after the RPF and landowner agree to make the changes necessary to ensure compliance with all laws. CAL FIRE follows-up on approved THPs with site inspections and can shut down operations, cite or fine RPFs, Licensed Timber Operators (LTOs), and landowners if illegal operations are found. (CAL FIRE, n.d.)

B. Local Regulations

The following ordinances address farmland and agricultural preserves within unincorporated Riverside County.

- Riverside County Ordinance No. 509: This ordinance establishes uniform rules which apply to Agricultural Preserves. This ordinance determines which uses are agricultural or compatible uses within an Agricultural Preserve and prohibits all other uses within an Agricultural Preserve.

- Riverside County Ordinance No. 625: This "Right-to-Farm" Ordinance requires that development of residential uses adjacent to properties zoned primarily for agricultural purposes be regulated. Specifically, Ordinance No. 625 states that if any agricultural operation has been in place for at least three years and is not considered a nuisance operation at the time the operation began, no change in surrounding land uses shall cause said operation to become a nuisance. A note is to be added to the Environmental Constraints Sheet for any tentative land division that states:

> *"...that no agricultural activity, operation, or facility, or appurtenances thereof, conducted or maintained for commercial purposes, and in a manner consistent with proper and accepted customs and standards, as established and followed by similar agricultural operations in the same locality, shall be or become a nuisance, private or public, due to any changed condition in or about the locality, after the same has been in operation for more than three (3) years if it was not a nuisance at the time it began."*

If any parcel within 300 feet of the site is zoned primarily for agricultural uses at the time of occupancy permit issuance, the Project shall comply with the "Right-to-Farm" Ordinance. County Ordinance No. 625 defines land zoned for "primarily agricultural purposes" as any land lying within any one of the following zone classifications established by the Riverside County Land Use Ordinance No. 348: A-1 (Light Agriculture); A-P (Light Agriculture with Poultry); A-2 (Heavy Agriculture); A-D (Agriculture-Dairy); or C/V (Citrus/Vineyard).

4.2.3 Basis for Determining Significance

Section II of Appendix G to the State CEQA Guidelines addresses typical adverse effects to forestry and agricultural resources, and includes the following threshold questions to evaluate a project's impacts on forest and agricultural resources:

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

- Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

- Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code *section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section* 51104(g))?

- Would the project result in the loss of forest land or conversion of forest land to non-forest use?

- Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

Significance thresholds are set forth in Riverside County's Environmental Assessment Checklist, are derived from Section II of Appendix G to the State CEQA Guidelines (listed above), and state that the proposed Project would have a significant impact on forestry or agricultural resources if construction and/or operation if the Project would:

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

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

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

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

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

f. *Result in the loss of forest land or conversion of forest land to non-forest use; or*

g. *Involve other changes in the existing environment which, due to their location or nature, could result in con-version of forest land to non-forest use.*

The significance thresholds set forth in Riverside County's Environmental Assessment Checklist were used to evaluate the significance of the proposed Project's impacts on forestry and agricultural resources.

4.2.4 METHODOLOGY

A. Land Evaluation and Site Assessment Model (LESA Model)

The LESA Model is a point-based approach that uses measurable factors to quantify the relative value of agricultural land resources and assist in the determination of the significance of agricultural land conversions. Many states have developed LESA Models specific to their local contexts. The California LESA Model was created as a result of Senate Bill 850 (Chapter 812/1993) and provides lead agencies with an optional methodology to ensure that potentially significant effects on the environment associated with agricultural land conversions are quantitatively and consistently considered in the environmental review process (CDC, 1997, p. 4). The California LESA Model is the methodology used by the County of Riverside to determine whether important agricultural resources are present on a property, and was utilized to evaluate the Project site's feasibility for agricultural resources.

The California LESA Model is made up of two components, known as "Land Evaluation" (LE) and "Site Assessment" (SA), that are scored and weighted separately to yield a total LE subscore and SA subscore. The Final LESA Score is the sum of the LE and SA subscores and has a maximum possible score of 100 points. Based on the Final LESA Score, numerical thresholds are used to determine the significance of a project's impacts on agricultural resources (CDC, 1997, p. 31).

1. Land Evaluation

The LE subscore consists of two factors, including the Land Capability Classification (LCC) rating and the Storie Index rating, which were devised to measure the inherent soil-based qualities of land as they relate to agricultural production. The LCC Rating and Storie Index rating scores are based upon the soil map unit(s) identified on a property and the acreage of each soil mapping unit relative to the property's total acreage. Data for the soil map unit(s), LCC, and Storie Index are obtained from soil survey data provided by the U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) (CDC, 1997, pp. 7-9).

❑ Land Capability Classification (LCC) Rating

There are eight (8) classes of LCC (I through VIII). Soils designated "I" have the fewest limitations for agricultural production and soils designated "VIII" are least suitable for farmland. The LCC is further divided into subclasses (designated by lowercase letters *e, w, s,* or *c*) to describe limitations, including a soil's susceptibility to erosion ("e"), limitations due to water in or on the soil ("w"), shallow or stony soils ("s"), or climate ("c") (USDA, n.d.).

Once the LCC for each soil mapping unit is obtained from the USDA NRCS soil survey, the LCC classification is converted into a numeric score established by the California LESA Model. Table 4.2-1, *Numeric Conversion of Land Capability Classification Units*, summarizes the LCC numeric conversion scores used by the LESA model. The LCC Score accounts for 25 percent of the total California LESA Model Score (CDC, 1997, p. 7).

Table 4.2-1 Numeric Conversion of Land Capability Classification Units

LCC	I	IIe	IIs, w	IIIe	IIIs, w	IVe	IVs, w	V	VI	VII	VIII
Rating	100	90	80	70	60	50	40	30	20	10	0

(CDC, 1997; T&B Planning, 2023, Table 3-1)

For properties with multiple soil mapping units, the LCC Score used in the LESA Model is determined by multiplying the LCC Rating for each map unit by the corresponding map unit's proportion of the property's total acreage. The LCC Score for each map unit is summed together for a total, single LCC Score for the property (CDC, 1997, p. 7).

❑ Storie Index Rating

The Storie Index is a quantitative method of rating the agricultural capability of soils. The Storie Index has been used in California for over 50 years, with the most recent version of the Storie Index being published in 1978. The Storie Index is based on four factors: 1) degree of soil profile development; 2) surface texture; 3)

slope; 4) other soil and landscape conditions including drainage, alkalinity, nutrient level, acidity, erosion, and microrelief. Soils are graded on a 100-point scale that represents the relative value of a given soil when used for intensive agricultural purposes (University of California, 1978, p. 1). The Storie Index Score accounts for 25 percent of the total California LESA Model Score (CDC, 1997, p. 12).

For properties with multiple soil mapping units, the Storie Index Score is calculated by multiplying the Storie Index rating by the map unit's proportion of the property's total acreage. The Storie Index Score for each map unit is added together to provide a single Storie Index Score for the property (CDC, 1997, p. 12).

2. Site Assessment (SA)

The SA subscore consists of four factors that measure social, economic, and geographic features that contribute to the overall value of agricultural land. The SA factors include Project Size, Water Resource Availability, Surrounding Agricultural Land, and Protected Resource Land (CDC, 1997, p. 13).

❑ Project Size

The Project Size rating evaluates the potential viability of potential agricultural productivity on a property. Generally, high quality soils (high rate of economic return per acre planted) only need to be present in relatively small quantities on a property to be considered important, whereas lower quality soils (low or moderate rate of economic return per acre planted) need to be present in larger quantities to be considered important.

The Project Size rating corresponds with the acreage of each LCC Class identified on a property. Table 4.2-2, *Project Size Scoring*, summarizes the different Project Size scoring combinations. For properties with multiple map units within the subject property, the mapping unit that generates the highest Project Size score is used as the final Project Size score for the Project site. The Project Size score accounts for 15 percent of the total California LESA Model Score (CDC, 1997, pp. 13-15).

Table 4.2-2 Project Size Scoring

LCC Class I or II soils		LCC Class III soils		LCC Class IV or lower	
Acreage	Points	Acreage	Points	Acreage	Points
80 or above	100	160 or above	100	320 or above	100
60-79	90	120-159	90	240-319	80
40-59	80	80-119	80	160-239	60
20-39	50	60-79	70	100-159	40
10-19	30	40-59	60	40-99	20
Fewer than 10	0	20-39	30	Fewer than 40	0
		10-19	10		
		Fewer than 10	0		

(CDC, 1997; T&B Planning, 2023, Table 3-2)

❑ Water Resource Availability Scoring

The Water Resources Availability rating measures the reliability of a property's water resources that could be used for agricultural production during non-drought and drought years (water availability score) and the

proportion of the property served by each water source (weighted availability score). The water availability score established by the California LESA Model is summarized in Table 4.2-3, *Water Resources Availability Scoring*. The total Water Resources score is the sum of the weighted availability score(s). The Water Resources Availability score accounts for 15 percent of the total California LESA Score (CDC, 1997, pp. 16, 29).

Table 4.2-3 Water Resources Availability Scoring

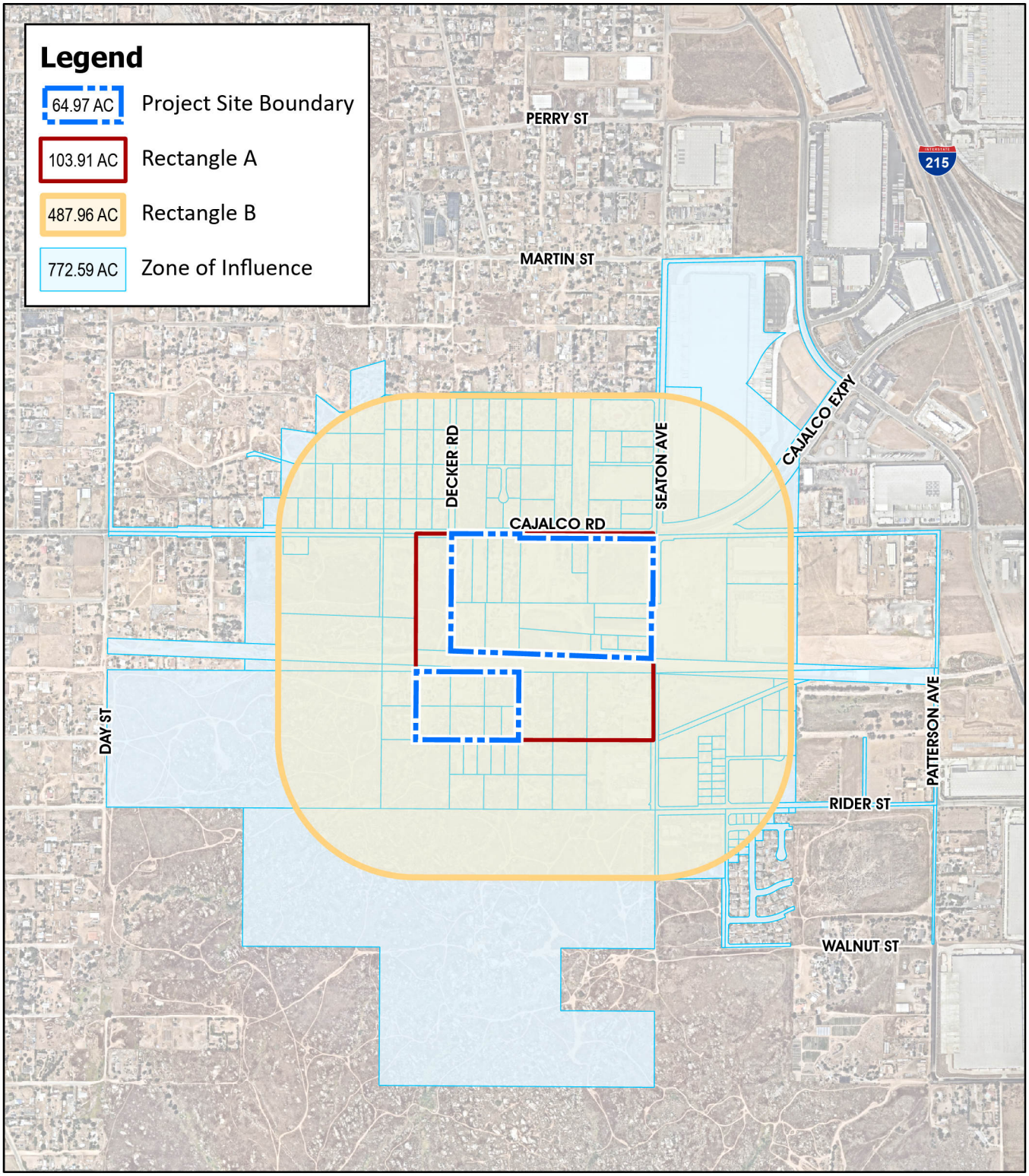
Non-Drought Years			Drought Years			SCORE
Restrictions			Restrictions			
Irrigation Feasible	Physical Restrictions	Economic Restrictions	Irrigation Feasible	Physical Restrictions	Economic Restrictions	
YES	NO	NO	YES	NO	NO	100
YES	NO	NO	YES	NO	YES	95
YES	NO	YES	YES	NO	YES	90
YES	NO	NO	YES	YES	NO	85
YES	NO	NO	YES	YES	YES	80
YES	YES	NO	YES	YES	NO	75
YES	YES	YES	YES	YES	YES	65
YES	NO	NO	NO	-- --	-- --	50
YES	NO	YES	NO	-- --	-- --	45
YES	YES	NO	NO	-- --	-- --	35
YES	YES	YES	NO	-- --	-- --	30
Irrigated production not feasible, but rainfall adequate for dryland production in both drought and non-drought years						25
Irrigated production not feasible, but rainfall adequate for dryland production in non-drought years (but not in drought years)						20
Neither irrigated nor dry land production feasible						0

(CDC, 1997; T&B Planning, 2023, Table 3-3)

❑ Surrounding Agricultural Land

The Surrounding Agricultural Land rating accounts for the potential effect of development on properties containing important agricultural resources that surround a project site. The Surrounding Agricultural Land rating is dependent on the amount of agricultural land or related open space within a project's "Zone of Influence" (ZOI). The ZOI is determined by drawing the smallest rectangle that will completely contain the Project site on a map (Rectangle A) and creating a second rectangle that extends 0.25-mile beyond Rectangle A on all sides (Rectangle B). All parcels that are within or intersected by Rectangle B are included within the project's ZOI (CDC, 1997, pp. 23-25). The ZOI for the Project site is illustrated on Figure 4.2-2, *Zone of Influence*.

The Surrounding Agricultural Land rating is determined by the proportion of land within a project's ZOI that is currently used for agricultural production. The Surrounding Agricultural Land score established by the California LESA Model is summarized in Table 4.2-4, *Surrounding Agricultural Land Score*. Data for surrounding agricultural land can be obtained from the Department of Conservation's Important Farmland



Source(s): ESRI, NearMap Imagery (May 2023)

Figure 4.2-2

Zone of Influence

Table 4.2-4 Surrounding Agricultural Land Score

Percent of Project's ZOI in Agricultural Use	Surrounding Agricultural Land Score
90 – 100 percent	100 Points
80 – 89	90
75 – 79	80
70 – 74	70
65 - 69	60
60 - 64	50
55 - 59	40
50 - 54	30
45 - 49	20
40 - 44	10
<40	0

Source: (CDC, 1997)

Map Series, the Department of Water Resources' Land Use Map Series, locally derived maps, and/or inspection of the site. The surrounding agricultural land score accounts for 15 percent of the total California LESA Model Score (CDC, 1997, pp. 26, 29).

❑ Surrounding Protected Resource Land

Similar to the Surrounding Agricultural Land rating, the California LESA Model considers the potential effect of development on protected resource lands surrounding a project site. Protected resource lands include Williamson Act contracted lands, publicly owned lands maintained as park, forest, or watershed resources, and lands with natural resource easements (e.g., agricultural, wildlife habitat, open space).

The Surrounding Protected Resource Land rating is determined by the proportion of protected resource lands within a project's ZOI. The Surrounding Protected Resource Land scoring system established by the California LESA Model is summarized in Table 4.2-5, *Surrounding Protected Resource Land Score*. The Surrounding Protected Resource Land score accounts for 5 percent of the total California LESA Score (CDC, 1997, pp. 28-29).

4.2.5 Impact Analysis

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

A. FMMP Classifications

As mapped by the CDC's FMMP, the northern 50.04 gross acres of the Project site contain approximately 19.84 acres of "Farmland of Local Importance," while the remaining 45.13 gross acres of the Project site (including the southern portions) are mapped as containing "Other Land" (CDC, 2021). As previously noted,

Table 4.2-5 Surrounding Protected Resource Land Score

Percent of Project's ZOI Defined as Protected	Surrounding Protected Resource Land Score (Points)
90 – 100	100
80 – 89	90
75 – 79	80
70 – 74	70
65 - 69	60
60 - 64	50
55 - 59	40
50 - 54	30
45 - 49	20
40 - 44	10
<40	0

(CDC, 1997)

"Farmland of Local Importance" and "Other Land" are not considered "Farmland," as that term is defined by CEQA, the County, or the CDC, meaning that the Project would not convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or any other "Farmland" as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use. The Project would result in impacts to approximately 19.84 acres of "Farmland of Local Importance" and 45.13 acres of "Other Land." Thus, based on FMMP mapping, the Project would not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance(Farmland) to a non-agricultural use.

B. LESA Model

As previously noted, a site-specific LESA Analysis was prepared for the Project, and is included as EIR *Technical Appendix B*. The LESA Model is a point-based approach that uses measurable factors to quantify the relative value of agricultural land resources and assist in the determination of the significance of agricultural land conversions. Many states have developed LESA Models specific to their local contexts. The California LESA Model was created as a result of Senate Bill 850 (Chapter 812/1993) and provides lead agencies with an optional methodology to ensure that potentially significant effects on the environment associated with agricultural land conversions are quantitatively and consistently considered in the environmental review process (CDC, 1997, p. 4). The California LESA Model is the methodology used by the County of Riverside to determine whether important agricultural resources are present on a property. Provided below is a summary of the results of the Project's LESA Analysis.

1. Land Evaluation (LE)

The LE subscore measures the agricultural suitability of soils identified on a property by using the LCC Rating and Storie Index for each present soil map unit. As previously indicated in EIR Table 2-2, the Project study area consists of twelve (12) soil map units including: Cieneba rocky sandy loam, 8 to 15 percent slopes, eroded (CkD2), Cieneba rocky sandy loam, 15 to 50 percent slopes, eroded (CkF2), Fallbrook sandy loam, shallow,

5 to 8 percent slopes, eroded (FbC2), Fallbrook rocky sandy loam, shallow, 8 to 15 percent slopes, eroded (FcD2), Hanford coarse sandy loam, 2 to 8 percent slopes (HcC), Monserate sandy loam, 0 to 5 percent slopes (MmB), Monserate sandy loam, 5 to 8 percent slopes, eroded (MmC2), Monserate sandy loam, 8 to 15 percent slopes, eroded (MmD2), Ramona sandy loam, 2 to 5 percent slopes, eroded (RaB2), Vista coarse sandy loam, 2 to 8 percent slopes (VsC), Vista coarse sandy loam, 8 to 15 percent slopes, eroded (VsD2), and Vista rocky coarse sandy loam, 2 to 35 percent slopes, eroded (VtF2). (T&B Planning, 2023, p. 11)

❑ Land Capability Classification

Refer to Table 4.2-6, *Land Capability Classification Score,* below, for the LCC Scores of the Project site. The Project site's overall LCC Score is 46.2. (T&B Planning, 2023, p. 11)

Table 4.2-6 Land Capability Classification Score

Soil Map Unit	Acres	Proportion of Project Site (percent)	LCC	LCC Rating	LCC Score
CkD2	6.8	10.5	VIe	20	2.1
CkF2	6.0	9.2	VIIe	10	0.92
FcC2	4.5	6.9	IVe	50	3.45
FcD2	1.9	2.9	VIe	20	0.58
HcC	0.1	0.2	IIIe	70	0.14
MmB	16.8	25.9	IVe	50	13.0
MmC2	0.1	0.2	IVe	50	0.1
MmD2	7.0	10.8	IVe	50	5.4
RaB2	13.6	20.9	IIIe	70	14.6
VsC	2.8	4.3	IVe	50	2.15
VsD2	4.7	7.2	IVe	50	3.6
VtF2	0.6	0.9	VIe	20	0.18
Totals	**64.9**	**100[1]**			**46.2**

[1]*Rounded to the nearest 10th.*
The non-irrigated LCC was utilized because under existing conditions, the Project site does not have an irrigation system.
(USDA, n.d.; T&B Planning, 2023, Table 4-1)

❑ Storie Index

Refer to Table 4.2-7, *Storie Index Score*, below, for the total Storie Index scores for the Project site. The Project site's overall Storie Index score is 42.0. (T&B Planning, 2023, p. 11)

2. Site Assessment (SA)

As previously noted, the SA subscore is based on a combination of a property's size, the availability of water resources, the presence/absence of surrounding agricultural lands, and the presence/absence of surrounding protected resource lands. (T&B Planning, 2023, p. 12)

❑ Project Size

Refer to Table 4.2-8, *Project Size Score*, below, for the total Project Size scores for the Project site. The Project's overall Project Size score is 20. (T&B Planning, 2023, p. 12)

Table 4.2-7 Storie Index Score

Soil Map Unit	Acres	Proportion of Project Site (percent)	Storie Index	Storie Index Score
CkD2	6.8	10.5	24	2.52
CkF2	6.0	9.2	18	1.66
FcC2	4.5	6.9	35	2.42
FcD2	1.9	2.9	34	0.99
HcC	0.1	0.2	82	0.16
MmB	16.8	25.9	30	7.77
MmC2	0.1	0.2	29	0.06
MmD2	7.0	10.8	28	3.02
RaB2	13.6	20.9	88	18.4
VsC	2.8	4.3	42	1.81
VsD2	4.7	7.2	40	2.88
VtF2	0.6	0.9	37	0.33
Totals	**64.9**	**100[1]**		**42.0**

[1]*Rounded to the nearest 10th.*
(USDA, n.d.; T&B Planning, 2023, Table 4-2)

Table 4.2-8 Project Size Score

	Soil Class		
	LCC Class I-II	**LCC Class III**	**LCC Class IV-VIII**
Acres of Project site	0	13.7	51.2
Project Size Scores	0	10	**20**

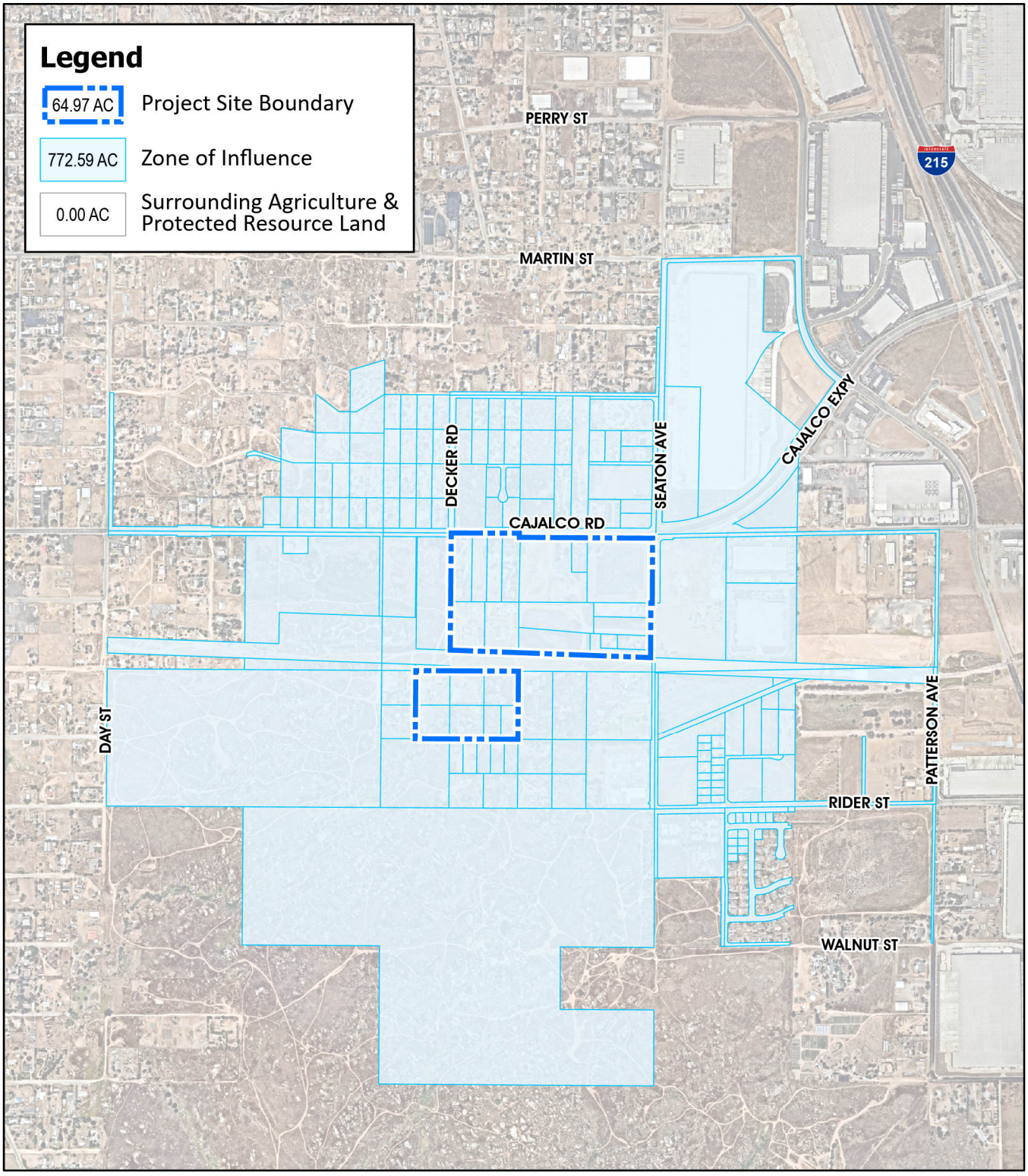
Refer to Table 4.2-2 for Project Size Scoring, which is based on LCC Class and acreage.
(USDA, n.d.; T&B Planning, 2023, Table 4-3)

❑ Water Resource Availability

The Project site does not have existing irrigation systems; therefore, the California LESA model considers irrigated production to be infeasible on the Project site (CDC, 1997, p. 18). Notwithstanding, the LESA Model analyzes the potential for dryland production. The County is characterized as having an arid climate and receives little rainfall throughout the year. The average annual precipitation in the general Project site vicinity is approximately 11 inches (Best Places, 2023). Dryland farming can be productive with as little as 10-12 inches of rain per year (CAWSI, 2022). Accordingly, at the Project site, dryland farming is considered feasible during normal years but not feasible during drought years, which corresponds to a Water Resources Availability score of 20 (refer to Table 4.2-3). (T&B Planning, 2023, p. 12)

❑ Surrounding Agricultural Land

The Surrounding Agricultural Land score is dependent on the presence or absence of active agricultural production land within a project's ZOI. Figure 4.2-3, *Surrounding Agricultural and Protected Resources Land*, illustrates the active agricultural production lands in the ZOIs for the Project site. As illustrated on Figure 4.2-3, there are no active agricultural production land with the Project site's ZOI. Table 4.2-9, *Surrounding Agricultural Land Score*, summarizes the Surrounding Agricultural Land score for the Project site; the Project site's Surrounding Agricultural Land score is 0. (T&B Planning, 2023, p. 13)



Source(s): ESRI, NearMap Imagery (May 2023)

Figure 4.2-3

Surrounding Agricultural and Protected Resources Land

Table 4.2-9 Surrounding Agricultural Land Score

Zone of Influence			Surrounding Agricultural Land Score
Total Acres	Acres of Surrounding Agricultural Land	Percent Surrounding Agricultural Land	
772.59	0	0.0	0

(T&B Planning, 2023, Table 4-4)

❑ **Surrounding Protected Resource Land**

The Surrounding Protected Resource Land score is dependent on the presence or absence of lands within a project's ZOI that have long-term use restrictions that are compatible with or supportive of agricultural uses. Figure 4.2-3 illustrates the protected resource lands in the Project site's ZOI. As illustrated on Figure 4.2-3, there are no protected resource lands within the Project site's ZOI. Table 4.2-10, *Surrounding Protected Resource Land Score*, summarizes the Surrounding Protected Resource Land score for the Project site; the Project site's Surrounding Protected Resource Land score is 0. (T&B Planning, 2023, p. 13)

Table 4.2-10 Surrounding Protected Resource Land Score

Zone of Influence			Surrounding Protected Resource Land Score
Total Acres	Acres of Protected Resource Land	Percent Protected Resource Land	
772.59	0	0.0	0

(T&B Planning, 2023, Table 4-5)

3. Total LESA Score

The total LESA Score is calculated by summing the Project site's LE and SA subscores. The Project site's LESA subscores are summarized in Table 4.2-11, *Total LESA Score Sheet – Project Site*. The Project site's final LESA score is 28.1. As shown in Table 4.2-12, *California LESA Model Scoring Thresholds*, impacts to land that receives a LESA score between 0 and 39 are not considered significant under CEQA. Accordingly, the Project site is determined to have a relatively low value for agricultural production, indicating that the Project site does not contain any areas of important farmland types. (T&B Planning, 2023, p. 15)

C. Conclusion

As indicated in the preceding analysis, the Project only would result in impacts to approximately 19.84 acres of "Farmland of Local Importance" and approximately 45.13 acres of "Other Land," neither of which comprise "Farmland," as that term is defined by CEQA, the County, or the CDC, meaning that the Project would not convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or any other "Farmland" as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use. Even if "Farmland" included "Farmland of Local Importance" based on the Project's LESA Analysis (*Technical Appendix B*), all of the Project's impacts on Farmland still

Table 4.2-11 Total LESA Score Sheet – Project Site

	Factor Scores	Factor Weight	Weighted Factor Scores
LE Factors			
LCC	46.2	0.25	11.6
Storie Index	42.0	0.25	10.5
		LE Subtotal	*22.1.*
SA Factors			
Project Size	20	0.15	3.0
Water Resource Availability	20	0.15	3.0
Surrounding Agricultural Land	0	0.15	0.0
Protected Resource Land	0	0.05	0.0
		SA Subtotal	*6.0*
Final LESA Score			**28.1**

(T&B Planning, 2023, Table 4-6)

Table 4.2-12 California LESA Model Scoring Thresholds

Total LESA Score	Scoring Decision
0 to 39	**Not Considered Significant**
40 to 59	Considered Significant only if LE and SA subscores are each greater than or equal to 20 points
60 to 79	Considered Significant unless either LE or SA subscore is less than 20 points
80 to 100	Considered Significant

(CDC, 1997, Table 9; T&B Planning, 2023, Table 5-1)

would be less than significant. The Project site's final LESA score is 28.1, which based on the thresholds shown in Table 4.2-12 indicates that the Project site does not contain any areas of important farmland types, and therefore, conversion of the Project site's "Farmland of Local Importance" and "Other Land" to non-agricultural use would be less than significant. Accordingly, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use, and impacts would be less than significant.

Threshold b.: ***Would the Project conflict with existing agricultural zoning, agricultural use or with land subject to a Williamson Act contract or land within a Riverside County Agricultural Preserve?***

Under existing conditions, approximately 4.7 acres in the northeast portion of the Project site are zoned for "Rural Residential, Minimum ½-Acre Lot Sizes (R-R-1/2)," while the remaining approximately 60.3 acres of the Project site are zoned for "Light Agriculture (A-1-1)." According to Riverside County Ordinance No. 625 (Right-To-Farm Ordinance), the A-1 zoning classification is identified as "land zoned for primarily agricultural purposes," while the site's existing R-R zoning classification is not considered to comprise agriculturally-zoned land. Accordingly, under existing conditions the Project site contains approximately 60.3 acres of lands zoned primarily for agricultural purposes. (Riverside County, 1994; RCIT, n.d.) However, the Project site has

not been used for agricultural production since at least 1990 (Group Delta, 2022, Table 3). Moreover, the Project includes applications for Change of Zone No. 2200062, which would change the zoning classification for the northern 44.66 net acres of the Project site from A-1-1 to I-P, which would ensure that the Project's planned warehouse building would be consistent with the site's underlying zoning classification. No changes to the existing zoning classification are proposed for the southern 13.33 net acres of the Project site, and this portion of the Project site would continue to be zoned for A-1-1 uses. The proposed park in this portion of the Project site would not conflict with the site's existing agricultural zoning, as park uses are allowed within the A-1 zone and improvements planned for the park site would not preclude future agricultural uses within this portions of the Project site. Accordingly, with approval of Change of Zone No. 2200062, the Project would not conflict with existing agricultural uses on site or with existing agricultural zoning on site, and impacts would therefore be less than significant.

There are numerous parcels surrounding the Project site that also are zoned for A-1-1 uses, including lands that abut the Project site's boundary. The proposed park site is not anticipated to result in any adverse impacts to existing agricultural uses or zoning in the surrounding area, as it is unlikely that future park users would file complaints associated with on-going agricultural uses in the area. In addition, the Project's proposed warehouse use would not be incompatible with agricultural uses, as warehouse uses generally are not considered sensitive to odors or other activities associated with agricultural operations. Moreover, none of the surrounding properties that are zoned for A-1-1 uses are currently being used for agricultural production. Furthermore, and as discussed under the analysis of Threshold c., the Project would be subject to compliance with Riverside County Ordinance No. 625, which would further ensure that Project-related impacts to surrounding agricultural uses would not occur. Accordingly, the Project would not conflict with existing agricultural uses on surrounding properties, and impacts would be less than significant.

According to Riverside County GIS, there are no agricultural preserves or Williamson Act contracted land within the Project vicinity. The nearest agricultural preserve and Williamson Act contracted land occurs approximately 1.6 miles southeast of the Project site (Perris Valley 3 Agricultural Preserve). (RCIT, n.d.) Due to the distance between the Project site and the Perris Valley 3 site, the Project has no potential to result in conflicts with land subject to a Williamson Act contract or land within a Riverside County Agricultural Preserve. No impact would occur.

Threshold c.: ***Would the Project cause development of non-agricultural uses within 300 feet of agriculturally zoned property (Ordinance No. 625 Right-to-Farm)?***

Under existing conditions, parcels within 300 feet of the Project site and that are zoned for agricultural uses include numerous parcels surrounding the northern 44.66 net acres of the Project site that are zoned A-1-1, as well as parcels zoned A-1-1 to the west and south of the southern 13.33 net acres of the Project site. However, based on a review of aerial photography, these areas generally are developed with rural residential uses with limited agricultural uses, with most agricultural uses consisting of dryland farming.

Although the Project site occurs within 300 feet of lands zoned primarily for agricultural purposes, the Project would be subject to the provisions of Riverside County Ordinance No. 625, which protects agricultural operations from nuisance complaints and encourages the development, improvement, and long-term viability

of agricultural land. Mandatory compliance with Ordinance No. 625, as would be assured through the Project's conditions of approval, would ensure that Project-related construction and operational activities would not indirectly cause or contribute to the conversion of off-site farmland to non-agricultural use. Based on the mandatory compliance with Ordinance No, 625, impacts would be less than significant.

Threshold d.:	***Would the Project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?***

There are no components of the Project that would involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use. Although agriculturally-zoned lands occur in the immediate Project vicinity (refer to the discussion of Thresholds b. and c.), there are no components of the proposed Project that could indirectly affect the viability of agricultural uses on these properties. Additionally, as indicated under the analysis of Threshold c., the Project would be subject to the provisions of Riverside County Ordinance No. 625, which protects agricultural operations from nuisance complaints and encourages the development, improvement, and long-term viability of agricultural land. Compliance with Ordinance No. 625 would ensure that future development of the Project does not result in indirect impacts to existing agricultural uses or existing agricultural zoning in the surrounding area. Thus, the Project would not result in any other changes to the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use, and impacts would be less than significant.

Threshold e.:	***Would the Project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Govt. Code section 51104(g))?***
Threshold f.:	***Would the Project result in the loss of forest land or conversion of forest land to non-forest use?***
Threshold g.:	***Would the Project involve other changes in the existing environment which, due to their location or nature, could result in conversion of forest land to non-forest use?***

The Project site and surrounding areas are not zoned for forest land (as defined in Public Resources Code (PRC) § 12220(g)), timberland (as defined by PRC § 4526), or timberland zoned Timberland Production (as defined by Government Code § 51104(g)) (RCIT, n.d.). As such, the Project has no potential to conflict with such zoning, and no impact would occur.

As shown in Figure 4.5.2 of the Riverside County General Plan Update Draft EIR No. 521, which was prepared in conjunction with the County's 2015 General Plan Update, aside from sparsely scattered lowland forests/woodlands there are no forestry resources in the Project's vicinity under existing conditions. The nearest forest land to the Project site is the Cleveland National Forest, located approximately 12.2 miles west of the Project site; however, no timber production occurs in association with the Cleveland National Forest (Riverside County, 2015a, Figure 4.5.2). Based on a review of aerial imagery, there are no forest-related uses

within the vicinity of the Project site (Google Earth, 2024). As such, the Project has no potential to result in the loss of forest land or conversion of forest land to non-forest use, and no impact would occur.

Furthermore, the Project would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of forest land to non-forest use. No impact would occur.

4.2.6 Cumulative Impact Analysis

The cumulative study area for the evaluation of potential impacts to agriculture and forestry resources includes all of western Riverside County. Lands within western Riverside County generally exhibit similar climate, geologic, and soil characteristics, and agricultural production is evaluated by Riverside County and the State of California at the County level. Additionally, agricultural lands throughout western Riverside County are subject to future development that would preclude agricultural uses, based on the various land use designations applied to lands throughout western Riverside County by the County's General Plan and the general plans of other local jurisdictions.

As discussed under Threshold a., implementation of the proposed Project would result in development of the 64.97 gross-acre Project site with park and warehouse uses, of which approximately 19.84 acres are mapped as "Farmland of Local Importance" and the remaining 45.13 acres are mapped as containing "Other Land" (CDC, 2021). Additionally, based on the Project's LESA Analysis, the Project site is determined to have a relatively low value for agricultural production, further demonstrating that the Project site does not contain any areas of important farmland types. Although it is possible that cumulative developments could result in significant impacts to important farmland types, the Project would not impact any important farmland types; therefore, Project impacts would be less than significant on a cumulatively-considerable basis.

With approval of the Project's Change of Zone No. 2200062, the northern portions of the Project site that are proposed for development with a warehouse would be rezoned from A-1-1 to I-P, which would ensure that the Project's planned warehouse building would be consistent with the site's underlying zoning classification. No changes to the existing zoning classification are proposed for the southern 13.33 net acres of the Project site, and this portion of the Project site would continue to be zoned for A-1-1 uses. The proposed park site in this portion of the Project site would not conflict with the site's existing agricultural zoning, as park uses are allowed within the A-1 zone and improvements planned for the park site would not preclude future agricultural uses within this portions of the Project site. Moreover, and based on the Project's LESA analysis (refer to Threshold a.), the Project site is determined to have a relatively low value for agricultural production. Accordingly, impacts due to a conflict with existing agricultural uses on site or with existing agricultural zoning on site would be less than significant on a cumulatively-considerable basis. Although lands surrounding the Project site are zoned for agricultural uses, the Project's proposed uses would not be incompatible with agricultural uses, as warehouse and park uses generally are not considered sensitive to odors or other activities associated with agricultural operations. Moreover, none of the surrounding properties that are zoned for A-1-1 uses are currently being used for agricultural production. Furthermore, the Project would be subject to compliance with Riverside County Ordinance No. 625, which would further ensure that Project-related impacts to surrounding agricultural uses would not occur. Accordingly, Project indirect impacts to existing agricultural uses in the surrounding areas would be less than significant on a cumulatively-considerable basis.

Additionally, as the Project site and lands in the immediate Project vicinity are not subject to any agricultural preserves or Williamson Act Contracts, the Project would have no potential to result in cumulatively-considerable impacts due to a conflict with agricultural preserves or Williamson Act Contracted lands.

Although there are lands surrounding the Project site and that are zoned for A-1-1 (i.e., an agricultural zoning classification), the Project would be subject to the provisions of Riverside County Ordinance No. 625, which protects existing agricultural operations from nuisance complaints and encourages the development, improvement, and long-term viability of agricultural land. Other cumulative developments within the Project vicinity that are located within 300 feet of agriculturally-zoned property similarly would be subject to compliance with Ordinance No. 625. Mandatory compliance with Ordinance No. 625 would ensure that cumulatively-considerable impacts due to the conversion of off-site farmland to non-agricultural use would be less than significant.

There are no components of the Project that would involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use. Accordingly, cumulatively-considerable impacts would not occur.

The Project site and surrounding areas are not zoned for forest land (as defined in PRC § 12220(g)), timberland (as defined by PRC § 4526), or timberland zoned Timberland Production (as defined by Government Code § 51104(g)). As such, the Project has no potential to conflict with such zoning, and no cumulatively-considerable impacts would occur. In addition, the Project has no potential to result in the loss of forest land or conversion of forest land to non-forest use, and no cumulatively-considerable impacts due to the loss or conversion of forest land would occur. Furthermore, there are no components of the proposed Project that could result in the conversion of forest land to non-forest use, as there are no lands used for forest land uses; thus, no cumulatively-considerable impacts would occur.

4.2.7 Significance of Impacts Before Mitigation

Threshold a.: Less-than-Significant Impact. The Project would result in impacts to approximately 19.84 acres "Farmland of Local Importance" and approximately 45.13 acres of "Other Land," neither of which comprise "Farmland," as that term is defined by CEQA, the County, or the CDC, meaning that the Project would not convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or any other "Farmland" as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use. Even if "Farmland" included "Farmland of Local Importance" and "Other Land," based on the Project's LESA Analysis (*Technical Appendix B*), all of the Project's impacts on Farmland still would be less than significant. The Project site's final LESA score is 28.1. As shown in Table 4.2-12, impacts to land that receives a LESA score between 0 and 39 are not considered significant under CEQA. Thus, the Project site is determined to have a relatively low value for agricultural production, indicating that the Project site does not contain any areas of important farmland types, and therefore, conversion of the Project site's "Farmland of Local Importance" and "Other Land" to non-agricultural use would be less than significant. Accordingly, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland

Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use, and impacts would be less than significant.

Threshold b.: Less-than-Significant Impact. Under existing conditions the Project site contains approximately 60.3 acres of lands zoned primarily for agricultural purposes. However, the Project site has not been used for agricultural production since at least 1990. Moreover, with approval of Change of Zone No. 2200062, the Project would not conflict with existing agricultural uses on site or with existing agricultural zoning on site, and impacts would therefore be less than significant. Although there are numerous parcels surrounding the Project site that also are zoned for A-1-1 uses, including lands that abut the Project site's boundary, none of the surrounding properties that are zoned for A-1-1 uses are currently being used for agricultural production. Moreover, the Project would be subject to compliance with Riverside County Ordinance No. 625, which would further ensure that Project-related impacts to surrounding agricultural uses would not occur. Accordingly, the Project would not conflict with existing agricultural uses on surrounding properties, and impacts would be less than significant. Additionally, the Project site is not subject to a Williamson Act contract and is not located within any County Agricultural Preserves, and there are no components of the proposed Project that have the potential to adversely affect agricultural operations at the nearest agricultural preserve/Williamson Act-contracted lands. As such, Project impacts to agricultural preserves and Williamson Act-contracted lands would be less than significant.

Threshold c.: Less-than-Significant Impact. Although the Project site occurs within 300 feet of agriculturally-zoned property, the Project would be subject to the provisions of Riverside County Ordinance No. 625, which protects agricultural operations from nuisance complaints and encourages the development, improvement, and long-term viability of agricultural land. With mandatory compliance with Riverside County Ordinance No. 625, impacts due to the development of non-agricultural uses within 300 feet of agriculturally zoned property would be less than significant.

Threshold d.: Less-than-Significant Impact. Assuming mandatory compliance with Riverside County Ordinance No. 625, there are no components of the Project that would involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use. Impacts would be less than significant.

Thresholds e., f., and g.: No Impact. There are no forest lands in the Project vicinity, and no lands in the Project vicinity are zoned for timberland, timberland production, or forest uses. The Project would not result in the conversion of forest land to non-forest use. No impact would occur.

4.2.8 Applicable Regulations, Design Requirements, and Mitigation

Applicable Regulations and Design Requirements

The following are applicable regulations and design requirements within Riverside County. Although these requirements technically do not meet CEQA's definition for mitigation, they are imposed herein to ensure Project compliance with applicable County regulations and design requirements.

- In the event that new agricultural uses become established on agriculturally-zoned lands (as defined by Riverside County Ordinance No. 625) prior to Project occupancy, the provisions of Ordinance No. 625 shall apply. Ordinance No. 625 requires that when lands are developed adjacent to properties zoned primarily for agricultural purposes (that support agricultural operations that have been in place for at least three years and not considered a nuisance operation at the time the operation began), future land buyers must be notified of any agricultural operations that are on-going in the area, and mandate that such agricultural uses shall not be the subject of nuisance complaints.

Mitigation

Impacts to Agriculture and Forestry Resources were determined to be less than significant; therefore, mitigation measures are not required.

4.3 AIR QUALITY

This Subsection is based on two technical reports prepared by Urban Crossroads, Inc. (Urban Crossroads). The first report addresses the Project's regional and localized impacts to air quality, is entitled, "Mead Valley Commerce Center (PPT220050) Air Quality Impact Analysis, County of Riverside" (herein, "AQIA"), is dated November 8, 2023, and is included as *Technical Appendix C1* to this EIR (Urban Crossroads, 2023a). The second report addresses the Project's potential to result health risk impacts to nearby sensitive receptors, is entitled, "Mead Valley Commerce Center (PPT220050) Mobile Source Health Risk Assessment, County of Riverside" (herein "HRA"), is dated December 4, 2023, and is included as *Technical Appendix C2* to this EIR (Urban Crossroads, 2023b). Refer to Section 7.0, *References*, for a complete list of reference sources.

4.3.1 EXISTING CONDITIONS

A. South Coast Air Basin (SCAB)

The Project site is located in the South Coast Air Basin (SCAB) within the jurisdiction of SCAQMD. The SCAQMD was created by the 1977 Lewis-Presley Air Quality Management Act, which merged four county air pollution control bodies into one regional district. Under the Act, the SCAQMD is responsible for bringing air quality in areas under its jurisdiction into conformity with federal and state air quality standards. The Project site is located within the SCAB, a 6,745-square mile subregion of the SCAQMD, which includes the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County. The SCAB is bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east, and the San Diego Air Basin to the south. (Urban Crossroads, 2023a, p. 12)

B. Regional Climate

The regional climate has a substantial influence on air quality in the SCAB. In addition, the temperature, wind, humidity, precipitation, and amount of sunshine influence the air quality. The annual average temperatures throughout the SCAB vary from the low to middle 60s degrees Fahrenheit (°F). Due to a decreased marine influence, the eastern portion of the SCAB shows greater variability in average annual minimum and maximum temperatures. January is the coldest month throughout the SCAB, with average minimum temperatures of 47°F in downtown Los Angeles and 36°F in San Bernardino. All portions of the SCAB have recorded maximum temperatures above 100°F. (Urban Crossroads, 2023a, p. 12)

Although the climate of the SCAB can be characterized as semi-arid, the air near the land surface is quite moist on most days because of the presence of a marine layer. This shallow layer of sea air is an important modifier of SCAB climate. Humidity restricts visibility in the SCAB, and the conversion of sulfur dioxide (SO_2) to sulfates (SO_4) is heightened in air with high relative humidity. The marine layer provides an environment for that conversion process, especially during the spring and summer months. The annual average relative humidity within the SCAB is 71% along the coast and 59% inland. Since the ocean effect is dominant, periods of heavy early morning fog are frequent and low stratus clouds are a characteristic feature. These effects decrease with distance from the coast. (Urban Crossroads, 2023a, p. 12)

More than 90% of the SCAB's rainfall occurs from November through April. The annual average rainfall varies from approximately nine inches in Riverside to fourteen inches in downtown Los Angeles. Monthly and yearly rainfall totals are extremely variable. Summer rainfall usually consists of widely scattered thunderstorms near the coast and slightly heavier shower activity in the eastern portion of the SCAB with frequency being higher near the coast. (Urban Crossroads, 2023a, p. 12)

Due to its generally clear weather, about three-quarters of available sunshine is received in the SCAB. The remaining one-quarter is absorbed by clouds. The ultraviolet portion of this abundant radiation is a key factor in photochemical reactions. On the shortest day of the year, there are approximately 10 hours of possible sunshine, and on the longest day of the year, there are approximately 14½ hours of possible sunshine. (Urban Crossroads, 2023a, p. 13)

The importance of wind to air pollution is considerable. The direction and speed of the wind determines the horizontal dispersion and transport of the air pollutants. During the late autumn to early spring rainy season, the SCAB is subjected to wind flows associated with the traveling storms moving through the region from the northwest. This period also brings five to ten periods of strong, dry offshore winds, locally termed "Santa Anas" each year. During the dry season, which coincides with the months of maximum photochemical smog concentrations, the wind flow is bimodal, typified by a daytime onshore sea breeze and a nighttime offshore drainage wind. Summer wind flows are created by the pressure differences between the relatively cold ocean and the unevenly heated and cooled land surfaces that modify the general northwesterly wind circulation over southern California. Nighttime drainage begins with the radiational cooling of the mountain slopes. Heavy, cool air descends the slopes and flows through the mountain passes and canyons as it follows the lowering terrain toward the ocean. Another characteristic wind regime in the SCAB is the "Catalina Eddy," a low level cyclonic (counterclockwise) flow centered over Santa Catalina Island which results in an offshore flow to the southwest. On most spring and summer days, some indication of an eddy is apparent in coastal sections. (Urban Crossroads, 2023a, p. 13)

In the SCAB, there are two distinct temperature inversion structures that control vertical mixing of air pollution. During the summer, warm high-pressure descending (subsiding) air is undercut by a shallow layer of cool marine air. The boundary between these two layers of air is a persistent marine subsidence/inversion. This boundary prevents vertical mixing which effectively acts as an impervious lid to pollutants over the entire SCAB. The mixing height for the inversion structure is normally situated 1,000 to 1,500 feet above mean sea level. (Urban Crossroads, 2023a, p. 13)

A second inversion-type forms in conjunction with the drainage of cool air off the surrounding mountains at night followed by the seaward drift of this pool of cool air. The top of this layer forms a sharp boundary with the warmer air aloft and creates nocturnal radiation inversions. These inversions occur primarily in the winter, when nights are longer and onshore flow is weakest. They are typically only a few hundred feet above mean sea level. These inversions effectively trap pollutants, such as nitrogen oxides (NO_X) and carbon monoxide (CO) from vehicles, as the pool of cool air drifts seaward. Winter is therefore a period of high levels of primary pollutants along the coastline. (Urban Crossroads, 2023a, p. 13)

C. *Wind Patterns*

The distinctive climate of the Project area and the SCAB is determined by its terrain and geographical location. The SCAB is located in a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean in the southwest quadrant with high mountains forming the remainder of the perimeter. Wind patterns across the south coastal region are characterized by westerly and southwesterly onshore winds during the day and easterly or northeasterly breezes at night. Winds are characteristically light although the speed is somewhat greater during the dry summer months than during the rainy winter season. (Urban Crossroads, 2023a, pp. 13-14)

D. *Criteria Pollutants*

Criteria pollutants are pollutants that are regulated through the development of human health based and/or environmentally based criteria for setting permissible levels. Criteria pollutants, their typical sources, and health effects are identified below.

1. Carbon Monoxide (CO)

CO is a colorless, odorless gas produced by the incomplete combustion of carbon-containing fuels, such as gasoline or wood. CO emissions come from any source that burns fuel such as automobiles, trucks, heavy construction equipment, farming equipment, and residential heating. CO concentrations tend to be highest during the winter morning, when little to no wind and surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines, unlike ozone (O_3), motor vehicles operating at slow speeds are the primary source of CO in the SCAB. The highest ambient CO concentrations are generally found near congested transportation corridors and intersections. (Urban Crossroads, 2023a, Table 2-1)

Individuals with a deficient blood supply to the heart are the most susceptible to the adverse effects of CO exposure. The effects observed include earlier onset of chest pain with exercise, and electrocardiograph changes indicative of decreased oxygen (O_2) supply to the heart. Inhaled CO has no direct toxic effect on the lungs but exerts its effect on tissues by interfering with O_2 transport and competing with O_2 to combine with hemoglobin present in the blood to form carboxyhemoglobin (COHb). Hence, conditions with an increased demand for O_2 supply can be adversely affected by exposure to CO. Individuals most at risk include fetuses, patients with diseases involving heart and blood vessels, and patients with chronic hypoxemia (O_2 deficiency) as seen at high altitudes. (Urban Crossroads, 2023a, Table 2-1)

2. Sulfur Oxides (SO_x)

Sulfur dioxide (SO_2) is a colorless, extremely irritating gas or liquid. It enters the atmosphere as a pollutant mainly as a result of burning high sulfur-content fuel oils and coal and from chemical processes occurring at chemical plants and refineries. When SO_2 oxidizes in the atmosphere, it forms SO_4. Collectively, these pollutants are referred to as sulfur oxides (SO_X). Sources of SO_X include coal or oil burning power plants and industries, refineries, and diesel engines. (Urban Crossroads, 2023a, Table 2-1)

A few minutes of exposure to low levels of SO_2 can result in airway constriction in some asthmatics, all of whom are sensitive to its effects. In asthmatics, increase in resistance to air flow, as well as reduction in breathing capacity leading to severe breathing difficulties, are observed after acute exposure to SO_2. In contrast, healthy individuals do not exhibit similar acute responses even after exposure to higher concentrations of SO_2. Animal studies suggest that despite SO_2 being a respiratory irritant, it does not cause substantial lung injury at ambient concentrations. However, very high levels of exposure can cause lung edema (fluid accumulation), lung tissue damage, and sloughing off of cells lining the respiratory tract. Some population-based studies indicate that the mortality and morbidity effects associated with fine particles show a similar association with ambient SO_2 levels. In these studies, efforts to separate the effects of SO_2 from those of fine particles have not been successful. It is not clear whether the two pollutants act synergistically, or one pollutant alone is the predominant factor. (Urban Crossroads, 2023a, Table 2-1)

3. Nitrogen Oxides (NO_X)

Nitrogen Oxides (NO_X) consist of nitric oxide (NO), nitrogen dioxide (NO_2), and nitrous oxide (N_2O) and are formed when nitrogen (N_2) combines with O_2. Their lifespan in the atmosphere ranges from one to seven days for NO and NO_2, to 170 years for N_2O. NO_X are typically created during combustion processes and are major contributors to smog formation and acid deposition. NO_X result from any source that burns fuel such as automobiles, trucks, heavy construction equipment, farming equipment and residential heating. NO_2 is a criteria air pollutant and may result in numerous adverse health effects. It absorbs blue light, resulting in a brownish-red cast to the atmosphere and reduced visibility. Of the seven types of NO_X compounds, NO_2 is the most abundant in the atmosphere. As ambient concentrations of NO_2 are related to traffic density, commuters in heavy traffic may be exposed to higher concentrations of NO_2 than those indicated by a regional monitoring station. (Urban Crossroads, 2023a, Table 2-1)

Population-based studies suggest that an increase in acute respiratory illness, including infections and respiratory symptoms in children (not infants), is associated with long-term exposure to NO_2 at levels found in homes with gas stoves, which are higher than ambient levels found in Southern California. Increase in resistance to air flow and airway contraction is observed after short-term exposure to NO_2 in healthy subjects. Larger decreases in lung functions are observed in individuals with asthma or chronic obstructive pulmonary disease (e.g., chronic bronchitis, emphysema) than in healthy individuals, indicating a greater susceptibility of these sub-groups. In animals, exposure to levels of NO_2 considerably higher than ambient concentrations result in increased susceptibility to infections, possibly due to the observed changes in cells involved in maintaining immune functions. The severity of lung tissue damage associated with high levels of Ozone (O_3) exposure increases when animals are exposed to a combination of O_3 and NO_2. (Urban Crossroads, 2023a, Table 2-1)

4. Ozone (O_3)

O_3 is a highly reactive and unstable gas that is formed when reactive organic gases (ROG) and NO_X, both byproducts of internal combustion engine exhaust, undergo slow photochemical reactions in the presence of sunlight. ROG sources include any source that burns fuels (e.g., gasoline, natural gas, wood, oil), solvents, petroleum processing, and storage and pesticides. O_3 concentrations are generally highest during the summer

months when direct sunlight, light wind, and warm temperature conditions are favorable to the formation of this pollutant. (Urban Crossroads, 2023a, Table 2-1)

Individuals exercising outdoors, children, and people with preexisting lung disease, such as asthma and chronic pulmonary lung disease, are considered to be the most susceptible subgroups for O_3 effects. Short-term exposure (lasting for a few hours) to O_3 at levels typically observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes. Elevated O_3 levels are associated with increased school absences. In recent years, a correlation between elevated ambient O_3 levels and increases in daily hospital admission rates, as well as mortality, has also been reported. An increased risk for asthma has been found in children who participate in multiple outdoor sports and live in communities with high O_3 levels. O_3 exposure under exercising conditions is known to increase the severity of the responses described above. Animal studies suggest that exposure to a combination of pollutants that includes O_3 may be more toxic than exposure to O_3 alone. Although lung volume and resistance changes observed after a single exposure diminish with repeated exposures, biochemical and cellular changes appear to persist, which can lead to subsequent lung structural changes. (Urban Crossroads, 2023a, Table 2-1)

5. Particulate Matter (PM)

Particulate matter (PM) includes inhalable particles with diameters that are generally 10 micrometers and smaller, which are referred to as PM_{10}, and fine inhalable particles with diameters that are generally 2.5 micrometers and smaller, which are referred to as $PM_{2.5}$. (Urban Crossroads, 2023a, Table 2-1)

PM_{10} is a major air pollutant consisting of tiny solid or liquid particles of soot, dust, smoke, fumes, and aerosols. Sources of PM_{10} include road dust, windblown dust, and construction. PM_{10} also is formed from other pollutants (acid rain, NO_X, SO_X, and organics), and from the incomplete combustion of any fuel. Particulate matter pollution is a major cause of reduced visibility (haze) which is caused by the scattering of light and consequently the significant reduction of air clarity. The size of the particles (10 microns or smaller, about 0.0004 inches or less) allows them to easily enter the lungs where they may be deposited, resulting in adverse health effects. Additionally, PM_{10} is a criteria air pollutant. (Urban Crossroads, 2023a, Table 2-1)

$PM_{2.5}$ is a similar air pollutant to PM_{10} consisting of tiny solid or liquid particles that are 2.5 microns or smaller (often referred to as fine particles). $PM_{2.5}$ comes from fuel combustion in motor vehicles, equipment, and industrial sources, and residential and agricultural burning. $PM_{2.5}$ also is formed from reaction of other pollutants (acid rain, NO_X, SO_X, and organics). These particles are formed in the atmosphere from primary gaseous emissions that include SO_4 formed from SO_2 release from power plants and industrial facilities and nitrates that are formed from NO_X release from power plants, automobiles, and other types of combustion sources. The chemical composition of fine particles highly depends on location, time of year, and weather conditions. $PM_{2.5}$ is a criteria air pollutant. (Urban Crossroads, 2023a, Table 2-1)

A consistent correlation between elevated ambient fine particulate matter (PM_{10} and $PM_{2.5}$) levels and an increase in mortality rates, respiratory infections, number and severity of asthma attacks and the number of hospital admissions has been observed in different parts of the United States and various areas around the

world. In recent years, some studies have reported an association between long-term exposure to air pollution dominated by fine particles and increased mortality, reduction in lifespan, and an increased mortality from lung cancer. Daily fluctuations in $PM_{2.5}$ concentration levels have also been related to hospital admissions for acute respiratory conditions in children, to school and kindergarten absences, to a decrease in respiratory lung volumes in normal children, and to increased medication use in children and adults with asthma. Recent studies show lung function growth in children is reduced with long-term exposure to particulate matter. The elderly, people with preexisting respiratory or cardiovascular disease, and children appear to be more susceptible to the effects of high levels of PM_{10} and $PM_{2.5}$. (Urban Crossroads, 2023a, Table 2-1)

6. Volatile Organic Compounds (VOCs)

Volatile Organic Compounds (VOCs) are hydrocarbon compounds (any compound containing various combinations of hydrogen and carbon atoms) that exist in the ambient air. VOCs contribute to the formation of smog through atmospheric photochemical reactions and/or may be toxic. Compounds of carbon (also known as organic compounds) have different levels of reactivity; that is, they do not react at the same speed or do not form O_3 to the same extent when exposed to photochemical processes. VOCs often have an odor, and some examples include gasoline, alcohol, and the solvents used in paints. Exceptions to the VOC designation include CO, carbon dioxide (CO_2), carbonic acid, metallic carbides or carbonates, and ammonium carbonate. VOCs are a criteria pollutant since they are a precursor to O_3, which is a criteria pollutant. The terms VOC and ROG (as discussed below) are used interchangeably. (Urban Crossroads, 2023a, Table 2-1)

Organic chemicals are widely used as ingredients in household products. Paints, varnishes, and wax all contain organic solvents, as do many cleaning, disinfecting, cosmetic, degreasing, and hobby products. Fuels are made up of organic chemicals. All of these products can release organic compounds while in use, and, to some degree, when they are stored. (Urban Crossroads, 2023a, Table 2-1)

Breathing VOCs can irritate the eyes, nose, and throat; can cause difficulty breathing and nausea; and can damage the central nervous system as well as other organs. Some VOCs can cause cancer. Not all VOCs have all these health effects, though many have several. (Urban Crossroads, 2023a, Table 2-1)

7. Reactive Organic Gases (ROGs)

Similar to VOCs, Reactive Organic Gases (ROGs) are also precursors in forming O_3 and consist of compounds containing methane (CH_4), ethane (C_2H_6), propane, butane, and longer chain hydrocarbons, which are typically the result of some type of combustion/decomposition process. Smog is formed when ROG and NO_X react in the presence of sunlight. ROGs are a criteria pollutant since they are a precursor to O_3, which is a criteria pollutant. The terms ROG and VOC (see above discussion) are used interchangeably. Sources of ROGs and health effects of ROGs are similar to VOCs, and are described above. (Urban Crossroads, 2023a, Table 2-1)

8. Lead (Pb)

Lead (Pb) is a heavy metal that is highly persistent in the environment and is considered a criteria pollutant. In the past, the primary source of Pb in the air was emissions from vehicles burning leaded gasoline. The major sources of Pb emissions include ore and metals processing, particularly Pb smelters; resource recovery; the

deterioration of Pb-based paints; and leaded gasoline use and piston-engine aircraft operating on leaded aviation gasoline. Other stationary sources include waste incinerators, utilities, and lead-acid battery manufacturers. (Urban Crossroads, 2023a, Table 2-1)

Fetuses, infants, and children are more sensitive than others to the adverse effects of Pb exposure. Exposure to low levels of Pb can adversely affect the development and function of the central nervous system, leading to learning disorders, distractibility, inability to follow simple commands, and lower intelligence quotients. In adults, increased Pb levels are associated with increased blood pressure. Pb poisoning can cause anemia, lethargy, seizures, and death; although it appears that there are no direct effects of Pb on the respiratory system. Pb can be stored in the bone from early age environmental exposure, and elevated blood Pb levels can occur due to breakdown of bone tissue during pregnancy, hyperthyroidism (increased secretion of hormones from the thyroid gland) and osteoporosis (breakdown of bony tissue). Fetuses and breast-fed babies can be exposed to higher levels of Pb because of previous environmental Pb exposure of their mothers. (Urban Crossroads, 2023a, Table 2-1)

9. Odor

Odor means the perception experienced by a person when one or more chemical substances in the air come into contact with the human olfactory nerves. Odors can come from many sources including animals, human activities, industry, nature, and vehicles. (Urban Crossroads, 2023a, Table 2-1)

Offensive odors can potentially affect human health in several ways. First, odorant compounds can irritate the eye, nose, and throat, which can reduce respiratory volume. Second, studies have shown that the VOCs that cause odors can stimulate sensory nerves to cause neurochemical changes that might influence health, for instance, by compromising the immune system. Finally, unpleasant odors can trigger memories or attitudes linked to unpleasant odors, causing cognitive and emotional effects such as stress. (Urban Crossroads, 2023a, Table 2-1)

E. Existing Air Quality

Existing air quality is measured at established SCAQMD air quality monitoring stations. Monitored air quality is evaluated in the context of ambient air quality standards. These standards are the levels of air quality that are considered safe, with an adequate margin of safety, to protect the public health and welfare. National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) currently in effect are shown in Table 4.3-1, *Ambient Air Quality Standards*. (Urban Crossroads, 2023a, p. 21)

The determination of whether a region's air quality is healthful or unhealthful is determined by comparing contaminant levels in ambient air samples to the state and federal standards. The most recent State and federal standards were updated by CARB on May 4, 2016 and are presented in Table 4.3-1. The air quality in a region is considered to be in attainment by the state if the measured ambient air pollutant levels for O_3, CO (except 8-hour Lake Tahoe), SO_2 (1 and 24 hour), NO_2, PM_{10}, and $PM_{2.5}$ are not to be exceeded. All others are not to be equaled or exceeded. It should be noted that the three-year period is presented for informational purposes

Table 4.3-1 Ambient Air Quality Standards

Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards [1]		National Standards [2]		
		Concentration [3]	Method [4]	Primary [3,5]	Secondary [3,6]	Method [7]
Ozone (O_3)[8]	1 Hour	0.09 ppm (180 µg/m^3)	Ultraviolet Photometry	—	Same as Primary Standard	Ultraviolet Photometry
	8 Hour	0.070 ppm (137 µg/m^3)		0.070 ppm (137 µg/m^3)		
Respirable Particulate Matter (PM10)[9]	24 Hour	50 µg/m^3	Gravimetric or Beta Attenuation	150 µg/m^3	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m^3		—		
Fine Particulate Matter (PM2.5)[9]	24 Hour	—	—	35 µg/m^3	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m^3	Gravimetric or Beta Attenuation	12.0 µg/m^3	15 µg/m^3	
Carbon Monoxide (CO)	1 Hour	20 ppm (23 mg/m^3)	Non-Dispersive Infrared Photometry (NDIR)	35 ppm (40 mg/m^3)	—	Non-Dispersive Infrared Photometry (NDIR)
	8 Hour	9.0 ppm (10 mg/m^3)		9 ppm (10 mg/m^3)	—	
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m^3)		—	—	
Nitrogen Dioxide (NO_2)[10]	1 Hour	0.18 ppm (339 µg/m^3)	Gas Phase Chemiluminescence	100 ppb (188 µg/m^3)	—	Gas Phase Chemiluminescence
	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)		0.053 ppm (100 µg/m^3)	Same as Primary Standard	
Sulfur Dioxide (SO_2)[11]	1 Hour	0.25 ppm (655 µg/m^3)	Ultraviolet Fluorescence	75 ppb (196 µg/m^3)	—	Ultraviolet Flourescence; Spectrophotometry (Pararosaniline Method)
	3 Hour	—		—	0.5 ppm (1300 µg/m^3)	
	24 Hour	0.04 ppm (105 µg/m^3)		0.14 ppm (for certain areas)[11]	—	
	Annual Arithmetic Mean	—		0.030 ppm (for certain areas)[11]	—	
Lead[12,13]	30 Day Average	1.5 µg/m^3	Atomic Absorption	—	—	High Volume Sampler and Atomic Absorption
	Calendar Quarter	—		1.5 µg/m^3 (for certain areas)[12]	Same as Primary Standard	
	Rolling 3-Month Average	—		0.15 µg/m^3		
Visibility Reducing Particles[14]	8 Hour	See footnote 14	Beta Attenuation and Transmittance through Filter Tape	No National Standards		
Sulfates	24 Hour	25 µg/m^3	Ion Chromatography			
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m^3)	Ultraviolet Fluorescence			
Vinyl Chloride[12]	24 Hour	0.01 ppm (26 µg/m^3)	Gas Chromatography			

See footnotes on next page ...

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Table 4.3-1 Ambient Air Quality Standards (Cont'd)

1. California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, and particulate matter (PM10, PM2.5, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.
2. National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM10, the 24 hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 $\mu g/m^3$ is equal to or less than one. For PM2.5, the 24 hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the U.S. EPA for further clarification and current national policies.
3. Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.
4. Any equivalent measurement method which can be shown to the satisfaction of the ARB to give equivalent results at or near the level of the air quality standard may be used.
5. National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.
6. National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.
7. Reference method as described by the U.S. EPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the U.S. EPA.
8. On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.
9. On December 14, 2012, the national annual PM2.5 primary standard was lowered from 15 $\mu g/m^3$ to 12.0 $\mu g/m^3$. The existing national 24-hour PM2.5 standards (primary and secondary) were retained at 35 $\mu g/m^3$, as was the annual secondary standard of 15 $\mu g/m^3$. The existing 24-hour PM10 standards (primary and secondary) of 150 $\mu g/m^3$ also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.
10. To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national 1-hour standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.
11. On June 2, 2010, a new 1-hour SO_2 standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO_2 national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.

    Note that the 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.
12. The ARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.
13. The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard (1.5 $\mu g/m^3$ as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.
14. In 1989, the ARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.

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(Urban Crossroads, 2023a, Table 2-2)

and is not the basis for how the State assigns attainment status. Attainment status for a pollutant means that the SCAQMD meets the standards set by the EPA or the California EPA (CalEPA). Conversely, nonattainment means that an area has monitored air quality that does not meet the NAAQS or CAAQS standards. In order to improve air quality in nonattainment areas, a State Implementation Plan (SIP) is drafted by CARB. The SIP outlines the measures that the state will take to improve air quality. Once nonattainment areas meet the standards and additional redesignation requirements, the EPA will designate the area as a maintenance area. (Urban Crossroads, 2023a, p. 21)

F. Regional Air Quality

Air pollution contributes to a wide variety of adverse health effects. The EPA has established NAAQS for six of the most common air pollutants: CO, Pb, O_3, particulate matter (PM_{10} and $PM_{2.5}$), NO_2, and SO_2 which are known as criteria pollutants. The SCAQMD monitors levels of various criteria pollutants at 37 permanent monitoring stations and 5 single-pollutant source Pb air monitoring sites throughout the air district. On December 28, 2021, CARB posted the 2021 amendments to the State and national area designations. See Table 4.3-2, *Attainment Status of Criteria Pollutants in the SCAB*, for attainment designations for the SCAB. Appendix 2.1 to the Project's AQIA (EIR *Technical Appendix C1*) provides geographic representation of the State and federal attainment status for applicable criteria pollutants within the SCAB. (Urban Crossroads, 2023a, p. 24)

Table 4.3-2 Attainment Status of Criteria Pollutants in the SCAB

Criteria Pollutant	State Designation	Federal Designation
O_3 – 1-hour standard	Nonattainment	--
O_3 – 8-hour standard	Nonattainment	Nonattainment
PM_{10}	Nonattainment	Attainment
$PM_{2.5}$	Nonattainment	Nonattainment
CO	Attainment	Unclassifiable/Attainment
NO_2	Attainment	Unclassifiable/Attainment
SO_2	Attainment	Unclassifiable/Attainment
Pb[1]	Attainment	Unclassifiable/Attainment

Note: See AQIA Appendix 2.1 (*Technical Appendix C1*) for a detailed map of State/National Area Designations within the SCAB.
[1] The Federal nonattainment designation for lead is only applicable towards the Los Angeles County portion of the SCAB.
"-" = The national 1-hour O_3 standard was revoked effective June 15, 2005.
(Urban Crossroads, 2023a, Table 2-3)

G. Local Air Quality

SCAQMD has designated general forecast areas and air monitoring areas (referred to as Source Receptor Areas [SRA]) throughout the district in order to provide Southern California residents information about the air quality conditions. The Project site is located within the Perris Valley area (SRA 24). The Perris Valley monitoring station is located approximately 3.69 miles southeast of the Project site and reports air quality statistics for O_3 (2020-2021) and PM_{10} (2020). As the Perris Valley monitoring station does not provide data

for O_3 (2022), CO, NO_2, $PM_{2.5}$ or PM_{10} (2021-2022), the next nearest monitoring stations are utilized. Data for CO, NO_2, and PM_{10} (2021) was obtained from the Lake Elsinore Area monitoring station, located in SRA 25, approximately 11.56 miles southwest of the Project site. The nearest station for $PM_{2.5}$ data was obtained from the Metropolitan Riverside County 1 monitoring station which is located approximately 14.14 miles northwest of the Project site in SRA 23. It should be noted that data from Lake Elsinore Area and Metropolitan Riverside County 1 monitoring stations were utilized in lieu of the Perris Valley monitoring station only in instances where data was not available. The most recent three (3) years of data available is shown on Table 4.3-3, *Project Area Air Quality Monitoring Summary (2019-2021)*, and identifies the number of days ambient air quality standards were exceeded for the study area, which is considered to be representative of the local air quality at the Project Site. Data for O_3, CO, NO_2, PM_{10}, and $PM_{2.5}$ for 2020 through 2022 was obtained from the SCAQMD Air Quality Data Tables. Additionally, data for SO_2 has been omitted as attainment is regularly met in the SCAB and few monitoring stations measure SO_2 concentrations. (Urban Crossroads, 2023a, pp. 24-25)

H. Regional Air Quality Improvement

The Project is within the jurisdiction of the SCAQMD. In 1976, California adopted the Lewis Air Quality Management Act which created SCAQMD from a voluntary association of air pollution control districts in Los Angeles, Orange, Riverside, and San Bernardino counties. The geographic area of which SCAQMD consists of is known as the SCAB. SCAQMD develops comprehensive plans and regulatory programs for the region to attain federal standards by dates specified in federal law. The agency is also responsible for meeting state standards by the earliest date achievable, using reasonably available control measures. (Urban Crossroads, 2023a, p. 29)

SCAQMD rule development through the 1970s and 1980s resulted in dramatic improvement in SCAB air quality. Nearly all control programs developed through the early 1990s relied on (i) the development and application of cleaner technology; (ii) add-on emission controls, and (iii) uniform CEQA review throughout the SCAB, such as is occurring here. Industrial emission sources have been significantly reduced by this approach and vehicular emissions have been reduced by technologies implemented at the state level by CARB. (Urban Crossroads, 2023a, p. 29)

As discussed above, the SCAQMD is the lead agency charged with regulating air quality emission reductions for the entire SCAB. SCAQMD created AQMPs which represent a regional blueprint for achieving healthful air on behalf of the 16 million residents of the SCAB. The 2012 AQMP states, “the remarkable historical improvement in air quality since the 1970’s is the direct result of Southern California’s comprehensive, multiyear strategy of reducing air pollution from all sources as outlined in its AQMPs.” (Urban Crossroads, 2023a, pp. 29-30)

Emissions of O_3,NO_X, VOC, and CO have been decreasing in the SCAB since 1975 and are projected to continue to decrease through 2020. These decreases result primarily from motor vehicle controls and reductions in evaporative emissions. Although vehicle miles traveled (VMT) in the SCAB continue to increase, NO_X and VOC levels are decreasing because of the mandated controls on motor vehicles and the replacement of older polluting vehicles with lower-emitting vehicles. NO_X emissions from electric utilities also have

Table 4.3-3 Project Area Air Quality Monitoring Summary (2019-2021)

Pollutant	Standard	Year		
		2020	2021	2022
O_3				
Maximum Federal 1-Hour Concentration (ppm)		0.125	0.117	0.121
Maximum Federal 8-Hour Concentration (ppm)		0.106	0.094	0.091
Number of Days Exceeding State 1-Hour Standard	> 0.09 ppm	34	25	17
Number of Days Exceeding State/Federal 8-Hour Standard	> 0.070 ppm	74	60	37
CO				
Maximum Federal 1-Hour Concentration	> 35 ppm	0.9	0.9	0.9
Maximum Federal 8-Hour Concentration	> 20 ppm	0.7	0.8	0.6
NO_2				
Maximum Federal 1-Hour Concentration	> 0.100 ppm	0.044	0.044	0.037
Annual Federal Standard Design Value		0.007	0.007	0.007
PM_{10}				
Maximum Federal 24-Hour Concentration (µg/m^3)	> 150 µg/m^3	77	89	91
Annual Federal Arithmetic Mean (µg/m^3)		35.9	21.4	19.8
Number of Days Exceeding Federal 24-Hour Standard	> 150 µg/m^3	0	0	0
Number of Days Exceeding State 24-Hour Standard	> 50 µg/m^3	6	4	1
$PM_{2.5}$				
Maximum Federal 24-Hour Concentration (µg/m^3)	> 35 µg/m^3	41.00	82.1	38.5
Annual Federal Arithmetic Mean (µg/m^3)	> 12 µg/m^3	12.63	12.58	10.80
Number of Days Exceeding Federal 24-Hour Standard	> 35 µg/m^3	4	10	1

ppm = Parts Per Million
µg/m^3 = Microgram per Cubic Meter
Source: Data for O_3, CO, NO_2, PM_{10}, and $PM_{2.5}$ was obtained from SCAQMD Air Quality Data Tables.

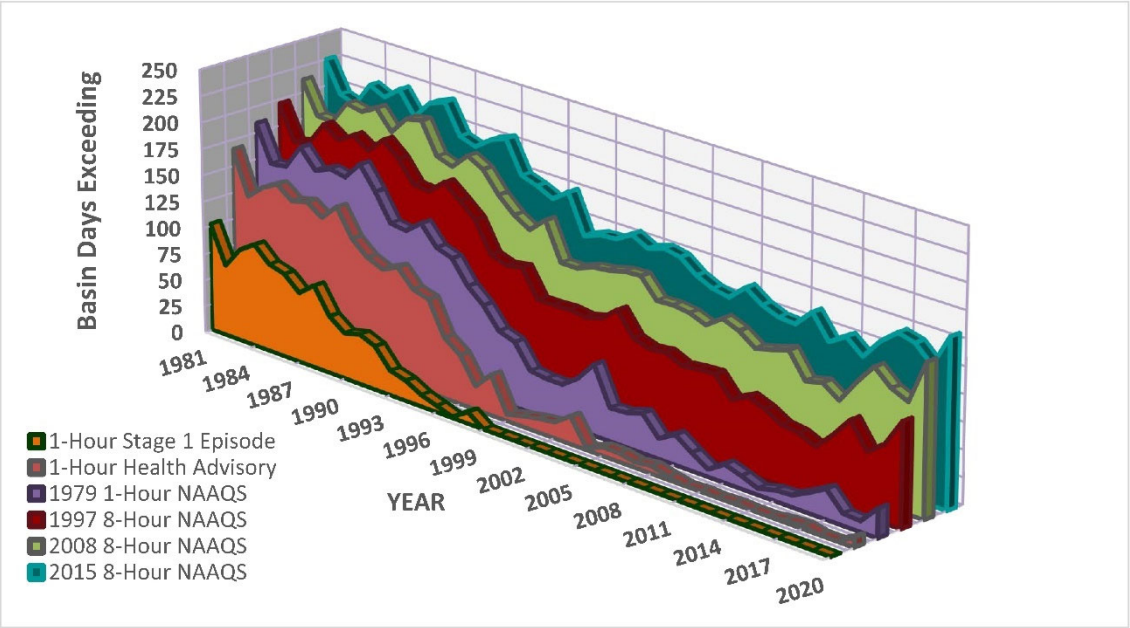
(Urban Crossroads, 2023a, Table 2-4)

decreased due to use of cleaner fuels and renewable energy. O_3 contour maps show that the number of days exceeding the 8-hour NAAQS has generally decreased between 1980 and 2020. For 2020, there was an overall decrease in exceedance days compared with the 1980 period. However, as shown on Figure 4.3-1, *SCAB O3 Trend*, O_3 levels have increased in the past three years due to higher temperatures and stagnant weather conditions. Notwithstanding, O_3 levels in the SCAB have decreased substantially over the last 30 years with the current maximum measured concentrations being approximately one-third of concentrations within the late 70's. (Urban Crossroads, 2023a, p. 30)

The overall trends of PM_{10} and $PM_{2.5}$ levels in the air (not emissions) show an overall improvement since 1975. Direct emissions of PM_{10} have remained somewhat constant in the SCAB and direct emissions of $PM_{2.5}$ have decreased slightly since 1975. Area wide sources (fugitive dust from roads, dust from construction, and other

sources) contribute the greatest amount of direct particulate matter emissions. (Urban Crossroads, 2023a, p. 30)

Figure 4.3-1 SCAB O_3 Trend

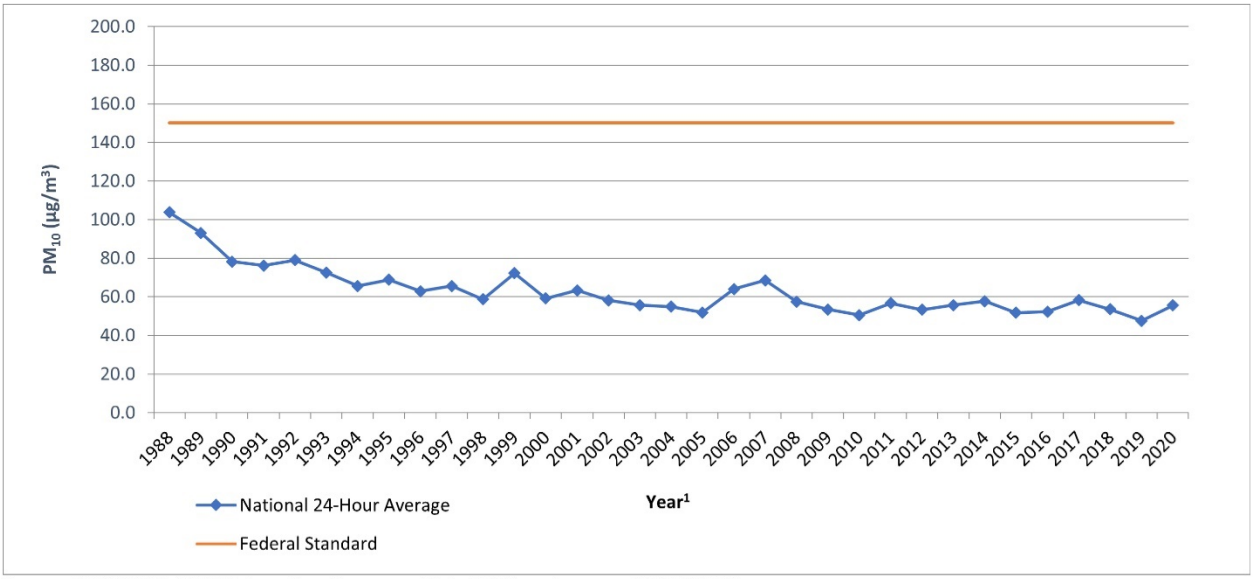


(Urban Crossroads, 2023a, Table 2-5)

As with other pollutants, the most recent PM_{10} statistics show an overall improvement as illustrated in Figure 4.3-2, *SCAB Average 24-Hour Concentration PM10 Trend (Based on Federal Standard)*, and Figure 4.3-3, *SCAB Annual Average Concentration PM10 Trend (Based on State Standard)*. During the period for which data are available, the 24-hour national annual average concentration for PM_{10} decreased by approximately 46%, from 103.7 microgram per cubic meter (µg/m³) in 1988 to 55.5 µg/m³ in 2020. Although the values are below the federal standard, it should be noted that there are days within the year where the concentrations would exceed the threshold. The 24-hour state annual average for emissions for PM_{10} have decreased by approximately 64%, from 93.9 µg/m³ in 1989 to 33.9 µg/m³ in 2020. Although data in the late 1990's show some variability, this is probably due to the advances in meteorological science rather than a change in emissions. Similar to the ambient concentrations, the calculated number of days above the 24-hour PM_{10} standards has also shown an overall drop. (Urban Crossroads, 2023a, pp. 30-31)

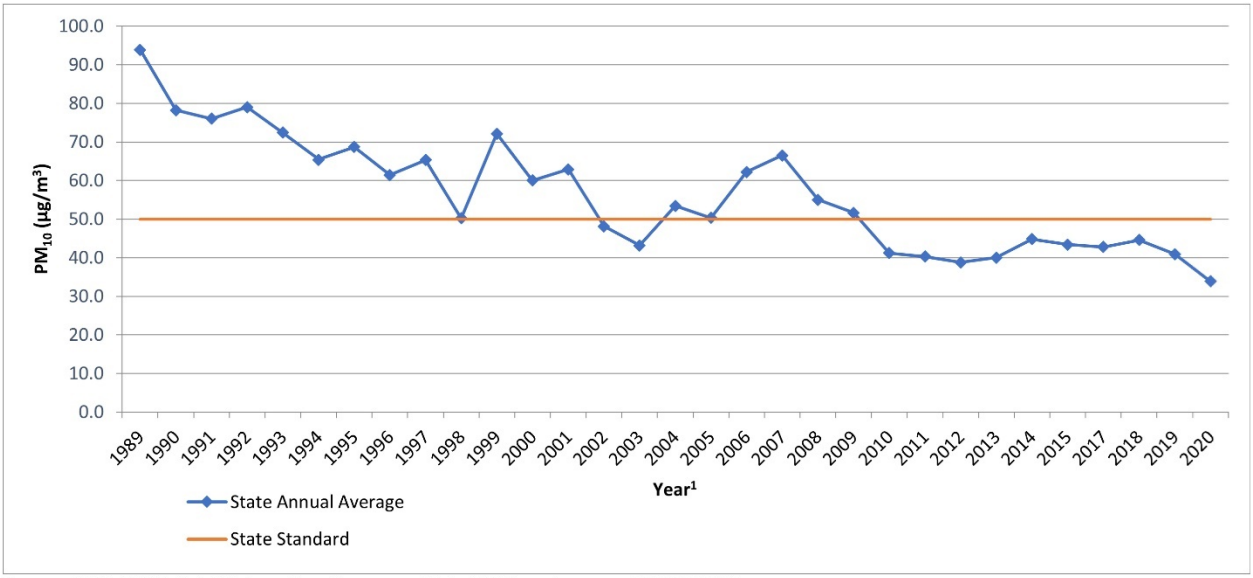
Figure 4.3-4, *SCAB 24-Hour Average Concentration PM2.5 Trend (Based on Federal Standard)*, and Figure 4.3-5, *SCAB Annual Average Concentration PM2.5 Trend (Based on State Standard)*, show the most recent 24-hour average $PM_{2.5}$ concentrations in the SCAB from 1999 through 2020. Overall, the national and State annual average concentrations have decreased by almost 50% and 31% respectively. It should be noted that the SCAB is currently designated as nonattainment for the State and federal $PM_{2.5}$ standards. (Urban Crossroads, 2023a, p. 32)

Figure 4.3-2 SCAB Average 24-Hour Concentration PM_{10} Trend (Based on Federal Standard)



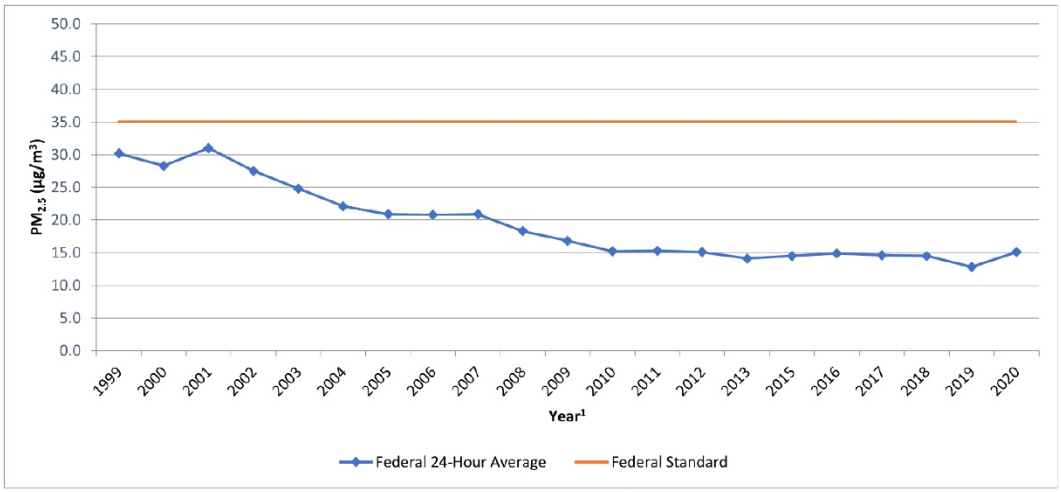
Source: 2020 CARB, iADAM: Top Four Summary: PM_{10} 24-Hour Averages (1988-2020)
[1] Some years have been omitted from the table as insufficient data (or no) data has been reported. Years with reported value of "0" have also been omitted.
(Urban Crossroads, 2023a, Table 2-6)

Figure 4.3-3 SCAB Annual Average Concentration PM_{10} Trend (Based on State Standard)



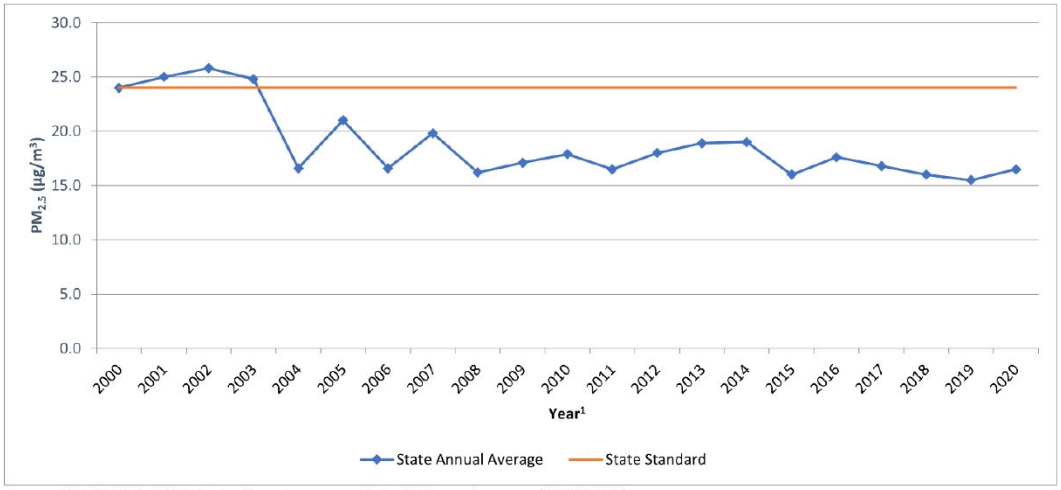
Source: 2020 CARB, iADAM: Top Four Summary: PM_{10} 24-Hour Averages (1988-2020)
[1] Some years have been omitted from the table as insufficient data (or no) data has been reported. Years with reported value of "0" have also been omitted.
(Urban Crossroads, 2023a, Table 2-7)

Figure 4.3-4 SCAB 24-Hour Average Concentration $PM_{2.5}$ Trend (Based on Federal Standard)



Source: 2020 CARB, iADAM: Top Four Summary: $PM_{2.5}$ 24-Hour Averages (1999-2020)
[1] Some years have been omitted from the table as insufficient data (or no) data has been reported. Years with reported value of "0" have also been omitted.
(Urban Crossroads, 2023a, Table 2-8)

Figure 4.3-5 SCAB Annual Average Concentration $PM_{2.5}$ Trend (Based on State Standard)



Source: 2020 CARB, iADAM: Top Four Summary: $PM_{2.5}$ 24-Hour Averages (1999-2020)
[1] Some years have been omitted from the table as insufficient data (or no) data has been reported. Years with reported value of "0" have also been omitted.
(Urban Crossroads, 2023a, Table 2-9)

While the 2012 AQMP PM_{10} attainment demonstration and the 2015 associated supplemental SIP submission indicated that attainment of the 24-hour standard was predicted to occur by the end of 2015, it could not anticipate the effect of the ongoing drought on the measured $PM_{2.5}$. The 2006 to 2010 base period used for the 2012 attainment demonstration had near-normal rainfall. While the trend of $PM_{2.5}$-equivalent emission reductions continued through 2015, the severe drought conditions contributed to the $PM_{2.5}$ increases observed after 2012. As a result of the disrupted progress toward attainment of the federal 24-hour $PM_{2.5}$ standard, SCAQMD submitted a request and the EPA approved, in January 2016, a "bump up" to the nonattainment

classification from "moderate" to "serious," with a new attainment deadline as soon as practicable, but not beyond December 31, 2019. As of March 14, 2019, the EPA approved portions of a SIP revision submitted by California to address CAA requirements for the 2006 24-hour $PM_{2.5}$ NAAQS in the Los Angeles-SCAB Serious $PM_{2.5}$ nonattainment area. The EPA also approved 2017 and 2019 motor vehicle emissions budgets for transportation conformity purposes and inter-pollutant trading ratios for use in transportation conformity analyses. (Urban Crossroads, 2023a, p. 33)

In December 2022, the SCAQMD released the Final 2022 AQMP. The 2022 AQMP continues to evaluate current integrated strategies and control measures to meet the NAAQS, as well as explore new and innovative methods to reach its goals. Some of these approaches include utilizing incentive programs, recognizing existing co-benefit programs from other sectors, and developing a strategy with fair-share reductions at the federal, state, and local levels. Similar to the 2016 AQMP, the 2022 AQMP incorporates scientific and technological information and planning assumptions, including the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS)[1] and updated emission inventory methodologies for various source categories. (Urban Crossroads, 2023a, p. 33)

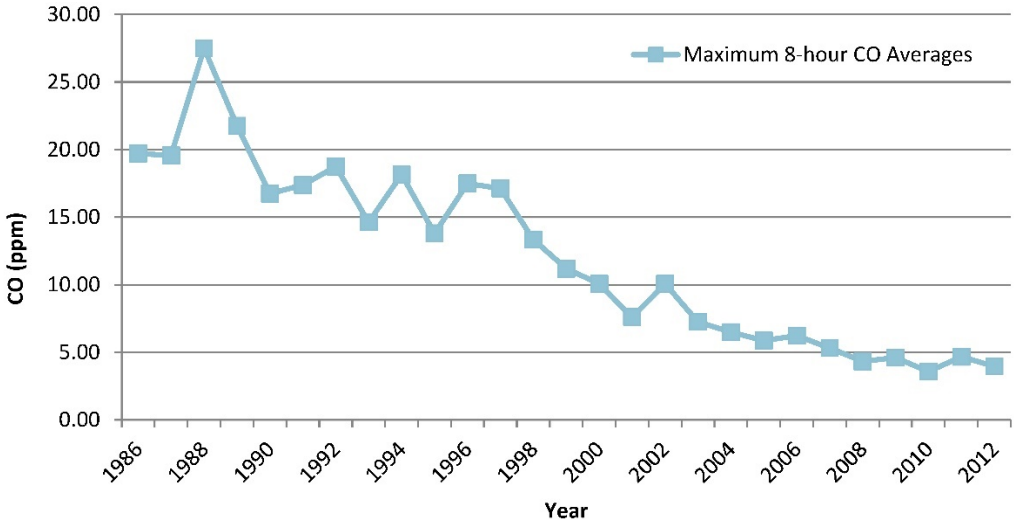
The most recent CO concentrations in the SCAB are shown in Figure 4.3-6, *SCAB 8-Hour Average Concentration CO Trend*. CO concentrations in the SCAB have decreased markedly – a total decrease of more about 80% in the peak 8-hour concentration from 1986 to 2012. It should be noted 2012 is the most recent year where 8-hour CO averages and related statistics are available in the SCAB. The number of exceedance days has also declined. The entire SCAB is now designated as attainment for both the State and federal CO standards. Ongoing reductions from motor vehicle control programs should continue the downward trend in ambient CO concentrations. (Urban Crossroads, 2023a, p. 33)

Part of the control process of the SCAQMD's duty to greatly improve the air quality in the SCAB is the uniform CEQA review procedures required by SCAQMD's 1993 CEQA Air Quality Handbook (1993 CEQA Handbook). The single threshold of significance used to assess project direct and cumulative impacts has in fact "worked" as evidenced by the track record of the air quality in the SCAB dramatically improving over the course of the past decades. As stated by the SCAQMD, the District's thresholds of significance are based on factual and scientific data and are therefore appropriate thresholds of significance to evaluate a project's potential air quality impacts. (Urban Crossroads, 2023a, p. 34)

The most recent NO_2 data for the SCAB is shown in Figure 4.3-7, *SCAB 1-Hour Average NO2 Concentration Trend (Based on Federal Standard)*, and Figure 4.3-8, *SCAB 1-Hour Average NO2 Concentration Trend (Based on State Standard)*. Over the last 50 years, NO_2 values have decreased significantly; the peak 1-hour national and State averages for 2020 is approximately 80% lower than what it was during 1963. The SCAB attained the State 1-hour NO_2 standard in 1994, bringing the entire State into attainment. A new State annual

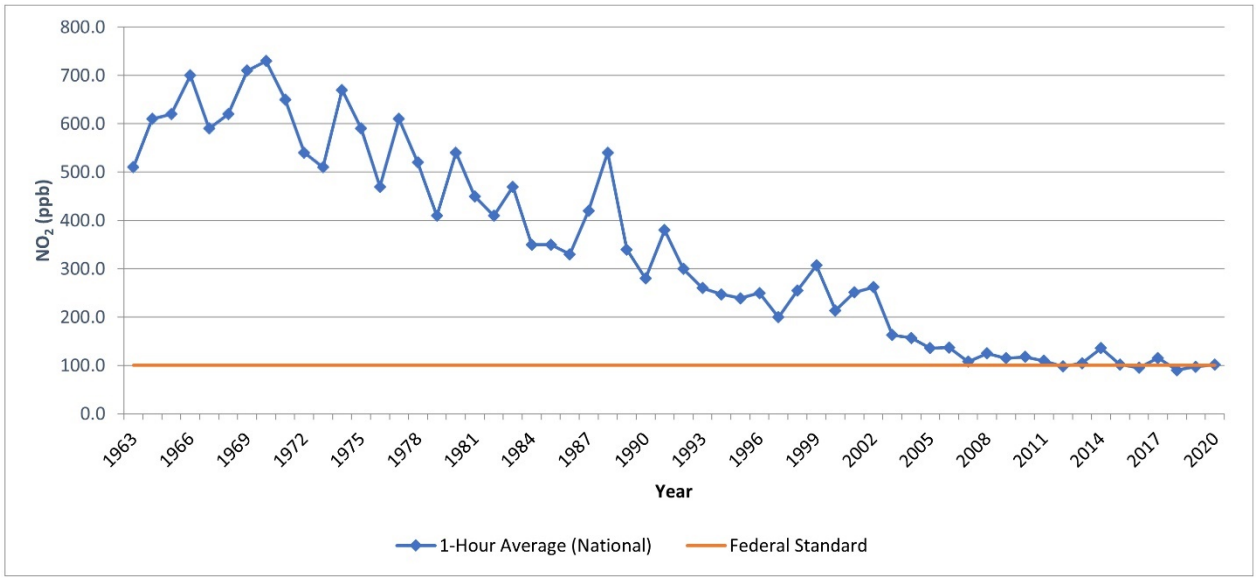
[1] It is acknowledged that SCAG adopted the 2024-2050 RTP/SCS in April 2024. However, the 2022 AQMP is reliant upon the 2020-2045 RTP/SCS.

Figure 4.3-6 SCAB 8-Hour Average Concentration CO Trend



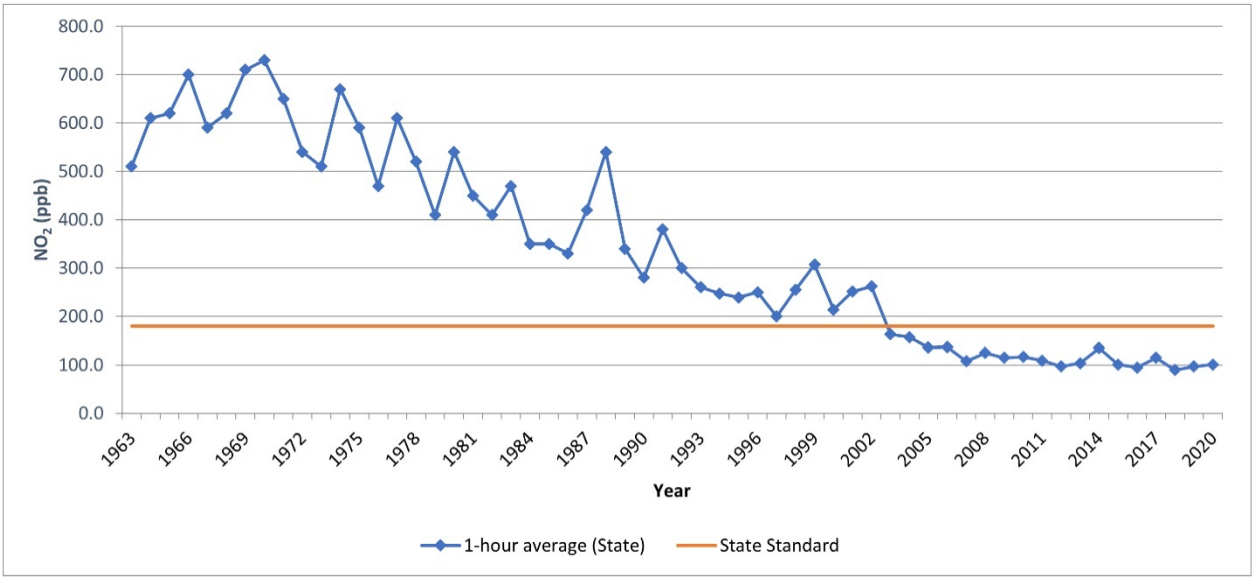
Source: 2020 CARB, iADAM: Top Four Summary: CO 8-Hour Averages (1986-2012)
[1] The most recent year where 8-hour concentration data is available is 2012.
(Urban Crossroads, 2023a, Table 2-10)

Figure 4.3-7 SCAB 1-Hour Average NO_2 Concentration Trend (Based on Federal Standard)



(Urban Crossroads, 2023a, Table 2-11)

Figure 4.3-8 SCAB 1-Hour Average NO_2 Concentration Trend (Based on State Standard)



(Urban Crossroads, 2023a, Table 2-12)

average standard of 0.030 ppm was adopted by CARB in February 2007. The new standard is just barely exceeded in the SCAQMD. NO_2 is formed from NO_X emissions, which also contribute to O_3. As a result, the majority of the future emission control measures would be implemented as part of the overall O_3 control strategy. Many of these control measures would target mobile sources, which account for more than three-quarters of California's NO_X emissions. These measures are expected to bring the SCAQMD into attainment of the state annual average standard. (Urban Crossroads, 2023a, p. 34)

I. Toxic Air Contaminants (TAC) Trends

In 1984, as a result of public concern for exposure to airborne carcinogens, CARB adopted regulations to reduce the amount of TAC emissions resulting from mobile and area sources, such as cars, trucks, stationary sources, and consumer products. According to the *Ambient and Emission Trends of Toxic Air Contaminants in California* journal article, which was prepared for CARB, results show that between 1990-2012, ambient concentration and emission trends for the seven TACs responsible for most of the known cancer risk associated with airborne exposure in California have declined significantly. The seven TACs studied include those that are derived from mobile sources: diesel particulate matter (DPM), benzene (C_6H_6), and 1,3-butadiene (C_4H_6); those that are derived from stationary sources: perchloroethylene (C_2Cl_4) and hexavalent chromium (Cr(VI)); and those derived from photochemical reactions of emitted VOCs: formaldehyde (CH_2O) and acetaldehyde (C_2H_4O). The decline in ambient concentration and emission trends of these TACs are a result of various regulations CARB has implemented to address cancer risk. (Urban Crossroads, 2023a, pp. 35-36)

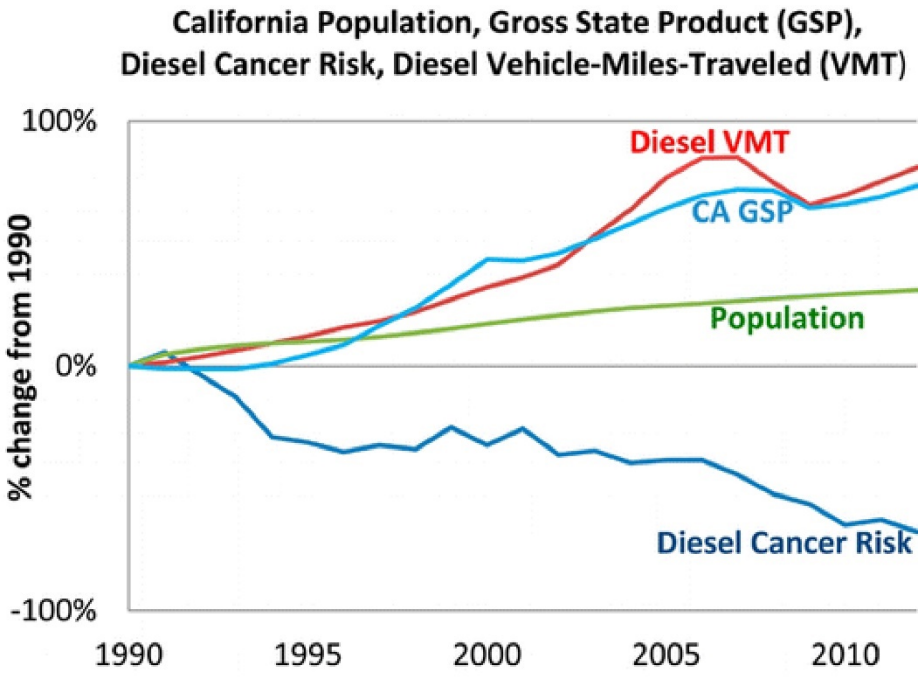
1. Mobile-Source TACs

CARB introduced two programs that aimed at reducing mobile emissions for light and medium duty vehicles through vehicle emissions controls and cleaner fuel. In California, light-duty vehicles sold after 1996 are

equipped with California's second-generation On-Board Diagnostic (OBD-II) system. The OBD-II system monitors virtually every component that can affect the emission performance of the vehicle to ensure that the vehicle remains as clean as possible over its entire life and assists repair technicians in diagnosing and fixing problems with the computerized engine controls. If a problem is detected, the OBD-II system illuminates a warning lamp on the vehicle instrument panel to alert the driver. This warning lamp typically contains the phrase "Check Engine" or "Service Engine Soon." The system also would store important information about the detected malfunction so that a repair technician can accurately find and fix the problem. CARB has recently developed similar OBD requirements for heavy-duty vehicles over 14,000 pounds (lbs). CARB's phase II Reformulated Gasoline Regulation (RFG-2), adopted in 1996, also led to a reduction of mobile source emissions. Through such regulations, benzene levels declined 88% from 1990-2012. 1,3-Butadiene concentrations also declined 85% from 1990-2012 as a result of the use of reformulated gasoline and motor vehicle regulations. (Urban Crossroads, 2023a, p. 36)

In 2000, CARB's Diesel Risk Reduction Plan (DRRP) recommended the replacement and retrofit of diesel-fueled engines and the use of ultra-low-sulfur (<15 ppm) diesel fuel. As a result of these measures, DPM concentrations have declined 68% since 2000, even though the State's population increased 31% and the amount of diesel vehicles miles traveled increased 81%, as shown on Figure 4.3-9, *DPM and Diesel Vehicle Miles Trend*. With the implementation of these diesel-related control regulations, CARB expects a DPM decline of 71% for 2000-2020. (Urban Crossroads, 2023a, p. 36)

Figure 4.3-9 DPM and Diesel Vehicle Miles Trend



(Urban Crossroads, 2023a, Exhibit 2-A)

2. Diesel Regulations

CARB and the Ports of Los Angeles and Long Beach (POLA and POLB) have adopted several iterations of regulations for diesel trucks that are aimed at reducing DPM. More specifically, CARB Drayage Truck Regulation, CARB statewide On-road Truck and Bus Regulation, and the Ports of Los Angeles and Long Beach Clean Truck Program (CTP) require accelerated implementation of "clean trucks" into the Statewide truck fleet. In other words, older more polluting trucks would be replaced with newer, cleaner trucks as a function of these regulatory requirements. (Urban Crossroads, 2023a, p. 37)

Moreover, the average Statewide DPM emissions for Heavy Duty Trucks (HDT), in terms of grams of DPM generated per mile traveled, would dramatically be reduced due to the aforementioned regulatory requirements. Diesel emissions identified in this analysis would therefore overstate future DPM emissions since not all the regulatory requirements are reflected in the modeling. (Urban Crossroads, 2023a, p. 37)

3. Cancer Risk Trends

Based on information available from CARB, overall cancer risk throughout the SCAB has had a declining trend since 1990. In 1998, following an exhaustive 10-year scientific assessment process, CARB identified particulate matter from diesel-fueled engines as a toxic air contaminant. The SCAQMD initiated a comprehensive urban toxic air pollution study called the MATES. DPM accounts for more than 70% of the cancer risk. (Urban Crossroads, 2023a, p. 37)

In January 2018, as part of the overall effort to reduce air toxics exposure in the SCAB, SCAQMD began conducting the MATES V Program. MATES V field measurements were conducted at ten fixed sites (the same sites selected for MATES III and IV) to assess trends in air toxics levels. MATES V also included measurements of ultrafine particles (UFP) and black carbon (BC) concentrations, which can be compared to the UFP levels measured in MATES IV. The final report for the MATES V study was published in August 2021. In addition to new measurements and updated modeling results, several key updates were implemented in MATES V. First, MATES V estimates cancer risks by taking into account multiple exposure pathways, which includes inhalation and non-inhalation pathways. This approach is consistent with how cancer risks are estimated in South Coast AQMD's programs such as permitting, Air Toxics Hot Spots (AB 2588), and CEQA. Previous MATES studies quantified the cancer risks based on the inhalation pathway only. Second, along with cancer risk estimates, MATES V includes information on the chronic non-cancer risks from inhalation and non-inhalation pathways for the first time. Cancer risks and chronic non-cancer risks from MATES II through IV measurements have been re-examined using current Office of Environmental Health Hazard Assessment (OEHHA) and CalEPA risk assessment methodologies and modern statistical methods to examine the trends over time. (Urban Crossroads, 2023a, p. 38)

MATES-V calculated cancer risks based on monitoring data collected at ten fixed sites within the SCAB. None of the fixed monitoring sites are within the local area of the Project site. However, MATES-V has extrapolated the excess cancer risk levels throughout the SCAB by modeling the specific grids. The Project is located within a quadrant of the geographic grid of the MATES-V model which predicted a cancer risk of 293 in one million for the area containing the Project site. DPM is included in this cancer risk along with all other TAC sources.

As in previous MATES iterations, DPM is the largest contributor to overall air toxics cancer risk. However, the average levels of DPM in MATES V are 53% lower at the 10 monitoring sites compared to MATES IV. Cumulative Project generated TACs are limited to DPM. (Urban Crossroads, 2023a, p. 38)

The reductions in cancer and non-cancer risks and heavy truck-related air quality emissions within the SCAB also has been documented in a technical memorandum prepared by Ramboll US Consulting, Inc. (Ramboll). This technical memorandum, which is herein incorporated by reference pursuant to CEQA Guidelines § 15150, is entitled, "Technical Comments in Response to the December 2022 Report Titled *A Region In Crisis: The Rationale For A Public Health State Of Emergency In The Inland Empire"* (herein, "Ramboll Report"), is dated February 13, 2023 , and a copy of this report is included in *Technical Appendix Q* to this EIR. (Ramboll, 2023). As demonstrated by the Ramboll Report, emissions of DPM and NO_X and vehicle miles traveled (VMT) from heavy truck trips have consistently declined within the Inland Empire (IE) and are expected to continue to decline through at least 2040. The Ramboll Report also notes that "[e]xisting regulatory requirements have reduced PM and NO_X emissions from trucks in the IE by 94% and 82% respectively from 2000 to 2023," and further notes that "[a]dditional reductions of PM (7%) and NO_X (27%) emissions are expected to occur from 2023 to 2040 as a result of the recently adopted Low NO_X Heavy-Duty Omnibus and ACT regulations that are already transitioning the diesel vehicles to cleaner technologies including Zero Emission (ZE) trucks." The Ramboll Report also demonstrates that the DPM emissions from trucks operating in the IE were reduced by 77% from 2016 to 2023, and shows that the DPM emissions from Transport Refrigeration Units (TRUs) operating in the IE also have been reduced by 39% since 2016. This reduction in DPM emission rates has resulted in a corresponding significant reduction in risk as well, despite increasingly conservative regulatory guidance in the preparation of HRAs, particularly OEHHA's adoption of age sensitivity factors in their revised HRA guidance released in 2015. Moreover, the results of Ramboll's study showed an estimated basin-wide air toxics cancer risk of 336 in a million in 2023, representing a 20% reduction as compared to 2018 when the basin average air toxics cancer risk was estimated at 424 in a million, as reported by MATES V. The Ramboll Report concludes that "substantial air quality improvements have occurred and will continue to occur based on existing regulatory requirements and the transition to ZE trucks as they become more commercially available will only further improve an already dramatically improved air quality environment." (Ramboll, 2023, pp. 14, 24, and 26)

J. Sensitive Receptors

The SCAQMD's Localized Significance Thresholds (LSTs) represent the maximum emissions from a project that would not cause or contribute to an exceedance of the most stringent applicable NAAQS and CAAQS at the nearest residence or sensitive receptor. Receptor locations are off-site locations where individuals may be exposed to emissions from a project's activities. (Urban Crossroads, 2023a, p. 55)

Some people are especially sensitive to air pollution and are given special consideration when evaluating air quality impacts from projects. These groups of people include children, the elderly, and individuals with pre-existing respiratory or cardiovascular illness. Structures that house these persons or places where they gather are defined as "sensitive receptors." These structures typically include uses such as residences, hotels, and hospitals where an individual can remain for 24 hours. (Urban Crossroads, 2023a, p. 55)

Receptors in the Project study area are described below and shown on Figure 4.3-10, *Sensitive Receptors Locations*. Localized air quality impacts and health risk assessments were evaluated at sensitive receptor land uses nearest the Project site. All distances are measured from the Project site boundary to the outdoor living areas (e.g., backyards) or at the building façade, whichever is closer to the Project site. (Urban Crossroads, 2023a, pp. 55-56)

- R1: Location R1 represents La Palapa Ranch building at 19451 Decker Road, approximately 280 feet northwest of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site, R1 is placed at the building façade.
- R2: Location R2 represents the existing residence at 22840 Cajalco Road, approximately 222 feet north of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site, R2 is placed at the building façade.
- R3: Location R4 represents the existing residence at 19701 Seaton Avenue approximately 167 feet south of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site, R3 is placed at the building façade.
- R4: Location R4 represents the existing residence at 22761 Cajalco Road, approximately 76 feet east of the Project site. R4 is placed in the private outdoor living areas (backyard) facing the Project site.
- R5: Location R5 represents the existing residence at 22655 Cajalco Road, approximately 130 feet west of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site, R5 is placed at the building façade.
- R6: Location R6 represents the potential worker receptor at the Genesis Supreme RV facility located approximately 786 feet east of the Project site.
- ON1: Location ON1 represents the future receiver at the Seaton Park handball court.
- ON2: Location ON2 represents the future receiver at the Seaton Park soccer field sideline.
- ON3: Location ON3 represents the future receiver at the Seaton Park soccer field sideline.
- ON4: Location ON4 represents the future receiver at the Seaton Park portable bleachers.

4.3.2 Applicable Regulatory Requirements

The following is a brief description of the federal, State, and local environmental laws and related regulations governing air quality emissions.

A. Federal Regulations

1. Federal Clean Air Act

The Clean Air Act (CAA; 42 U.S.C. § 7401 et seq.) is the comprehensive federal law that regulates air emissions from stationary and mobile sources. Among other things, this law authorizes Environmental Protection Agency (EPA) to establish National Ambient Air Quality Standards (NAAQS) to protect public

Figure 4.3-10 Sensitive Receptors Locations

health and public welfare and to regulate emissions of hazardous air pollutants, which include ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_x), sulfur dioxide (SO_2), particulate matter (PM_{10}), $PM_{2.5}$, and lead (Pb). (EPA, 2023a)

One of the goals of the CAA was to set and achieve NAAQS in every state by 1975 in order to address the public health and welfare risks posed by certain widespread air pollutants. The setting of these pollutant standards was coupled with directing the states to develop state implementation plans (SIPs), applicable to appropriate industrial sources in the state, in order to achieve these standards. The CAA was amended in 1977 and 1990 primarily to set new goals (dates) for achieving attainment of NAAQS since many areas of the country had failed to meet the deadlines. (EPA, 2023a)

The sections of the federal CAA most directly applicable to the development of the Project site include Title I (Non-Attainment Provisions) and Title II (Mobile Source Provisions). Title I provisions address the urban air pollution problems of O_3 (smog), CO, and PM_{10}. Specifically, it clarifies how areas are designated and re-designated "attainment." It also allows EPA to define the boundaries of "nonattainment" areas: geographical areas whose air quality does not meet Federal air quality standards designed to protect public health. (EPA, 2022b) Mobile source emissions are regulated in accordance with the CAA Title II provisions. These standards are intended to reduce tailpipe emissions of hydrocarbons, CO, and NO_X on a phased-in basis that began in model year 1994. Automobile manufacturers also are required to reduce vehicle emissions resulting from the evaporation of gasoline during refueling. These provisions further require the use of cleaner burning gasoline and other cleaner burning fuels such as methanol and natural gas. (EPA, 2022c)

Section 112 of the Clean Air Act addresses emissions of hazardous air pollutants. Prior to 1990, CAA established a risk-based program under which only a few standards were developed. The 1990 Clean Air Act Amendments revised Section 112 to first require issuance of technology-based standards for major sources and certain area sources. "Major sources" are defined as a stationary source or group of stationary sources that emit or have the potential to emit 10 tons per year or more of a hazardous air pollutant or 25 tons per year or more of a combination of hazardous air pollutants. An "area source" is any stationary source that is not a major source. (EPA, 2023a)

For major sources, Section 112 requires that EPA establish emission standards that require the maximum degree of reduction in emissions of hazardous air pollutants. These emission standards are commonly referred to as "maximum achievable control technology" or "MACT" standards. Eight years after the technology-based MACT standards are issued for a source category, EPA is required to review those standards to determine whether any residual risk exists for that source category and, if necessary, revise the standards to address such risk. (EPA, 2023a)

2. National Emissions Standards for Hazardous Air Pollutants (NESHAP) Program

National Emission Standards for Hazardous Air Pollutants (NESHAP) are stationary source standards for hazardous air pollutants. Hazardous air pollutants (HAPs) are those pollutants that are known or suspected to cause cancer or other serious health effects, such as reproductive effects or birth defects, or adverse environmental effects. The EPA develops national enforcement initiatives that focus on significant

environmental risks and noncompliance patterns. For Fiscal Years 2014 to 2016, the Cutting Hazardous Air Pollutants National Initiatives Strategy focuses on categories of sources that emit HAPs. (EPA, 2023d)

Sources subject to NESHAPs are required to perform an initial performance test to demonstrate compliance. To demonstrate continuous compliance, sources are generally required to monitor control device operating parameters which are established during the initial performance test. Sources may also be required to install and operate continuous emission monitors to demonstrate compliance. Consistent with EPA's Clean Air Act Stationary Source Compliance Monitoring Strategy, NESHAP sources that meet the Clean Air Act definition of "major source" generally receive a full compliance evaluation by the state or regional office at least once every two years. (EPA, 2023d)

B. State Regulations

1. California Clean Air Act (CCAA)

The California Clean Air Act (CCAA) establishes numerous requirements for district plans to attain state ambient air quality standards for criteria air contaminants. The CCAA mandates achievement of the maximum degree of emissions reductions possible from vehicular and other mobile sources in order to attain the State's ambient air quality standards, the California Ambient Air Quality Standards (CAAQS), by the earliest practical date. The California Air Resources Board (CARB) established the CAAQS for all pollutants for which the federal government has NAAQS and, in addition, established standards for sulfates, visibility, hydrogen sulfide, and vinyl chloride. Generally, the CAAQS are more stringent than the NAAQS. For districts with serious air pollution, its attainment plan should include the following: no net increase in emissions from new and modified stationary sources; and best available retrofit technology for existing sources. (SCAQMD, n.d.1)

2. Air Toxic Hot Spots Act

The Air Toxic "Hot Spots" Information and Assessment Act of 1987, commonly known as AB 2588, (Health & Safety Code §§ 44300, et seq.) requires facilities emitting specified quantities of pollutants to conduct risk assessments describing the health impacts to neighboring communities created by their emissions of numerous specified hazardous compounds. If the district determines the health impact to be significant, neighbors must be notified. In addition, state law requires the facility to develop and implement a plan to reduce the health impacts to below significance, generally within five years. Additional control requirements for hazardous emissions from specific industries are established by the state and enforced by districts. (SCAQMD, n.d.1)

3. Air Quality Management Planning

The California Air Resources Board (CARB) and local air districts throughout the State are responsible for developing clean air plans to demonstrate how and when California will attain air quality standards established under both the CAA and CCAA. For the areas within California that have not attained air quality standards, CARB works with local air districts to develop and implement State and local attainment plans. In general, attainment plans contain a discussion of ambient air quality data and trends; a baseline emissions inventory; future year projections of emissions, which account for growth projections and already adopted control measures; a comprehensive control strategy of additional measures needed to reach attainment; an attainment demonstration, which generally involves complex modeling; and contingency measures. Plans may also

include interim milestones for progress toward attainment. Air quality planning activities undertaken by CARB also include the development of policies, guidance, and regulations related to State and federal ambient air quality standards; coordination with local agencies on transportation plans and strategies; and providing assistance to local districts and transportation agencies. (CARB, n.d.4)

4. Title 24 Energy Efficiency Standards and California Green Building Standards

The California Energy Commission (CEC) first adopted Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) in 1978 in response to a legislative mandate to reduce energy consumption in the state. Although not originally intended to reduce GHG emissions, increased energy efficiency, and reduced consumption of electricity, natural gas, and other fuels would result in fewer GHG emissions from residential and nonresidential buildings subject to the standard. The standards are updated periodically to allow for the consideration and inclusion of new energy efficiency technologies and methods. The 2022 version of Title 24 was adopted by the CEC and became effective on January 1, 2023. The 2022 Building Energy Efficiency Standards focuses on four key areas in newly constructed homes and businesses: (1) encouraging electric heat pump technology for space and water heating, which consumes less energy and produces fewer emissions than gas-powered units; (2) establishing electric-ready requirements for single-family homes to position owners to use cleaner electric heating, cooking and electric vehicle (EV) charging options whenever they choose to adopt those technologies; (3) expanding solar photovoltaic (PV) system and battery storage standards to make clean energy available onsite and complement the State's progress toward a 100 percent clean electricity grid; and strengthening ventilation standards to improve indoor air quality. The 2019 Building Energy Efficiency Standards already were seven (7) percent more efficient than the previous (2016) Building Energy Efficiency Standards for residential construction and 30 percent more efficient than the previous Standards for non-residential construction. The 2016 Building Energy Efficiency Standards also already were 28 percent more efficient for residential construction and five (5) percent more efficient for nonresidential construction than the 2013 Building Energy Efficiency Standards they replaced. (CEC, n.d.3)

Part 11 of Title 24 is referred to as the California Green Building Standards Code (CALGreen Code). The purpose of the CALGreen Code is to "improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices in the following categories: (1) Planning and design; (2) Energy efficiency; (3) Water efficiency and conservation; (4) Material conservation and resource efficiency; and (5) Environmental air quality." The CALGreen Code is not intended to substitute or be identified as meeting the certification requirements of any green building program that is not established and adopted by the California Building Standards Commission (CBSC). Unless otherwise noted in the regulation, all newly constructed buildings in California are subject of the requirements of the CALGreen Code.

As previously stated, the Title 24 Building Energy Efficient Standards and CALGreen Code are updated on a regular basis, with the most recent approved updates consisting of the 2022 Building Energy Efficiency Standards and 2022 CALGreen Code, which became effective on January 1, 2023. Non-residential mandatory measures included in the 2022 CALGreen Code include:

- Short-term bicycle parking. If the new project or an additional alteration is anticipated to generate visitor traffic, provide permanently anchored bicycle racks within 200 feet of the visitors' entrance, readily visible to passers-by, for 5% of new visitor motorized vehicle parking spaces being added, with a minimum of one two-bike capacity rack (5.106.4.1.1).

- Long-term bicycle parking. For new buildings with tenant spaces that have 10 or more tenant-occupants, provide secure bicycle parking for 5% of the tenant-occupant vehicular parking spaces with a minimum of one bicycle parking facility (5.106.4.1.2).

- Designated parking for clean air vehicles. In new projects or additions to alterations that add 10 or more vehicular parking spaces, provide designated parking for any combination of low-emitting, fuel-efficient and carpool/van pool vehicles as shown in Table 5.106.5.2 (5.106.5.2).

- EV charging stations. New construction shall facilitate the future installation of EV supply equipment. The compliance requires empty raceways for future conduit and documentation that the electrical system has adequate capacity for the future load. The number of spaces to be provided for is contained in Table 5.106. 5.3.3 (5.106.5.3). Additionally, Table 5.106.5.4.1 specifies requirements for the installation of raceway conduit and panel power requirements for medium- and heavy-duty electric vehicle supply equipment for warehouses, grocery stores, and retail stores.

- Outdoor light pollution reduction. Outdoor lighting systems shall be designed to meet the backlight, uplight and glare ratings per Table 5.106.8 (5.106.8).

- Construction waste management. Recycle and/or salvage for reuse a minimum of 65% of the nonhazardous construction and demolition waste in accordance with Section 5.408.1.1. 5.405.1.2, or 5.408.1.3; or meet a local construction and demolition waste management ordinance, whichever is more stringent (5.408.1).

- Excavated soil and land clearing debris. 100% of trees, stumps, rocks and associated vegetation and soils resulting primarily from land clearing shall be reuse or recycled. For a phased project, such material may be stockpiled on site until the storage site is developed (5.408.3).

- Recycling by Occupants. Provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, organic waste, and metals or meet a lawfully enacted local recycling ordinance, if more restrictive (5.410.1).

- Water conserving plumbing fixtures and fittings. Plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) shall comply with the following:

    - Water Closets. The effective flush volume of all water closets shall not exceed 1.28 gallons per flush (5.303.3.1)

- Urinals. The effective flush volume of wall-mounted urinals shall not exceed

- 0.125 gallons per flush (5.303.3.2.1). The effective flush volume of floor- mounted or other urinals shall not exceed 0.5 gallons per flush (5.303.3.2.2).

- Showerheads. Single showerheads shall have a minimum flow rate of not more than 1.8 gallons per minute and 80 psi (5.303.3.3.1). When a shower is served by more than one showerhead, the combine flow rate of all showerheads and/or other shower outlets controlled by a single valve shall not exceed 1.8 gallons per minute at 80 psi (5.303.3.3.2).

- Faucets and fountains. Nonresidential lavatory faucets shall have a maximum flow rate of not more than 0.5 gallons per minute at 60 psi (5.303.3.4.1). Kitchen faucets shall have a maximum flow rate of not more than 1.8 gallons per minute of 60 psi (5.303.3.4.2). Wash fountains shall have a maximum flow rate of not more than 1.8 gallons per minute (5.303.3.4.3). Metering faucets shall not deliver more than 0.20 gallons per cycle (5.303.3.4.4). Metering faucets for wash fountains shall have a maximum flow rate not more than 0.20 gallons per cycle (5.303.3.4.5).

- Outdoor potable water uses in landscaped areas. Nonresidential developments shall comply with a local water efficient landscape ordinance or the current California Department of Water Resources' Model Water Efficient Landscape Ordinance (MWELO), whichever is more stringent (5.304.1).

- Water meters. Separate submeters or metering devices shall be installed for new buildings or additions in excess of 50,000 sf or for excess consumption where any tenant within a new building or within an addition that is project to consume more than 1,000 gallons per day (GPD) (5.303.1.1 and 5.303.1.2).

- Outdoor water uses in rehabilitated landscape projects equal or greater than 2,500 sf. Rehabilitated landscape projects with an aggregate landscape area equal to or greater than 2,500 sf requiring a building or landscape permit (5.304.3).

- Commissioning. For new buildings 10,000 sf and over, building commissioning shall be included in the design and construction processes of the building project to verify that the building systems and components meet the owner's or owner representative's project requirements (5.410.2).

5. California Air Resources Board Rules

The CARB enforces rules related to air pollutant emissions in the State of California. Rules with applicability to the Project include, but are not limited to, those listed below.

- CARB Rule 2480 (13 CCR 2480): Airborne Toxics Control Measure to Limit School Bus Idling and Idling at Schools, which limits nonessential idling for commercial trucks and school buses within 100 feet of a school.

- CARB Rule 2485 (13 CCR 2485): Airborne Toxic Control Measure to Limit Diesel-Fuel Commercial Vehicle Idling, which limits nonessential idling to five minutes or less for commercial trucks.
- CARB Rule 2449 (13 CCR 2449): In-Use Off-Road Diesel Idling Restricts, which limits nonessential idling to five minutes or less for diesel-powered off-road equipment.

6. South Coast Air Quality Management District Rules

The South Coast Air Quality Management District (SCAQMD) enforces rules related to air pollutant emissions in the SCAB. Rules with applicability to the Project include, but are not limited to, those listed below.

- SCAQMD Rule 201: Permit to Construct
- SCAQMD Rule 402: Nuisance Odors
- SCAQMD Rule 403: Fugitive Dust
- SCAQMD Rule 431.2: Low Sulfur Fuel
- SCAQMD Rule 1113: Table of Standards
- SCAQMD Rule 1186: PM_{10} Emissions from Paved and Unpaved Roads, and Livestock Operations

7. SCAQMD Rule 2305: Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program

The Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program aims to reduce nitrogen oxide and diesel emissions associated with warehouses, help meet federal standards and improve public health, especially in communities located near warehouses in the SCAQMD. Rule 2305 applies to owners and operators of warehouses located in the SCAQMD jurisdiction with greater than or equal to 100,000 square feet of indoor floor space in a single building. WAIRE is a menu-based point system. Warehouse operators are required to earn a specific number of points every year. This is based on the number of trucks trips made to and from the warehouse each year, with larger trucks such as tractors or tractor-trailers multiplied by 2.5. WAIRE Points may be earned through: a) completing any combination of actions in the WAIRE menu; or b) completing actions in an approved, site-specific custom WAIRE Plan; or c) paying a mitigation fee. If an operator chooses to pay a mitigation fee, the funds will be used to provide incentivizes for near-zero and zero-emission trucks and zero-emission charging and fueling infrastructure in communities near the warehouse(s) that paid the fee. (SCAQMD, n.d.2)

8. Truck & Bus Regulation

Under the Truck and Bus Regulation, adopted by CARB in 2008, all diesel truck fleets operating in California are required to adhere to an aggressive schedule for upgrading and replacing heavy-duty truck engines. Older, more polluting trucks are required to be replaced first, while trucks that already have relatively clean engines are not required to be replaced until later. Pursuant to the Truck and Bus Regulation, all pre-1994 heavy trucks (trucks with a gross vehicle weight rating greater than 26,000 pounds) were removed from service on California roads by 2015. Between 2015 and 2020, pre-2000 heavy trucks were equipped with PM filters and upgraded or replaced with an engine that meets 2010 emissions standards. The upgrades/replacements occurred on a rolling basis based on model year. By 2023, all heavy trucks operating on California roads must have engines

that meet 2010 emissions standards. Lighter trucks (those with a gross vehicle weight rating of 14,001 to 26,000 pounds) adhered to a similar schedule, and were all replaced by 2020. (CARB, n.d.2)

9. Advanced Clean Truck Regulation

In June 2020, CARB adopted a new Rule requiring truck manufacturers to transition from diesel trucks and vans to electric zero-emission trucks beginning in 2024. By 2045, every new truck sold in California will be required to be zero-emission. Manufacturers who certify Class 2b-8 chassis or complete vehicles with combustion engines would be required to sell zero-emission trucks as an increasing percentage of their annual California sales from 2024 to 2035. By 2035, zero-emission truck/chassis sales would need to be 55% of Class 2b – 3 truck sales, 75% of Class 4 – 8 straight truck sales, and 40% of truck tractor sales. CARB reports that as of 2020, most commercially-available models of zero-emission vans, trucks and buses operate less than 100 miles per day. Commercial availability of electric-powered long-haul trucks is very limited. However, as technology advances over the next 20 years, zero-emission trucks will become suitable for more applications, and several truck manufacturers have announced plans to introduce market ready zero-emission trucks in the future. (CARB, 2021)

10. Senate Bill 535 (SB 535) – Disadvantaged Communities

Senate Bill 535 ("SB 535"; De León, Chapter 830, 2012) recognizes the potential vulnerability of low-income and disadvantaged communities to poor air quality. Disadvantaged communities in California are specifically targeted for investment of proceeds from the State's cap-and-trade program. These investments are aimed at improving public health, quality of life, and economic opportunity in California's most burdened communities while at the same time reducing pollution that causes climate change. Authorized by the California Global Warming Solutions Act of 2006 (AB 32), the State's cap-and-trade program is one of several strategies that California uses to reduce greenhouse gas emissions that cause climate change. The funds must be used for programs that further reduce emissions of greenhouse gases. SB 535 requires that 25 percent of the proceeds from the Greenhouse Gas Reduction Fund go to projects that provide a benefit to disadvantaged communities. The California Environmental Protection Agency (CalEPA) is charged with the duty to identify disadvantaged communities. CalEPA bases its identification of these communities on geographic, socioeconomic, public health, and environmental hazard criteria (Health and Safety Code, section 39711, subsection (a)). In this capacity, CalEPA currently defines a disadvantaged community, from an environmental hazard and socioeconomic standpoint, as a community that scores within the top 25 percent of the census tracts, as analyzed by the California Communities Environmental Health Screening Tool Version 3.0 (CalEnviroScreen). (OEHHA, 2023)

The Project site's Census Tract 6065042904 is designated as a disadvantaged community. It is ranked by the State as being in the 55st percentile for pollution burden which, based on the Census Tract's demographic characteristics, results in the Office of Environmental Health Hazard Assessment (OEHHA) ranking the area in the 81st percentile of communities that are disproportionately burdened by multiple sources of pollution. OEHHA's CalEnviroScreen 4.0, is a screening methodology that the State uses to identify California communities that are disproportionately burdened by multiple sources of pollution. The CalEnviroScreen 4.0 indicators for the Project site's Census Tract were shown in Table 2-1 in EIR Section 2.0, *Environmental*

Setting. As indicated in Table 2-1, for the Project site's Census Tract, the highest environmental exposures from air pollutants are from ozone (O_3) and traffic. The highest human health hazard factors in the Project site's Census Tract are include compromised health conditions related to cardiovascular disease, low levels of educational attainment, and unemployment. (OEHHA, 2023; CalEPA, 2022)

11. Senate Bill 1000 (SB 1000) – Environmental Justice in Local Land Use Planning

In an effort to address the inequitable distribution of pollution and associated health effects in low-income communities and communities of color, the Legislature passed and Governor Brown signed Senate Bill 1000 (SB 1000) in 2016, requiring local governments to identify environmental justice communities (called "disadvantaged communities") in their jurisdictions and address environmental justice in their general plans. This new law has several purposes, including to facilitate transparency and public engagement in local governments' planning and decision-making processes, reduce harmful pollutants and the associated health risks in environmental justice communities, and promote equitable access to health-inducing benefits, such as healthy food options, housing, public facilities, and recreation. SB 1000 requires environmental justice elements to identify objectives and policies to reduce unique or compounded health risks in disadvantaged communities. Generally, environmental justice elements will include policies to reduce the community's exposure to pollution through air quality improvement. SB 1000 affirms the need to integrate environmental justice principles into the planning process to prioritize improvements and programs that address the needs of disadvantaged communities. (OAG, n.d.)

12. Assembly Bill 617 (AB 617)

Assembly Bill 617 (AB 617) was enacted into law in 2017, and relates to criteria air pollutants and toxic air contaminants from sources other than vehicles. In response to AB 617, the California Air Resources Board (CARB) established the Community Air Protection Program (CAPP or Program). The Program's focus is to reduce exposure in communities most impacted by air pollution. Communities around the State are working together to develop and implement new strategies to measure air pollution and reduce health impacts. This first-of-its-kind statewide effort includes community air monitoring and community emissions reduction programs. In addition, the Legislature appropriated funding to support early actions to address localized air pollution through targeted incentive funding to deploy cleaner technologies in these communities, as well as grants to support community participation in the AB 617 process. AB 617 also includes new requirements for accelerated retrofit of pollution controls on industrial sources, increased penalty fees, and greater transparency and availability of air quality and emissions data, which will help advance air pollution control efforts throughout the State. This new effort provides an opportunity to continue to enhance air quality planning efforts and better integrate community, regional, and State level programs to provide clean air. (CARB, n.d.1)

13. Senate Bill 1137 (SB 1137)

SB 1137 is intended to protect the public health of California's communities by creating a minimum health and safety distance of 3,200-feet between sensitive receptors, such as a residence, school, childcare facility, playground, hospital, or nursing home and an oil and gas production well. Specifically, the bill prohibits the California Geological Energy Management Division (CalGEM) from approving the drilling, re-drilling, or significant alteration of any oil and gas well within this "health protection zone." SB 1137 also requires oil

and gas facility operators in these protection zones to implement strict pollution controls, and to develop response plans to protect the health of Californians currently living within 3,200 feet of an existing oil well. SB 1137 also requires operators of wells/facilities to provide an individual indemnity bond sufficient to pay the full cost of properly plugging and abandoning the well and decommissioning the facility in order to prevent operators from failing to properly decommission. (CA Legislative Info, n.d.40)

C. Local Regulations

1. Riverside County General Plan Air Quality Element

The County General Plan Air Quality Element identifies goals, policies and programs that are meant to balance the County's actions regarding land use, circulation, and other issues with their potential effects on air quality. The Air Quality Element addresses ambient air quality standards set forth by the USEPA and CARB. The Air Quality Element contains policies designed to establish a regional basis for improving air quality. The following relevant and applicable policies from the County's Air Quality Element have been identified for the Project:

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

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

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

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

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

AQ 3.1: Allow the market place, as much as possible, to determine the most economical approach to relieve congestion and cut emissions.

AQ 3.3: Encourage large employers and commercial/industrial complexes to create Transportation Management Associations.

AQ 4.1: Require the use of all feasible building materials/methods which reduce emissions.

AQ 4.2: Require the use of all feasible efficient heating equipment and other appliances, such as water heaters, swimming pool heaters, cooking equipment, refrigerators, furnaces and boiler units.

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

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

AQ 4.9: Require compliance with SCAQMD Rules 403 and 403.1, and support appropriate future measures to reduce fugitive dust emanating from construction sites.

2. Riverside County Board of Supervisors Good Neighbor Policy for Logistics and Warehouse/ Distribution Uses

The County of Riverside Board of Supervisors *Good Neighbor Policy for Logistics and Warehouse/ Distribution Uses* ("Good Neighbor Policy") provides a framework through which large-scale logistics and warehouse projects, such as that proposed by the Project, can be designed and operated in a way that lessens their impact on surrounding communities and the environment. It is meant to apply Best Management Practices to help minimize potential impacts to sensitive receptors and is intended to be used in conjunction with the County's Land Use Ordinance, which provides development requirements for said projects. This policy provides a series of development and operational criteria applicable to logistics and warehouse projects that include any building larger than 250,000 square feet in size that are implemented to supplement project-level mitigation measures in order to further reduce impacts related to logistics and warehousing development and operations. It should be noted that the currently-proposed Project consists of applications for a General Plan Amendment, Specific Plan Amendment, and Change of Zone, and no site-specific development applications (e.g., plot plans, etc.) are proposed at this time. As the Good Neighbor Policy requirements relate to site-specific development and construction activities, the requirements of the Good Neighbor Policy would be enforced as part of the County's review of future site-specific development applications, such as implementing plot plans. (Riverside County, n.d.1)

4.3.3 Basis for Determining Significance

A. Thresholds of Significance

Section III of Appendix G to the State CEQA Guidelines addresses typical adverse effects to air quality, and includes the following threshold questions to evaluate the Project's impacts due to air quality emissions (OPR, 2018a):

- Would the Project conflict with or obstruct implementation of the applicable air quality plan?
- Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?
- Would the Project expose sensitive receptors to substantial pollutant concentrations?
- Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Significance thresholds are set forth in Riverside County's Environmental Assessment Checklist, are derived from Section II of Appendix G to the State CEQA Guidelines (listed above), and state that the proposed Project would have a significant impact due to air quality emissions if construction and/or operation of the Project would:

a. *Conflict with or obstruct implementation of the applicable air quality plan;*

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

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

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

The significance thresholds set forth in Riverside County's Environmental Assessment Checklist were used to evaluate the significance of the proposed Project's impacts due to air quality emissions. Riverside County also has chosen to apply SCAQMD significance thresholds, as presented in SCAQMD's CEQA Air Quality Significance Thresholds (April 2019), to evaluate the Project's air quality impacts against the above thresholds.

Accordingly, Threshold a., which addresses Section III.a of Appendix G to the State CEQA Guidelines, evaluates whether the proposed Project would conflict with SCAQMD's 2022 AQMP, which addresses State and federal requirements under the CAA. A conflict with the AQMP standards and requirements would inhibit the SCAQMD's ability to achieve State and federal standards for air quality.

Threshold b. addresses Section III.b of Appendix G to the CEQA Guidelines, and emissions generated by a development project would be significant under Threshold b. if emissions are projected to exceed the Regional Thresholds established by the SCAQMD for criteria pollutants.

Threshold c. addresses Section III.c of Appendix G to the State CEQA Guidelines. Under this threshold, impacts would be potentially significant if emissions are projected to exceed the LSTs established by the State of California and the SCAQMD for criteria pollutants, if the Project would cause or contribute to CO "Hot Spots," or if the Project were to result in cancer or health hazard impacts that exceed the SCAQMD thresholds of significance.

Threshold d. evaluates Section III.d of Appendix G of the State CEQA Guidelines. SCAQMD Rule 402 ("Nuisance") and California Health & Safety Code, Division 26, Part 4, Chapter 3, Section 41700 prohibit the emission of any material which causes nuisance to a considerable number of persons or endangers the comfort, health, or safety of the public, including odors. The potential to violate Rule 402 or § 41700 is used herein as a basis to consider a project's odors or other emissions to be significant and require feasible mitigation measures.

B. SCAQMD Regional Thresholds

The SCAQMD also has developed regional significance thresholds for other regulated pollutants, as summarized in Table 4.3-4, *Maximum Daily Regional Emissions Thresholds*. The SCAQMD's *CEQA Air Quality Significance Thresholds* (March 2023) indicate that any projects in the SCAB with daily emissions

that exceed any of the indicated thresholds should be considered as having an individually and cumulatively significant air quality impact. (Urban Crossroads, 2023a, p. 40)

Table 4.3-4 Maximum Daily Regional Emissions Thresholds

Pollutant	Regional Construction Threshold	Regional Operational Thresholds
NO_X	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM_{10}	150 lbs/day	150 lbs/day
$PM_{2.5}$	55 lbs/day	55 lbs/day
SO_X	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Pb	3 lbs/day	3 lbs/day

lbs/day = Pounds Per Day
(Urban Crossroads, 2023a, Table 3-1)

C. *SCAQMD Localized Thresholds*

1. *Localized Thresholds for Construction Activity*

In order to estimate localized pollutant concentrations resulting from Project construction and long-term operational activities, the SCAQMD-approved American Meteorological Society/EPA Regulatory Model (AERMOD) dispersion model was utilized, as discussed in further detail in Subsection 3.6 of the Project's AQIA (*Technical Appendix C1*). The purpose of performing a localized significance is to assess the potential for the Project to create site-adjacent health impacts. The results of the dispersion modeling were then compared to the SCAQMD's LSTs, which are presented below in Table 4.3-5, *Maximum Daily Localized Emissions Thresholds*. (Urban Crossroads, 2023a, pp. 53-59)

Table 4.3-5 Maximum Daily Localized Emissions Thresholds

Pollutant	Localized Significance Thresholds	
	Site Preparation/Grading	Long-Term Operation
CO (1 Hour)	20 ppm	20 ppm
CO (8 Hour)	9 ppm	9 ppm
NO_2 (1 Hour)	0.18 ppm	0.18 ppm
PM_{10} (24 Hours)	10.4 µg/m^3	2.5 µg/m^3
$PM_{2.5}$ (24 Hours)	10.4 µg/m^3	2.5 µg/m^3

(Urban Crossroads, 2023a, Tables 3-9 and 3-10)

2. *Localized Thresholds for CO Emissions*

Based on the SCAQMD's CEQA Air Quality Handbook (1993), a project's localized CO emissions impacts would be significant if they exceed the following California standards for localized CO concentrations (Urban Crossroads, 2023a, p. 59):

- 1-hour CO standard of 20.0 ppm

- 8-hour CO standard of 9.0 ppm

D. Toxic Air Contaminant Thresholds

The SCAQMD regulates levels of air toxics through a permitting process that covers both construction and operation. The SCAQMD has adopted Rule 1401 for both new and modified sources that use materials classified as air toxics. The SCAQMD CEQA Guidelines for permit processing consider the following types of projects significant:

- Any project involving the emission of a carcinogenic or toxic air contaminant identified in SCAQMD Rule 1401 that exceeds the maximum individual cancer risk of 10 in one million if the project is constructed with best available control strategy for toxics (T-BACT) using the procedures in SCAQMD Rule 1401.

- Any project that could accidentally release an acutely hazardous material or routinely release a toxic air contaminant posing an acute health hazard above an acute or chronic hazard index of 1.0.

E. Methodology

1. California Emissions Estimator Model (CalEEMod)

Land uses such as the Project affect air quality through construction-source and operational-source emissions. In May 2023, the California Air Pollution Control Officers Association (CAPCOA) in conjunction with other California air districts, including SCAQMD, released the latest version of CalEEMod version 2022.1.1.12. The purpose of this model is to calculate construction-source and operational-source criteria pollutant (VOCs, NO_X, SO_X, CO, PM_{10}, and $PM_{2.5}$) and greenhouse gas (GHG) emissions from direct and indirect sources, and to quantify applicable air quality and GHG reductions achieved from mitigation measures. Accordingly, the latest version of CalEEMod has been used to determine the Project's construction and operational air quality emissions. Output from the model runs for both construction and operational activity are provided in Appendices 3.1 and 3.2 to the Project's AQIA (*Technical Appendix C1*). (Urban Crossroads, 2023a, p. 41)

2. Emissions Factors Model (EMFAC)

Vehicle DPM emissions were calculated using emission factors for particulate matter less than 10µm in diameter (PM_{10}) generated with the 2021 version of the EMission FACtor model (EMFAC) developed by the CARB. EMFAC 2021 is a mathematical model that CARB developed to calculate emission rates from motor vehicles that operate on highways, freeways, and local roads in California and is commonly used by CARB to project changes in future emissions from on-road mobile sources. The most recent version of this model, EMFAC 2021, incorporates regional motor vehicle data, information and estimates regarding the distribution of vehicle miles traveled (VMT) by speed, and number of starts per day. (Urban Crossroads, 2023b, p. 13)

3. Construction Emissions

Construction activities associated with the Project would result in emissions of VOCs, NO_X, SO_X, CO, PM_{10}, and $PM_{2.5}$. Construction related emissions are expected from the following construction activities: demolition,

site preparation, grading, crushing/blasting, building construction, paving, and architectural coating (Urban Crossroads, 2023a, p. 41).

❑ Construction Activities

Demolition Activities

The site is currently developed with existing uses/structures which total approximately 43,858 s.f. that would be demolished. Demolished material associated with demolition would be hauled off-site. (Urban Crossroads, 2023a, p. 41)

Site Preparation and Grading Activities

Dust is typically a major concern during grading activities. Because such emissions are not amenable to collection and discharge through a controlled source, they are called "fugitive emissions." Fugitive dust emissions rates vary as a function of many parameters (soil silt, soil moisture, wind speed, area disturbed, number of vehicles, depth of disturbance or excavation, etc.). CalEEMod was utilized to calculate fugitive dust emissions resulting from this phase of activity. It is anticipated that the Project would require a total of 218,000 cubic yards (cy) of export. Site preparation and grading activities are modeled as sequential phases. (Urban Crossroads, 2023a, p. 41)

Rock Crushing Activities

The Project would utilize rock crushing, with crushed material being used as back fill to reduce the amount of soils that would need to be exported from the site. It should be noted that as a conservative measure and to account for all hauling related emissions, this analysis assumes the full 218,000 cy of export with no reductions of import from rock crushing. It is anticipated that all rock crushing activities would occur during the overall grading phase. This is also conservative since spreading the emissions over a greater time frame would lower the reported daily emissions. Fugitive dust emissions would also be generated through the crushing of rocks on-site. The US EPA's AP-42 compilation of emission factors available in Chapter 11.19.2-2 were used to estimate fugitive dust from rock crushing activities. To be conservative, it is estimated that approximately 218,000 tons of rock could be crushed during the grading phase, which represents the full 218,000 anticipated export, and would represent approximately 3,462 tons per day (218,000 cy/63 days ~ 3,462 tons per day). It is estimated that crushing activities would result in 22.16 pounds per day of PM_{10} emissions and 3.04 pounds of $PM_{2.5}$ emissions per day. An electric rock crusher would break down the fragmented rocks and would be powered by a diesel generator, which was included in the grading phase to account for equipment emissions. PM emissions from rock crushing were added to the winter 2025 maximum construction emissions. Additional details on the emissions calculation associated with crushing are provided in AQIA Appendix 3.1 (*Technical Appendix C1*). (Urban Crossroads, 2023a, p. 42)

Blasting Activities

The Project site may require blasting. While the need for blasting is not known at this point, the emissions effects of blasting are included in the AQIA (*Technical Appendix C1*). For modeling purposes, it is anticipated no more than two blasting events could occur per day for logistics and safety reasons. The estimated emissions

of NO_X, CO, and SO_X from explosives used for blasting were determined using emission factors in Section 13.3 (Explosives Detonation) of AP-42 (EPA 1980), and PM_{10} and $PM_{2.5}$ emissions were determined using Section 11.9 of AP-42 (EPA, 1980). According to AP-42, "Unburned hydrocarbons also result from explosions, but in most instances, methane is the only species that has been reported" (EPA 1980); methane is not a VOC, and a methane emission factor has not been determined for ammonium nitrate/fuel oil (ANFO). A rock drill has been included in the grading phase to account for equipment emissions during blasting preparation. While equipment emissions are included in overall construction emission estimates, blasting activities would limit on-site activity for safety reasons and no other significant activities would occur on the same day other than a few pieces of equipment supporting the blasting activity. Blast emissions are based on a maximum of 1-ton ANFO per day for CO, NO_X, and SO_2, and PM emissions estimates are conservatively assuming the entire 64.97 gross acres of the Project site as the blast areas. Blasting is anticipated to result in 67 lbs. of CO, 17 lbs. of NO_X, 2 lbs. of SO_2, 1.38 lbs. of PM_{10}, and 0.32 lbs. of $PM_{2.5}$. While blasting events would limit on-site equipment activity and typically be analyzed as a separate phase, to present a conservative analysis, the blasting emissions previously presented were added to the winter 2025 maximum construction emissions. (Urban Crossroads, 2023a, p. 42)

Building Construction, Paving, and Architectural Coating Activities

Building construction and paving emissions are primarily associated with exhaust emissions from on-site equipment and vehicular trips to the site by construction workers and vendor trips. Architectural coating emissions include worker trips as well, but the primary pollutant emission of concern during this phase is ROG/VOC. CalEEMod default emission rates include the effects of Rule 1113 to limit ROG/VOC emissions. To present a reasonable worst-case scenario, the building construction, paving, and architectural coating activities are modeled as overlapping phases. (Urban Crossroads, 2023a, p. 43)

Off-Site Utility and Infrastructure Improvements

To support the Project development, there will be grading, trenching, and paving for off-site improvements associated with roadway construction and utility installation for the Project. It is expected that these off-site improvements would be constructed within the existing public right-of-way (ROW) on Decker Road, Seaton Avenue, Cajalco Road and Rider Street. Construction emissions from this off-site work would, therefore, be relatively short term, not concentrated in one area, and would be reduced at any given location as construction work moves linearly along the existing public right-of-way and farther from sensitive uses. The physical constraints would limit the amount of construction equipment that could be used, and any off-site and utility infrastructure construction would not use equipment totals that would exceed the equipment totals shown in EIR Table 3-2, *Construction Equipment Assumptions*. (Urban Crossroads, 2023a, p. 43)

On-Road Trips

Construction generates on-road vehicle emissions from vehicle usage for workers, vendors, and haul trucks commuting to and from the site. The number of worker, vendor, and hauling trips are presented in Table 4.3-6, *Construction Trip Assumptions*. Worker trips are based on CalEEMod defaults. It should be noted that for vendor trips, specifically, CalEEMod only assigns vendor trips to the Building Construction phase. Vendor trips would likely occur during all phases of construction. As such, the CalEEMod defaults for vendor trips

have been adjusted based on a ratio of the total vendor trips to the number of days of each subphase of activity. Additionally, per client provided information, 200 truck trips per day for hauling is expected. (Urban Crossroads, 2023a, p. 43)

Table 4.3-6 Construction Trip Assumptions

Construction Activity	Worker Trips Per Day	Vendor Trips Per Day	Hauling Trips Per Day
Demolition	15	27	9
Site Preparation	18	11	0
Grading	43	31	200
Building Construction	421	95	0
Paving	15	0	0
Architectural Coating	84	0	0

(Urban Crossroads, 2023a, Table 3-2)

Construction Duration

Refer to DEIR subsection 3.6.1.B and EIR Table 3-1, *Construction Duration*, for a description of the duration of anticipated construction activities.

Construction Equipment

Refer to DEIR subsection 3.6.1.B and EIR Table 3-2, *Construction Equipment Assumptions*, for a description of the duration of anticipated construction activities.

4. Operational Emissions

Operational activities associated with the Project would result in emissions of VOCs, NO_X, SO_X, CO, PM_{10}, and $PM_{2.5}$. Operational emissions are expected from the following primary sources: Area Source Emissions, Energy Source Emissions, Mobile Source Emissions, Stationary Source Emissions, On-Site Cargo Handling Equipment Emissions, and TRU Emissions. (Urban Crossroads, 2023a, p. 46)

❑ Area Source Emissions

Architectural Coatings

Over a period of time the buildings that are part of this Project would require maintenance and would therefore produce emissions resulting from the evaporation of solvents contained in paints, varnishes, primers, and other surface coatings. The emissions associated with architectural coatings were calculated using CalEEMod. (Urban Crossroads, 2023a, p. 46)

Consumer Products

Consumer products include, but are not limited to detergents, cleaning compounds, polishes, personal care products, and lawn and garden products. Many of these products contain organic compounds which when released in the atmosphere can react to form ozone and other photochemically reactive pollutants. The

emissions associated with use of consumer products were calculated based on defaults provided within CalEEMod. (Urban Crossroads, 2023a, p. 46)

Landscape Maintenance Equipment

Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shedders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the Project. It should be noted that as October 9, 2021, Governor Gavin Newsom signed AB 1346. The bill aims to ban the sale of new gasoline-powered equipment under 25 gross horsepower (known as small off-road engines [SOREs]) by 2024. For purposes of analysis, the emissions associated with landscape maintenance equipment were calculated based on assumptions provided in CalEEMod. (Urban Crossroads, 2023a, p. 47)

❑ Energy Source Emissions

Combustion Emissions Associated with Electricity

Criteria pollutant emissions are emitted through the generation of electricity. However, because electrical generating facilities for the Project area are located either outside the region (State) or offset through the use of pollution credits (RECLAIM) for generation within the SCAB, criteria pollutant emissions from off-site generation of electricity are excluded from the evaluation of significance. Based on information provided by the Project Applicant, the site is also not expected to utilize natural gas for the building envelope, and therefore would not generate any emissions from direct energy consumption. Electricity usage associated with the Project was calculated based on client provided data and includes 20% of the building user's electric power from renewable sources, in accordance with Riverside County Climate Action Plan (CAP) Update Measure R2-CE1. (Urban Crossroads, 2023a, p. 47)

❑ Mobile Source Emissions

The Project related operational air quality emissions derive primarily from vehicle trips generated by the Project, including employee trips to and from the site and truck trips associated with the proposed uses. Trip characteristics available from the Project's Traffic Analysis ("TA;" EIR *Technical Appendix N2*) were used in the analysis. (Urban Crossroads, 2023a, p. 47)

Approach for Analysis of the Project

In order to determine emissions from passenger car vehicles, CalEEMod defaults for trip length and trip purpose were utilized. Default vehicle trip lengths for primary trips will be populated using data from the local metropolitan planning organizations/Regional Transportation Planning Agencies (MPO/RTPA). Trip type percentages and trip lengths provided by MPO/RTPAs truncate data at their demonstrative borders. This analysis assumes that passenger cars include Light-Duty-Auto vehicles (LDA), Light-Duty-Trucks (LDT1[2] &

[2] Vehicles under the LDT1 category have a gross vehicle weight rating (GVWR) of less than 6,000 lbs. and equivalent test weight (ETW) of less than or equal to 3,750 lbs.

LDT2[3]), Medium-Duty-Vehicles (MDV), and Motorcycles (MCY) vehicle types. In order to account for emissions generated by passenger cars, the fleet mix in Table 4.3-7, *Passenger Car Fleet Mix* was utilized. (Urban Crossroads, 2023a, p. 47)

Table 4.3-7 Passenger Car Fleet Mix

Land Use	% Vehicle Type				
	LDA	LDT1	LDT2	MDV	MCY
High-Cube Fulfillment Center	53.90%	4.13%	22.26%	17.20%	2.51%
High-Cube Cold Storage					

Note: The Project-specific passenger car fleet mix used in this analysis is based on a proportional split utilizing the default CalEEMod percentages assigned to LDA, LDT1, LDT2, and MDV vehicle types.
(Urban Crossroads, 2023a, Table 3-6)

To determine emissions from trucks for the proposed industrial uses, the analysis incorporated the SCAQMD recommended truck trip length of 15.3 miles for 2-axle (LHDT1, LHDT2), 14.2 miles for 3-axle (MHDT) trucks, and 39.9 miles for 4+-axle (HHDT) trucks and weighting the average trip lengths using traffic trip percentages. The trip length function for the proposed industrial building use has been calculated to 35.88 miles for high-cube fulfillment center and 28.56 miles for high-cube cold storage and an assumption of 100% primary trips. This trip length assumption is higher than the CalEEMod defaults for trucks. In order to be consistent with the Project's TA (EIR *Technical Appendix N2*), trucks are broken down by truck type. The truck fleet mix is estimated by rationing the trip rates for each truck type based on information provided by the SCAQMD recommended truck mix, by axle type. Heavy trucks are broken down by truck type (or axle type) and are categorized as either Light-Heavy-Duty Trucks (LHDT1[4] & LHDT2 [5])/2-axle, Medium-Heavy-Duty Trucks (MHDT)/3-axle, and Heavy-Heavy-Duty Trucks (HHDT)/4+-axle. To account for emissions generated by trucks, the fleet mix in Table 4.3-8, *Truck Fleet Mix*, was utilized. (Urban Crossroads, 2023a, p. 48)

Table 4.3-8 Truck Fleet Mix

Land Use	% Vehicle Type			
	LHDT1	LHDT2	MHDT	HHDT
High-Cube Fulfillment Center	5.52%	1.57%	8.95%	83.95%
High-Cube Cold Storage	27.30%	7.78%	10.53%	54.39%

Note: Project-specific truck fleet mix is based on the number of trips generated by each truck type (LHDT1, LHDT2, MHDT, and HHDT) relative to the total number of truck trips.
(Urban Crossroads, 2023a, Table 3-7)

[3] Vehicles under the LDT2 category have a GVWR of less than 6,000 lbs. and ETW between 3,751 lbs. and 5,750 lbs.
[4] Vehicles under the LHDT1 category have a GVWR of 8,501 to 10,000 lbs.
[5] Vehicles under the LHDT2 category have a GVWR of 10,001 to 14,000 lbs.

Fugitive Dust Related to Vehicular Travel

Vehicles traveling on paved roads would be a source of fugitive emissions due to the generation of road dust inclusive of brake and tire wear particulates. The emissions estimate for travel on paved roads were calculated using CalEEMod. (Urban Crossroads, 2023a, p. 48)

❑ **On-Site Cargo Handling Equipment Source Emissions**

It is common for industrial buildings to require the operation of exterior cargo handling equipment in the building's truck court areas. For this Project, on-site modeled operational equipment includes up to five (5) 175 horsepower (hp), natural gas-powered cargo handling equipment – port tractor operating 4 hours a day[6] for 365 days of the year. (Urban Crossroads, 2023a, pp. 48-49)

❑ **TRU Emissions**

In order to account for the possibility of refrigerated uses, trucks associated with the cold-storage land use are assumed to also have Transportation Refrigeration Units (TRUs). For modeling purposes, 57 two-way truck trips during have been estimated to include TRUs (e.g., all truck trips that would be associated with up to 150,526-sf of high-cube cold storage use, as summarized in the Project's TA (EIR *Technical Appendix N2*). TRUs are accounted for during on-site and off-site travel. The TRU calculations are based on EMissions FACtor Model version 2021 (EMFAC2021), developed by the CARB. EMFAC2021 does not provide emission rates per hour or mile as with the on-road emission model and only provides emission inventories. Emission results are produced in tons per day while all activity, fuel consumption and horsepower hours were reported at annual levels. The emission inventory is based on specific assumptions including the average horsepower rating of specific types of equipment and the hours of operation annually. These assumptions are not always consistent with assumptions used in the modeling of project level emissions. Therefore, the emissions inventory was converted into emission rates to accurately calculate emissions from TRU operation associated with project level details. This was accomplished by converting the annual horsepower hours to daily operational characteristics and converting the daily emission levels into hourly emission rates based on the total emission of each criteria pollutant by equipment type and the average daily hours of operations. (Urban Crossroads, 2023a, p. 49)

5. Modeling Inputs for Mobile Source Health Risk Assessment

The Project's HRA (*Technical Appendix C2*) was prepared based on SCAQMD guidelines to produce conservative estimates of risk posed by Project-related DPM emissions.

[6] Based on Table II-3, Port and Rail Cargo Handling Equipment Demographics by Type, from CARB's Technology Assessment: Mobile Cargo Handling Equipment document, a single piece of equipment could operate up to 2 hours per day (Total Average Annual Activity divided by Total Number Pieces of Equipment). As such, the analysis conservatively assumes that the tractor/loader/backhoe would operate up to 4 hours per day.

❑ Construction Health Risk Assessment

The emissions calculations for the construction HRA component are based on an assumed mix of construction equipment and hauling activity as discussed above for the Project's AQIA and as described in further detail EIR Section 3.0 (refer specifically to EIR subsection 3.6.1.B) (Urban Crossroads, 2023b, p. 10).

❑ Operational Emissions

On- and Off-Site Truck Activity

Vehicle DPM emissions were calculated using emission factors for particulate matter less than 10µm in diameter (PM_{10}) generated with the 2021 version of the EMission FACtor model (EMFAC) developed by the CARB. The most recent version of this model, EMFAC 2021, incorporates regional motor vehicle data, information and estimates regarding the distribution of vehicle miles traveled (VMT) by speed, and number of starts per day. (Urban Crossroads, 2023b, p. 13)

Several distinct emission processes are included in EMFAC 2021. Emission factors calculated using EMFAC 2021 are expressed in units of grams per vehicle miles traveled (g/VMT) or grams per idle-hour (g/idle-hr), depending on the emission process. The emission processes and corresponding emission factor units associated with diesel particulate exhaust for this Project are presented below. (Urban Crossroads, 2023b, p. 13)

For the proposed Project, annual average PM_{10} emission factors were generated by running EMFAC 2021 in EMFAC Mode for vehicles in the Riverside County jurisdiction. The EMFAC Mode generates emission factors in terms of grams of pollutant emitted per vehicle activity and can calculate a matrix of emission factors at specific values of temperature, relative humidity, and vehicle speed. The model was run for speeds traveled in the vicinity of the Project. The vehicle travel speeds for each segment modeled are summarized below. (Urban Crossroads, 2023b, p. 13)

- Idling – on-site loading/unloading and truck gate
- 5 miles per hour – on-site vehicle movement including driving and maneuvering
- 25 miles per hour – off-site vehicle movement including driving and maneuvering.

It is expected that minimal idling would occur at nearby intersections during truck travel on study area roadways (e.g., at an intersection during a red light, or yielding to make a turn). Notwithstanding, the analysis conservatively utilizes a reduced off-site average speed of 25 miles per hour (below the posted speed limit) for travel on study area roadways, use of a lower average speed for off-site travel results in a higher emission factor and therefore any negligible idling that would occur during truck travel along the study area is accounted for. (Urban Crossroads, 2023b, p. 13)

Calculated emission factors are shown in Table 4.3-9, *2026 Weighted Average DPM Emissions Factors*. As a conservative measure, a 2026 EMFAC 2021 run was conducted and a static 2026 emissions factor data set was used for the entire duration of analysis herein (e.g., 30 years). Use of 2026 emission factors would overstate potential impacts since this approach assumes that emission factors remain "static" and do not change over time due to fleet turnover or cleaner technology with lower emissions that would be incorporated into vehicles

after 2026. Additionally, based on EMFAC 2021, Light-Heavy-Duty Trucks are comprised of 59.8% diesel, Medium-Heavy-Duty Trucks are comprised of 91.9% diesel, and Heavy-Heavy-Duty Trucks are comprised of 94.9% diesel. Trucks fueled by diesel are accounted for by these percentages accordingly in the emissions factor generation. Appendix 2.2 of the Project's HRA (*Technical Appendix C2*) includes additional details on the emissions estimates from EMFAC. (Urban Crossroads, 2023b, pp. 13-14)

Table 4.3-9 2026 Weighted Average DPM Emissions Factors

Speed	Weighted Average
0 (idling)	0.07232 (g/idle-hr)
5	0.01820 (g/s)
25	0.00834 (g/s)

(Urban Crossroads, 2023b, Table 2-3)

The vehicle DPM exhaust emissions were calculated for running exhaust emissions. The running exhaust emissions were calculated by applying the running exhaust PM_{10} emission factor (g/VMT) from EMFAC over the total distance traveled. The following equation was used to estimate off-site emissions for each of the different vehicle classes comprising the mobile sources: (Urban Crossroads, 2023b, p. 14)

$Emissions_{speedA}$ (g/s) = $EF_{RunExhaust}$ (g/VMT) * Distance (VMT/trip) * Number of Trips (trips/day) ÷ seconds per day

Where:

$Emissions_{speedA}$ (g/s): Vehicle emissions at a given speed A;
$EF_{RunExhaust}$ (g/VMT): EMFAC running exhaust PM_{10} emission factor at speed A;
Distance (VMT/trip): Total distance traveled per trip.

Similar to off-site traffic, on-site vehicle running emissions were calculated by applying the running exhaust PM_{10} emission factor (g/VMT) from EMFAC and the total vehicle trip number over the length of the driving path using the same formula presented above for on-site emissions. In addition, on-site vehicle idling exhaust emissions were calculated by applying the idle exhaust PM_{10} emission factor (g/idle-hr) from EMFAC and the total truck trip over the total assumed idle time (15 minutes). The following equation was used to estimate the on-site vehicle idling emissions for each of the different vehicle classes: (Urban Crossroads, 2023b, p. 14)

$Emissions_{idle}$ (g/s) = EF_{idle} (g/hr) * Number of Trips (trips/day) * Idling Time (min/trip) * 60 minutes per hour / seconds per day

Where:

$Emissions_{idle}$ (g/s): Vehicle emissions during idling;
EF_{idle} (g/s): EMFAC idle exhaust PM_{10} emission factor.

Each roadway was modeled as a line source (made up of multiple adjacent volume sources). Due to the large number of volume sources modeled for this analysis, the corresponding coordinates of each volume source have not been included in this report but are included in Appendix 2.3 of the Project's HRA (*Technical Appendix C2*). The DPM emission rate for each volume source was calculated by multiplying the emission factor (based on the average travel speed along the roadway) by the number of trips and the distance traveled along each roadway segment and dividing the result by the number of volume sources along that roadway, as illustrated on Table 4.3-10, *DPM Emissions from Project Trucks (2026 Analysis Year)*. The modeled emission sources are illustrated on Figure 4.3-11, *Modeled On-Site Emission Sources*, for on-site sources and Figure 4.3-12, *Modeled Off-Site Emission Sources*, for off-site sources. The modeling domain is limited to the Project's primary truck route and includes off-site sources in the study area for more than ¾ mile. This modeling domain is more inclusive and conservative than using only a ¼ mile modeling domain which is the distance supported by several reputable studies which conclude that the greatest potential risks occur within a ¼ mile of the primary source of emissions (in the case of the Project, the primary source of emissions is the on-site idling and on-site travel). (Urban Crossroads, 2023b, pp. 14-15)

Table 4.3-10 DPM Emissions from Project Trucks (2026 Analysis Year)

Truck Emission Rates						
Source	**Trucks Per Day**	**VMT[a] (miles/ day)**	**Truck Emission Rate[b] (grams/mile)**	**Truck Emission Rate[b] (grams/ idle-hour)**	**Daily Truck Emissions[c] (grams/day)**	**Modeled Emission Rates (g/second)**
On-Site Idling North	109			0.0723	2.53	2.923E-05
On-Site Idling South	109			0.0723	2.53	2.923E-05
On-Site Travel	438	375.74	0.0182		7.59	8.781E-05
Off-Site Travel - Seaton 75%	328	70.24	0.0083		0.61	7.102E-06
Off-Site Travel - Cajalco 15%	66	65.53	0.0083		0.57	6.626E-06
Off-Site Travel - Cajalco 60%	263	123.19	0.0083		1.08	1.250E-05
Off-Site Travel - Cajalco 55%	241	87.58	0.0083		0.77	8.855E-06
Off-Site Travel - Seaton 25%	109	111.04	0.0083		0.97	1.123E-05
Off-Site Travel - Harvill 25%	109	100.16	0.0083		0.87	1.013E-05
Off-Site Travel - Harvill 5%	22	40.09	0.0083		0.35	4.053E-06

[a] Vehicle miles traveled are for modeled truck route only.
[b] Emission rates determined using EMFAC 2021. Idle emission rates are expressed in grams per idle hour rather than grams per mile.
[c] This column includes the total truck travel and truck idle emissions. For idle emissions this column includes emissions based on the assumption that each truck idles for 15 minutes and each TRU operates for 30 minutes.

(Urban Crossroads, 2023b, Table 2-4)

Figure 4.3-11 Modeled On-Site Emission Sources

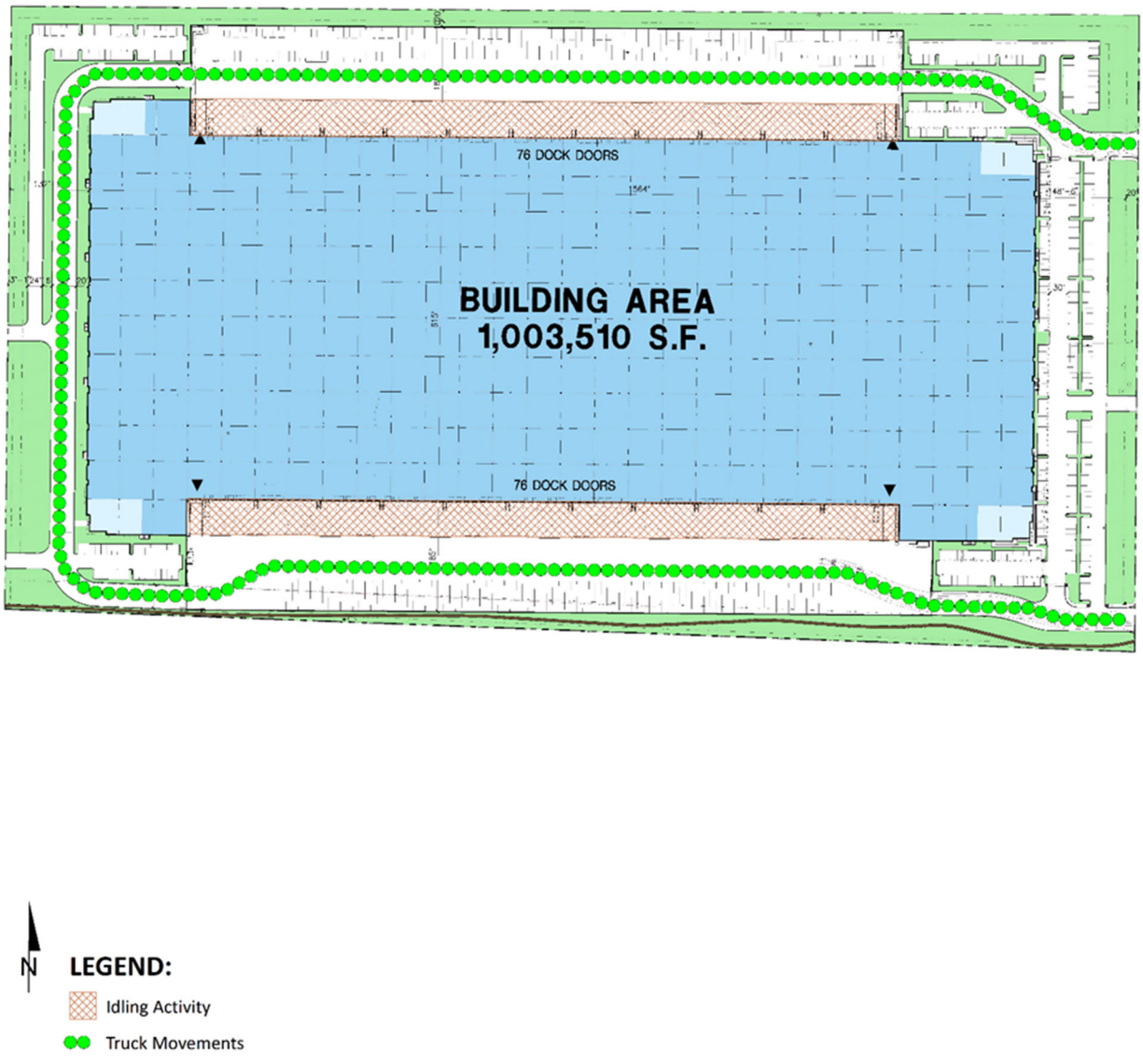
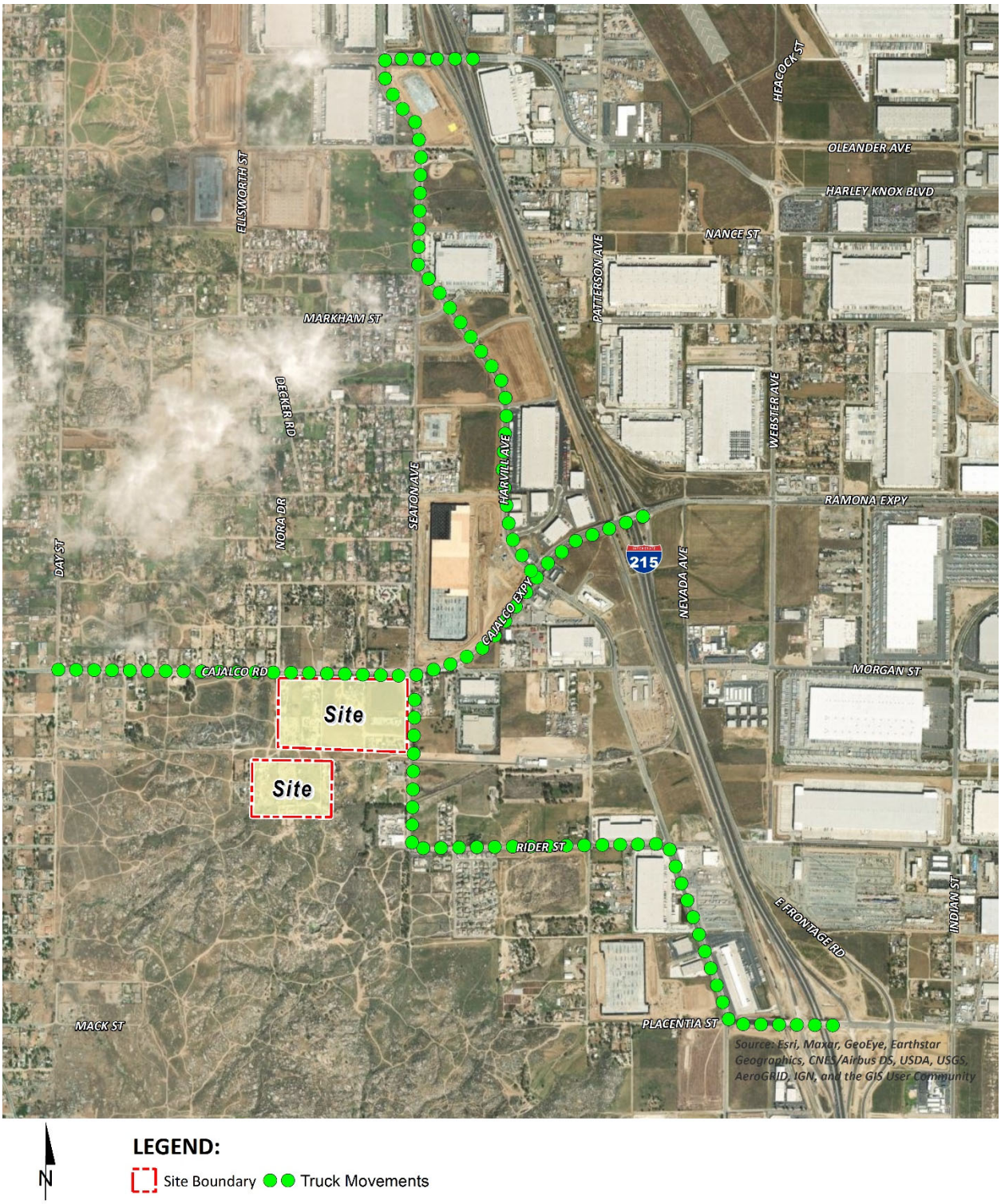


Figure 4.3-12 Modeled Off-Site Emission Sources



On-site truck idling was estimated to occur as trucks enter and travel through the Project site. Although the Project's diesel-fueled truck and equipment operators will be required by State law to comply with CARB's idling limit of 5 minutes, staff at SCAQMD recommends that the on-site idling emissions be calculated assuming 15 minutes of truck idling, which would take into account on-site idling which occurs while the trucks are waiting to pull up to the truck bays, idling at the bays, idling at check-in and check-out, etc. As such, this analysis calculates truck idling at 15 minutes, consistent with SCAQMD's recommendation. (Urban Crossroads, 2023b, p. 15)

As summarized in the Project's TA (*Technical Appendix N2*), the Project is expected to generate a total of approximately 2,886 actual vehicular trip-ends per day (1,443 vehicles inbound + 1,443 vehicles outbound) which includes 2,448 passenger vehicle trips (1,224 passenger vehicles inbound + 1,224 passenger vehicles outbound) and 438 two-way truck trips (219 trucks inbound per day + 219 trucks outbound) per day. (Urban Crossroads, 2023b, p. 15)

4.3.4 Impact Analysis

Threshold a.: ***Would the Project conflict with or obstruct implementation of the applicable air quality plan?***

The Project site is located within the SCAB, which is characterized by relatively poor air quality. The SCAQMD has jurisdiction over an approximately 10,743 square-mile area consisting of the four-county Basin and the Los Angeles County and Riverside County portions of what use to be referred to as the Southeast Desert Air Basin. In these areas, the SCAQMD is principally responsible for air pollution control, and works directly with the Southern California Association of Governments (SCAG), county transportation commissions, local governments, as well as state and federal agencies to reduce emissions from stationary, mobile, and indirect sources to meet state and federal ambient air quality standards. (Urban Crossroads, 2023a, p. 61)

Currently, these State and federal air quality standards are exceeded in most parts of the SCAB although, as discussed above in subsections 4.3.1H and 4.3.1I, overall air quality in the SCAB is vastly improving – even in the face of tremendous population growth over the past decades. In response, the SCAQMD has adopted a series of AQMPs to meet the State and federal ambient air quality standards. AQMPs are updated regularly in order to more effectively reduce emissions, accommodate growth, and to minimize any negative fiscal impacts of air pollution control on the economy. (Urban Crossroads, 2023a, p. 61)

In December 2022, the SCAQMD released the *Final 2022 AQMP* (*2022 AQMP*). The *2022 AQMP* continues to evaluate current integrated strategies and control measures to meet the CAAQS, as well as explore new and innovative methods to reach its goals. Some of these approaches include utilizing incentive programs, recognizing existing co-benefit programs from other sectors, and developing a strategy with fair-share reductions at the federal, state, and local levels. Similar to the 2016 AQMP, the *2022 AQMP* incorporates scientific and technological information and planning assumptions, including the *2020-2045 RTP/SCS*, a planning document that supports the integration of land use and transportation to help the region meet the

federal CAA requirements[1]. The Project's consistency with the AQMP will be determined using the *2022 AQMP* as discussed below. (Urban Crossroads, 2023a, pp. 61-62)

Criteria for determining consistency with the AQMP are defined in Chapter 12, Section 12.2 and Section 12.3 of the *1993 CEQA Handbook*. These indicators are discussed below:

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

The violations that Consistency Criterion No. 1 refers to are the CAAQS and NAAQS. CAAQS and NAAQS violations would occur if Regional Thresholds or LSTs were exceeded.

Construction Impacts – Consistency Criterion No. 1

Consistency Criterion No. 1 refers to violations of the CAAQS and NAAQS. CAAQS and NAAQS violations would occur if localized or regional significance thresholds were exceeded. As indicated under the analysis of Thresholds b. and c., the Project's localized and regional construction-source emissions would not exceed applicable regional significance threshold or LST thresholds. Thus, the Project's construction-related emissions would be consistent with the AQMP according to this criterion. (Urban Crossroads, 2023a, p. 62)

Operational Impacts – Consistency Criterion No.1

As indicated under the discussion and analysis of Threshold c., the Project's localized operational-source emissions would not exceed applicable LSTs. However, and as discussed under the analysis of Threshold b., Project operational-source emissions would exceed applicable regional thresholds for emissions of NO_X. Accordingly, Project operational-source NO_X emissions exceedances would therefore increase the frequency or severity of existing air quality violations and would cause or contribute to new violations or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP. Thus, the Project's operational-related emissions would not be consistent with the AQMP according to this criterion. (Urban Crossroads, 2023a, p. 62)

Conclusion – Consistency Criterion No. 1

On the basis of the preceding discussion, the Project is determined to be inconsistent with the first criterion.

- ***Consistency Criterion No. 2****: The Project will not exceed the assumptions in the AQMP based on the years of Project build-out phase.*

The 2022 AQMP demonstrates that the applicable ambient air quality standards can be achieved within the timeframes required under federal law. Growth projections from local general plans adopted by cities and counties in the district are provided to the SCAG, which develops regional growth forecasts, which are then used to develop future air quality forecasts for the AQMP. Development consistent with the growth projections in County of Riverside General Plan is considered to be consistent with the AQMP. (Urban Crossroads, 2023a, pp. 62-63)

Construction Impacts – Consistency Criterion No. 2

Peak day emissions generated by construction activities are largely independent of land use assignments, but rather are a function of development scope and maximum area of disturbance. Irrespective of the site's land use designation, development of the site to its maximum potential would likely occur, with disturbance of the majority of the Project site occurring during construction activities. As such, when considering that no construction-related emissions thresholds would be exceeded (as discussed under the analysis of Thresholds b. and c.), the Project's construction-related emissions would be consistent with the AQMP according to this criterion. (Urban Crossroads, 2023a, p. 63)

Operational Impacts – Consistency Criterion No. 2

The Project site is located within an unincorporated portion of the County of Riverside. As per the General Plan, the unincorporated portions of the County are divided into 19 area plans. These area plans provide more detailed land use and policy direction regarding local issues such as land use, circulation, open space, and other topical areas. (Urban Crossroads, 2023a, p. 63)

The General Plan and MVAP designate the Project site for "Commercial Retail (CR)" land uses with Rural Community – Very Low-Density Residential (VLDR) uses. The General Plan states that the Commercial Retail land use designation is intended for local and regional serving retail and service uses at an allowable Floor Area Ratio (FAR) of 0.20-0.35. The Rural Community – Very Low-Density Residential (VLDR) land use designation is intended for single-family detached residences on large parcels of 1 to 2 acres with limited agriculture and animal keeping. (Urban Crossroads, 2023a, p. 63)

Implementation of the Project would require an amendment to the General Plan Land Use designation and Zoning designation of the Project Site. Thus, the Project would be inconsistent with the AQMP according to this criterion. (Urban Crossroads, 2023a, p. 63)

Conclusion – Consistency Criterion No. 2

As the Project is not consistent with the current General Plan land use designations and would result in NO_X emission exceedances, the Project is therefore determined to be inconsistent with the second criterion.

AQMP Consistency Conclusion

The Project would be inconsistent with AQMP Criterion No's. 1 and 2 under long-term operational conditions, resulting in a determination that impacts in this regard would be potentially significant. The Project would implement air quality mitigation measures identified below in subsection 4.3.7, which would act to generally reduce the Project's operational-source air pollutant emissions of NO_X. Additionally, incorporation of contemporary energy-efficient technologies and operational programs and compliance with SCAQMD emissions reductions and control requirements would serve to reduce Project air pollutant emissions generally. Notwithstanding, based on the analysis presented above, the Project is considered to be inconsistent with applicable AQMP Consistency Criteria. This is evaluated as a significant impact of the proposed Project. (Urban Crossroads, 2023a, p. 63)

Threshold b.: ***Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?***

❑ Construction Emissions

Construction activities associated with the Project would result in emissions of VOCs, NO_X, SO_X, CO, PM_{10}, and $PM_{2.5}$. Construction-related emissions are expected from the following construction activities: demolition, site preparation, grading, crushing/blasting, building construction, paving, and architectural coating. Refer to Subsection 3.4 of the Project's AQIA (*Technical Appendix C1*) for a description of the modeling inputs used to calculate the Project's estimated construction-related air pollutant emissions. (Urban Crossroads, 2023a, pp. 41-45)

CalEEMod calculates maximum daily emissions for summer and winter periods. As such, the estimated maximum daily construction emissions without mitigation for both summer and winter periods are summarized on Table 4.3-11, *Overall Construction Emissions Summary (Without Mitigation)*. Detailed unmitigated construction model outputs are presented in Appendix 3.1 to the Project's AQIA (*Technical Appendix C1*). Under the assumed scenarios, emissions resulting from the Project construction would not exceed criteria pollutant thresholds established by the SCAQMD. Accordingly, impacts due to the Project's regional air quality emissions during construction activities would be less than significant requiring no mitigation. (Urban Crossroads, 2023a, p. 45)

Table 4.3-11 Overall Construction Emissions Summary (Without Mitigation)

Year	Emissions (lbs/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Summer						
2024	0.68	13.75	19.90	0.04	1.78	0.65
2025	57.38	21.82	62.36	0.06	8.00	2.31
Winter						
2024	2.34	60.98	87.97	0.24	10.66	3.89
2025	62.59	77.36	154.67	2.24	34.62	7.92
Maximum Daily Emissions	**62.59**	**77.36**	**154.67**	**2.24**	**34.62**	**7.92**
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

Source: CalEEMod construction-source (unmitigated) emissions are presented in Appendix 3.1 of the Project's AQIA (*Technical Appendix C1*).
(Urban Crossroads, 2023a, Table 3-5)

❑ Operational Emissions

Operational activities associated with the Project would result in emissions of VOCs, NO_X, SO_X, CO, PM_{10}, and $PM_{2.5}$. Operational emissions are expected from the following primary sources: area source emissions, energy source emissions, mobile source emissions, stationary source emissions, on-site cargo handling equipment emissions, and TRU emissions. Refer to subsection 4.3.3E (above) for a description of modeling inputs and assumptions used to calculate the Project's operational emissions. (Urban Crossroads, 2023a, pp. 46-49)

As previously stated, CalEEMod utilizes summer and winter EMFAC2021 emission factors in order to derive vehicle emissions associated with Project operational activities, which vary by season. The estimated operational-source emissions are summarized on Table 4.3-12, *Summary of Peak Operational Emissions (Without Mitigation)*. As shown in Table 4.3-12, the Project would exceed the numerical thresholds of significance established by the SCAQMD for operational emissions of NO_X. As previously indicated in Table 4.3-2, the SCAB is designated as nonattainment for O_3, and VOCs and NO_X are precursors to ozone formation. Thus, the Project's emissions of NO_X would cumulatively contribute to a net increase of a criteria pollutant (O_3) for which the SCAB is considered nonattainment. Accordingly, the Project's long-term operational emissions of NO_X would represent a significant impact for which mitigation would be required. Detailed operation model outputs for the Project are presented in Appendix 3.1 to the Project's AQIA (*Technical Appendix C1*). (Urban Crossroads, 2023a, p. 49)

Threshold c.: ***Would the Project expose sensitive receptors, which are located within one (1) mile of the project site, to substantial pollutant concentrations?***

During construction and operational activities, the Project has the potential to expose nearby sensitive receptors to substantial pollutant concentrations. The following provides an analysis based on the applicable LSTs established by the State of California and SCAQMD, an analysis of the Project's potential to result in or contribute to CO "hot spots," and an analysis of the Project's potential to result in cancer risks and non-cancer health hazards.

A. Localized Significance Thresholds (LSTs) Analysis

In order to estimate localized pollutant concentrations resulting from Project construction, the SCAQMD-approved AERMOD dispersion model was utilized. The modeling approach utilized is discussed in detail in subsection 4.3.3E (above). (Urban Crossroads, 2023a, p. 54)

Sensitive receptors considered as part of the analysis previously were depicted on Figure 4.3-10 and were described previously in subsection 4.3.1J. Consistent with the *LST Methodology*, the nearest land use where an individual could remain for 24 hours to the Project site has been used to determine construction and operational air quality impacts for emissions of PM_{10} and $PM_{2.5}$, since PM_{10} and $PM_{2.5}$ thresholds are based on a 24-hour averaging time. Per the *LST Methodology*, commercial and industrial facilities are not included in the definition of sensitive receptor because employees and patrons do not typically remain onsite for a full 24

Table 4.3-12 Summary of Peak Operational Emissions (Without Mitigation)

Source	Emissions (lbs/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Summer						
Mobile Source	11.37	54.05	144.76	0.73	43.75	11.92
Area Source	30.08	0.37	43.64	0.00	0.08	0.06
Stationary Source	0.39	1.09	1.00	0.00	0.06	0.06
TRUs	4.13	4.52	0.49	0.00	0.19	0.18
On-Site Equipment Source	0.59	1.88	82.22	0.00	0.15	0.14
Project Maximum Daily Emissions	**46.55**	**61.90**	**272.11**	**0.73**	**44.23**	**12.34**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**NO**	**YES**	**NO**	**NO**	**NO**	**NO**
Winter						
Mobile Source	10.83	56.84	120.17	0.71	43.75	11.92
Area Source	22.91	0.00	0.00	0.00	0.00	0.00
Stationary Source	0.39	1.09	1.00	0.00	0.06	0.06
TRUs	4.13	4.52	0.49	0.00	0.19	0.18
On-Site Equipment Source	0.59	1.88	82.22	0.00	0.15	0.14
Project Maximum Daily Emissions	**38.85**	**64.32**	**203.88**	**0.71**	**44.15**	**12.29**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**NO**	**YES**	**NO**	**NO**	**NO**	**NO**

Source: CalEEMod operational-source emissions are presented in Appendix 3.1 of the Project's AQIA (*Technical Appendix C1*). (Urban Crossroads, 2023a, Table 3-8)

hours but are typically onsite for 8 hours or less. However, the *LST Methodology* explicitly states that "LSTs based on shorter averaging periods, such as the NO_2 and CO LSTs, could also be applied to receptors such as industrial or commercial facilities since it is reasonable to assume that a worker at these sites could be present for periods of one to eight hours." Therefore, any adjacent land use where an individual could remain for 1 or 8 hours, that is located at a closer distance to the Project site than the receptor used for PM_{10} and $PM_{2.5}$ analysis, must be considered to determine construction and operational LST air impacts for emissions of NO_2 and CO since these pollutants have an averaging time of 1 and 8 hours. (Urban Crossroads, 2023a, p. 55)

Localized Significance Thresholds (LSTs) – Construction

Based on SCAQMD's *LST Methodology*, emissions of concern during construction activities are on-site NO_X, CO, $PM_{2.5}$, and PM_{10}. The *LST Methodology* clearly states that "off-site mobile emissions from the Project should not be included in the emissions compared to LSTs." As such, for purposes of the construction LST

analysis, only emissions included in the CalEEMod "onsite" emissions outputs were considered. (Urban Crossroads, 2023a, p. 54)

As shown on Table 4.3-13, *Localized Significance Summary - Peak Construction*, emissions during the peak construction activity would not exceed the SCAQMD's localized significance thresholds at the maximally exposed receptor location. All other modeled locations in the Project's study area would experience a lesser concentration and consequently a lesser impact. As such, the Project's localized impacts during construction activity would be less than significant. Outputs from the model runs for construction LSTs are provided in Appendix 3.3 of the Project's AQIA (*Technical Appendix C1*). (Urban Crossroads, 2023a, p. 58)

Table 4.3-13 Localized Significance Summary - Peak Construction

Peak Construction	CO	NO_2		PM_{10}	$PM_{2.5}$
	Averaging Time				
	1-Hour	8-Hour	1-Hour	24-Hours	24-Hours
Peak Day Localized Emissions	0.10	0.03	2.57E-02	3.50	0.74
Background Concentration [A]	1.6	0.8	0.044		
Total Concentration	**1.70**	**0.83**	**0.07**	**3.50**	**0.74**
SCAQMD Localized Significance Threshold	20	9	0.18	10.4	10.4
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**

[A] Highest concentration from the last three years of available data.
Notes: PM_{10} and $PM_{2.5}$ concentrations are expressed in µg/m^3. All others are expressed in ppm.
Based on SCAQMD's LST Methodology, background concentrations are considered only for CO and NO_2.
(Urban Crossroads, 2023a, Table 3-9)

Localized Significance Thresholds (LSTs) – Long-Term Operations

The LST analysis generally includes on-site sources (area, energy, mobile, and on-site cargo handling equipment, as discussed in EIR subsection 4.3.3.E. However, it should be noted that the CalEEMod outputs do not separate on-site and off-site emissions from mobile sources. As such, to establish a maximum potential impact scenario for analytic purposes, the modeled emissions include all on-site Project-related stationary (area) sources and on-site Project-related mobile emissions. In order to account for on-site mobile emissions, a trip length of 3.0 miles was utilized for both scenarios for both trucks and passenger cars. (Urban Crossroads, 2023a, p. 58)

As shown in Table 4.3-14, *Localized Significance Summary - Peak Operations*, emissions during peak operational activity would not exceed the SCAQMD's localized significance thresholds at the maximally impacted receptor location. All other modeled locations in the study area would experience a lesser concentration and consequently a lesser impact. As such, the Project's localized impacts during operational activity would be less than significant. Outputs from the model runs for operational LSTs are provided in Appendix 3.3 of the Project's AQIA (*Technical Appendix C1*). (Urban Crossroads, 2023a, p. 63)

Table 4.3-14 Localized Significance Summary - Peak Operations

Peak Construction	CO	NO_2		PM_{10}	$PM_{2.5}$
	Averaging Time				
	1-Hour	8-Hour	1-Hour	24-Hours	24-Hours
Peak Day Localized Emissions	4.94E-02	3.72E-02	3.11E-03	2.00	0.57
Background Concentration [A]	1.6	0.8	0.044		
Total Concentration	**1.65**	**0.84**	**0.05**	**2.00**	**0.57**
SCAQMD Localized Significance Threshold	20	9	0.18	2.5	2.5
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**

[A] Highest concentration from the last three years of available data.
Notes: PM_{10} and $PM_{2.5}$ concentrations are expressed in $\mu g/m^3$. All others are expressed in ppm.
Based on SCAQMD's LST Methodology, background concentrations are considered only for CO and NO_2.
(Urban Crossroads, 2023a, Table 3-10)

B. Carbon Monoxide "Hot Spots"

An adverse CO concentration, known as a "hot spot," would occur if an exceedance of the State one-hour standard of 20 ppm or the eight-hour standard of 9 ppm were to occur. It has long been recognized that CO hotspots are caused by vehicular emissions, primarily when idling at congested intersections. In response, vehicle emissions standards have become increasingly stringent in the last twenty years. Currently, the allowable CO emissions standard in California is a maximum of 3.4 grams/mile for passenger cars (there are requirements for certain vehicles that are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of increasingly sophisticated and efficient emissions control technologies, CO concentration in the SCAB is now designated as attainment, as previously noted in Table 4.3-2. (Urban Crossroads, 2023a, p. 59)

To establish a more accurate record of baseline CO concentrations affecting the SCAB, a CO "hot spot" analysis was conducted in 2003 for four busy intersections in Los Angeles at the peak morning and afternoon time periods. This "hot spot" analysis did not predict any violation of CO standards, as shown on Table 3-11 of the Project's AQIA (*Technical Appendix C1*). (Urban Crossroads, 2023a, p. 59)

Based on the SCAQMD's 2003 AQMP and the 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan), peak carbon monoxide concentrations in the SCAB were a result of unusual meteorological and topographical conditions and not a result of traffic volumes and congestion at a particular intersection. As evidence of this, for example, 8.4 ppm 8-hr CO concentration measured at the Long Beach Boulevard and Imperial Highway intersection (highest CO generating intersection within the "hot spot" analysis), only 0.7 ppm was attributable to the traffic volumes and congestion at this intersection; the remaining 7.7 ppm were due to the ambient air measurements at the time the 2003 AQMP was prepared. In contrast, an adverse CO concentration, known as a "hot spot," would occur if an exceedance of the state one-hour standard of 20 parts per million (ppm) or the eight-hour standard of 9 ppm were to occur. (Urban Crossroads, 2023a, p. 60)

The ambient 1-hr and 8-hr CO concentration within the Project study area is estimated to be 0.9 ppm and 0.6 ppm, respectively (data from Lake Elsinore Area monitoring station for 2022). Therefore, even if the traffic volumes for the proposed Project were ten times the traffic volumes generated at the Long Beach Boulevard and Imperial Highway intersection, due to the on-going improvements in ambient air quality and vehicle

emissions controls, the Project would not be capable of resulting in a CO "hot spot" at any study area intersections. As noted above, only 0.7 ppm were attributable to the traffic volumes and congestion at one of the busiest intersections in the SCAB. Therefore, if these traffic volumes were multiplied by ten times, it could be expected that the CO attributable to traffic would increase tenfold as well, resulting in 7 ppm – even if this were added to either the 1-hour or 8-hour CO concentrations within the Project study area, this would result in 7.9 ppm and 7.6 ppm for the 1-hr and 8-hr timeframes, respectively. Neither of which would exceed the applicable 1-hr standard of 20 ppm or the 8-hr standard of 9 ppm. (Urban Crossroads, 2023a, p. 60)

Similar considerations are also employed by other Air Districts when evaluating potential CO concentration impacts. More specifically, the Bay Area Air Quality Management District (BAAQMD) concludes that under existing and future vehicle emission rates, a given project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour (vph) – or 24,000 vph where vertical and/or horizontal air does not mix – in order to generate a significant CO impact. Traffic volumes generating the CO concentrations for the "hot spot" analysis are shown on Table 3-12 of the Project's AQIA (*Technical Appendix C1*). The busiest intersection evaluated was that at Wilshire Boulevard and Veteran Avenue, which had AM/PM traffic volumes of 8,062 vph and 7,719 vph, respectively. (Urban Crossroads, 2023a, p. 60)

As summarized on Table 4.3-15, *Peak Hour Traffic Volumes*, the intersection of the 1-215 Northbound Ramps and Ramona Expressway would have the highest AM and PM traffic volumes of 7,486 vph and 8,322 vph, respectively. As such, total traffic volumes at the intersections considered are less than the 24,000 vph that could result in a CO hotspot impact. As such, the Project considered herein along with background and cumulative development would not produce the volume of traffic required to generate a CO "hot spot" either in the context of the 2003 Los Angeles hot spot study or based on representative BAAQMD CO threshold considerations. Therefore, CO "hot spots" are not an environmental impact of concern for the Project. Localized air quality impacts related to mobile-source emissions would therefore be less than significant. (Urban Crossroads, 2023a, p. 61)

Table 4.3-15 Peak Hour Traffic Volumes

Intersection Location	Peak Traffic Volumes (vph)				
	Northbound (AM/PM)	Southbound (AM/PM)	Eastbound (AM/PM)	Westbound (AM/PM)	Total (AM/PM)
Clark St. & Cajalco Rd.	678/438	372/421	1,147/1,405	1,493/1,435	3,690/3,699
Harvill Av. & Cajalco Expressway	1,128/1,119	749/1,505	1,506/1,865	2,590/1,805	5,974/6,293
I-215 SB Ramps & Ramona Expressway	0/0	2,599/2,181	1,749/2,926	2,456/2,297	6,804/7,404
I-215 NB Ramps & Ramona Expressway	1,569/1,332	0/0	2,867/3,632	3,050/3,358	7,486/8,322

(Urban Crossroads, 2023a, table 3-13)

C. *Project-Related DPM Source Cancer and Non-Cancer Risks*

A Project-specific Health Risk Assessment (HRA) was prepared for the Project and is included as EIR *Technical Appendix C2*. Refer to Section 2 of the Project's HRA for a detailed discussion of the recommended methodology, emissions estimation, exposure quantification, carcinogenic chemical risk, and non-carcinogenic exposure used as inputs to the analysis. Nearby sensitive receptors evaluated as part of the HRA are described above in subsection 4.3.1J and are depicted on Figure 4.3-10. Provided below is a summary of

the results of the HRA for the Maximally Exposed Individual Receptor (MEIR) and Maximally Exposed Individual Worker (MEIW), and Maximally Exposed Individual School Child (MEISC).

1. Construction-Related Health Risk Impacts

The land use with the greatest potential exposure to Project construction-source DPM emissions is Location R4 which is located approximately 76 feet east of the Project site at an existing residence located at 22761 Cajalco Road (refer to Figure 4.3-10). R4 is placed in the private outdoor living area (backyard) facing the Project site. As shown in Table 4.3-16, *Summary of Construction Cancer and Non-Cancer Risks*, at the MEIR, the maximum incremental cancer risk attributable to Project construction-source DPM emissions is estimated at 1.40 in one million, which is less than the SCAQMD significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable threshold of 1.0. Location R4 is the nearest receptor to the Project site and would experience the highest concentrations of DPM during Project construction due to meteorological conditions at the site. Because all other modeled receptors would experience lower concentrations of DPM during Project construction, all other receptors in the vicinity of the Project would be exposed to less emissions and therefore less risk than the MEIR identified herein. As such, the Project will not cause a significant human health or cancer risk to adjacent land uses as a result of Project construction activity. All other receptors during construction activity would experience less risk than what is identified for this location. Therefore, Project-related cancer and non-cancer health risks during construction would be less than significant. (Urban Crossroads, 2023b, p. 24)

Table 4.3-16 Summary of Construction Cancer and Non-Cancer Risks

Time Period	Location	Maximum Lifetime Cancer Risk (Risk per Million)	Significance Threshold (Risk per Million)	Exceeds Significance Threshold
1.28 Year Exposure	Maximum Exposed Sensitive Receptor	1.40	10	NO
Time Period	**Location**	**Maximum Hazard Index**	**Significance Threshold**	**Exceeds Significance Threshold**
Annual Average	Maximum Exposed Sensitive Receptor	<0.01	1.0	NO

(Urban Crossroads, 2023b, Table ES-1)

2. Operational-Related Health Risk Impacts

Residential Exposure Scenario

The residential land use with the greatest potential exposure to Project operational-source DPM emissions is Location R3 which is located approximately 167 feet south of the Project site at an existing residence located at 19701 Seaton Avenue (refer to Figure 4.3-10). Since there are no private outdoor living areas (backyards) facing the Project site, R3 is placed at the building façade. As summarized in Table 4.3-17, *Summary of Operational Cancer and Non-Cancer Risks*, at the MEIR, the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 1.95 in one million, which is less than the SCAQMD significance threshold of 10 in one million. At this same location, non-cancer risks were estimated

Table 4.3-17 Summary of Operational Cancer and Non-Cancer Risks

Time Period	Location	Maximum Lifetime Cancer Risk (Risk per Million)	Significance Threshold (Risk per Million)	Exceeds Significance Threshold
30 Year Exposure	Maximum Exposed Sensitive Receptor	1.95	10	NO
25 Year Exposure	Maximum Exposed Worker Receptor	0.07	10	NO
9 Year Exposure	Maximum Exposed Individual School Child	0.09	10	NO
Time Period	**Location**	**Maximum Hazard Index**	**Significance Threshold**	**Exceeds Significance Threshold**
Annual Average	Maximum Exposed Sensitive Receptor	<0.01	1.0	NO
Annual Average	Maximum Exposed Worker Receptor	<0.01	1.0	NO
Annual Average	Maximum Exposed Individual School Child	<0.01	1.0	NO

(Urban Crossroads, 2023b, Table ES-2)

to be <0.01, which would not exceed the applicable significance threshold of 1.0. Although Location R3 is not the nearest receptor to the Project site, it is the location that would experience the highest concentrations of DPM during project operation due to meteorological conditions at the site. All other receptors would experience lower concentrations of DPM and thus less risk during operation of the proposed Project than the MEIR identified herein. As such, the Project will not cause a significant human health or cancer risk to adjacent land uses as a result of Project operational activity. All other receptors would experience less risk than what is identified for this location. Therefore, Project-related cancer and non-cancer health risks to nearby residences during operation would be less than significant. (Urban Crossroads, 2023b, p. 24)

Worker Exposure Scenario

The worker receptor land use with the greatest potential exposure to Project operational-source DPM emissions is Location R6, which represents the potential worker receptor located approximately 786 feet east of the Project site (refer to Figure 4.3-10). As shown in Table 4.3-17, at the MEIW, the maximum incremental cancer risk impact is 0.07 in one million which is less than the SCAQMD's threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Location R6 is the worker receptor that would experience the highest concentrations of DPM during Project operation due to meteorological conditions at the site. All other worker receptors in the vicinity of the Project would be exposed to less emissions and therefore less risk than the MEIW identified herein. As such, the Project will not cause a significant human health or cancer risk to nearby workers. Therefore, Project-related cancer and non-cancer health risks to adjacent workers during operation would be less than significant. (Urban Crossroads, 2023b, p. 25)

School Child Exposure Scenario

The nearest facility to the Project site that provides school services is the Perris Seventh Day Adventist Church, located approximately 1,080 feet north of the Project site. As shown in Table 4.3-17, at the Maximally Exposed Individual School Child (MEISC), the maximum incremental cancer risk impact attributable to the Project is calculated to be 0.09 in one million, which is less than the significance threshold of 10 in one million. At this same location, non-cancer risks attributable to the Project were calculated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Because all other modeled school receptors would be exposed to lower concentrations of DPM, all other school receptors in the vicinity of the of the Project would be exposed to less emissions and therefore less risk than the MEISC identified herein. Therefore, Project-related cancer and non-cancer health risks to nearby school children during long-term operation would be less than significant. (Urban Crossroads, 2023b, p. 25)

3. Combined Construction and Operational Health Risk Impacts

The land use with the greatest potential exposure to Project construction-source and operational-source DPM emissions is Location R4 (refer to Figure 4.3-10). As shown in Table 4.3-18, *Summary of Construction and Operational Cancer and Non-Cancer Risks*, at the Maximally Exposed Sensitive Receptor, the maximum incremental cancer risk attributable to Project construction-source and operational-source DPM emissions is estimated at 2.60 in one million, which is less than the threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable threshold of 1.0. As such, the Project would not cause a significant human health or cancer risk to nearby residences associated with combined construction and operational emissions. (Urban Crossroads, 2023b, p. 25)

Table 4.3-18 Summary of Construction and Operational Cancer and Non-Cancer Risks

Time Period	Location	Maximum Lifetime Cancer Risk (Risk per Million)	Significance Threshold (Risk per Million)	Exceeds Significance Threshold
30 Year Exposure	Maximum Exposed Sensitive Receptor	2.60	10	NO
Time Period	**Location**	**Maximum Hazard Index**	**Significance Threshold**	**Exceeds Significance Threshold**
Annual Average	Maximum Exposed Sensitive Receptor	<0.01	1.0	NO

(Urban Crossroads, 2023b, Table ES-3)

It should be noted that the receptors presented in Figure 4.3-10 do not represent all modeled receptors. Additionally, the potential risk to on-site receptors located on the park portion of the proposed Project (Locations ON1 through ON4) would be lesser than those shown for other receptors in the Project vicinity, as any potential exposures would be short-term in nature and would not exceed the pollutant concentrations modeled at nearby sensitive receptors surrounding the Project site. Therefore, Project-related health risk impacts associated with construction and long-term operation of the Project would be less than significant. (Urban Crossroads, 2023b, p. 25)

D. Community Health

Most local agencies, including the County of Riverside, lack the data to do their own assessment of potential health impacts from criteria air pollutant emissions, as would be required to establish customized, locally-specific thresholds of significance based on potential health impacts from an individual development project. The use of national or "generic" data to fill the gap of missing local data would not yield accurate results because such data does not capture local air patterns, local background conditions, or local population characteristics, all of which play a role in how a population experiences air pollution. Because it is impracticable to accurately isolate the exact cause of a human disease (for example, the role a particular air pollutant plays compared to the role of other allergens and genetics in causing asthma), existing scientific tools cannot accurately estimate health impacts of the Project's air emissions without undue speculation. Instead, readers are directed to the above analysis of the Project's air quality impacts, which provides extensive information concerning the quantifiable and non-quantifiable health risks related to the Project's construction and long-term operation. (Urban Crossroads, 2023a, p. 64)

Notwithstanding, the Project's AQIA does evaluate the proposed Project's localized impact to air quality for emissions of CO, NO_X, PM_{10}, and $PM_{2.5}$ by comparing the proposed Project's on-site emissions to the SCAQMD's applicable LST thresholds. The LST analysis above determined that the Project would not result in emissions exceeding SCAQMD's LSTs during construction or long-term operation. Therefore, the proposed Project would not be expected to exceed the most stringent applicable federal or State ambient air quality standards for emissions of CO, NO_X, PM_{10}, and $PM_{2.5}$. The Project's localized emissions would comply with federal, State, and local air quality standards. The proposed Project's emissions are not sufficiently high enough to use a regional modeling program to correlate health effects on a basin-wide level, and such an analysis would not provide a reliable indicator of health effects even if modeled. (Urban Crossroads, 2023a, pp. 64-65)

Threshold d.: ***Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?***

Land uses generally associated with odor complaints include agricultural uses (livestock and farming), wastewater treatment plants, food processing plants, chemical plants, composting operations, refineries, landfills, dairies, and fiberglass molding facilities. The Project does not contain land uses typically associated with emitting objectionable odors. Potential odor sources associated with the proposed Project may result from construction equipment exhaust, the application of asphalt and architectural coatings during construction activities, and the temporary storage of typical solid waste (refuse) associated with the proposed Project's (long-term operational) uses. (Urban Crossroads, 2023a, p. 65)

Standard construction requirements would minimize odor impacts from construction. The Project would be subject to standard construction requirements, including the use of low-VOC architectural coatings as required by SCAQMD Rule 113, *Table of Standards*; compliance with low sulfur fuel requirements pursuant to SCAQMD Rule 431.2, *Low Sulfur Fuel;* and compliance with SCAQMD Rule 402, *Nuisance*, which requires that a person shall not discharge air contaminants or other materials that would cause health or safety hazards to any considerable number of persons or the public. Compliance with these standard construction

requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and are thus considered less than significant. (Urban Crossroads, 2023a, p. 65)

Potential sources of operational odors generated by the Project's long-term operations would include disposal of miscellaneous commercial refuse and the use of diesel equipment. It is expected that Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with current solid waste regulations. The proposed Project also would be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, odors associated with the Project operations would not adversely affect a substantial number of people, and Project impacts during long-term operations would be less than significant. (Urban Crossroads, 2023a, p. 65)

Accordingly, Project odor-causing emissions impacts during near-term construction and long-term operational activities would be less than significant (Urban Crossroads, 2023a, p. 65).

4.3.5 Cumulative Impact Analysis

With exception of the issue of odors, the cumulative study area for air quality includes the County of Riverside and the SCAB. The SCAB is designated as a nonattainment area for State standards of O_3, PM_{10}, and $PM_{2.5}$. The region is also designated as a nonattainment area for federal standards of O_3 and $PM_{2.5}$. Cumulative growth in population, vehicle use, and industrial activity could inhibit efforts to improve regional air quality and attain the ambient air quality standards. Thus, with exception of odors, the setting for this cumulative analysis consists of the SCAB and associated growth and development anticipated in the air basin. For the issue of odors, the cumulative study area includes the Project site and lands in close proximity to the Project site, as odors diminish rapidly with distance from the source.

As previously shown in Table 4.3-2, the CAAQS designate the Project region as nonattainment for O_3, PM_{10}, and $PM_{2.5}$, while the NAAQS designates the Project region as nonattainment for O_3 and $PM_{2.5}$. The AQMD has published a report on how to address cumulative impacts from air pollution: *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution*. In this report the AQMD clearly states (Page D-3): (Urban Crossroads, 2023a, p. 66)

> *"...the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or Environmental Impact Report (EIR). The only case where the significance thresholds for project specific and cumulative impacts differ is the Hazard Index (HI) significance threshold for TAC emissions. The project specific (project increment) significance threshold is HI > 1.0 while the cumulative (facility-wide) is HI > 3.0. It should be noted that the HI is only one of three TAC emission significance thresholds considered (when applicable) in a CEQA analysis. The other two are the maximum individual cancer risk (MICR) and the cancer burden, both of which use the same significance thresholds (MICR of 10 in 1 million and cancer burden of 0.5) for project specific and cumulative impacts.*

Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant."

Therefore, this analysis assumes that individual projects that do not generate operational or construction emissions that exceed the SCAQMD's recommended daily thresholds for project-specific impacts also would not cause a cumulatively considerable increase in emissions for those pollutants for which the SCAB is in nonattainment, and, therefore, would not be considered to have a significant, adverse air quality impact. Alternatively, individual project-related construction and operational emissions that exceed SCAQMD thresholds for project-specific impacts would be considered cumulatively considerable. SCAQMD's thresholds of significance for project-specific direct and cumulatively-considerable impacts have clearly been successful, as application of these thresholds has led to significant air quality improvements throughout the SCAB, as demonstrated by the detailed discussion presented in subsection 4.3.1H (above). (Urban Crossroads, 2023a, p. 66)

A. AQMP Consistency (Threshold a.)

As discussed under the analysis of Threshold a., although construction activities associated with the proposed Project would not conflict with the SCAQMD AQMP, and although the Project's operational air quality emissions would be below the SCAQMD LSTs, long-term operation of the proposed Project would exceed applicable regional thresholds for emissions of NO_X. In addition, the Project's proposed land uses are not consistent with the land use assumptions used in the AQMP. Thus, the Project would result in a conflict with the SCAQMD AQMP prior to mitigation. As other cumulative developments also have the potential to result in conflicts with the SCAQMD AQMP, Project impacts due to a conflict with the SCAQMD AQMP would be cumulatively considerable.

B. Regional Criteria Pollutant Emissions (Threshold b.)

As indicated under the analysis of Threshold b., although the Project's construction-related regional emissions would not exceed the SCAQMD thresholds of significance, the Project's operational-related regional emissions would exceed the SCAQMD threshold of significance for NO_X. As previously indicated in Table 4.3-2, the SCAB is designated as nonattainment for O_3, and VOCs and NO_X are precursors to ozone formation. Thus, the Project's emissions of NO_X would cumulatively contribute to a net increase of a criteria pollutant (O_3) for which the SCAB is considered nonattainment. Accordingly, and pursuant to SCAQMD's thresholds of significance that indicate that direct impacts also should be considered to be cumulatively considerable, the Project's impacts due to operational emissions of NO_X would be cumulatively considerable.

C. Localized Air Quality Impacts (Threshold c.)

1. LST Analysis

As indicated under the analysis of Threshold c., and as shown in Table 4.3-13 and Table 4.3-14, construction and long-term operation of the proposed Project would not exceed any of the SCAQMD LSTs. Accordingly,

and based on SCAQMD guidance, the Project's construction and long-term operational localized air quality impacts would be less than significant on a cumulatively-considerable basis.

2. CO "Hot Spots"

As indicated in the analysis of Threshold c., the Project and other cumulative developments would not generate the level of traffic volumes necessary to produce a CO "hot spot." As shown in Table 4.3-15, the intersection of the 1-215 Northbound Ramps and Ramona Expressway would have the highest AM and PM traffic volumes of 7,486 vph and 8,322 vph, respectively, which is far below the traffic volumes identified in the 2003 AQMP. Accordingly, the Project when considered in conjunction with background and cumulative development would not produce the volume of traffic required to generate a CO "hot spot" either in the context of the 2003 Los Angeles hot spot study or based on representative BAAQMD CO threshold considerations. Localized air quality impacts due to CO "hot spots" would therefore be less than significant on a cumulatively-considerable basis.

D. Odors (Threshold d.)

With respect to odors, and as discussed under the analysis of Threshold d., the proposed Project would be required to comply with SCAQMD Rules 113, 402, and 431.2 to prevent occurrences of public nuisances (including odors) during both construction and long-term operation, and would be subject to Riverside County's solid waste regulations. Other developments within the cumulative study area similarly would be required to comply with SCAQMD rules and regulations and the solid waste regulations of the applicable jurisdictions. Therefore, Project impacts due to other emissions (such as those leading to odors) would be less-than-cumulatively considerable.

4.3.6 Significance of Impacts Before Mitigation

Threshold a.: Significant Direct and Cumulatively-Considerable Impact. The proposed Project's construction-related air quality emissions would not exceed the SCAQMD regional thresholds or LSTs, and would not conflict with the SCAQMD AQMP. Additionally, the Project's long-term operational impacts due to LSTs also would be below the SCAQMD thresholds of significance. However, the Project's long-term emissions of NO_X would exceed the SCAQMD regional thresholds. Additionally, due to the land use changes proposed as part of the Project, the Project would generate operational-source emissions not reflected within the current 2022 AQMP regional emissions inventory for the SCAB. Thus, prior to mitigation, the Project would be inconsistent with the SCAQMD AQMP, resulting in a significant impact on both a direct and cumulatively-considerable basis.

Threshold b.: Significant Direct and Cumulatively-Considerable Impact. Construction-related emissions associated with the Project would not exceed any of the SCAQMD regional thresholds. However, under long-term operating conditions, Project-related emissions of NO_X would exceed the SCAQMD regional thresholds. As previously indicated in Table 4.3-2, the SCAB is designated as nonattainment for O_3, and VOCs and NO_X are precursors to ozone formation. Thus, the Project's emissions of NO_X would cumulatively contribute to a net increase of a criteria pollutant (O_3) for which the SCAB is considered nonattainment. Accordingly, the

Project's long-term operational emissions of NO_X would represent a significant impact for which mitigation would be required.

Threshold c.: Less-than-Significant Impact. The Project's construction-related and long-term operational emissions would not exceed any of the SCAQMD LSTs, and impacts would be less than significant. In addition, the Project, even when considered in the context of cumulative developments, would not produce the level of traffic volumes necessary to create a CO "hot spot"; thus, impacts due to CO "hot spots" would be less than significant. In addition, construction and operational-related activities associated with the Project would not expose nearby sensitive receptors to cancer or non-cancer health risks exceeding the SCAQMD thresholds of significance of 10 in one million or 1.0, respectively, and impacts would be less than significant.

Threshold d.: Less-than-Significant Impact. The Project does not propose land uses typically associated with emitting objectionable odors. Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and is thus considered less than significant. Additionally, it is expected that Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the County's solid waste regulations. The proposed Project also would be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, odors associated with the proposed Project construction and operations would be less than significant and no mitigation is required.

4.3.7 County Regulations, Design Requirements, and Mitigation

Applicable County Regulations and Design Requirements

The following are applicable regulations and design requirements within Riverside County. Although these requirements technically do not meet CEQA's definition for mitigation, they are imposed herein to ensure Project compliance with applicable County regulations and design requirements.

- The Project is required to comply with the provisions of South Coast Air Quality Management District Rule 403, "Fugitive Dust" by implementing the following dust control measures during construction activities, such as earth moving activities, grading, and equipment travel on unpaved roads. Prior to grading permit issuance, the County shall verify that the following notes are included on the grading plan. Project contractors shall be required to ensure compliance with the notes and permit periodic inspection of the construction site by County of Riverside staff or its designee to confirm compliance. These notes also shall be specified in bid documents issued to prospective construction contractors.
    - All clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 miles per hour (mph) per SCAQMD guidelines in order to limit fugitive dust emissions.
    - The contractor shall ensure that all disturbed unpaved roads and disturbed areas within the Project are watered at least three (3) times daily during dry weather. Watering, with complete coverage of disturbed areas, shall occur at least three times a day, preferably in the midmorning, afternoon, and after work is done for the day.

- The contractor shall ensure that traffic speeds on unpaved roads and Project site areas are reduced to 15 mph or less.

- The Project is required to comply with the provisions of South Coast Air Quality Management District Rule 1113, *Architectural Coatings*, by requiring that all architectural coatings must consist of low VOCs (i.e., VOCs of less than 50 grams per liter [g/L]) unless otherwise specified in the Rule 1113.

- The Project is required to comply with applicable SCAQMD rules for construction activities on the Project site. In addition to the SCAQMD requirements listed above, additional SCAQMD Rules that are currently applicable during construction activity for this Project include but are not limited to: Rule 1403 (Asbestos); Rule 431.2 (Low Sulfur Fuel); and Rule 1186 / 1186.1 (Street Sweepers).

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

Mitigation

MM 4.3-1 The minimum number of automobile electric vehicle (EV) charging stations required by the California Code of Regulations Title 24 shall be provided. Additionally, a minimum of one (1) 160 Kilowatt charging station for use by Class 8 heavy-duty EV trucks including additional charging stations shall be installed in the truck docking areas of the proposed warehouse building prior to final building inspection for the building. In addition, and to facilitate the possible future installation of infrastructure that would charge the batteries that power the motors of electric-powered trucks, the following shall be installed:

a. At Shell building permit, an electrical room(s) and/or exterior area(s) of the site shall be designated where future electrical panels would be located for the purpose of supplying power to on-site charging facilities for electric powered trucks. Conduit shall be installed from this designated area where the panel would be located to the on-site location where the charging facilities would be located where electric-powered trucks would park and connect to charging facilities to charge the batteries that power the motors of the electric-powered trucks.

b. At issuance of a building permit for Tenant Improvements, if the tenant is served by electric trucks, the electrical panel and charging units shall be installed, and the electrical wiring connections shall be made from the electrical panel to the charging units. If the tenant is not served by electric trucks, this requirement shall not apply.

MM 4.3-2 Prior to issuance of building permits for future uses on site, Riverside County shall verify that passenger car Electric Vehicle (EV) charging stations and designated carpool parking stalls ~~have been~~will be accommodated. For the Project's proposed warehouse building, a minimum of 18 spaces with Electric Vehicle Charging Stations (EVCSs) shall be accommodated, in

addition to a minimum of 54 Electric Vehicle (EV) capable parking spaces, inclusive of the American with Disabilities Act (ADA) EV Van spaces and ADA EV standard spaces required by Title 24. In addition, a minimum of two (2) Level 2 chargers and one (1) Level 1 charging unit shall be installed at the proposed warehouse building. ~~per the provisions of the California Green Building Standards Code~~Additionally, a minimum of eight (8) Level 2 EV chargers shall be installed at the proposed park site. The Riverside County Building & Safety Department ~~and~~ shall verify that construction documents for the warehouse building ~~the plans~~ require that ~~each~~ the building be constructed with an adequately sized electrical panel(s) and conduit to accommodate ~~future~~ the required number of ~~EV~~ charging stations, inclusive of future charging stations that may be installed at the EV capable spaces ~~at a minimum of 5 percent of the passenger car parking spaces~~.

MM 4.3-3 As a component of all future lease or sales agreements, the lease or sales document shall include a provision requiring all on-site mobile equipment used as part of building operations (including yard trucks, hostlers, yard goats, pallet jacks, forklifts) shall be required to be powered by electricity, and an appropriate numbers of charging stations for the on-site equipment shall be accommodated on site.

MM 4.3-4 In order to promote alternative fuels, and help support lower air pollutants associated with truck fleets, the developer/successor-in-interest shall provide building occupants with information related to SCAQMD's Carl Moyer Program, CARB's Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project (HVIP), and/or other such programs that promote truck retrofits or "clean" vehicles and information including, but not limited to, the health effect of diesel particulates, benefits of reduced idling time, CARB regulations, and importance of not parking in residential areas. Tenants shall be notified about the availability of: 1) alternatively fueled cargo handling equipment; 2) grant programs for diesel-fueled vehicle engine retrofit and/or replacement; 3) designated truck parking locations in the project vicinity; 4) access to alternative fueling stations proximate to the site that supply compressed natural gas; and 5) the United States Environmental Protection Agency's SmartWay program.

MM 4.3-5 All future construction activities associated with the Project shall be subject to adherence with the Riverside County Board of Supervisors Policy F-3 ("Good Neighbor Policy" for Logistics and Warehouse/Distribution Uses). The following provisions shall apply to all future construction activities on site:

a. All diesel fueled off-road construction equipment greater than 50 horsepower, including but not limited to excavators, graders, rubber-tired dozers, and similar "off-road" construction equipment shall be equipped with CARB Tier 4 Compliant engines. If the operator lacks Tier 4 equipment, and it is not available for lease or short-term rental within 50 miles of the project site, Tier 3 or cleaner off-road construction equipment may be utilized subject to County approval.

b. All excavators, graders, rubber-tired dozers, and similar "off-road" construction equipment shall be CARB Tier 3 Certified engines or better.

c. The maximum daily disturbance area (actively graded area) shall not exceed 10 acres per day.

d. Construction contractors shall utilize construction equipment, with properly operating and maintained mufflers, consistent with manufacturers' standards.

e. The surrounding streets shall be swept on a regular basis to remove any construction related debris and dirt.

f. Appropriate dust control measures that meet the SCAQMD standards shall be implemented for grading and construction activity.

g. Construction Contractors shall prohibit truck drivers from idling more than five (5) minutes and require operators to turn off engines when not in use, in compliance with the California Air Resources Board regulations.

h. Construction equipment maintenance records and data sheets, which includes equipment design specifications and equipment emission control tier classifications, as well as any other records necessary to verify compliance with the items listed above, shall be kept onsite and furnished to the County upon request.

i. During construction, the Transportation & Land Management Agency representative shall conduct an on-site inspection with a facility representative to verify compliance with these policies, and to identify other opportunities to reduce construction impacts.

Project contractors shall be required to ensure compliance with these requirements and permit periodic inspection of the construction site by County of Riverside staff or its designee to confirm compliance. These requirements also shall be specified in bid documents issued to prospective construction contractors.

MM 4.3-6 All future operations on site shall adhere to the germane policy provisions in the Riverside County Board of Supervisors Policy F-3 ("Good Neighbor Policy" for Logistics and Warehouse/Distribution Uses). Applicable requirements of Policy F-3 shall be specified in future lease agreements with all future tenants, and future tenants shall be required to permit periodic inspection by Riverside County to ensure compliance. Applicable feasible provisions of the Good Neighbor Policy that would serve to measurably reduce Project-related operational emissions include, but are not limited to, the following:

a. Warehouse/distribution facilities greater than 250,000 square feet shall be designed to provide adequate on-site parking for commercial trucks and passenger vehicles and on-site queuing for trucks that is away from sensitive receptors. The general queuing and spill-over of trucks onto surrounding public streets shall be prevented. Commercial trucks shall not be parked in the public road right-of-way or nearby residential areas.

b. Sites shall clearly mark entry and exit points for trucks and service vehicles.

c. Sites shall be densely screened with landscaping along all bordering streets and adjacent sensitive receptors, with trees spaced no further apart than 25 feet on center. Fifty percent of the landscape screening shall include a minimum of 36- inch box trees. Facility operators will be responsible to establish a long-term maintenance mechanism to assure that the landscaping remains in place and functional in accordance with the approved landscaping plan.

d. Facility operators shall maintain records of their fleet equipment and ensure that all diesel-fueled Medium-Heavy Duty Trucks ("MHDT") and Heavy-Heavy Duty Trucks ("HHD") accessing the site use year CARB 2010 or newer engines. The records shall be maintained on-site and be made available for inspection by the County.

e. Legible, durable, weather-proof signs shall be placed at truck access gates, loading docks, and truck parking areas that identify applicable California Air Resources Board (CARB) anti-idling regulations. At a minimum each sign shall include: 1) instructions for truck drivers to shut off engines when not in use; 2) instructions for drivers of diesel trucks that do not include Transport Refrigeration Units (TRUs) to restrict idling to no more than ~~five~~ three minutes; 3) instructions for drivers of diesel trucks that include TRUs to restrict idling to a maximum of 30 minutes; and ~~3~~4) telephone numbers of the building facilities manager and CARB to report violations.

f. Facility operators shall train their managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.

g. Signs shall be posted in the appropriate locations and/or handouts should be provided that show the locations of nearest food options, fueling, truck maintenance services, and other similar convenience services.

h. Each tenant shall designate a Compliance Officer responsible for implementing the measures described herein and/or in the project conditions of approval and mitigation measures. Contact information shall be provided to the County and updated annually, and signs shall be posted in visible locations providing the contact information for the Compliance Officer to the surrounding community. The Compliance Officer also shall coordinate with CARB and SCAQMD to obtain the latest information about regional air quality concentrations, health risks, and trucking regulations.

i. Signs shall be posted in the appropriate locations heavy truck drivers to park and perform any maintenance of trucks in designated on-site areas and not within the surrounding community or on public streets.

j. Facility operators for sites that exceed 250 employees shall establish a rideshare program, in accordance with AQMD rule 2202, with the intent of discouraging single-occupancy vehicle trips and promote alternate modes of transportation, such as carpooling and transit where feasible.

Regardless as to whether they are listed above in Mitigation Measure MM 4.3-6, the Project shall comply with all other applicable provisions of Board of Supervisors' Policy F-3.

MM 4.3-7 As a component of all future lease or sales agreements, the lease or sales document shall include a provision requiring all building tenants to utilize electric equipment for landscape maintenance to the extent feasible.

MM 4.3-8 Prior to issuance of building permits, Riverside County shall ensure that the building plans include a note requiring the posting of signage directing all Project-related truck traffic to utilize Seaton Avenue and Cajalco Road/Cajalco Expressway to access the Interstate 215 freeway. Prior to final building inspection, the County shall verify that the required signage has been posted. The requirement to utilize Seaton Avenue and Cajalco Road/Cajalco Expressway to access these facilities also shall be specified in future lease or sales agreements issued to prospective tenants.

4.3.8 Significance of Impacts After Mitigation

Threshold a.: Significant and Unavoidable Direct and Cumulatively-Considerable Impact. As discussed below under the discussion of Threshold b., implementation of Mitigation Measures MM 4.3-1 through MM 4.3-7 would reduce the Project's long-term air quality emissions, but would not reduce the Project's long-term emissions of NO_X to below the SCAQMD regional thresholds of significance. Additionally, the Project's proposed land uses are not consistent with the growth forecasts included in the 2022 SCAQMD AQMP. Thus, Project's direct and cumulatively-considerable impacts due to a conflict with or obstruction of the SCAQMD 2022 AQMP would represent a significant and unavoidable impact for which additional mitigation measures are not available. It should be noted, however, that the future tenants of the Project's warehouse building would be subject to SCAQMD Rule 2305, Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program. Pursuant to the WAIRE Program, warehouse operators are required to earn a specific number of points every year. This is based on the number of trucks trips made to and from the warehouse each year, with larger trucks such as tractors or tractor-trailers multiplied by 2.5. WAIRE Points may be earned through: a) completing any combination of actions in the WAIRE menu; or b) completing actions in an approved, site-specific custom WAIRE Plan; or c) paying a mitigation fee. If an operator chooses to pay a mitigation fee, the funds will be used to provide incentivizes for near-zero and zero-emission trucks and zero-emission charging and fueling infrastructure in communities near the warehouse(s) that paid the fee. As the future tenants of the Project's proposed warehouse building are unknown at this time, it is unknown whether future tenants would comply with the WAIRE Program through on-site actions or through payment of fees, either of which would serve to reduce the Project's significant and unavoidable air quality impacts due to NO_X emissions, although the amount of reductions to the Project's level of NO_X emissions would not be known until future tenants are identified and the future tenants either undertake measures to comply with the WAIRE Program or pay mitigation fees.

Threshold b.: Significant and Unavoidable Direct and Cumulatively-Considerable Impact. Implementation of Mitigation Measures MM 4.3-1 through MM 4.3-7 would reduce the Project's long-term air quality emissions, although the exact reduction amount cannot be quantified. For some measures it would be overly speculative

to quantify resulting emissions reductions. For instance, while the Project would install passenger car EV charging stations it cannot be determined how many zero emission vehicles would replace gasoline-fueled vehicles as a result. Additionally, in order to promote alternative fuels, and help support "clean" truck fleets, the developer/successor-in-interest at the Project must provide building occupants with information related to SCAQMD's Carl Moyer Program, or other such programs that promote truck retrofits or "clean" vehicles. Yet it cannot be reasonably predicted how many clean trucks would replace diesel-fueled trucks as a result. With other measures the reduction values cannot be quantified due to limitation in the modeling software, such as the requirement that all future cold storage warehousing be equipped with electrical hookups to eliminate idling of main and auxiliary engines during the loading and unloading process. Thus, even with implementation of these mitigation measures and with compliance with the anticipated regulations implemented by the EPA and CARB to improve truck efficiency, the estimated long-term emissions generated under full buildout of the proposed Project still would exceed the SCAQMD's regional operational significance threshold for NO_X and would cumulatively contribute to the nonattainment designations in the SCAB for O_3. Additionally, the predominance of the Project's operational-source emissions would be generated by passenger cars and trucks accessing the Project site. Neither the Project Applicant nor the County have regulatory authority to control tailpipe or consumer product emissions, and no feasible mitigation measures beyond the measures identified herein exist that would reduce Project operational-source NO_X emissions to levels that are less than significant. Therefore, the proposed Project's operational emissions of NO_X would represent a significant and unavoidable impact for which additional mitigation is not available.

4.4 BIOLOGICAL RESOURCES

The analysis in this Subsection is based, in part, on information from the report titled "Habitat Assessment and Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis" (herein, "HA"), prepared by ELMT Consulting, Inc. (herein, "ELMT"), and dated ~~May~~ March 2025~~4~~ (ELMT, 2025a)~~(ELMT, 2024a)~~. This report is included as *Technical Appendix D1* to this EIR. Additionally, the information in this Subsection is based in part on the Project's, "Determination of Biologically Equivalent or Superior Preservation Report," (herein, "DBESP"), prepared by ELMT, dated ~~May~~ March 2025~~4~~, and included as *Technical Appendix D2* to this EIR (ELMT, 2025b)~~(ELMT, 2024b)~~. In addition, the analysis in this subsection is based in part on the Project's "Delineation of State and Federal Jurisdictional Waters," also prepared by ELMT, dated July 2024, and included as *Technical Appendix D3* to this EIR (ELMT, 2024)~~(ELMT, 2024c)~~. Finally, the analysis herein relies on the results of a wet season survey for fairy shrimp, prepared by Glenn Lukos Associates (herein, "GLA"), entitled, "Report of Findings for 2023-2024 Wet-Season Survey for Listed Branchiopods Conducted for the Mead Valley Commerce Center Project, Mead Valley, Riverside County, California," dated July 9, 2024, and included as EIR *Technical Appendix D4* to this EIR (GLA, 2024).

4.4.1 EXISTING CONDITIONS

A. *Study Area Conditions*

For purposes of discussion herein, the term "Study Area" refers to the approximately 64.9~~78~~ acres of the Project site that are proposed for development with public park and warehouse uses and the approximately ~~21.76~~19.78 acres of offsite roadway and utility improvements associated with Cajalco Road, Seaton Avenue, Decker Road, and Rider Street. In total, the Study Area encompasses approximately 8~~4.756.74~~ acres.

The northern 50.04 acres of the Project site consist of previously disturbed/developed areas bisected by moderately maintained dirt roads and several non-native grassland fields. The developed areas consist of a mechanical equipment yard, a tenant occupied recreational vehicle (RV) parking lot, and several residential homes. The northwestern portion of the southern 14.93 acres of the Project site supports a residential home with farm animals and stock infrastructure. The remaining portions of the southern 14.93 acres support mostly undeveloped, vacant land including rocky outcrops and disturbed sage scrub. The majority of the Project site supports developed/disturbed land and has been subject to a variety of anthropogenic disturbances associated with current development, historic agricultural activities, routine weed abatement, and illegal dumping. Historic aerials show these activities have been ongoing since at least 1959. The disturbances present on the Project site have eliminated fully intact natural plant communities that historically occurred on the Project site and surrounding area. As a result, only disturbed native plant communities occur on-site under existing conditions. Refer to Appendix B, *Site Photographs*, of the Project's HA report (*Technical Appendix D1*) for representative site photographs of the Project Site and off-site street improvement areas. (ELMT, 2025a, p. 16)~~(ELMT, 2024a, p. 16)~~

B. *Vegetation and Land Use Types*

Due to historic land uses and ongoing disturbances, only disturbed native plant communities occur within the Study Area. The Study Area supports two (2) land cover types that would be classified as Disturbed/Developed and Ornamental, one (1) non-native plant community that would be classified as Non-native Grassland, and two (2) native plant communities that would be classified as Disturbed Southern Willow Scrub and Disturbed

Riversid~~ic~~an Sage Scrub. Refer to Figure 4.4-1, *Vegetation Map*. The plant communities and land cover types are summarized in Table 4.4-1, *Summary of Study Area Vegetation/Land Use* Types, and are described in further detail below. For a complete list of plant species observed during the field investigation, refer to Appendix D to the Project's HA report (*Technical Appendix D1)*. (ELMT, 2025a, p. 17)~~(ELMT, 2024a, p. 17)~~

Table 4.4-1 Summary of ~~On-Site~~Study Area Vegetation/Land Use Types

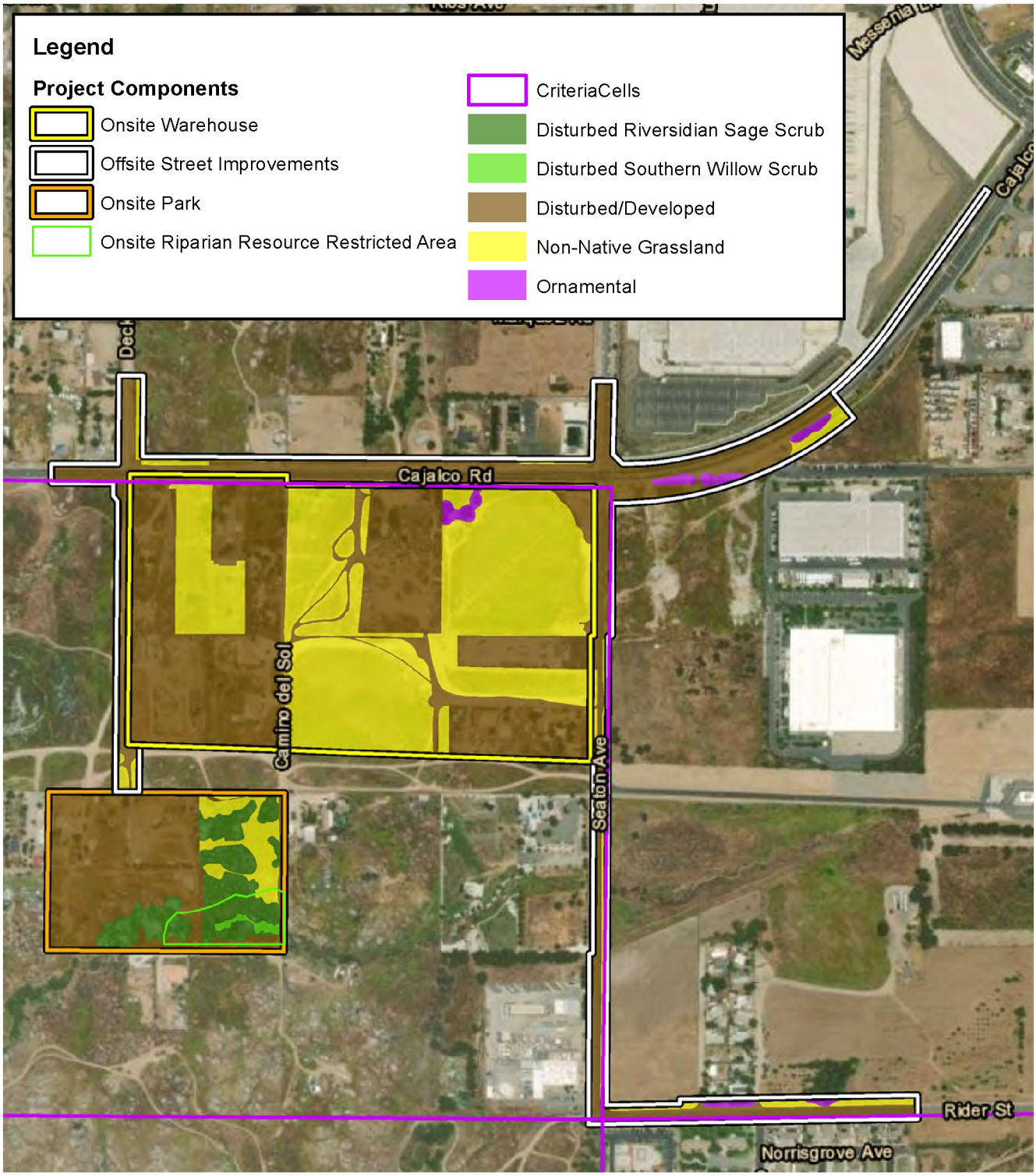
Vegetation/Land Used Type	Inside Criteria Cells (Acres)	Outside Criteria Cells (Acres)	Total (Acres)
Disturbed/Developed	~~40.00~~39.606	11.244~~12.09~~	**50.85~~2.09~~**
Non-native Grassland	26.595~~60~~	2.205~~88~~	**28.89~~.48~~**
Ornamental	0.39	0.73	**1.12**
Disturbed Southern Willow Scrub	0.192~~1~~	0.00	**0.192~~1~~**
Disturbed Riversidean Sage Scrub	3.80	0.00	**3.80**
Total	70.581~~1.0~~	14.179~~15.7~~	**84.76~~6.7~~**

(ELMT, 2025a, Table 3)~~(ELMT, 2024a, Table 2)~~

- **Disturbed/Developed**. The majority of the Study Area supports disturbed and developed land that previously supported agricultural land uses. These areas consist of residential single-family homes, paved driveways, equestrian and sock facilities, a heavy equipment business, and an RV storage lot. The Project site and off-site improvement areas also are interweaved with dirt roads, adjacent open lots, and debris piles (e.g., trash, concrete refuse, etc.). Most dirt roads and lots are routinely maintained but do include areas of non-native vegetation and several depressions/ road ruts that inundate with water during wet season. Non-native vegetation observed on-site include London rocket (*Sisymbrium irio*), red-stemmed filaree (*Erodium cicutarium*), cheeseweed (*Malva parviflora*), common fiddleneck (*Amsinckia intermedia*), ripgut grass (*Bromus diandrus*), and Russian thistle (*Salsola australis*). These plant species were also dominant in the adjacent open fields (nonnative grasslands). The developed portions of the Study Area also include ornamental plant species adjacent to paved boulevards and sidewalks near Cajalco Road, within the heavy equipment rental business, and along Rider Street in the southern off-site improvement area. (ELMT, 2025a, p. 17)~~(ELMT, 2024a, p. 17)~~

- **Ornamental**. The Study Area supports non-native ornamental landscaping in association with existing roads and commercial developments. Ornamental landscaping supported by the project site includes Peruvian pepper (*Schinus molle*) and Mexican fan palm (*Washingtonia robusta*) along paved boulevards and sidewalks near Cajalco Road in the northern portion of the site, a row of Italian cypress (*Cupressus sempervirens*) within the heavy equipment rental business, and a group of European olive (*Olea europaea*) along Rider Street in the southern off-site improvement areas. (ELMT, 2025a, pp. 17-18)~~(ELMT, 2024a, pp. 17-18)~~

- **Non-native Grasslands**. The Project site supports non-native grassland communities within the northern and central portions of the site between the disturbed and developed areas as well as along the dirt access roads. This plant community is dominated by non-native species including common fiddleneck, foxtail brome (*Bromus madritensis* ssp. *rubens*), ripgut grass, Russian thistle, bare barley (*Hordeum murinum*), Mediterranean grass (*Schismus barbatus*), slender wild oat (*Avena barbata*),



Source(s): ELMT (March 2025)

Figure 4.4-1

Not to Scale

Vegetation Map

stink net (*Oncosiphon piluliferum*), summer mustard (*Hirschfeldia incana*), and red-stemmed filaree (*Erodium cicutarium*). (ELMT, 2025a, p. 18)~~(ELMT, 2024a, p. 18)~~

- **Disturbed Southern Willow Scrub**. The Project site supports a disturbed southern willow scrub plant community in the southern portion of the Project site within a remnant portion of an unnamed ephemeral stream. This area is dominated by a mix of native and non-native vegetation and has been impacted and disturbed by surrounding development, encampments, and hydrology modifications. Native species observed in this plant community include black willow (*Salix gooddingii*), mule fat (*Baccharis salicifolia*), California sagebrush (*Artemesia californica*), deerweed (*Acmispon glaber*), miniature lupine (*Lupinus bicolor*), and California buckwheat (*Eriogonum fasciculatum*). Non-native trees also were dominant within this portion of the Project site, which included tree tobacco (*Nicotiana glauca*), castor bean (*Ricinus communis*), and tamarisk (*Tamarix ramosissima*). (ELMT, 2025a, p. 18)~~(ELMT, 2024a, p. 18)~~

- **Disturbed Riversid~~i~~an Sage Scrub**. The Study Area supports a disturbed Riversid~~i~~an sage scrub plant community within the southwest portion of the site. These areas were historically left unmaintained due to the rocky outcrops that occur sporadically throughout this community and have prevented historic agricultural and/or grazing activities. Native sage scrub species observed in between the rocky areas were California sagebrush, California buckwheat, deerweed, scarlet monkeyflower (*Erythranthe cardinalis*), coastal prickly pear (*Opuntia littoralis*), and annuals such as miniature lupine, Pomona milk vetch (*Astragalus pomensis*), ripgut grass, stink-net, and common fiddleneck. (ELMT, 2025a, p. 18)~~(ELMT, 2024a, p. 18)~~

C. *Wildlife*

Plant communities provide foraging habitat, nesting, and denning sites for wildlife species, and shelter from adverse weather or predation. Provided below is a discussion of wildlife species that were observed during the field survey or that are expected to occur within the Project site and off-site improvement areas. The discussion is to be used as a general reference and is limited by the season, time of day, and weather condition in which the field survey was conducted. Wildlife detections were based on calls, songs, scat, tracks, burrows, and direct observation. For a complete list of wildlife species observed during the field investigation, refer to Appendix D of the Project's HA report (*Technical Appendix D1*). (ELMT, 2025a, p. 18)~~(ELMT, 2024a, p. 18)~~

1. *Fish*

No fish were observed during the field investigation. Due to the ephemeral nature of the drainages supported by the Project site and the lack of suitable habitats upstream, no native fish species are expected to occur. (ELMT, 2025a, p. 19)~~(ELMT, 2024a, p. 19)~~

2. *Amphibians*

The Study Area supports an unnamed ephemeral stream that provides limited habitat for a few amphibian species adapted to a high degree of human disturbances. The only amphibian species detected on site was western toad (*Anaxyrus boreas*). Other common amphibian species that could be expected to occur include American bullfrog (*Lithobates catesbeianus*), Baja California tree frog (*Pseudacris hypochondriaca*

hypochondriaca), and garden slender salamander (*Batrachoseps major major*). (ELMT, 2025a, p. 19)~~(ELMT, 2024a, p. 19)~~

3. Reptiles

The Study Area provides limited habitat for a few reptile species adapted to a high degree of human disturbances. The only reptile species observed on-site were western fence lizard (*Sceloporus occidentalis*) and granite spiny lizard (Sceloporus orcutti). Other common reptilian species that could be expected to occur include western side-blotched lizard (*Uta stansburiana elegans*) and southern alligator lizard (*Elgaria multicarinata*). (ELMT, 2025a, p. 19)~~(ELMT, 2024a, p. 19)~~

4. Birds and Raptors

The Study Area provides suitable foraging habitat and limited nesting habitat for bird species adapted to a high degree of human disturbance. Avian species detected during the field survey include Cooper's hawk (*Accipiter cooperii*), red-tailed hawk (*Buteo jamaicensis*), bushtit (*Psaltriparus minimus*), Eurasian collared-dove (*Streptopelia decaocto*), common raven (*Corvus corax*), song sparrow (*Melospiza melodia*), American crow (*Corvus brachyrhynchos*), American kestrel (*Falco sparverius*), house finch (*Haemorhous mexicanus*), lesser goldfinch (*Spinus psaltria*), hooded oriole (*Icterus cucullatus*), western meadowlark (*Sturnella ~~m~~neglecta*), northern mockingbird (*Mimus polyglotto~~u~~s*), California towhee (*Melozone crissalis*), savannah sparrow (*Zonotrichia leucophrys*), house sparrow (*Passer domesticus*), Anna's hummingbird (*Calypte anna*), house wren (*Troglodytes aedon*), Say's phoebe (*Sayornis saya*), European starling (*Sturnus vulgaris*), Cassin's kingbird (*Tyrannus vociferans*), mourning dove (*Zenaida macroura*), and whitecrowned sparrow (*Zonotrichia leucophrys*). (ELMT, 2025a, p. 19)~~(ELMT, 2024a, p. 19)~~

5. Mammals

The Study Area provides suitable foraging and denning habitat for mammalian species adapted to degraded conditions and routine anthropogenic disturbance. Mammalian species observed/detected during the field investigation included California ground squirrel (*Otospermophilus beecheyi*), desert cottontail (*Sylvilagus audubonii*), and California mouse (*Peromyscus californicus*). In addition, free-roaming domestic dog (*Canis familiaris*) and cat (*Felis catus*) were observed in association with the existing development. Other common mammalian species expected to occur include opossum (*Didelphis virginiana*) and raccoon (*Procyon lotor*). No bat species are expected to occur due to a lack of suitable roosting habitat (i.e., suitable trees, crevices, abandoned structures) within and surrounding the project site and off-site street improvement areas. (ELMT, 2025a, pp. 19-20)~~(ELMT, 2024a, pp. 19-20)~~

D. Nesting Birds

No active nests or nesting behaviors were directly observed on-site during the field survey, which was conducted during the breeding season. The Study Area has the potential to provide nesting habitat for year-round and seasonal avian residents, as well as migrating songbirds that could occur in the area that are adapted to a high degree of disturbance. Additionally, the undeveloped vacant areas have the potential to support birds that nest on the open ground such as killdeer. (ELMT, 2025a, p. 20)~~(ELMT, 2024a, p. 20)~~

E. Wildlife Corridors and Linkages

Habitat linkages provide links between larger undeveloped habitat areas that are separated by development. Wildlife corridors are similar to linkages but provide specific opportunities for animals to disperse or migrate between areas. A corridor can be defined as a linear landscape feature of sufficient width to allow animal movement between two comparatively undisturbed habitat fragments. Adequate cover is essential for a corridor to function as a wildlife movement area. It is possible for a habitat corridor to be adequate for one species yet inadequate for others. Wildlife corridors are significant features for dispersal, seasonal migration, breeding, and foraging. Additionally, open space can provide a buffer against both human disturbance and natural fluctuations in resources. (ELMT, 2025a, p. 20)~~(ELMT, 2024a, p. 20)~~

The Study Area is not identified as occurring in a wildlife corridor or linkage. As mapped by the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), as the nearest defined linkage occurs approximately 270 feet to the south of the Study Area within Noncontiguous Habitat Block 4, which is composed of the Motte-Rimrock Reserve. As a Noncontiguous Habitat Block, the Motte-Rimrock Reserve is not connected to other Habitat Blocks or Core habitat areas by any existing or proposed Linkages or Constrained Linkages. Since the Study Area primarily supports developed/disturbed land and non-native habitats, the Study Area the Study Area does not contribute meaningfully to wildlife movement opportunities within Noncontiguous Habitat Block 4. (ELMT, 2025a, p. 20)~~(ELMT, 2024a, p. 20)~~

F. Special-Status Biological Resources

A records search was conducted for reported locations of special-status plant and wildlife species as well as natural communities of special concern in the Steele Peak and Perris USGS 7.5-minute quadrangles. Two quadrangles were used due to the proximity of the site to quadrangle boundaries and regional topography. Special-status plant and wildlife species were evaluated for their potential to occur within the Study Area based on habitat requirements, availability, and quality of suitable habitat, and known distributions. Twenty-four (24) special-status plant species, seventy-eight (78) special-status wildlife species, and three (3) special-status plant communities have been recorded in the Steele Peak and Perris USGS 7.5-minute quadrangles. Species determined to have the potential to occur within the general vicinity are provided in Appendix C, *Potentially Occurring Special-Status Biological Resources*, of the Project's HA report (*Technical Appendix D1)*. (ELMT, 2025a, p. 21)~~(ELMT, 2024a, p. 21)~~

1. Special-Status Plants

According to the California Natural Diversity Database (CNDDB) and California Native Plant Society (CNPS), twenty-four (24) special-status plant species have been recorded in the Steele Peak and Perris quadrangles (refer to Appendix C of the Project's HA report, included as *Technical Appendix D1*). No special-status plant species were observed within the Study Area during the field investigation. The Study Area has been subject to decades of anthropogenic disturbances which have removed quality native plant communities that historically occurred. Based on habitat requirements for specific species and the availability and quality of on-site habitats, it was determined that the Study Area has a low potential to support paniculate tarplant (*Deinandra paniculata*). It was further determined that the Study Area does not have potential to support the remainder of special-status plant species known to occur in the vicinity of the Study Area and are all presumed to be absent. (ELMT, 2025a, p. 22)~~(ELMT, 2024a, pp. 21-22)~~

Paniculate tarplant is not federally or State listed as endangered or threatened, nor is it a covered species under the MSHCP. It is designated by the CNPS as a Rare Plant Rank 4.2 species. Paniculate tarplant is adapted to degraded conditions and routine disturbance and occurs commonly in former agricultural land in western Riverside County and was determined to have a low potential to be supported within the Study Area. (ELMT, 2025a, p. 22)~~(ELMT, 2024a, p. 22)~~

2. Special-Status Wildlife

According to the CNDDB, seventy-eight (78) special-status wildlife species have been reported in the Steele Peak and Perris quadrangles (refer to Appendix C to the Project's HA, included as *Technical Appendix D1*). One (1) special-status wildlife species was observed during the field investigation, Cooper's hawk. Based on habitat requirements for specific species and the availability and quality of habitats within the Study Area, it was determined that the Study Area has a high potential to support Western spadefoot (*Spea hammondii*), California glossy snake (*Arizona elegans occidentalis*), coast horned lizard (*Phrynosoma blainvillii*), coast patch-nosed snake (*Salvadora hexalepsis*), San Diegan whiptail (*Aspidoscelis tigris stejnegeri*), red-diamond rattlesnake (*Crotalus ruber*), California horned lark (*Eremophila alpestris actia*), Lawrence's goldfinch (*Spinus lawrencei*), Loggerhead shrike (*Lanius ludovicianus*), Southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*), and Whitetailed kite (*Elamus leucurus*). It was determined that the Study Area has a low potential to support Stephen's kangaroo rat (*Dipodomys stephensi*), western mastiff bat (*Eumops perotis californicus*), and western yellow bat (*Lasiurus xanthinus*). It was further determined that the Study Area does not have the potential to support any of the other special-status wildlife species known to occur in the vicinity of the site and all are presumed to be absent. (ELMT, 2025a, p. 22)~~(ELMT, 2024a, p. 22)~~

Stephen's kangaroo rat is federally and State listed as threatened. None of the remaining aforementioned species are federally or State listed as threatened or endangered. In addition, western spadefoot, coast horned lizard, San Diegan whiptail, red-diamond rattlesnake, California horned lark, Lawrence's goldfinch, loggerhead shrike, northern harrier, Southern California rufous-crowned sparrow, white-tailed kite, and Stephen's kangaroo rat are covered species under the MSHCP. Of the aforementioned avian species, only California horned lark and Cooper's hawk might be expected to nest within the Study Area; the remaining avian species are not expected to nest within the Study Area due to the lack of suitable nesting habitat or opportunities. (ELMT, 2025a, p. 22)~~(ELMT, 2024a, p. 22)~~

Due to regional significance and pending listing status, the potential occurrence of Crotch's bumblebee (*Bombus crotchii*) is evaluated herein. The Crotch's bumblebee is a candidate species for listing status under the California Endangered Species Act (CESA). It is a colonial species that lives almost exclusively from coastal California east towards the Sierra-Cascade Crest and can be found uncommonly in western Nevada and south through Baja California. The Crotch's bumblebee inhabits grassland and scrub habitats in hotter and drier climates than most other bumblebee species and is only capable of tolerating a narrow range of climatic conditions. This species feeds on a variety of annual and perennial plant species, classifying it as a dietary generalist. It usually nests underground, often in abandoned rodent dens. The limited plant species diversity supported within the non-native grassland and disturbed Riversidean sage scrub plant communities within the Study Area provide at best minimal foraging habitat for Crotch's bumblebee. Further, the density of available vegetation and thoroughly mixed and compacted soils within the Study Area do not provide suitable burrowing

conditions for this species. Therefore, the Study Area was determined not to have potential to support Crotch's bumblebee. (ELMT, 2025a, p. 23)~~(ELMT, 2024a, pp. 22-23)~~

3. *Special-Status Plant Communities*

The CNDDB lists three (3) special-status habitats as being identified within the Steele Peak and Perris quadrangles: Southern Coast Live Oak Riparian Forest, Southern Cottonwood Willow Riparian Forest, and Southern Sycamore Alder Riparian Woodland. None of these special-status plant communities occur within the Study Area. (ELMT, 2025a, p. 23)~~(ELMT, 2024a, p. 23)~~

G. *Critical Habitat*

Under the federal Endangered Species Act (ESA), "Critical Habitat" is designated at the time of listing of a species or within one year of listing. Critical Habitat refers to specific areas within the geographical range of a species at the time it is listed that include the physical or biological features that are essential to the survival and eventual recovery of that species. Maintenance of these physical and biological features requires special management considerations or protection, regardless of whether individuals or the species are present or not. All federal agencies are required to consult with the United States Fish and Wildlife Service (USFWS) regarding activities they authorize, fund, or permit which may affect a federally listed species or its designated Critical Habitat. The purpose of the consultation is to ensure that projects will not jeopardize the continued existence of the listed species or adversely modify or destroy its designated Critical Habitat. The designation of Critical Habitat does not affect private landowners, unless a project they are proposing is on federal lands, uses federal funds, or requires federal authorization or permits (e.g., funding from the Federal Highways Administration or a CWA Permit from the United States Army Corps of Engineers ["Corps"]). If there is a federal nexus, then the federal agency that is responsible for providing the funding or permit would consult with the USFWS. (ELMT, 2025a, p. 23)~~(ELMT, 2024a, p. 23)~~

The Study Area is not located with federally designated Critical Habitat. The nearest designated Critical Habitats are located approximately five miles southeast for spreading navarretia (*Navarretia fossalis*) and thread-leaved brodiaea (*Brodiaea filifolia*), as shown on Exhibit 7 (Critical Habitat) of the Project's HA report (*Technical Appendix D1*). (ELMT, 2025a, p. 23)~~(ELMT, 2024a, p. 23)~~

H. *Focused Survey Results*

Glenn Lukos Associates (herein, "GLA") conducted focused surveys for burrowing owl and fairy shrimp within all suitable habitats in 2023 and 2024. Survey dates, conditions, and results are presented below. (ELMT, 2025a, p. 24)~~(ELMT, 2024a, p. 23)~~

1. *Burrowing Owl*

Burrowing owl is currently designated as a Candidate Species for Listing under the California Endangered Species Act~~California Species of Special Concern~~. The burrowing owl is a grassland specialist distributed throughout western North America where it occupies open areas with short vegetation and bare ground within shrub, desert, and grassland environments. Burrowing owls use a wide variety of arid and semi-arid environments with level to gently-sloping areas characterized by open vegetation and bare ground. The western burrowing owl (*Athene cunicularia* ssp. *hypugaea*), which occurs throughout the western United States

including California, rarely digs its own burrows and is instead dependent upon the presence of burrowing mammals (i.e., California ground squirrels, coyotes, and badgers) whose burrows are often used for roosting and nesting. The presence or absence of colonial mammal burrows is often a major factor that limits the presence or absence of burrowing owls. Where mammal burrows are scarce, burrowing owls have been found occupying man-made cavities, such as buried and non-functioning drainpipes, stand-pipes, and dry culverts. They also require low growth or open vegetation allowing line-of-sight observation of the surrounding habitat to forage and watch for predators. In California, the burrowing owl breeding season extends from the beginning of February through the end of August. (ELMT, 2025a, pp. 35-36)~~(ELMT, 2024a, p. 33)~~

No burrowing owls or sign (e.g., whitewash, pellets, burrow decoration) were observed during the April 6, June 20, July 7, and July 14, 2023, focused surveys for the burrowing owl. Therefore, burrowing owls are considered absent from the Project site. (ELMT, 2025a, p. 24)~~(ELMT, 2024a, p. 24)~~

2. *Fairy shrimp*

During general site surveys in January and March 2023, GLA observed 22 road-rut features that exhibited ponding and might have potential to support listed fairy shrimp (refer to Exhibit 6 of the Project's HA, included as *Technical Appendix D1*). These features required protocol surveys (dry season and wet season) to determine the presence or absence of listed fairy shrimp, which were completed in 2023 and 2024. (ELMT, 2025a, p. 24)~~(ELMT, 2024a, p. 24)~~

During the dry season surveys conducted by GLA, no listed fairy shrimp were identified within the Study Area, as only the common Lindahl's fairy shrimp (*Branchinecta lindahli*) were documented as occurring within the Survey Area. During the wet season surveys conducted during the 2023 to 2024 wet season, no listed fairy shrimp were identified within the Study Area, as only common Lindahl's fairy shrimp were documented within the Study Area. Accordingly, and based on the dry and wet season survey results, listed fairy shrimp species are considered absent from the Study Area. (ELMT, 2025a, p. 24)~~(ELMT, 2024a, p. 24)~~

During the wet season surveys conducted by GLA, and as documented in EIR *Technical Appendix D4*, a total of 21 features were sampled during the 2023-2024 wet season. Of the 21 features sampled, three features supported fairy shrimp. The results of the wet season survey determined that only the common versatile fairy shrimp was present within three of the depressional features. The results of the analysis determined that the Project site is not occupied with any sensitive fairy shrimp species, such as Riverside fairy shrimp, Santa Rosa Plateau fairy shrimp, or vernal pool fairy shrimp. (GLA, 2024, p. 3)

I. *Jurisdictional Waters*

1. *State and Federal Jurisdictional Waters*

There are three key agencies that regulate activities within inland streams, wetlands, and riparian areas in California. The United States Army Corps of Engineers ("Corps") Regulatory Branch regulates discharge of dredge and/or fill materials into "waters of the United States" pursuant to Section 404 of the Federal Clean Water Act (CWA) and Section 10 of the Rivers and Harbors Act. Of the State agencies, the Santa Ana Regional Water Quality Control Board (RWQCB) regulates discharges into surface waters pursuant to Section 401 of the CWA and the California Porter-Cologne Water Quality Control Act, and the California Department of Fish

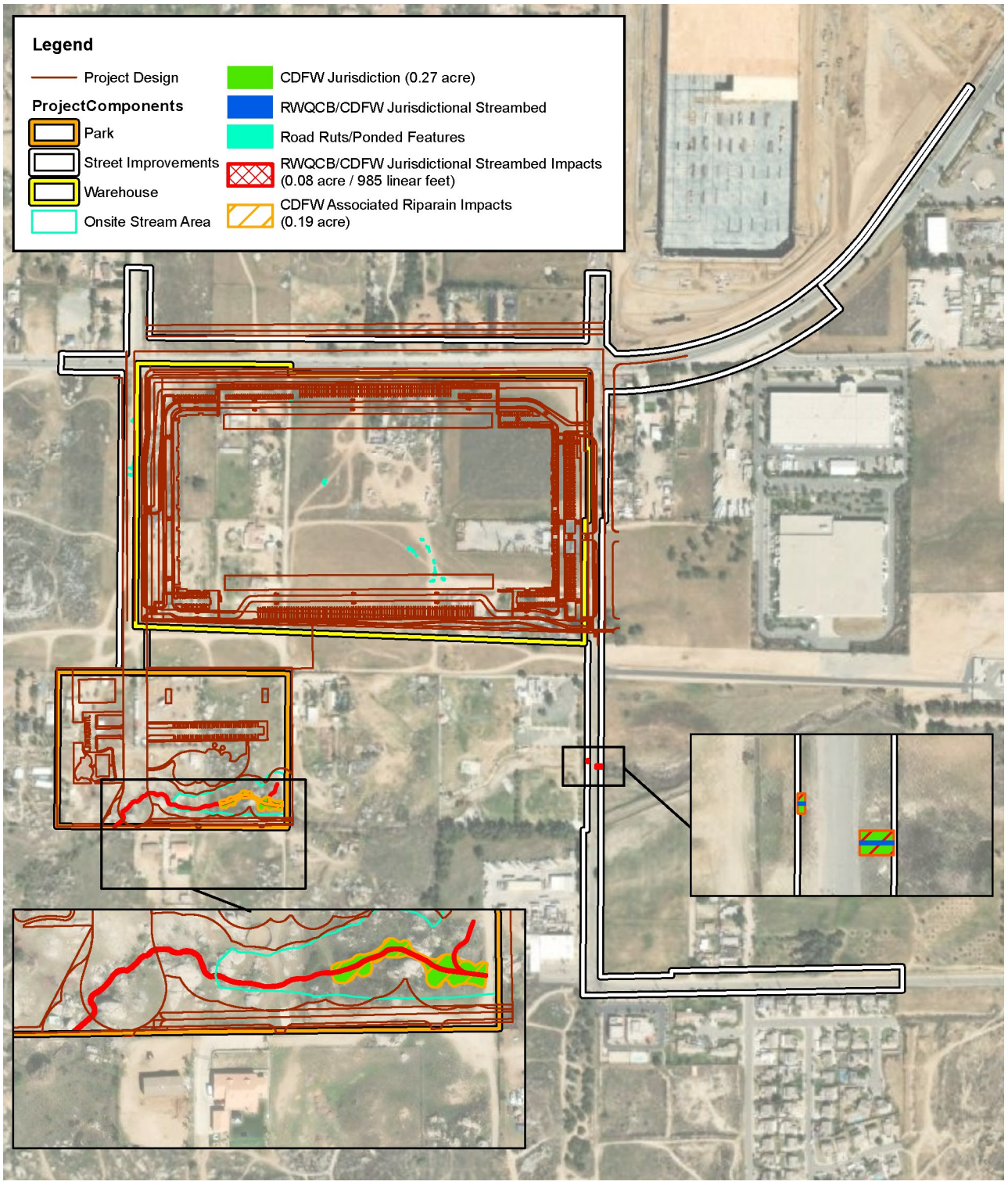
and Wildlife (CDFW) regulates alterations to streambed and associated plant communities pursuant to Section 1602 of the California Fish and Game Code. (ELMT, 2024, p. 7)~~(ELMT, 2024c, p. 7)~~

As shown on Figure 4.4-2, *Jurisdictional Areas*, the Project site supports two jurisdictional drainage features (Drainage A and Tributary A-1) within the 14.94 acres proposed for park uses in the southern portion of the Project site.

Drainage A enters the site from an elevated undeveloped rocky outcrop to the southwest. Drainage A conveys flows eastward towards two eight-inch culverts that convey flows beneath the unnamed access road that bounds the southern portion of the site to the east. Off-site, Drainage A continues conveying flows eastward towards two 36-inch corrugated metal pipe culverts, ultimately terminating at a MWD facility located approximately 0.25-mile to the east. Within site boundaries, Drainage A conveys flows for approximately 877 linear feet and has an Ordinary High Water Mark (OHWM) that varies in width from approximately 2 to 4 feet. No wetland vegetation or hydric soils were observed. Surface water was present throughout Drainage A due to a storm that had passed through the area in the days preceding the survey. During the field delineation, approximately 286 feet of moderately disturbed riparian stream was observed. Riparian vegetation associated with Drainage A consisted of black willow (*Salix gooddingii*), mule fat (*Baccharis salicifolia*), tree tobacco (*Nicotiana glauca*), castor bean (*Ricinis communis*), and tamarisk (*Tamarix ramosissima*). Vegetation within the understory of the riparian vegetation consisted of disturbed Riversidean sage scrub and non-native/ruderal grasses and annual species. No hydrophytic vegetation was observed within the riparian understory. (ELMT, 2024, p. 21)~~(ELMT, 2024c, p. 18)~~

Tributary A-1 originates at a small rip-rap apron adjacent to the unnamed access road that bounds the southern portion of the site to the east. The rip-rap was assumed to have been installed to decrease erosion along the north/south dirt access road. Tributary A-1 conveys flows to the southwest for approximately 108 feet until converging with Drainage A. The OWHM for Tributary A-1 was approximately 2 feet in width. Vegetation associated with Tributary A-1 consisted of upland non-native grasses and ruderal annuals such as London rocket (*Sisymbrium irio*), red-stemmed filaree (*Erodium cicutarium*), cheeseweed (*Malva parviflora*), common fiddleneck (*Amsinckia intermedia*), ripgut grass (*Bromus diandrus*), stink net (*Oncosiphon piluliferum*), summer mustard (*Hirschfeldia incana*), and Russian thistle (*Salsola australis*). (ELMT, 2024, p. 21)~~(ELMT, 2024c, pp. 18-19)~~

The on-site ephemeral drainage features are not relatively permanent, standing, or continuously flowing bodies of water and, therefore, do not qualify as Waters of the United States under the regulatory authority of the Corps. However, both features qualify as waters of the State and fall under the regulatory authority of the RWQCB and CDFW. As summarized in Table 4.4-2*, Summary of State and Federal Jurisdictional Areas*, RWQCB jurisdiction within the Study Area totals approximately 0.09~~6~~-acre (985 linear feet), none of which consists of State wetlands. CDFW jurisdiction within the Study Area totals approximately 0.28~~7~~-acre (985 linear feet), of which approximately 0.192~~1~~-acre consists of riparian habitat and 0.09~~6~~-acre supports streambed. (ELMT, 2024, p. 21)~~(ELMT, 2024c, p. 21)~~



Source(s): ELMT (07-11-2024)

Figure 4.4-2

Not to Scale

Jurisdictional Areas

Table 4.4-2 Summary of State and Federal Jurisdictional Areas

Jurisdictional Feature	ACOE Jurisdictional Acreage (Linear Feet)	RWQCB Jurisdictional Acreage (Linear Feet)	CDFW Jurisdictional Acreage (Linear Feet)
Drainage A	0.00 (0.00)	0.0855~~57~~ (877)	0.275 (877)
Tributary A-1	0.00 (0.00)	0.0053~~53~~ (108)	0.0050~~503~~ (108)
Totals:	**0.00 (0.00)**	**0.096~~96~~ (985)**	**0.287~~87~~ (985)**

(ELMT, 2024, Table ES-1)~~(ELMT, 2024c, Table ES-1)~~

2. *MSHCP Riparian/Riverine Areas and Vernal Pools*

Riparian/Riverine Areas

As defined under Section 6.1.2 of the MSHCP (Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools), riparian/riverine areas are areas dominated by trees, shrubs, persistent emergent plants, or emergent mosses and lichens which occur close to or are dependent upon nearby freshwater, or areas with freshwater flowing during all or a portion of the year. Conservation of these areas is intended to protect habitat that is essential to a number of listed or special-status water-dependent fish, amphibian, avian, and plant species. Any alteration or loss of riparian/riverine habitat from development of a project requires the preparation of a Determination of Biologically Equivalent or Superior Preservation (DBESP) analysis to ensure the replacement of any lost functions and values of habitats for the listed species. This assessment is independent from considerations given to waters of the United States and waters of the State under the CWA, the California Porter-Cologne Water Quality Control Act, and CDFW jurisdictional streambed under the California Fish and Game Code. (ELMT, 2025a, p. 28)~~(ELMT, 2024a, p. 28)~~

The Project site contains approximately 0.28~~7~~-acre of MSHCP Riparian/Riverine areas, of which 0.192~~1~~-acre is considered disturbed southern willow scrub riparian habitat associated with Drainage A (riparian habitat) and 0.09~~6~~-acre consist of riverine habitat. While stands of sparse black willow and mulefat are present, the majority of the canopy layer of this plant community is composed of tree tobacco, castor bean, and tamarisk, which diminishes the suitability of the site for special-status wildlife species dependent upon riparian plant communities. (ELMT, 2025a, p. 28)~~(ELMT, 2024a, p. 28)~~

The composition of the disturbed southern willow scrub supported on-site has been degraded by these dominant species such that contiguous willow canopies are no longer present. In addition, these plant species have reduced the availability of suitable habitats for native riparian understory species, and the understory of the disturbed southern willow scrub supported by the project site consists almost of native upland species and non-native herbaceous species with no native wetland obligate species present. Due to incomplete canopy, limited acreage, and lack of riparian plant species diversity of the disturbed southern willow scrub supported on-site, the habitat associated with the on-site drainages features does not provide suitable habitat for any of the riparian obligate species listed under the MSHCP that may occur within the regional vicinity, including the State- and federally-listed as endangered least Bell's Vireo (Vireo bellii pusillus [LBVI]), southwestern willow flycatcher (*Empidonax traillii extimus*), or yellow-billed cuckoo (*Coccyzus americanus*). (ELMT, 2025a, p. 31)~~(ELMT, 2024a, p. 30)~~

The highly degraded and inconsistent canopy of the disturbed southern willow scrub precludes nesting by LBVI, southwestern willow flycatcher, and yellow-billed cuckoo, as these species require dense, sprawling

canopies to obscure nests from predators. Further, LBVI and southwestern willow flycatcher each require minimum nesting territories of 0.5-acre, which exceeds the available riparian habitats supported on site. In addition, the lack of native plant diversity reduces the availability of insect prey for these species. As a result, no focused surveys were conducted or recommended by ELMT, as these species are considered to be absent from the Project site. (ELMT, 2025a, p. 31)~~(ELMT, 2024a, pp. 30-31)~~

Vernal Pools

Vernal pools are seasonally inundated, ponded areas that only form in regions where specialized soil and climatic conditions exist. During fall and winter rains typical of Mediterranean climates, water collects in shallow depressions where downward percolation of water is prevented by the presence of a hard pan or clay pan layer (duripan) below the soil surface. Later in the spring when rains decrease and the weather warms, the water evaporates and the pools generally disappear by May. The shallow depressions remain relatively dry until late fall and early winter with the advent of greater precipitation and cooler temperatures. Vernal pools provide unusual "flood and drought" habitat conditions to which certain plant and wildlife species have specifically adapted as well as invertebrate species such as fairy shrimp. (ELMT, 2025a, p. 32)~~(ELMT, 2024a, p. 31)~~

One of the factors for determining the suitability of the habitat for fairy shrimp would be demonstrable evidence of seasonal ponding in an area of topographic depression that is not subject to flowing waters. These astatic pools typically are characterized as vernal pools. More specifically, vernal pools are seasonal wetlands that occur in depression areas without a continual source of water. They have wetland indicators of all three parameters (soils, vegetation, and hydrology) during the wetter portion of the growing season but normally lack wetland indicators of hydrology and/or vegetation during the drier portion of the growing season. Obligate hydrophytes and facultative wetlands plant species normally are dominant during the wetter portion of the growing season. The determination that an area exhibits vernal pool characteristics and the definition of the watershed supporting vernal pool hydrology is made on a case-by-case basis. Such determinations should consider the length of time the area exhibits upland and wetland characteristics and the manner in which the area fits into the overall ecological system as a wetland. The seasonal hydrology of vernal pools provides for a unique environment, which supports plants and invertebrates specifically adapted to a regime of winter inundation, followed by an extended period when the pool soils are dry. (ELMT, 2025a, p. 32)~~(ELMT, 2024a, p. 31)~~

The MSHCP lists two general classes of soils known to be associated with special-status plant species: clay soils and Traver-Domino Willow association soils. The specific clay soils known to be associated with special-status species within the MSHCP plan area include Bosanko, Auld, Altamont, and Porterville series soils, whereas the Traver-Domino Willows association includes saline-alkali soils largely located along floodplain areas of the San Jacinto River and Salt Creek. Without the appropriate soils to create the impermeable restrictive layer, none of the special-status species associated with vernal pools can occur. Exeter sandy loam (0 to 2 percent slopes) and Madera fine sandy loam (0 to 2 percent slopes) are mapped as historically underlying the Study Area. In addition, agricultural land uses spanning much of the past century have thoroughly mixed and compacted on-site soils, such that conditions suitable for the formation of vernal pools are no longer present. (ELMT, 2025a, p. 32)~~(ELMT, 2024a, p. 32)~~

The Project site contains several road rut features that pond seasonally. Although these features exhibit hydrology, the features are compacted and lack hydric soils, and the features do not support any vegetation. Based on a review of historic aerial photographs and observations during the field investigations, ELMT concludes that there is no indication of vernal pools. However, these depressions features/ponded areas have the potential to provide suitable fairy shrimp habitat within the Project site and off-site street improvement areas. (ELMT, 2025a, p. 32)~~(ELMT, 2024a, p. 32)~~

Below is a summary of the fairy shrimp known to occur in Western Riverside County and their potential to occur within the Study Area.

- Riverside fairy shrimp (*Streptocephalus woottoni*): Riverside fairy shrimp are restricted to deep seasonal vernal pools, vernal pool like ephemeral ponds, and stock ponds and other human modified depressions. They prefer warm-water pools that have low to moderate dissolved solids, are less predictable, and remain filled for extended periods of time. Basins that support Riverside fairy shrimp typically are dry for a portion of the year, but usually are filled by late fall, winter, or spring during the rainy season, and may persist through May. Known habitat occurs within annual grasslands, which may be interspersed through chaparral or coastal sage scrub vegetation. In Riverside County, Riverside fairy shrimp have been found in pools formed over the following soils: Murrieta stony clay loams, Las Posas series, Wyman clay loam, and Willows soils. (ELMT, 2025a, p. 33)~~(ELMT, 2024a, p. 32)~~

  No soils that are known to support Riverside fairy shrimp occur within the Study Area. While ponding was observed during the field investigation, this was due to recent storm events and heavy soil compaction caused by recent disturbances. In addition, during wet and dry season surveys for listed Branchiopods, only the common versatile fairy shrimp was detected, and no Riverside fairy shrimp were identified in any of the features that were sampled during the 2023-2024 wet and dry seasons. Therefore, the Study Area was determined not to provide suitable habitat for Riverside fairy shrimp. (ELMT, 2025a, p. 33; GLA, 2024, p. 3)~~(ELMT, 2024a, p. 32; GLA, 2024, p. 3)~~

- Santa Rosa Plateau fairy shrimp (*Linderiella santarosae*): Santa Rosa Plateau fairy shrimp are restricted to seasonal southern basalt flow vernal pools with cool clear to milky waters that are moderately predictable and remain filled for extended periods of time and are known only from vernal pool on the Santa Rosa Plateau. Since the Study Area is not located within the known area where Santa Rosa Plateau fairy shrimp have been documented, and no indicators of historic water ponding or astatic water conditions were observed within the Study Area, Santa Rosa Plateau fairy shrimp are not expected to occur. In addition, during wet and dry season surveys for listed Branchiopods, only the common versatile fairy shrimp was detected, and no Santa Rosa Plateau fairy shrimp were identified in any of the features that were sampled during the 2023-2024 wet and dry seasons. Therefore, the Study Area was determined not to provide suitable habitat for Santa Rosa Plateau fairy shrimp. (ELMT, 2025a, p. 33; GLA, 2024, p. 3)~~(ELMT, 2024a, pp. 32-33; GLA, 2024, p. 3)~~

- Vernal pool fairy shrimp (*Branchinecta lynchi*): Vernal pool fairy shrimp are restricted to seasonal vernal pools (vernal pools and alkali vernal pools) and prefer cool-water pools that have low to moderate dissolved solids, are unpredictable, and often short lived. The vernal pool fairy shrimp is known from four locations in Western Riverside County MSHCP Plan Area: Skunk Hollow, the Santa

Rosa Plateau, Salt Creek, and the vicinity of the Pechanga Indian Reservation. The Study Area is not located within or adjacent to the four known populations, and no indicators of historic water ponding or astatic water conditions were observed on site. In addition, during wet and dry season surveys for listed Branchiopods, only the common versatile fairy shrimp was detected, and no vernal pool fairy shrimp were identified in any of the features that were sampled during the 2023-2024 wet and dry seasons. Therefore, the Study Area was determined not to provide suitable habitat for vernal pool fairy shrimp. (ELMT, 2025a, p. 33; GLA, 2024, p. 3)~~(ELMT, 2024a, p. 33; GLA, 2024, p. 3)~~

4.4.2 APPLICABLE ENVIRONMENTAL REGULATIONS

A. Federal Regulations

1. Endangered Species Act (ESA) of 1973

The purpose of the federal Endangered Species Act (ESA) is to protect and recover imperiled species and the ecosystems upon which they depend. It is administered by the U.S. Fish and Wildlife Service (USFWS) and the Commerce Department's National Marine Fisheries Service (NMFS). The USFWS has primary responsibility for terrestrial and freshwater organisms, while the responsibilities of NMFS are mainly marine wildlife such as whales and anadromous fish such as salmon. Under the ESA, species may be listed as either endangered or threatened. "Endangered" means a species is in danger of extinction throughout all or a significant portion of its range. "Threatened" means a species is likely to become endangered within the foreseeable future. All species of plants and animals, except pest insects, are eligible for listing as endangered or threatened. (USFWS, 2017)

The ESA makes it unlawful for a person to take a listed animal without a permit. Take is defined as "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect or attempt to engage in any such conduct." Through regulations, the term "harm" is defined as "an act which actually kills or injures wildlife. Such an act may include significant habitat modification or degradation where it actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding, or sheltering." Listed plants are not protected from take, although it is illegal to collect or maliciously harm them on federal land. Protection from commercial trade and the effects of federal actions do apply for plants. (USFWS, 2017)

Section 7 of the ESA requires federal agencies to use their legal authorities to promote the conservation purposes of the ESA and to consult with the USFWS and NMFS, as appropriate, to ensure that effects of actions they authorize, fund, or carry out are not likely to jeopardize the continued existence of listed species. During consultation, the "action" agency receives a "biological opinion" or concurrence letter addressing the proposed action. In the relatively few cases in which the USFWS or NMFS makes a jeopardy determination, the agency offers "reasonable and prudent alternatives" about how the proposed action could be modified to avoid jeopardy. It is extremely rare that a project ends up being withdrawn or terminated because of jeopardy to a listed species. (USFWS, 2017)

Section 10 of the ESA may be used by landowners including private citizens, corporations, tribes, states, and counties who want to develop property inhabited by listed species. Landowners may receive a permit to take such species incidental to otherwise legal activities, provided they have developed an approved habitat conservation plan (HCP). HCPs include an assessment of the likely impacts on the species from the proposed

action, the steps that the permit holder will take to avoid, minimize, and mitigate the impacts, and the funding available to carry out the steps. HCPs may benefit not only landowners but also species by securing and managing important habitat and by addressing economic development with a focus on species conservation. (USFWS, 2017)

2. Clean Water Act Section 401

Clean Water Act (CWA) § 401 water quality certification provides states and authorized tribes with an effective tool to help protect water quality, by providing them an opportunity to address the aquatic resource impacts of federally issued permits and licenses. Under § 401, a federal agency cannot issue a permit or license for an activity that may result in a discharge to waters of the U.S. until the state or tribe where the discharge would originate has granted or waived § 401 certification. The central feature of CWA § 401 is the state or tribe's ability to grant, grant with conditions, deny, or waive certification. Granting certification, with or without conditions, allows the federal permit or license to be issued consistent with any conditions of the certification. Denying certification prohibits the federal permit or license from being issued. Waiver allows the permit or license to be issued without state or tribal comment. States and tribes make their decisions to deny, certify, or condition permits or licenses based in part on the proposed project's compliance with Environmental Protection Agency (EPA)-approved water quality standards. In addition, states and tribes consider whether the activity leading to the discharge will comply with any applicable effluent limitations guidelines, new source performance standards, toxic pollutant restrictions, and other appropriate requirements of state or tribal law. (EPA, 2019a)

Many states and tribes rely on § 401 certification to ensure that discharges of dredge or fill material into a water of the U.S. do not cause unacceptable environmental impacts and, more generally, as their primary regulatory tool for protecting wetlands and other aquatic resources. However, § 401 is limited in scope and application to situations involving federally-permitted or licensed activities that may result in a discharge to a water of the U.S. If a federal permit or license is not required, or would authorize impacts only to waters that are not waters of the U.S., the activity is not subject to the CWA § 401. (EPA, 2019a)

3. Clean Water Act Section 404

Section 404 of the CWA establishes a program to regulate the discharge of dredged or fill material into waters of the United States, including wetlands. Wetlands subject to Clean Water Act Section 404 are defined as "areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas." Activities in waters of the United States regulated under this program include fill for development, water resource projects (such as dams and levees), infrastructure development (such as highways and airports) and mining projects. Section 404 requires a permit before dredged or fill material may be discharged into waters of the United States, unless the activity is exempt from Section 404 regulation (e.g. certain farming and forestry activities). (EPA, n.d.)

The basic premise of the program is that no discharge of dredged or fill material may be permitted if: (1) a practicable alternative exists that is less damaging to the aquatic environment; or (2) the nation's waters would be significantly degraded. Applications for permits must, to the extent practicable: (l) demonstrate steps have

been taken to avoid wetland impacts; (2) demonstrate that potential impacts on wetlands have been minimized; and (3) provide compensation for any remaining unavoidable impacts. Proposed activities are regulated through a permit review process. (EPA, n.d.)

An individual permit is required for potentially significant impacts. Individual permits are reviewed by the U.S. Army Corps of Engineers (USACE), which evaluates applications under a public interest review, as well as the environmental criteria set forth in the CWA Section 404(b)(1) Guidelines. However, for most discharges that will have only minimal adverse effects, a general permit may be suitable. General permits are issued on a nationwide, regional, or State basis for particular categories of activities. The general permit process eliminates individual review and allows certain activities to proceed with little or no delay, provided that the general or specific conditions for the general permit are met. States also have a role in Section 404 decisions, through state program general permits, water quality certification, or program assumption. (EPA, n.d.)

4. Executive Order 11990 – Protection of Wetlands

The purpose of Executive Order (EO) 11990 is to "minimize the destruction, loss or degradation of wetlands and to preserve and enhance the natural and beneficial values of wetlands." To meet these objectives, the Order requires federal agencies, in planning their actions, to consider alternatives to wetland sites and limit potential damage if an activity affecting a wetland cannot be avoided. (FEMA, 2020a) The Order applies to:

- Acquisition, management, and disposition of federal lands and facilities construction and improvement projects which are undertaken, financed, or assisted by federal agencies;

- Federal activities and programs affecting land use, including but not limited to water and related land resources planning, regulation, and licensing activities. (FEMA, 2020a)

The procedures require the determination of whether or not the proposed project will be in or will affect wetlands. If so, a wetlands assessment must be prepared that describes the alternatives considered. The procedures include a requirement for public review of assessments. (FEMA, 2020a)

5. Migratory Bird Treaty Act (16 USC Section 703-712)

The Migratory Bird Treaty Act (MBTA) makes it illegal for anyone to take, possess, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid permit issued pursuant to federal regulations. The migratory bird species protected by the MBTA are listed in 50 CFR 10.13. The USFWS has statutory authority and responsibility for enforcing the MBTA (16 U.S.C. 703-712). The MBTA implements Conventions between the United States and four countries (Canada, Mexico, Japan, and Russia) for the protection of migratory birds. (USFWS, 2020a)

B. State Regulations

1. California Endangered Species Act (CESA)

The California Endangered Species Act (CESA) states that all native species of fishes, amphibians, reptiles, birds, mammals, invertebrates, and plants, and their habitats, threatened with extinction and those experiencing

a significant decline which, if not halted, would lead to a threatened or endangered designation, will be protected or preserved. The California Department of Fish and Wildlife (CDFW) works with interested persons, agencies, and organizations to protect and preserve such sensitive resources and their habitats. CESA prohibits the take of any species of wildlife designated by the California Fish and Game Commission as endangered, threatened, or candidate species. CDFW may authorize the take of any such species if certain conditions are met. (CDFW, n.d.)

Section 2081 subdivision (b) of the California Fish and Game Code (CFGC) allows CDFW to authorize take of species listed as endangered, threatened, candidate, or a rare plant, if that take is incidental to otherwise lawful activities and if certain conditions are met. These authorizations are commonly referred to as incidental take permits (ITPs). (CDFW, n.d.)

If a species is listed by both the federal ESA and CESA, CFGC Section 2080.1 allows an applicant who has obtained a federal incidental take statement (federal Section 7 consultation) or a federal incidental take permit (federal Section 10(a)(1)(B)) to request that the Director of CDFW find the federal documents consistent with CESA. If the federal documents are found to be consistent with CESA, a consistency determination (CD) is issued and no further authorization or approval is necessary under CESA. (CDFW, n.d.)

A Safe Harbor Agreement (SHA) authorizes incidental take of a species listed as endangered, threatened, candidate, or a rare plant, if implementation of the agreement is reasonably expected to provide a net conservation benefit to the species, among other provisions. SHAs are intended to encourage landowners to voluntarily manage their lands to benefit CESA-listed species. California SHAs are analogous to the federal safe harbor agreement program and CDFW has the authority to issue a consistency determination based on a federal safe harbor agreement. (CDFW, n.d.)

2. Natural Community Conservation Planning Act (NCCP)

CDFW's Natural Community Conservation Planning (NCCP) program takes a broad-based ecosystem approach to planning for the protection and perpetuation of biological diversity. The NCCP program began in 1991 as a cooperative effort to protect habitats and species. It is broader in its orientation and objectives than the California and Federal Endangered Species Acts, as these laws are designed to identify and protect individual species that have already declined in number significantly. (CDFW, n.d.)

An NCCP identifies and provides for the regional protection of plants, animals, and their habitats, while allowing compatible and appropriate economic activity. Working with landowners, environmental organizations, and other interested parties, a local agency oversees the numerous activities that compose the development of an NCCP. CDFW and the USFWS provide the necessary support, direction, and guidance to NCCP participants. (CDFW, n.d.)

There are currently 17 approved NCCPs (includes 6 subarea plans) and more than 9 NCCPs in various stages of planning (includes 2 subarea plans), which together cover more than 8 million acres and will provide conservation for nearly 400 special status species and a wide diversity of natural community types throughout California. (CDFW, n.d.)

3. California Fish and Game Code, Section 1600, et seq.

CFGC section 1602 requires an entity to notify CDFW prior to commencing any activity that may do one or more of the following: (1) substantially divert or obstruct the natural flow of any river, stream, or lake; (2) substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or (3) deposit debris, waste or other materials that could pass into any river, stream, or lake. The CFGC indicates that "any river, stream or lake" includes those that are episodic (they are dry for periods of time) as well as those that are perennial (they flow year round). This includes ephemeral streams, desert washes, and watercourses with a subsurface flow. It may also apply to work undertaken within the flood plain of a body of water. (CDFW, n.d.)

CDFW requires a Lake and Streambed Alteration (LSA) Agreement when it determines that the activity, as described in a complete LSA Notification, may substantially adversely affect existing fish or wildlife resources. An LSA Agreement includes measures necessary to protect existing fish and wildlife resources. CDFW may suggest ways to modify a project that would eliminate or reduce harmful impacts to fish and wildlife resources. Before issuing an LSA Agreement, CDFW must comply with CEQA. (CDFW, n.d.)

4. Native Plant Protection Act (NPPA) of 1977

The Native Plant Protection Act (NPPA) was enacted in 1977 and allows the Fish and Game Commission to designate plants as rare or endangered. There are 64 species, subspecies, and varieties of plants that are protected as rare under the NPPA. The NPPA prohibits take of endangered or rare native plants, but includes some exceptions for agricultural and nursery operations; emergencies; and after properly notifying CDFW for vegetation removal from canals, roads, and other sites, changes in land use, and in certain other situations. (CDFW, n.d.)

5. Oak Woodlands Conservation Program

The Oak Woodlands Conservation Program offers landowners, conservation organizations, cities and counties an opportunity to obtain funding for projects designed to conserve and restore California's oak woodlands. While the Program is statewide in nature, it provides opportunities to address oak woodland issues on a regional priority basis. The Program is designed to help local efforts achieve oak woodland protection, and provides a mechanism to achieve sustainable ranch and farming operations and healthy oak woodlands. (WCB, n.d.)

6. Unlawful Take or Destruction of Nests or Eggs (CFGC Sections 3503.5-3513)

Section 3503.5 of the CFGC specifically protects birds of prey, stating: “It is unlawful to take, possess, or destroy any . . . [birds-of-prey] or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto.” Section 3513 of the CFGC duplicates the federal protection of migratory birds, stating: “It is unlawful to take or possess any migratory nongame bird as designated in the Migratory Bird Treaty Act or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the Migratory Bird Treaty Act.” (CA Legislative Info, n.d.)

7. Porter-Cologne Water Quality Act

The Porter-Cologne Act is the principal law governing water quality regulation in California. It establishes a comprehensive program to protect water quality and the beneficial uses of water. The Porter-Cologne Act applies to surface waters, wetlands, and ground water and to both point and nonpoint sources of pollution. Pursuant to the Porter-Cologne Act (California Water Code section 13000 et seq.), the policy of the State is as follows:

- That the quality of all the waters of the State shall be protected;
- That all activities and factors affecting the quality of water shall be regulated to attain the highest water quality within reason; and
- That the State must be prepared to exercise its full power and jurisdiction to protect the quality of water in the State from degradation. (SWRCB, 2014)

The Porter-Cologne Act established nine Regional Water Boards (based on hydrogeologic barriers) and the State Water Board, which are charged with implementing its provisions and which have primary responsibility for protecting water quality in California. The State Water Board provides program guidance and oversight, allocates funds, and reviews Regional Water Boards decisions. In addition, the State Water Board allocates rights to the use of surface water. The Regional Water Boards have primary responsibility for individual permitting, inspection, and enforcement actions within each of nine hydrologic regions. The State Water Board and Regional Water Boards have numerous Non-Point Source (NPS)-related responsibilities, including monitoring and assessment, planning, financial assistance, and management. (SWRCB, 2014)

The Regional Water Boards regulate discharges under the Porter-Cologne Act primarily through issuance of National Pollutant Discharge Elimination System (NPDES) permits for point source discharges and waste discharge requirements (WDRs) for NPS discharges. Anyone discharging or proposing to discharge materials that could affect water quality (other than to a community sanitary sewer system regulated by an NPDES permit) must file a report of waste discharge. The SWRCB and the RWQCBs can make their own investigations or may require dischargers to carry out water quality investigations and report on water quality issues. The Porter-Cologne Act provides several options for enforcing WDRs and other orders, including cease and desist orders, cleanup and abatement orders, administrative civil liability orders, civil court actions, and criminal prosecutions. (SWRCB, 2014)

The Porter-Cologne Act also requires adoption of water quality control plans that contain the guiding policies of water pollution management in California. A number of statewide water quality control plans have been adopted by the State Water Board. In addition, regional water quality control plans (basin plans) have been adopted by each of the Regional Water Boards and get updated as necessary and practical. These plans identify the existing and potential beneficial uses of waters of the State and establish water quality objectives to protect these uses. The basin plans also contain implementation, surveillance, and monitoring plans. Statewide and regional water quality control plans include enforceable prohibitions against certain types of discharges, including those that may pertain to nonpoint sources. Portions of water quality control plans, the water quality objectives and beneficial use designations, are subject to review by the EPA, when approved they become water quality standards under the CWA. (SWRCB, 2014)

C. Local and Regional Plans and Regulations

1. Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP)

The continued loss of habitat to new development and the cumbersome process of environmental review and habitat mitigation on a project-by-project basis led to preparation of the MSHCP. The MSHCP is a multi-jurisdictional accomplishment that provides a regional conservation solution to species and habitat issues. The primary intent of the MSHCP is to provide for the conservation of a range of plants and animals within natural communities characteristic of western Riverside County and in return, provide take coverage and mitigation for projects throughout the plan area to avoid the cost and delays of mitigating biological impacts on a project-by-project basis. (Riverside County, 2015, p. 4.8-49)

The MSHCP was adopted by Riverside County on June 17, 2003, and is a comprehensive, multijurisdictional Habitat Conservation Plan (HCP) pursuant to Section 10(a)(1)(B) of FESA, as well as an NCCP pursuant to the California Fish and Game Code. The USFWS issued a Biological Opinion and Federal ESA Section 10 permit for the MSHCP on June 22, 2004, and CDFW issued a Natural Community Conservation Planning (NCCP) Approval and Take Authorization on the same date. As long as adherence to the policies and requirements of the MSHCP is maintained, participants in the MSHCP, which include the County of Riverside and 18 cities, are allowed to authorize 'incidental take' of covered plant and wildlife species. (Riverside County, 2015, p. 4.8-49)

The MSHCP provides for the long-term survival of protected and sensitive species by designating a contiguous system of habitat to be added to existing public/quasi-public lands. The Plan includes an impact fee collected by the permittees and used in part to acquire these lands. Depending on the location of the private or public development project, certain biological studies are required for Plan compliance. These studies may identify the need for specific measures to avoid, minimize and reduce impacts to covered species and their habitat. (Riverside County, 2015, pp. 4.8-49 and 4.8-50)

The MSHCP defines two distinct consistency processes for development projects based on their location within the MSHCP's coverage area, with separate processes for projects located outside of Criteria Areas and those within a Criteria Area. Criteria Areas consist of 160-acre 'cells' with identified conservation objectives. (Riverside County, 2015, p. 4.8-50)

2. Stephens' Kangaroo Rat Habitat Conservation Plan (SKR HCP)

The Stephens' Kangaroo Rat Habitat Conservation Plan (SKR HCP) was prepared under the direction of the Riverside County Habitat Conservation Agency (RCHCA) Board of Directors, in consultation with USFWS and CDFW. The County of Riverside is a member agency of the RCHCA. The 30-year SKR HCP was designed to acquire and permanently conserve, maintain, and fund the conservation, preservation, restoration, and enhancement of Stephens' kangaroo rat-occupied habitat. The SKR HCP covers approximately 534,000 acres within the member jurisdictions and includes an estimated 30,000 acres of occupied Stephens' kangaroo rat habitat. The SKR HCP requires members to preserve and manage 15,000 acres of occupied habitat in seven Core Reserves encompassing over 41,000 acres. (Riverside County, 2015, p. 4.8-52)

On May 3, 1996, the USFWS issued a permit to the Riverside County Habitat Conservation Agency to incidentally take the federally endangered Stephens' kangaroo rat (*Dipodomys stephensi*). Similarly, the CDFW issued a California Endangered Species Act Management Authorization for Implementation of the Stephens' kangaroo rat on May 6, 1996. As of 2015, more than $50 million had been dedicated to the establishment and management of a system of regional preserves designed to ensure the survival of SKR in the plan area. This effort resulted in the permanent conservation of approximately 50% of the SKR-occupied habitat remaining in the HCP area. Through direct funding and in-kind contributions, SKR habitat in the regional reserve system is managed to ensure its continuing ability to support the species. Core reserves were deemed complete in December of 2003. (Riverside County, 2015, p. 4.8-52)

3. Riverside County Oak Tree Management Guidelines

In March 1993, the County of Riverside issued Oak Tree Management Guidelines to address the treatment of oak woodlands in areas where zoning and/or General Plan density restrictions allow the effective use of clustering. The guidelines are generally considered to be the most effective where minimum lot sizes are 2.5 acres or larger, or where oak woodlands are concentrated in a relatively small portion of a project site. The guidelines include recommendations for oak inventories, land use designs to cluster home sites in order to reduce impacts to oaks and mitigation measures for oak conservation. (Riverside County, 2015, p. 4.8-53)

4. Riverside County Ordinance No. 559 – Regulating the Removal of Trees

Riverside County Ordinance No. 559 regulates the removal of living native trees on parcels of property greater than one-half acre, located above 5,000 feet within the unincorporated area of Riverside County without first obtaining a permit to do so. The purpose of the ordinance is to ensure that the timberlands of Riverside County are protected and the ecological balance of such timberlands is preserved. (Riverside County, 2015, p. 4.8-53)

4.4.3 BASIS FOR DETERMINING SIGNIFICANCE

Section IV of Appendix G to the State CEQA Guidelines addresses typical adverse effects to biological resources, and includes the following threshold questions to evaluate the Project's impacts to biological resources (FHWA, 2017):

- *Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?*
- *Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?*
- *Would the Project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

- *Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?*
- *Would the Project Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*
- *Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

Significance thresholds are set forth in Riverside County's Environmental Assessment Checklist, are derived from Section IV of Appendix G to the State CEQA Guidelines (listed above), and state that the proposed Project would have a significant impact on biological resources if construction and/or operation of the Project would:

- *Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state conservation plan;*
- *Have a substantial adverse effect, either directly or through habitat modifications, on any endangered, or threatened species, as listed in Title 14 of the California Code of Regulations (Sections 670.2 or 670.5) or in Title 50, Code of Federal Regulations (Sections 17.11 or 17.12);*
- *Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U. S. Wildlife Service;*
- *Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites;*
- *Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U. S. Fish and Wildlife Service;*
- *Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means; or*
- *Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.*

The significance thresholds set forth in Riverside County's Environmental Assessment Checklist were used to evaluate the significance of the proposed Project's impacts to biological resources.

4.4.4 IMPACT ANALYSIS

Threshold a:	***Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state conservation plan?***

The Project area is subject to two separate habitat conservation plans: the Stephens' Kangaroo Rat HCP and the Western Riverside County MSHCP. Each is discussed below.

A. Project Consistency with the SKR HCP

As previously noted, the SKR HCP was prepared under the direction of the RCHCA Board of Directors, in consultation with USFWS and CDFW. Riverside County is a member agency of the RCHCA. According to Figure S-1 of the SKR HCP, the Study Area is not located within or adjacent to any SKR core reserve areas. Additionally, the Project Applicant would be required to contribute fees towards the establishment and long-term maintenance of the SKR HCP core reserve pursuant to Riverside County Ordinance No. 663. The Project would not conflict with any provisions of the SKR HCP; thus, a less-than-significant impact would occur.

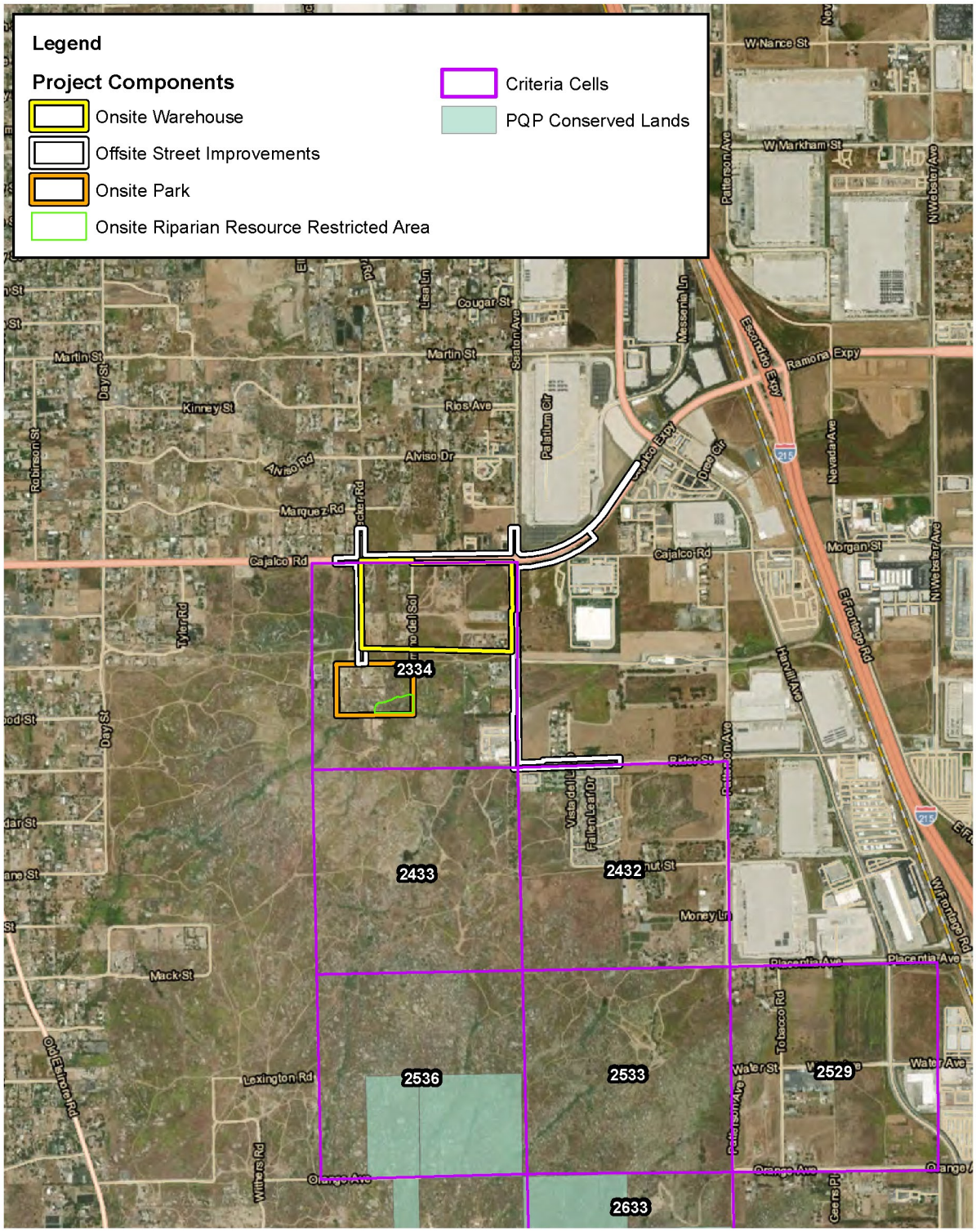
B. Project Consistency with the MSHCP

Provided below is an evaluation of the Project's consistency with MSHCP Reserve Assembly requirements, Section 6.1.2 (Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools), Section 6.1.3 (Protection of Narrow Endemic Plant Species), Section 6.1.4 (Guidelines Pertaining to the Urban/Wildlands Interface [UWIG]), and Section 6.3.2 (Additional Survey Needs and Procedures).

1. Project Consistency with MSHCP Reserve Assembly Requirements

The entire Project site occurs within the northern portions of MSHCP Criteria Cell 2334. Criteria Cell 2334 is an independent cell totaling approximately 160 acres in size. As noted by the MSHCP, conservation within Criteria Cell 2334 is intended to contribute to assembly of Proposed Noncontiguous Habitat Block 4. Conservation within this Cell is intended to focus on assembly of coastal sage scrub habitat. Areas conserved within this Cell are intended to be connected to coastal sage scrub habitat proposed for conservation in Cell Group A to the south. Conservation within this Cell is anticipated to comprise approximately 5% of the Cell focusing on the southern portion of the Cell. Using the 5% conservation for Criteria Cell 2334, approximately eight acres are described for conservation within this approximate 160-acre Criteria Cell. (ELMT, 2025a, pp. 42-43)~~(ELMT, 2024a, p. 42)~~

The Project site is located within the northern portion of Criteria Cell 2334, as depicted on Figure 4.4-3, *MSHCP Criteria Areas*. Because the MSHCP Conservation Criteria for Cell 2334 is focused on conserving approximately eight acres within the southern portions of the Criteria Cell, and because the Project site is located in the northern portions of Criteria Cell 2334, the Project site is located outside of the areas targeted conservation within this Cell. Furthermore, the Project site does not functionally contribute to Proposed Noncontiguous Habitat Block 4. Accordingly, implementation of the Project as proposed would not impede the conservation goals for Criteria Cell 2334. Potential indirect impacts to Proposed Noncontiguous Habitat Block 4 (i.e., noise, lighting, etc.) would be minimized with implementation of the MSHCP Urbans Wildlands



Source(s): ELMT (March 2025)

Figure 4.4-3

Not to Scale

MSHCP Criteria Areas

Guidelines, as discussed below. Accordingly, the proposed Project would not conflict with the MSHCP conservation requirements for Criteria Cell 2334, and as such the Project would be fully consistent with the MSHCP Reserve Assembly requirements. No impact would occur. (ELMT, 2025a, p. 43)~~(ELMT, 2024a, p. 42)~~

2. Project Consistency with MSHCP Section 6.1.2 (Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools)

Riparian and Riverine Impacts

As previously noted, the Project site contains approximately 0.28~~7~~-acre of MSHCP Riparian/Riverine areas, of which 0.19~~21~~-acre consists of disturbed southern willow scrub riparian habitat associated with Drainage A and 0.0~~9~~6-acre consists of riverine habitat. Project construction activities are expected to permanently impact approximately 0.05~~all 0.27~~-acre of ~~riparian/~~riverine habitat associated with Drainage A, while the remaining 0.23-acre of riparian/riverine habitat, plus a 1.7-acre upland buffer, would be avoided and placed into a conservation easement~~present on site~~. While stands of sparse black willow and mulefat are present, the majority of the canopy layer of this plant community is composed of tree tobacco, castor bean, and tamarisk, which diminishes the suitability of these areas for special-status wildlife species that are dependent upon riparian plant communities. (ELMT, 2025b, p. 10)~~(ELMT, 2024a, p. 28)~~

The composition of the disturbed southern willow scrub supported on-site has been degraded by these dominant species such that contiguous willow canopies are no longer present. In addition, these plant species have reduced the availability of suitable habitats for native riparian understory species, and the understory of the disturbed southern willow scrub supported by the Project site consists almost of native upland species and non-native herbaceous species with no native wetland obligate species present. Due to incomplete canopy, limited acreage, and lack of riparian plant species diversity of the disturbed southern willow scrub supported on-site, the habitat associated with the on-site drainages features does not provide suitable habitat for any of the riparian obligate species listed under the MSHCP that may occur within the regional vicinity, including the State- and federally-listed as endangered least Bell's Vireo, southwestern willow flycatcher, and yellow-billed cuckoo. ~~(ELMT, 2024a, p. 30)~~ (ELMT, 2025b, p. 11)

The highly degraded and inconsistent canopy of the disturbed southern willow scrub precludes nesting by LBVI, southwestern willow flycatcher, and yellow-billed cuckoo, as these species require dense, sprawling canopies to obscure nests from predators. Further, LBVI and southwestern willow flycatcher each require minimum nesting territories of 0.5-acre, which exceeds the available riparian habitats supported on-site. In addition, the lack of native plant diversity reduces the availability of insect prey for these species. As a result, no focused surveys were required for this species pursuant to MSHCP Section 6.1.2. Accordingly, no impacts to this species would occur from Project implementation. (ELMT, 2025b, p. 11)

In accordance with Section 6.1.2 of the MSHCP, a DBESP was prepared for the proposed Project and is included as EIR *Technical Appendix D2*. The Project's DBESP requires mitigation for impacts to 0.05~~27~~-acre of riverine habitat (areas that do not support riparian habitat) through the purchase of re-establishment and/or establishment mitigation credits through the Riverpark Mitigation Bank at a minimum 1:1 ratio. In the event no establishment and/or establishment credits are available, the Project's DBESP requires a mitigation to impact ratio of at least 2:1 of rehabilitation credits that would be needed to compensate for the loss of 0.05-

acre of riverine habitat on site. In the event that no off-site mitigation credits are available from Riverpark Mitigation Bank, the Project's DBESP requires the Project Applicant to mitigate impacts to 0.05-acre of riverine habitat on-site through the management (i.e., the removal of non-native woody plant species) of the 0.23-acre of the riparian/riverine habitat onsite that would be avoided as part of the Project. The 0.23-acre of riverine/riparian habitat currently supports invasive plant species (i.e., castor bean and tree tobacco, and tree of heaven) that would be removed to enhance the riparian/riverine habitat. The Project's DBESP further requires the Project Applicant to place a conservation easement over the 1.93-acre on-site conservation area (inclusive of the 0.23-acre of avoided riparian/riverine habitat and a 1.7-acre upland buffer). A Habitat Mitigation and Monitoring and Reporting Program (HMMRP) would be required and would be subject to review any approval by the Riverside County Environmental Programs Division (EPD), the Western Riverside County Regional Conservation Authority (RCA), USFWS, CDFW, and the RWQCB. Additionally, a Long-term Management Plan will be prepared and approved by the aforementioned agencies. If the onsite enhancement option is selected, an addendum to the DBESP would be required to be submitted to the County of Riverside prior to grading permit issuance. The addendum would include: (1) supplementary maps of the proposed onsite mitigation area, (2) a commitment to a conservation easement in favor of a qualified habitat maintenance organization, (3) funding for the selected organization to perform long-term maintenance, and (4) a requirement for the County to condition the Project to submit a Habitat Mitigation Monitoring and Reporting Program (HMMRP) for agency review at least 60 days prior to construction. ~~of riverine/riparian habitat via off-site preservation through the purchase of mitigation credits from the Riverpark Mitigation Bank and/or other approved bank (i.e., Skunk Hollow), or combination thereof at a ratio of 3:1. Preservation credits would be purchased out of the Skunk Hollow Mitigation bank if no other mitigation credits are available at a 4:1 ratio.~~ However, in the absence of mitigation the Project has the potential to conflict with the conservation requirements of MSHCP Section 6.1.2. This is evaluated as a potentially significant impact of the proposed Project for which mitigation, in the form of compensatory mitigation, would be required. (ELMT, 2025a, pp. 29-30)~~(ELMT, 2024a, pp. 29-30)~~

Vernal Pool Impacts

As previously noted, a review of recent and historic aerial photographs of the Study Area during wet and dry seasons did not provide visual evidence of an astatic or vernal pool conditions within the Study Area. The Project site supported agricultural land uses for several decades and has been heavily degraded by recent installation of flood control infrastructure and staging and storage activities associated with nearby construction activities, which have resulted in heavy compaction of on-site soils. The Project site contains 22 road rut features that pond seasonally. Although these features exhibit hydrology, the features are compacted and lack hydric soils, and the features do not support any vegetation. From the review of historic aerial photographs and observations during the field investigations, ELMT concludes that there is no indication of vernal pools or suitable fairy shrimp habitat occurring within the Study Area. As previously noted, and as confirmed by the Project's focused wet season fairy shrimp survey (EIR *Technical Appendix D4*), the Study Area does not contain suitable habitat for Riverside fairy shrimp, Santa Rosa Plateau fairy shrimp, or vernal pool fairy shrimp, and none of the depressions that occur on site are occupied by sensitive fairy shrimp species. Accordingly, the Project would not conflict with the provisions of MSHCP Section 6.1.2 related to vernal pools, and no impact would occur. (ELMT, 2025a, pp. 32-33)~~(ELMT, 2024a, pp. 31-33)~~

3. *Project Consistency with MSHCP Section 6.1.3 (Protection of Narrow Endemic Plant Species)*

Section 6.1.3 of the MSHCP, Protection of Narrow Endemic Plant Species, states that the MSHCP database does not provide sufficient detail to determine the extent of the presence/distribution of Narrow Endemic Plant Species within the MSHCP Plan Area. Additional surveys may be needed to gather information to determine the presence/absence of these species to ensure that appropriate conservation of these species occurs. Based on the Western Riverside County Regional Conservation Authority (RCA) MSHCP Information Map query and a review of the MSHCP, it was determined that the Study Area is not located within any designated survey area for Narrow Endemic Plant Species. Further, based on the results of the field investigation, the Study Area does not provide suitable habitat for MSHCP listed Narrow Endemic Plant Species. Accordingly, the Project has no potential to conflict with MSHCP Section 6.1.3, and no impact would occur. (ELMT, 2025a, p. 33)~~(ELMT, 2024a, p. 33)~~

4. *Project Consistency with MSHCP Section 6.1.4 (Urban/Wildlands Interface Guidelines)*

Section 6.1.4 of the MSHCP, Guidelines Pertaining to Urban/Wildlands Interface (UWIG), is intended to address indirect effects associated with development in proximity to MSHCP Conservation Areas. Portions of the Study Area (including the 64.98-acre Project site) are located within Criteria Cell 2334, with portions of the off-site improvement areas along Rider Street and Seaton Avenue extending into Criteria Cell 2433, which is part of Cell Group A, and Criteria Cell 2432, which is part of Cell Group B. These three Criteria Cells ~~which is~~ are intended to contribute to the Noncontiguous Habitat Block 4/the Motte-Rimrock Reserve. As a result, the Project is subject to compliance with the MSHCP Urban/Wildlands Interface Guidelines. Provided below is an assessment of the Project's consistency with the UWIG provisions related to drainage, toxics, lighting, noise, invasive plant species, barriers, and grading/land development. (ELMT, 2025a, p. 34)~~(ELMT, 2024a, p. 33)~~

Drainage

Proposed projects located in proximity to the MSHCP Conservation Areas are required to incorporate measures, including measures required through the National Pollutant Discharge Elimination System (NPDES) requirements, to ensure that the quantity and quality of runoff discharged to the MSHCP Conservation Areas is not altered in an adverse way when compared with existing conditions. In particular, measures are required to be put in place to avoid discharge of untreated surface runoff from developed and paved areas into the MSHCP Conservation Areas. Stormwater systems are required to be designed to prevent the release of toxins, chemicals, petroleum products, exotic plant materials or other elements that might degrade or harm biological resources or ecosystem processes within the MSHCP Conservation Areas. This can be accomplished using a variety of methods including natural detention basins, grass swales, or mechanical trapping devices. Regular maintenance also is required to ensure effective operations of runoff control systems. The Project's construction contractor would be required to develop a Stormwater Pollution Prevention Plan (SWPPP) to address potential runoff and water quality effects during construction. Following the completion of construction activities, and pursuant to the Project's Water Quality Management Plan ("WQMP"; EIR *Technical Appendix J2*), the Project's drainage system would provide detention and water quality treatment to ensure runoff from the site does not result in increased rates of runoff or pollution that could affect water quality in areas downstream. Mandatory compliance with the future-required SWPPP during construction and

the Project's WQMP under long-term operations would ensure that the Project does not conflict with the MSHCP provisions related to indirect drainage impacts. Accordingly, impacts would be less than significant. (ELMT, 2025a, p. 34)~~(ELMT, 2024a, p. 33)~~

Toxics

Land uses proposed in proximity to the MSHCP Conservation Area that use chemicals or generate bioproducts such as manure that are potentially toxic or may adversely affect wildlife species, habitat, or water quality are required to incorporate measures to ensure that application of such chemicals does not result in discharge to the MSHCP Conservation Area. As noted above, near-term construction activities would be subject to compliance with a SWPPP and long-term operations would be subject to compliance with the Project's WQMP, both of which would preclude the discharge of toxics from the Project site that could adversely affect the MSHCP Conservation Area. Additionally, park uses are not associated with the use or storage of toxic substances. As such, the Project would not conflict with the MSHCP provisions related to toxics, and impacts would be less than significant. (ELMT, 2025a, p. 34) ~~(ELMT, 2024a, p. 34)~~

Lighting

Night lighting is required to be directed away from the MSHCP Conservation Areas to protect species within the MSHCP Conservation Areas from direct night lighting. There is a potential that future implementing developments within the Project may require nighttime lighting during construction activities, specifically during night-time concrete pouring activities. Thus, during Project construction activities the Project has the potential to conflict with the lighting provisions of the MSHCP, resulting in a near-term significant impact.

Under long-term operating conditions, future development on site would be subject to compliance with Riverside County Ordinance No. 655 (Mt. Palomar Observatory) and Riverside County Ordinance No. 915 (Regulating Outdoor Lighting). In particular, Section 5 of Riverside County Ordinance No. 915 requires that "[a]ll outdoor luminaires in shall (*sic*) be located, adequately shielded, and directed such that no direct light falls outside the parcel of origin, or onto the public right-of-way." Riverside County would review future implementing projects (i.e., building permits) to ensure compliance with Riverside County Ordinance Nos. 655 and 915, which would ensure that long-term operational lighting does not adversely affect the MSHCP Conservation Areas. As such, under long-term conditions the Project would not conflict with the lighting provisions of the MSHCP, and impacts would be less than significant. (ELMT, 2025a, p. 34)~~(ELMT, 2024a, p. 34)~~

Noise

Noise has the potential to adversely affect sensitive wildlife species within the MSHCP Conservation Area. Proposed noise generating land uses affecting the MSHCP Conservation Area are required to incorporate setbacks, berms, or walls to minimize the effects of noise on MSHCP Conservation Area resources pursuant to applicable rules, regulations, and guidelines related to land use noise standards. For planning purposes, wildlife within the MSHCP Conservation Area should not be subject to noise that would exceed residential noise standards (i.e., 80 dBA Leq and 70 dBA Leq for daytime and nighttime construction noise, respectively, and 55 dBA Leq for long-term operations). (ELMT, 2025a, pp. 34-35)~~(ELMT, 2024a, p. 33)~~

In order to assess the Project's potential to result in construction- and operational-related noise impacts, the Project's Noise Impact Analysis ("NIA"; included as EIR *Technical Appendix L*) includes an analysis of potential noise impacts on potential future conservation areas associated with Criteria Cell 2334. As shown on EIR Figure 4.13-8, Receptor R6 is located immediately south of the proposed public park site and represents potential future conservation areas within Criteria Cell 2334. As indicated in EIR Table 4.13-9, typical construction activities associated with the Project would expose Receptor R6 to noise levels up to 66.0 dBA Leq, which would not exceed the residential noise threshold of 80 dBA Leq. EIR Table 4.13-10 shows that nighttime concrete pouring activities associated with the Project's proposed warehouse building would expose Receptor R6 to noise levels up to 34.5 dBA Leq, which would not exceed the residential noise threshold of 80 dBA Leq. In addition, EIR Table 4.13-11 shows that Receptor R6 would be exposed to Project construction-related blasting noise levels up to 72.1 dBA Lmax, which would not exceed the OSMRE and the CFR standards for airblasts. Accordingly, the analysis presented in the Project's NIA and in EIR Subsection 4.13 demonstrates that Project-related construction activities would not expose potential nearby MSHCP conservation areas to excessive noise levels, and as such Project construction activities would not conflict with the noise provisions set forth by MSHCP Section 6.1.4. Impacts would be less than significant.

As shown on EIR Figure 4.13-5, the analysis of potential Project-related operational noise impacts includes two receptor locations, Receptors BIO-11 and BIO-12, located along the eastern and southern boundaries of the proposed public park site in the southern portions of the Project site. These receptor locations were selected to represent potential future indirect noise impacts that could adversely affect future conservation areas within Criteria Cell 2334. As shown in EIR Table 4.13-4, Project operations would expose Receptor BIO-11 to daytime noise levels of up to 54.5 dBA Leq and nighttime noise levels of up to 51.5 dBA Leq, which would not exceed the identified residential noise standard of 55 dBA Leq. Accordingly, the analysis presented in EIR Subsection 4.13 demonstrates that Project-related long-term operational activities would not expose potential nearby MSHCP conservation areas to excessive noise levels, and as such Project operational activities would not conflict with the noise provisions set forth by MSHCP Section 6.1.4. Impacts would be less than significant.

Invasive Species

Projects adjacent to the MSHCP Conservation Areas are required to avoid the use of invasive plant species in landscaping, including invasive, non-native plant species listed in Volume I, Table 6-2 of the MSHCP. The Project's Plot Plan No. 220050 (PPT 220050) application materials include Conceptual Landscape Plans for both the northern and southern portions of the Project site, which are presented on EIR Figures 3-23 and 3-24, respectively. Based on a review of the plant species included on the Project's Conceptual Landscape Plans, none of the plant species listed on MSHCP Volume I, Table 6-2 are included in the Project's landscape plan plant palette. As part of future grading and building permit applications, Riverside County would review the grading and building plans to ensure consistency with the list of plant species identified as part of the PPT 220050 Conceptual Landscape Plans, which would ensure that none of the prohibited plant species listed in MSHCP Table 6-2 ultimately are planted on site. Accordingly, the Project would not conflict with the MSHCP provisions related to invasive species, and on this basis the Project would not conflict with MSHCP Section 6.1.4. No impact would occur. (ELMT, 2025a, p. 35)~~(ELMT, 2024a, p. 33)~~

Barriers

Proposed land uses adjacent to the MSHCP Conservation Areas are required to incorporate barriers, where appropriate in individual project designs, to minimize unauthorized public access, domestic animal predation, illegal trespass or dumping in the MSHCP Conservation Areas. Such barriers may include native landscaping, rocks/boulders, fencing, walls, signage and/or other appropriate mechanisms. As previously noted, the Project site is located within the northern portions of MSHCP Criteria Cell 2334. Conservation within Cell 2334 is intended to comprise approximately 5% of the 160-acre Criteria Cell, focusing on the southern portion of the cell. No portion of the Project site is targeted for conservation under the MHSPC, and no MSHCP conservation areas are proposed on site. While it is possible that future conservation areas could occur in close proximity to the Project site, any barriers required for such future conservation areas would be installed in conjunction with the dedication of such lands to the MSHCP Reserve System. There are no components of the proposed Project that would have the potential to conflict with the barriers provisions of MSHCP Section 6.1.4. Accordingly, potential impacts due to a conflict with MSHCP Section 6.1.4 requirements related to barriers would be less than significant. (ELMT, 2025a, p. 35)~~(ELMT, 2024a, p. 33)~~

Grading/Land Development

The MSHCP states that manufactured slopes associated with development shall not extend into the MSHCP Conservation Areas. As depicted on the grading plan included as part of PPT 220050, Project grading would not extend into the portions of Cell 2334 that may be conserved in the future as part of the MSHCP Reserve System. All grading activities at the public park site in the southern portions of the Project site would occur on site, with exception of off-site roadway and drainage improvements, neither of which would occur adjacent to areas planned for conservation by the MSHCP. As such, the Project would not conflict with the MSHCP requirements related to grading and land development, and impacts would be less than significant. (ELMT, 2025a, p. 35)~~(ELMT, 2024a, p. 33)~~

5. Project Consistency with MSHCP Section 6.3.2 (Additional Survey Needs and Procedures)

In accordance with Section 6.3.2 of the MSHCP, Additional Survey Needs and Procedures, additional surveys may be needed for certain species in order to achieve coverage for these species. The query of the RCA MSHCP Information Map and review of the MSHCP determined that the Study Area is located within the designated survey area for burrowing owl as depicted in Figure 6-4 within Section 6.3.2 of the MSHCP. The Project site is not located within the survey area for any other species pursuant to MSHCP Section 6.3.2. (ELMT, 2025a, p. 35) ~~(ELMT, 2024a, p. 35)~~

Burrowing owl is currently designated as a California Species of Special Concern (SSC). The burrowing owl is a grassland specialist distributed throughout western North America where it occupies open areas with short vegetation and bare ground within shrub, desert, and grassland environments. Burrowing owls use a wide variety of arid and semi-arid environments with level to gently-sloping areas characterized by open vegetation and bare ground. The western burrowing owl (*Athene cunicularia* ssp. *hypugaea*), which occurs throughout the western United States including California, rarely digs its own burrows and is instead dependent upon the presence of burrowing mammals (i.e., California ground squirrels, coyotes, and badgers) whose burrows are often used for roosting and nesting. The presence or absence of colonial mammal burrows is often a major factor that limits the presence or absence of burrowing owls. Where mammal burrows are scarce, burrowing

owls have been found occupying man-made cavities, such as buried and non-functioning drainpipes, stand-pipes, and dry culverts. They also require low growth or open vegetation allowing line-of-sight observation of the surrounding habitat to forage and watch for predators. In California, the burrowing owl breeding season extends from the beginning of February through the end of August. (ELMT, 2025a, pp. 35-36)~~(ELMT, 2024a, p. 33)~~

Under the MSHCP burrowing owl is considered an adequately conserved covered species that may still require focused surveys in certain areas as designated in Figure 6-4 of the MSHCP. The Project site occurs within the MSHCP burrowing owl survey area and a habitat assessment was conducted for the species to ensure compliance with MSHCP guidelines for the species. In accordance with the MSHCP Burrowing Owl Survey Instructions (2006), survey protocol consists of two steps, Step I – Habitat Assessment and Step II – Locating Burrows and Burrowing Owls. Refer to Subsection 5.4 of the Project's HA (*Technical Appendix D1*) for a detailed description of the survey methodology and results. (ELMT, 2025a, p. 36)~~(ELMT, 2024a, p. 35)~~

A habitat assessment for the burrowing owl was conducted on January 19, March 8, and April 6, 2023. Results from the habitat assessment indicate that suitable resources for burrowing owl are present throughout the Project site and off-site improvement areas. Accordingly, if suitable habitat is documented on-site or within adjacent habitats, both Step II focused surveys and the 30-day preconstruction surveys are required in order to comply with the MSHCP guidelines. (ELMT, 2025a, p. 37) ~~(ELMT, 2024a, pp. 35-36)~~

Concurrent with the initial habitat assessment, a detailed focused burrow survey was conducted and included documentation of appropriately sized natural burrows or suitable man-made structures that may be utilized by burrowing owl. A systematic survey for burrows, including burrowing owl sign, was conducted concurrently with the January 19, March 8, and April 6, 2023, habitat assessments by walking across all suitable habitats within the Project site and offsite improvement areas. Areas providing potential habitat for burrowing owls were surveyed for suitable burrows, consisting of natural and non-natural substrates in areas with low, open vegetation. All burrows encountered were examined for shape, scat, pellets, white-wash, feathers, tracks, and prey remains. Suitable burrows/sites, including rock piles and non-natural substrates, were thoroughly examined for signs of presence. (ELMT, 2025a, p. 37) ~~(ELMT, 2024a, pp. 36-37)~~

Based on the results of the 2023 burrowing owl focused surveys, no burrowing owls or evidence of recent or historic use by burrowing owls were observed on the Project site or off-site improvement areas. As a result, burrowing owls are presumed to be absent from the Project site and off-site street improvement areas. (ELMT, 2025a, p. 38)~~(ELMT, 2024a, p. 37)~~ Although focused surveys conducted for the proposed Project determined that the burrowing owl is absent from the Study Area, there is nonetheless a potential for the site to become occupied with burrowing owls prior to construction activities. This is evaluated as a potentially significant impact for which mitigation, in the form of pre-construction burrowing owl surveys, would be required.

6. Conclusion of MSHCP Consistency

As indicated in the preceding analysis, the proposed Project has the potential to conflict with MSHCP Section 6.1.2 (due to Project impacts to 0.05~~27~~-acre of MSHCP ~~riparian/~~riverine areas), MSHCP Section 6.1.4 (due to nighttime lighting during construction-related concrete pouring activities), and MSHCP Section 6.3.2 (due to

potential impacts to the burrowing owl). Accordingly, prior to mitigation, Project impacts due to a conflict with the MSHCP would represent a significant impact for which mitigation would be required.

Threshold b:	***Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any endangered, or threatened species, as listed in Title 14 of the California Code of Regulations (Sections 670.2 or 670.5) or in Title 50, Code of Federal Regulations (Sections 17.11 or 17.12)?***
Threshold c:	***Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U. S. Wildlife Service?***

The following discussion examines the potential impacts to plant and wildlife resources that would occur as a result of the proposed Project.

A. Impacts to Special-Status Plant Communities

The CNDDB lists three (3) special-status habitats as being identified within the Steele Peak and Perris quadrangles: Southern Coast Live Oak Riparian Forest, Southern Cottonwood Willow Riparian Forest, and Southern Sycamore Alder Riparian Woodland. None of these special-status plant communities occur within the Study Area. Accordingly, the Project would not result in impacts to special-status plant communities, and no impact would occur. (ELMT, 2025a, p. 23)~~(ELMT, 2024a, p. 23)~~

B. Impacts to Special-Status Plant Species

No special-status plant species were observed during the field investigation. Based on habitat requirements for the identified special-status species, known species distributions, and the quality and availability of habitats present, it was determined that the Project site has a low potential to support paniculate tarplant. It was further determined that the Project site and off-site improvement areas do not have potential to support the remainder of special-status plant species known to occur in the vicinity of the site and are all presumed to be absent. (ELMT, 2025a, p. 22)~~(ELMT, 2024a, p. 22)~~

Paniculate tarplant is not federally or State listed as endangered or threatened, nor is it a covered species under the MSHCP. It is designated by the CNPS as a Rare Plant Rank 4.2 species. Paniculate tarplant is adapted to degraded conditions and routine disturbance and occurs commonly in former agricultural land in western Riverside County and was determined to have a low potential to be supported within the Project site. Due to limited suitable habitat available for this species and isolation of the Project site from known occupied areas, no impacts to this species are expected to occur from Project implementation, if present. (ELMT, 2025a, p. 22)~~(ELMT, 2024a, p. 22)~~

Accordingly, Project impacts to special-status plant species would be less than significant and no mitigation measures would be required.

C. *Impacts to Special-Status Wildlife Species*

One (1) special-status wildlife species was observed during the field investigation, Cooper's hawk. Based on habitat requirements for specific species and the availability and quality of on-site habitats, it was determined that the Project site has a high potential to support western spadefoot, California glossy snake, coast horned lizard, coast patch-nosed snake, San Diegan whiptail, red-diamond rattlesnake, California horned lark, Lawrence's goldfinch, Loggerhead shrike, Southern California rufous-crowned sparrow, and White-tailed kite. It was determined that the Project site has a low potential to support Stephen's kangaroo rat (*Dipodomys stephensi*), western mastiff bat, and western yellow bat. It was further determined that the Project site does not have the potential to support any of the other special-status wildlife species known to occur in the vicinity of the Project site and all are presumed to be absent. (ELMT, 2025a, p. 46)~~(ELMT, 2024a, p. 42)~~

Stephen's kangaroo rat is federally- and State-listed as threatened. However, Project impacts to the SKR, would be offset through participation in the SKR HCP and compliance with the MSHCP (as discussed under Threshold a.). None of the remaining aforementioned species are federally- or State-listed as threatened or endangered. In addition, western spadefoot, coast horned lizard, San Diegan whiptail, red-diamond rattlesnake, California horned lark, Lawrence's goldfinch, loggerhead shrike, northern harrier, Southern California rufous-crowned sparrow, white-tailed kite, and Stephen's kangaroo rat are covered species under the MSHCP. Thus, any impacts to these species would be addressed through the Project's compliance with the MSHCP and payment of MSHCP fees pursuant to Riverside County Ordinance No. 810. Accordingly, impacts to these species would be less than significant, requiring no mitigation beyond mandatory payment of MSHCP fees. (ELMT, 2025a, p. 46)~~(ELMT, 2024a, p. 42)~~

The Crotch's bumblebee is a candidate species for listing status by the CESA. However, the limited plant species diversity supported within the non-native grassland and disturbed Riversidean sage scrub plant communities within the Study Area provide at best minimal foraging habitat for Crotch's bumblebee. Further, the density of available vegetation and thoroughly mixed and compacted soils do not provide suitable burrowing conditions for this species. Accordingly, the Study Area was determined not to have potential to support Crotch's bumblebee. Therefore, the Project would result in less-than-significant impacts to the Crotch's bumblebee. (ELMT, 2025a, p. 23)~~(ELMT, 2024a, p. 23)~~

Additionally, and as noted above, no burrowing owls or evidence of recent or historic use by burrowing owls were observed on the Project site or off-site improvement areas during focused surveys conducted on site. As a result, burrowing owls are presumed to be absent from the Project site and off-site improvement areas. (ELMT, 2025a, p. 35)~~(ELMT, 2024a, p. 35)~~ Although focused surveys conducted for the proposed Project determined that the burrowing owl is absent from the Study Area, there is nonetheless a potential for the site to become occupied with burrowing owls prior to construction activities. This is evaluated as a potentially significant impact for which mitigation, in the form of pre-construction burrowing owl surveys, would be required.

B. *Project Impacts to Nesting Birds and Raptors*

No active nests or nesting behaviors were directly observed on-site during the field survey, which was conducted during the breeding season. The Project site has the potential to provide nesting habitat for year-round and seasonal avian residents, as well as migrating songbirds that could occur in the area that are adapted

to a high degree of disturbance. Additionally, the undeveloped vacant areas have the potential to support birds that nest on the open ground such as killdeer. In addition, the California horned lark and Cooper's hawk might be expected to nest on-site. (ELMT, 2025a, p. 20)~~(ELMT, 2024a, p. 20)~~

Nesting birds and raptors are protected pursuant to the federal Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (Sections 3503, 3503.5, 3511, and 3513 prohibit the take, possession, or destruction of birds, their nests or eggs). If construction occurs between February 1st and August 31st, a pre-construction clearance survey for nesting birds and raptors is required prior to the start of any vegetation removal or ground disturbing activities to ensure that no nesting birds or raptors will be disturbed during construction. (ELMT, 2025a, p. 20)~~(ELMT, 2024a, p. 20)~~ Accordingly, because there is a potential for nesting birds or raptors to occur within areas planned for development as part of the Project during the breeding season (February 1 to August 31), the Project has the potential to result in significant impacts to nesting birds or raptors during the breeding season. This is evaluated as a significant impact for which mitigation would be required.

Threshold d: ***Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?***

The proposed Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species. There are no identified MSHCP wildlife Linkages (including MSHCP existing or proposed Linkages or Constrained Linkages) within the Project area, and the Study Area does not occur within any MSHCP-identified habitat Cores. The Project would not impede the use of native wildlife nursery sites, as the Project's proposed development footprint does not support any colonial breeding groups that would be considered as a native wildlife nursery site. Accordingly, Project impacts to wildlife corridors and nursery sites would be less than significant.

However, as previously noted the Project has the potential to impact active bird or raptor nests if vegetation is removed during the nesting season (February 1 to August 31). Impacts to nesting birds are prohibited by the MBTA and CFGC. Because impacts to native birds and raptors are prohibited by MBTA and similar provisions of CFGC, impacts to native birds and raptors by the proposed Project would not be a significant impact under CEQA. The native birds and raptors with potential to nest on the Project site would be those that are extremely common to the region and highly adapted to human landscapes (e.g., house finch, killdeer). The number of individuals potentially affected by the Project would not significantly affect regional, let alone local populations of such species. Notwithstanding, the Project has the potential to result in impacts to nesting migratory birds and raptors during the nesting season, including migratory birds. Accordingly, Project impacts to nesting birds and raptors during the nesting season represents a significant impact for which mitigation would be required.

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

A. Project Impacts to Sensitive Natural Communities

The CNDDB lists three (3) special-status habitats as being identified within the Steele Peak and Perris quadrangles: Southern Coast Live Oak Riparian Forest, Southern Cottonwood Willow Riparian Forest, and Southern Sycamore Alder Riparian Woodland. None of these special-status plant communities occur within the Study Area. Accordingly, no impacts to special-status habitats would occur as a result of the Project. (ELMT, 2025a, p. 23)~~(ELMT, 2024a, p. 23)~~

As previously discussed in EIR subsection 3.6.1.A, for purposes of analysis in this EIR, the maximum extent of ground disturbance, including on- and off-site improvements, includes full disturbance to the 50.04 acres proposed for warehouse use in the northern portions of the Project site, ~~full~~ disturbance ~~of~~ to approximately 12.94 acres of the 14.934 gross-acre park site, and disturbances associated with offsite roadway and infrastructure improvement totaling ±19.78~~21.76~~ acres. Accordingly, implementation of the proposed Project would result in impacts to ~~all~~ most of the vegetation communities within the Study Area as previously identified in Table 4.4-1, including impacts to 50.274~~2.09~~ acres of disturbed/developed habitats, 28.719~~.48~~ acres of impacts to non-native grassland, 1.12 acres of impact to ornamental vegetation, ~~0.21 acre of disturbed southern willow scrub,~~ and ~~3.80~~2.66 acres of disturbed Riversidean sage scrub. ~~With possible exception of impacts to disturbed southern willow scrub, which are discussed below, n~~None of the vegetation communities ~~identified~~ that would be impacted on site or within the Project's off-site improvement areas are considered sensitive, as the Project has been designed to avoid all 0.19-acre of disturbed southern willow scrub habitat within the park site. With mandatory payment of MSHCP fees pursuant to Riverside County Ordinance No. 810, ~~and with possible exception of impacts to disturbed southern willow scrub (as discussed below),~~ Project impacts to vegetation communities would be less than significant.

~~While stands of black willow and mulefat are present within the disturbed southern willow scrub on site, the majority of the canopy layer of this plant community is composed of tree tobacco, castor bean, and tamarisk, which diminishes the suitability of the site for special status wildlife species dependent upon riparian plant communities. The composition of the disturbed southern willow scrub supported on site has been degraded by these dominant species such that contiguous willow canopies are no longer present. In addition, these plant species have reduced the availability of suitable habitats for native riparian understory species, and the upland species and non-native herbaceous species with no native wetland obligate species present. Due to incomplete canopy, limited acreage, and lack of riparian plant species diversity of the disturbed southern willow scrub supported on site, the habitat associated with the on-site drainage feature does not provide suitable habitat for any of the riparian obligate species listed under the MSHCP that may occur within the regional vicinity, including the State- and federally-listed as endangered least Bell's Vireo, southwestern willow flycatcher, or yellow-billed cuckoo. (ELMT, 2024a, pp. 28-29)~~

~~The highly degraded and inconsistent canopy of the disturbed southern willow scrub precludes nesting by least Bell's Vireo, southwestern willow flycatcher, and yellow-billed cuckoo, as these species require dense, sprawling canopies to obscure nests from predators. Further, least Bell's Vireo and southwestern willow flycatcher each require minimum nesting territories of 0.5-acre, which exceeds the available riparian habitats supported on-site. In addition, the lack of native plant diversity reduces the availability of insect prey for these~~

~~species. Notwithstanding, the 0.21-acre of disturbed southern willow scrub comprises riparian habitat; thus, Project impacts to 0.21-acre of disturbed southern willow scrub would represent a significant impact of the proposed Project for which mitigation would be required. (ELMT, 2024a, p. 29)~~

B. Project Impacts to Riparian/Riverine Habitat

Two (2) ephemeral drainage features, Drainage A and associated Tributary A-1, were observed in the southern portion of the Project site during the field investigation. The on-site ephemeral drainage features are not relatively permanent, standing, or continuously flowing bodies of water and, therefore, do not qualify as waters of the United States under the regulatory authority of the Corps. However, both features qualify as waters of the State and fall under the regulatory authority of the RWQCB and CDFW. RWQCB jurisdiction within the ~~Project site~~Study Area totals approximately 0.096-acre (985 linear feet), none of which consists of State wetlands. CDFW jurisdiction within the Project site totals approximately 0.287-acre, of which approximately 0.1921-acre consists of riparian habitat and 0.09-acre supports streambed ~~(i.e., disturbed southern willow scrub)~~. Implementation of the proposed Project would result in direct permanent impacts to approximately 0.05-acre (350 linear feet) of RWQCB jurisdictional areas and approximately 0.05-acre (350 linear feet) of CDFW jurisdictional areas. MSHCP Section 6.1.2 Riparian/Riverine resources on site also consist of 0.287-acre, ~~all~~ of which 0.05-acre would be impacted as part of the Project. Accordingly, Project impacts to 0.056-acre of RWQCB jurisdiction, 0.0527-acre of CDFW jurisdiction, and 0.0527-acre of MSHCP Section 6.1.2 Riparian/Riverine resources represent a significant impact for which mitigation would be required. (ELMT, 2025a, p. 44)~~(ELMT, 2024a, p. 44)~~

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

No inundated areas, wetland features, or wetland plant species that would be considered wetlands as defined by Section 404 of the Clean Water Act occur within the Study Area. As a result, implementation of the proposed Project would not have substantial adverse effect on federally-protected wetlands, and no impact would occur. (ELMT, 2025a, p. 45)~~(ELMT, 2024a, p. 45)~~

As also discussed under the analysis of Threshold e., Drainage A and Tributary A-1 exhibit characteristics consistent with the RWQCB's methodology and comprise jurisdictional waters of the State. As shown in Table 4.4-3, *Regional Board Jurisdictional Waters*, RWQCB jurisdiction within the Study Area totals 0.096-acre (985 liner feet), none of which is State wetland waters. Implementation of the Project would result in impacts to ~~all~~ 0.056-acre of RWQCB jurisdictional areas within the Study Area. Accordingly, prior to mitigation Project impacts to 0.056-acre (~~985~~ 350 liner feet) of RWQCB jurisdictional areas represents a significant impact of the proposed Project for which mitigation would be required. (ELMT, 2025a, p. 41)~~(ELMT, 2024a, p. 41)~~

Table 4.4-3 Regional Board Jurisdictional Waters

Jurisdictional Feature	Regional Board Jurisdiction	
	On-Site Jurisdiction Acreage (Linear Feet)	Jurisdictional Impacts Acreage (Linear Feet)
Drainage A	0.0855~~7~~ (877)	0.05~~7~~ (~~877~~350)
Tributary A-1	0.005~~3~~ (108)	0.00~~3~~ (~~108~~)
TOTAL	**0.09~~6~~ (985)**	**0.05~~6~~ (350~~985~~)**

(ELMT, 2024, p. 21)~~(ELMT, 2024c, p. 21)~~

As also discussed under the analysis of Threshold e., the on-site drainage features and associated riparian habitat exhibits characteristics consistent with CDFW's methodology and comprise CDFW jurisdictional streambed. As summarized in Table 4.4-4, *CDFW Jurisdictional Waters*, approximately 0.28~~7~~-acre (985 linear feet) of CDFW jurisdiction was mapped within the Study Area, consisting of 0.190~~6~~-acre of ~~jurisdictional streambed~~ riparian habitat and 0.092~~1~~-acre of ~~associated habitat~~streambed. ~~CDFW's jurisdiction within Drainage A extends beyond the Ordinary High Water Mark (OHWM) or streambed to the outer canopy of the riparian vegetation (disturbed southern willow scrub).~~ Implementation of the proposed Project would result in impacts to ~~the entire~~approximately 0.052~~7~~-acre (~~985~~ 350 linear feet) of CDFW jurisdiction present within the Study Area. Accordingly, prior to mitigation, Project impacts to 0.052~~7~~-acre (~~985~~ 350 linear feet) of CDFW jurisdiction represents a significant impact for which mitigation would be required. (ELMT, 2024, p. 22)~~(ELMT, 2024c, p. 22)~~

Table 4.4-4 CDFW Jurisdictional Waters

Jurisdictional Feature	CDFW Jurisdiction	
	On-Site Jurisdiction Acreage (Linear Feet)	Jurisdictional Impacts Acreage (Linear Feet)
Drainage A	0.275 (877)	0.052~~7~~ (~~877~~350)
Tributary A-1	0.005~~3~~ (108)	0.00~~3~~ (~~108~~)
TOTAL	**0.28~~7~~ (985)**	**0.052~~7~~ (~~985~~350)**

(ELMT, 2024, Table 2)~~(ELMT, 2024c, Table 2)~~

Threshold g: ***Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?***

Aside from the SKR HCP and the MSHCP, which are addressed under the analysis of Threshold a., the only other local policies or ordinances protecting biological resources are the Riverside County Oak Tree Management Guidelines and Riverside County Ordinance No. 559 (Regulating the Removal of Trees).

As previously indicated in Table 4.4-1 and as previously described in subsection 4.4.1.B, none of the vegetation communities present on the Project site contain oak trees. Accordingly, the Project has no potential to conflict with the Riverside County Oak Tree Management Guidelines, and no impact would occur.

Riverside County Ordinance No. 559 applies to properties located above 5,000 feet above mean sea level (amsl) in elevation, while the maximum elevation at the Project site is approximately 1,622 feet amsl; thus, Riverside County Ordinance No. 559 is not applicable to the proposed Project.

Based on the foregoing analysis, the Project would not conflict with any local policies or ordinances protecting biological resources, and no impact would occur.

4.4.5 CUMULATIVE IMPACT ANALYSIS

The cumulative impact analysis considers development of the Project in conjunction with other development projects located within the purview of the Western Riverside County MSHCP. This Study Area for cumulatively-considerable impacts to biological resources is appropriate because the MSHCP encompasses a large area surrounding the Project Site, and provides for the long-term protection of sensitive plant, animal, and plant communities throughout the MSHCP area. Additionally, most cumulative development projects within the Project vicinity would be subject to the provisions of the MSHCP, and the general range of habitats, species, climate, etc. are fairly consistent throughout the MSHCP.

As indicated under the analysis of Threshold a., with mandatory payment of fees pursuant to Riverside County Ordinance No. 663, the Project would not conflict with the SKR HCP. Other developments within the cumulative study area also would be required to contribute fees towards the SKR HCP pursuant to Ordinance No. 663 or the implementing ordinances of cities within the cumulative study area; thus, Project impacts due to a conflict with the SKR HCP would be less than significant on a cumulatively-considerable basis. With respect to the MSHCP, the Project site is not targeted for conservation as part of the MSHCP, and as such the Project has no potential to result in cumulatively-considerable impacts due to a conflict with the MSHCP Reserve Assembly requirements. Although the Project would not impact vernal pools, the Project would result in impacts to 0.05-acre of the overall 0.287-acre of MSHCP-defined riparian/riverine areas present within the Study Area, representing a potential conflict with MSHCP Volume I, Section 6.1.2. As other cumulative developments similarly could result in impacts to MSHCP riparian/riverine areas, Project impacts to 0.0527-acre of riparian/riverine areas would be cumulatively considerable prior to mitigation. The Project would not impact any NEPSSA species; thus, cumulatively-considerable impacts due to a conflict with Volume I, Section 6.1.3 of the MSHCP would not occur. The Project has the potential to conflict with the MSHCP UWIG due to indirect nighttime lighting impacts affecting future MSHCP conservation areas. As other cumulative developments similarly would have the potential to conflict with the MSHCP UWIG requirements, Project impacts would be cumulatively considerable prior to mitigation. Additionally, the Project has the potential to conflict with MSHCP Section 6.3.2 with respect to the burrowing owl. As other cumulative developments also have the potential to conflict with MSHCP Section 6.3.2, Project impacts due to a potential conflict with MSHCP Section 6.3.2 would be cumulatively considerable prior to mitigation.

As discussed under the analysis of Thresholds b. and c., the Project would not impact any special-status plant communities, and no special-status plant species were observed during the field investigation; thus, cumulatively-considerable impacts to special-status plants would not occur. Although Project impacts to most special-status animal species would be less than significant and thus would not be cumulatively considerable, the Project has the potential to result in impacts to the burrowing owl and to nesting birds and raptors during

the nesting season. As other cumulative developments similarly could result in impacts to the burrowing owl and/or nesting birds and raptors, Project impacts would be cumulatively considerable prior to mitigation.

As discussed under the analysis of Threshold d., the Project site is not identified as a wildlife movement corridor by the MSHCP, and as such the Project's cumulatively-considerable impacts to wildlife movement would be less than significant. However, the Project has the potential to result in impacts to nesting birds and raptors during the nesting season, including migratory birds. Accordingly, as other cumulative developments similarly have the potential to impact nesting birds or raptors, Project impacts to nesting birds and raptors during the nesting season represents a cumulatively-considerable impact for which mitigation would be required.

As discussed under the analysis of Threshold e., the Project would not result in impacts to any sensitive natural communities; thus, cumulatively-considerable impacts to sensitive natural communities would not occur. ~~0.21 acre of disturbed southern willow scrub that comprises riparian habitat. As other cumulative developments also could result in impacts to riparian habitat, Project impacts to 0.21 acre of disturbed southern willow scrub represents a cumulatively considerable impact of the Project for which mitigation would be required. In addition~~ However, the Project would result in impacts to 0.056-acre (350~~985~~ linear feet) of RWQCB jurisdiction, 0.05~~27~~-acre (350 linear feet) of CDFW jurisdiction, and 0.05~~27~~-acre of MSHCP Section 6.1.2 Riparian/Riverine resources. As other cumulative developments similarly have the potential to result in impacts to jurisdictional areas, the Project's impacts to 0.056-acre (~~985~~ 350 linear feet) of RWQCB jurisdiction, 0.05~~27~~-acre (350 linear feet) of CDFW jurisdiction, and 0.05~~27~~-acre of MSHCP Section 6.1.2 Riparian/Riverine resources would be cumulatively considerable.

Although the Study Area does not contain any wetlands as defined by Section 404 of the Clean Water Act, Drainage A and Tributary A-1 are considered jurisdictional by the RWQCB and CDFW. Implementation of the Project would result in impacts to 0.056-acre (350~~985~~ liner feet) of RWQCB jurisdictional areas and 0.05~~27~~-acre (350~~985~~ linear feet) of CDFW jurisdiction. As other cumulative developments similarly have the potential to result in impacts to areas considered jurisdictional by the RWQCB and/or CDFW, Project impacts to 0.056-acre (350~~985~~ liner feet) of RWQCB jurisdictional areas and 0.05~~27~~-acre (~~985~~ 350 linear feet) of CDFW jurisdiction would be cumulatively considerable prior to mitigation.

As indicated under the analysis of Threshold g., aside from the SKR HCP and MSHCP (which are addressed under the analysis of Threshold a.), the only other local policies or ordinances protecting biological resources are the Riverside County Oak Tree Management Guidelines (OTMG) and Riverside County Ordinance No. 559 (Regulating the Removal of Trees). However, the Project site does not contain any oak trees that would be subject to the County's OTMG, and Riverside County Ordinance No. 559 applies only to properties located above 5,000 feet amsl. Accordingly, Project impacts due to a conflict with local policies or ordinances protecting biological resources would be less-than-cumulatively considerable.

4.4.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Threshold a.: Significant Direct and Cumulatively-Considerable Impact. The proposed Project would not conflict with the Stephens' Kangaroo Rat Habitat Conservation Plan (SKR HCP), with the mandatory payment of fees pursuant to Riverside County Ordinance No. 663. The Project would not result in a conflict with the

MSHCP Reserve Assembly requirements. Although the Project would not result in impacts to vernal pools, the Project would result in impacts to 0.0527-acre of MSHCP riparian/riverine areas regulated by MSHCP Section 6.1.2; thus, prior to mitigation, Project impacts to 0.0527-acre of MSHCP riparian/riverine areas would represent a significant impact on a direct and cumulatively-considerable basis for which mitigation would be required. The Project site is not located within a NEPSSA area, and therefore the Project has no potential to result in impacts due to a conflict with MSHCP Section 6.1.3. Although the Project's indirect impacts associated with drainage, toxics, invasive species, noise, barriers, and grading/land development would be less than significant and would not conflict with the MSHCP UWIG, the Project has the potential to conflict with MSHCP UWIG provisions related to lighting; accordingly, Project impacts due to a conflict with MSHCP Section 6.1.4 would be significant on both a direct and cumulatively-considerable basis prior to mitigation. Although the Project site does not occur within a CAPSSA or a special species survey area for amphibians or mammals, and although focused surveys conducted for the proposed Project during the 2023 breeding season determined that the burrowing owl is absent from the Study Area, the Project site has the potential to become occupied by burrowing owls prior to site grading and development. Project impacts to the burrowing owl represent a potential conflict with MSHCP Section 6.3.2, and as such prior to mitigation Project impacts to the burrowing owl would be significant on both a direct and cumulatively-considerable basis.

Thresholds b. and c.: Significant Direct and Cumulatively-Considerable Impact. No special-status plants were detected within the Study Area. As such, the proposed Project would not impact special-status plants, and no impact would occur. Project impacts to western spadefoot, California glossy snake, coastal whiptail, coast horned-lizard, coast patch-nosed snake, Belding's orange-throat whiptail, red-diamond rattlesnake, Cooper's hawk, northern harrier, white-tailed kite, California horned lark, Lawrence's goldfinch, loggerhead shrike, Southern California rufous-crowned sparrow, and one small mammal (Stephens' kangaroo rat) and two bat species (western mastiff bat and western yellow bat) would be less than significant with mandatory compliance with the MSHCP and payment of MSHCP development fees pursuant to Riverside County Ordinance No. 810. The Study Area was determined not to have potential to support Crotch's bumblebee, and as such the Project would not result in impacts to Crotch's bumblebee. Although focused surveys conducted for the proposed Project determined that the burrowing owl is absent from the Study Area, there is nonetheless a potential for the site to become occupied with burrowing owls prior to construction activities; thus, Project impacts to the burrowing owl are evaluated as a potentially significant impact for which mitigation, in the form of pre-construction burrowing owl surveys, would be required. Additionally, in the event that grading activities are proposed during the nesting season (February 1 to August 31), the Project has the potential to result in impacts to nesting birds and raptors, including the Cooper's hawk, red-tailed hawk, and kestrel, if any individuals establish nests prior to the commencement of grading and ground-disturbing activities at the site; thus, prior to mitigation Project impacts to nesting birds and raptors would be significant on both a direct and cumulatively-considerable basis.

Threshold d.: Significant Direct and Cumulatively-Considerable Impact. The proposed Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species. There are no identified MSHCP wildlife Linkages (including existing or proposed MSHCP Linkages or Constrained Linkages) within the Study Area. The Project would not impede the use of native wildlife nursery sites, as the Project's proposed development footprint does not support any colonial breeding groups that would be considered as a native wildlife nursery site. However, the Project has the potential to result in impacts to nesting birds and raptors during the nesting season (February 1 to August 31), including migratory birds.

Accordingly, Project impacts to nesting birds and raptors during the nesting season represents a significant impact for which mitigation would be required.

Threshold e.: Significant Direct and Cumulatively-Considerable Impact. Implementation of the Project would result in permanent impacts to 50.2742.13 acres of disturbed/developed habitats, 28.7069.48 acres of impacts to non-native grassland, 1.12 acres of impact to ornamental vegetation, 0.21-acre of disturbed southern willow scrub, and 2.663.80 acres of disturbed Riversidean sage scrub. With possible exception of impacts to disturbed southern willow scrub, nNone of the vegetation communities identified that would be impacted by the Project on site or within the Project's off-site improvement areas are considered sensitive, as the Project has been designed to avoid impacts to all 0.19-acre of disturbed southern willow scrub habitat present on site. With mandatory payment of MSHCP fees pursuant to Riverside County Ordinance No. 810, and with possible exception of impacts to disturbed southern willow scrub, Project impacts to vegetation communities would be less than significant. Although the portions of the Project site that support disturbed southern willow scrub are highly degraded and do not offer nesting habitat for sensitive bird species such as the least Bell's Vireo, southwestern willow flycatcher, and yellow billed cuckoo, the 0.21-acre of disturbed southern willow scrub comprises riparian habitat; thus, Project impacts to 0.21-acre of disturbed southern willow scrub would represent a significant impact of the proposed Project for which mitigation would be required. In additionHowever, the Project would result in impacts to 0.056-acre (350985 linear feet) of RWQCB jurisdiction, 0.0527-acre (350 linear feet) of CDFW jurisdiction, and 0.0527-acre of MSHCP Section 6.1.2 Riparian/Riverine resources (inclusive of 0.21-acre of southern willow scrub), which represents a significant impacts for which mitigation would be required.

Threshold f.: Significant Direct and Cumulatively-Considerable Impact. The Project site does not contain any State- or federally-protected wetlands; therefore, no impacts to State- or federally-protected wetlands would occur with implementation of the Project. However, the Project would result in impacts to 0.056-acre (985 350 liner feet) of areas subject to RWQCB jurisdiction, and would result in impacts to 0.0527-acre (985 350 linear feet) of areas subject to CDFW jurisdiction. Accordingly, prior to mitigation, Project impacts to 0.056-acre (350985 liner feet) of RWQCB jurisdictional areas and 0.0527-acre (350985 linear feet) of CDFW jurisdictional areas represents a significant impacts of the Project for which mitigation would be required.

Threshold g.: No Impact. Aside from the SKR HCP and MSHCP, which are addressed under the analysis of Threshold a., the only other local policies or ordinances protecting biological resources are the Riverside County Oak Tree Management Guidelines and Riverside County Ordinance No. 559 (Regulating the Removal of Trees). However, the Project site does not contain any oak trees subject to the Riverside County Oak Tree Management Guidelines. Additionally, the Project site does not occur at an elevation exceeding 5,000 feet amsl; thus, Riverside County Ordinance No. 559 is not applicable to the proposed Project. Therefore, and aside from potential impacts due to a conflict with the MSHCP (as addressed under the analysis of Threshold a.), the Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, and no impact would occur.

4.4.7 COUNTY REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

Applicable County Regulations and Design Requirements

The following are applicable regulations and design requirements within Riverside County. Although these requirements technically do not meet CEQA's definition for mitigation, they are imposed herein to ensure Project compliance with applicable County regulations and design requirements.

- Prior to issuance of grading permits, the Project Applicant shall make payment of Western Riverside County MSHCP fees pursuant to Riverside County Ordinance No. 810, *Establishing an Interim Open Space Mitigation Fee*.

- Prior to issuance of grading permits, the Project Applicant shall make payment of fees pursuant to the Stephen's Kangaroo Rat Habitat Conservation Plan and Riverside County Ordinance No. 663, *Establishing the Riverside County Stephens' Kangaroo Rat Habitat Conservation Plan and Setting Mitigation Fees*.

- Prior to issuance of grading permits affecting waters of the State, which include impacts to 0.056-acre (350~~985~~ liner feet) of Santa Ana Regional Water Quality Control Board (RWQCB) jurisdiction and 0.0527-acre (350~~985~~ linear feet) of California Department of Fish and Wildlife (CDFW) jurisdiction within the proposed public park site, the Project Applicant shall secure appropriate regulatory permits and agreements from the CDFW and the RWQCB, which are expected to include a Waste Discharge Requirement (WDR) issued by the RWQCB and a Lake and Streambed Alteration Agreement (CFGC Section 1602 Permit) issued by CDFW. Copies of these permits and agreements shall be provided to the Riverside County Environmental Programs Department and Planning Department before grading occurs within State jurisdictional waters that are present within the public park site.

- The Project is required to comply with Riverside County Ordinance No. 655, which sets forth requirements for lamp source and shielding of light emissions for outdoor fixtures to reduce "skyglow" or light pollution that affects day or nighttime views from the Mount Palomar Observatory (located approximately 63.9 miles south of the Project site in northern San Diego County). Pursuant to the requirements of Ordinance No. 655, all lighting shall consist of low-pressure sodium lighting, or other lamp types that emit 4050 lumens or less. If light fixtures are proposed above 4050 lumens, then the lighting shall be fully shielded in conformance with the requirements of Ordinance No. 655.

- The Project is required to comply with Riverside County Ordinance No. 915, which provides minimum requirements for outdoor lighting to reduce light trespass. Ordinance No. 915 provides regulations for adequate lighting shielding, glare, and light trespass in order to ensure all development in Riverside County installs lighting in a way that does not jeopardize the health, safety, or general welfare of Riverside County residents and degrade their quality of life.

Mitigation

MM 4.4-1 Prior to final grading inspection for the proposed public park site, a conservation easement shall be recorded over the 0.23-acre of preserved riparian/riverine habitat on site in addition to a 1.77-acre upland buffer area, providing for the permanent conservation of approximately 2.00 acres of the Project site.

In addition, ~~P~~prior to issuance of grading permits affecting the southern 14.93 acres of the Project site that are proposed for development with a public park, the Project Applicant shall compensate for permanent impacts to 0.05~~6~~-acre (350~~985~~ linear feet) of RWQCB jurisdiction, 0.05~~27~~-acre (350 linear feet) of CDFW jurisdiction, and 0.05~~27~~-acre of MSHCP Section 6.1.2 Riparian/Riverine resources in accordance with the Project's Determination of Biologically Equivalent or Superior Preservation (DBESP), dated ~~May 2024~~March 2025. The Project's DBESP requires the purchase of re-establishment and/or establishment mitigation credits through the Riverpark Mitigation Bank and/or other approved mitigation bank consisting of re-establishment and/or establishment credits at a 1:1 ratio. However, if no re-establishment and/or establishment credits are available, then impacts to 0.05-acre of riverine habitat shall instead be mitigated through the purchase of rehabilitation credits at a minimum 2:1 ratio. In the event that mitigation credits are purchased, the Project Applicant shall provide Riverside County with proof of purchase prior to issuance of a grading permit.

In the event that no mitigation credits are available at the Riverpark Mitigation Bank or other approved mitigation banks, then impacts to 0.05-acre (350 linear feet) of RWQCB jurisdiction, 0.05-acre (350 linear feet) of CDFW jurisdiction, and 0.05-acre of MSHCP Section 6.1.2 Riparian/Riverine resources shall be mitigated through the management (removal of non-native woody plant species) of 0.23-acre of the riparian/riverine habitat that would be located within the on-site conservation easement, as this habitat currently supports invasive plant species that undermine the quality of the existing riparian/riverine habitat. The required 2.00-acre conservation easement area shall include the existing streambed, which is located at a topographic low spot on the property, and the immediate surrounding habitat which consists of rocky outcrops and disturbed Riversidean sage scrub habitat. Further, the DBESP requires preparation of a Habitat Mitigation Monitoring and Reporting Program (HMMRP) to describe the activities required to implement and maintain the mitigation required to compensate for permanent impacts to 0.05-acre of the on-site drainage features. If the on-site enhancement option is selected, the DBESP shall be updated through an addendum submitted prior to grading permit issuance. The addendum shall include the required HMMRP, maps of the mitigation area, conservation easement provisions, and long-term funding commitments, in accordance with the MSHCP and applicable agency requirements. Prior to the issuance of grading permits for the public park site, the required HMMRP shall be subject to review and approval by the Riverside County Environmental Programs Department (EPD), the Western Riverside Conservation Agency (RCA), the United States Fish and Wildlife Service (USFWS), the California Department of Fish and Game (CDFW), and the Santa Ana Regional Water Quality Control Board (RWQCB). As part of the required HMMRP, and also prior to issuance of grading permits, the Project Applicant shall establish a non-wasting endowment for the long-

term management of the conservation easement, where management would occur beyond the requirements described in MSHCP Chapter 5, *Management and Monitoring*. Prior to issuance of grading permits, Riverside County shall review the approved HMMRP to ensure that all Project Applicant responsibilities as identified by the HMMRP have been or would be completed to the satisfaction of EPD, RCA, USFWS, CDFW, and/or RWQCB.
~~mitigation through the purchase of mitigation credits at the Riverpark Mitigation Bank and/or other approved mitigation bank (i.e., Skunk Hollow), or combination thereof at a minimum ratio of 3:1. Preservation credits would be purchased out of the Skunk Hollow Mitigation bank if no other mitigation credits are available at a 4:1 ratio. Prior to issuance of grading permits affecting the southern 14.93 acres, the Project Applicant shall provide the Riverside County Environmental Programs Department (EPD) and the Riverside County Planning Department with evidence (e.g., receipts) demonstrating that the required mitigation credits have been purchased from the Riverpark Mitigation Bank and/or other approved mitigation bank.~~

~~MM 4.4-1~~MM 4.4-2 In the event that nighttime construction is proposed as part of future building permits, then prior to commencement of nighttime construction activities, the Property Owner/Developer shall provide evidence to the County that the Contractor Specifications require that any temporary nighttime lighting installed during construction shall be downward facing and hooded or shielded to prevent security light from spilling outside the staging area or from directly broadcasting security light into the sky, onto adjacent residential properties, or into potential future open space areas that may be located near the proposed public park site. Project contractors shall be required to permit periodic inspection of the construction site by Riverside County staff or its designee to confirm compliance.

~~MM 4.4-2~~MM 4.4-3 In accordance with MSHCP Objective 6, prior to issuance of grading permits or other permits authorizing ground disturbance or discing, the Project Applicant shall retain a qualified biologist to perform a burrowing owl survey at all potentially suitable habitat sites within the Project's limits of disturbance within 30 days of the commencement of any ground-disturbing activities at the Project site, as discussed below.

- Pre-Construction Survey: The pre-construction survey shall be performed by a qualified biologist that will survey the site for the presence/absence of burrowing owls within 30 days prior to commencement of ground-disturbing activities at the Project site. If burrowing owls are detected on-site during the pre-construction survey, the owls shall be relocated/excluded from the site outside of the breeding season following accepted protocols, and subject to the approval of the Western Riverside County Regional Conservation Authority (RCA) and Wildlife Agencies (i.e., CDFW and/or USFWS)

- Burrowing Owl Management Plan: In the event that burrowing owl is determined to be present, or in the event that an assumption is made that the burrowing owl occurs on-site, a burrowing owl management plan shall be prepared and implemented in coordination with the Western Riverside County Regional Conservation Authority (RCA) and CDFW that shall detail the relocation of owls from the Project site, passively and/or actively. If

additional site visits determine the species is absent, then the pre-construction survey (as discussed above) shall instead be implemented.

A copy of the results of the pre-construction survey (and all additional surveys), as well as copies of the Burrowing Owl Management Plan, if required, shall be provided to the County of Riverside Planning Department for review and approval (in the case of the Burrowing Owl Management Plan) prior to any vegetation clearing and/or ground disturbance activities.

~~MM 4.4-3~~MM 4.4-4 Prior to the issuance of grading permits, Riverside County shall ensure that the following note is included on the Project's grading plans. Project contractors shall be required to ensure compliance with this note and permit periodic inspection of the construction site by Riverside County staff or its designee to confirm compliance. This note also shall be specified in bid documents issued to prospective construction contractors.

"Vegetation clearing shall be conducted outside of the bird nesting season (February 1 to August 31) to the extent feasible. If avoidance of the nesting season is not feasible, a nesting bird survey shall be conducted by a qualified biologist within no more than 72 hours of such scheduled disturbance, to determine the presence of nests or nesting birds. If active nests are identified, the biologist shall establish appropriate buffers around the vegetation (typically 500 feet for raptors and sensitive species, 300 feet for non-raptors/non-sensitive species). All work within these buffers shall be halted until the nesting effort is finished (i.e., the juveniles are surviving independent from the nest). The biologist shall review and verify compliance with these nesting boundaries and shall verify the nesting effort has finished. Work may resume within the buffer area when no other active nests are found. Alternatively, a qualified biologist may determine that construction can be permitted within the buffer areas and would develop a monitoring plan to prevent any impacts while the nest continues to be active (eggs, chicks, etc.). Upon completion of the survey and any follow-up construction avoidance management, a report shall be prepared and submitted to Riverside County for mitigation monitoring compliance record keeping. If vegetation removal is not completed within 72 hours of a negative survey during nesting season, the nesting survey must be repeated to confirm the absence of nesting birds."

4.4.8 SIGNIFICANCE OF IMPACTS AFTER MITIGATION

Threshold a.: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.4-1 would ensure that Project impacts to 0.0527-acre of MSHCP ~~riparian/~~riverine areas would be mitigated in accordance with the Project's DBESP (EIR *Technical Appendix D2*). As required by the Project's DBESP, the Project Applicant would place a conservation easement over approximately 2.00 acres of the park site, which would include 0.23-acre of riparian/riverine habitat as well as a 1.77-acre upland buffer area. To mitigate the Project's impacts to 0.05-acre of riverine resources, Mitigation Measure MM 4.4-1 requires the Project Applicant to purchase re-establishment and/or establishment mitigation credits from the Riverpark Mitigation Bank or other approved mitigation bank at a minimum 1:1 ratio. However, if no re-establishment and/or establishment credits are available, Mitigation Measure MM 4.4-1 requires that impacts

to 0.05-acre of riverine habitat shall instead be mitigated through the purchase of rehabilitation credits at a minimum 2:1 ratio. In the event that no mitigation credits are available at the Riverpark Mitigation Bank or other approved mitigation banks, then Mitigation Measure MM 4.4-1 requires that impacts to 0.05-acre (350 linear feet) of RWQCB jurisdiction, 0.05-acre (350 linear feet) of CDFW jurisdiction, and 0.05-acre of MSHCP Section 6.1.2 Riparian/Riverine resources shall be mitigated through the management (removal of non-native woody plant species) of the 0.23-acre of the riparian/riverine habitat that would be located within the on-site conservation easement, as this habitat currently supports invasive plant species that undermine the quality of the existing riparian/riverine habitat. In the event that no mitigation credits are available, the mitigation further requires the preparation and implementation of an HMMRP and the establishment of a non-wasting endowment to ensure long-term preservation of the 2.00-acre avoidance area. Implementation of any of the alternatives allowed by Mitigation Measure MM 4.4-1 would fully compensate for Project impacts to 0.05-acre impacts to riparian/riverine habitat, and would reduce Project impacts to 0.05-acre of riparian/riverine habitat to less-than-significant levels. ~~at a minimum 3:1 ratio through the purchase of mitigation credits from the Riverpark Mitigation Bank and/or other approved mitigation bank (i.e., Skunk Hollow). Preservation credits would be purchased out of the Skunk Hollow Mitigation bank if no other mitigation credits are available at a 4:1 ratio. With implementation of the required mitigation, the Project would be consistent with Volume I, Section 6.1.2 of the MSHCP, and impacts would be reduced to less than significant levels.~~ Implementation of Mitigation Measure MM 4.4-2 would ensure that measures are incorporated into the Project's construction phase to preclude significant construction-related nighttime lighting impacts affecting potential future conservation areas near the proposed on-site public park, and would reduce the Project's potential conflict with Section 6.1.4 of the MSHCP to less-than-significant levels. Implementation of Mitigation Measure MM 4.4-3 would ensure that appropriate pre-construction surveys are conducted prior to ground disturbing activities, and also requires preparation and implementation of a Burrowing Owl Management Plan (if required), in accordance with MSHCP Objective 6 for the burrowing owl. With implementation of the required mitigation, Project impacts to the burrowing owl would be reduced to below a level of significance, thereby ensuring Project consistency with MSHCP Section 6.3.2.

Thresholds b. and c.: Less-than-Significant Impact with Mitigation Incorporated. In the event that Project construction activities occur during the nesting season for birds and raptors (February 1 to August 31), Mitigation Measure MM 4.4-4 would ensure pre-construction surveys are conducted for nesting birds and raptors prior to commencement of construction activities, and further would ensure appropriate avoidance of any active nests that may be identified. Implementation of the required mitigation would reduce Project impacts to nesting birds and raptors to below a level of significance. In addition, Implementation of Mitigation Measure MM 4.4-3 would ensure that appropriate pre-construction surveys are conducted prior to ground disturbing activities, and requires preparation and implementation of a Burrowing Owl Management Plan (if required), thereby ensuring that Project impacts to burrowing owl would be reduced to less-than-significant levels.

Threshold d.: Less-than-Significant Impact with Mitigation Incorporated. In the event that Project construction activities occur during the nesting season for birds (February 1 to August 31), Mitigation Measure MM 4.4-4 would ensure pre-construction surveys are conducted for nesting birds prior to commencement of construction activities, and further would ensure appropriate avoidance of any active nests that may be identified. Implementation of the required mitigation would reduce Project impacts to nesting migratory birds to below a level of significance.

Threshold e.: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.4-1 would ensure that Project impacts to 0.0527-acre of MSHCP riparian/riverine areas would be mitigated in accordance with the Project's DBESP (EIR *Technical Appendix D2*). As required by the Project's DBESP, the Project Applicant would place a conservation easement over approximately 2.00 acres of the park site, which would include 0.23-acre of riparian/riverine habitat as well as a 1.77-acre upland buffer area. To mitigate the Project's impacts to 0.05-acre of riverine resources, Mitigation Measure MM 4.4-1 requires the Project Applicant to purchase re-establishment and/or establishment mitigation credits from the Riverpark Mitigation Bank or other approved mitigation bank at a minimum 1:1 ratio. However, if no re-establishment and/or establishment credits are available, Mitigation Measure MM 4.4-1 requires that impacts to 0.05-acre of riverine habitat shall instead be mitigated through the purchase of rehabilitation credits at a minimum 2:1 ratio. In the event that no mitigation credits are available at the Riverpark Mitigation Bank or other approved mitigation banks, then Mitigation Measure MM 4.4-1 requires that impacts to 0.05-acre (350 linear feet) of RWQCB jurisdiction, 0.05-acre (350 linear feet) of CDFW jurisdiction, and 0.05-acre of MSHCP Section 6.1.2 Riparian/Riverine resources shall be mitigated through the management (removal of non-native woody plant species) of the 0.23-acre of the riparian/riverine habitat that would be located within the on-site conservation easement, as this habitat currently supports invasive plant species that undermine the quality of the existing riparian/riverine habitat. In the event that no mitigation credits are available, the mitigation further requires the preparation and implementation of an HMMRP and the establishment of a non-wasting endowment to ensure long-term preservation of the 2.00-acre avoidance area. Implementation of any of the alternatives allowed by Mitigation Measure MM 4.4-1 would fully compensate for Project impacts to 0.05-acre impacts to riparian/riverine habitat, and would reduce Project impacts to 0.05-acre of riparian/riverine habitat to less-than-significant levels. Implementation of any of the alternatives allowed by Mitigation Measure MM 4.4-1 would fully compensate for Project impacts to ~~at a minimum 3:1 ratio through the purchase of mitigation credits from the Riverpark Mitigation Bank and/or other approved mitigation bank (i.e., Skunk Hollow). Preservation credits would be purchased out of the Skunk Hollow Mitigation bank if no other mitigation credits are available at a 4:1 ratio. Implementation of the required mitigation would reduce the Project's impacts to~~ 0.056-acre (350985 linear feet) of RWQCB jurisdiction, 0.0527-acre (350 linear feet) of CDFW jurisdiction ~~(inclusive of 0.21 acre of disturbed southern willow scrub)~~, and 0.0527-acre of MSHCP Section 6.1.2 Riparian/Riverine resources to less-than-significant levels.

Threshold f.: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.4-1 would ensure that Project impacts to 0.056-acre (350985 liner feet) of RWQCB jurisdictional areas and 0.0527-acre (350985 linear feet) of CDFW jurisdiction are mitigated in accordance with the Project's DBESP (EIR *Technical Appendix D2*). As required by the Project's DBESP, the Project Applicant would place a conservation easement over approximately 2.00 acres of the park site, which would include 0.23-acre of riparian/riverine habitat as well as a 1.77-acre upland buffer area. To mitigate the Project's impacts to 0.05-acre of riverine resources, Mitigation Measure MM 4.4-1 requires the Project Applicant to purchase re-establishment and/or establishment mitigation credits from the Riverpark Mitigation Bank or other approved mitigation bank at a minimum 1:1 ratio. However, if no re-establishment and/or establishment credits are available, Mitigation Measure MM 4.4-1 requires that impacts to 0.05-acre of riverine habitat shall instead be mitigated through the purchase of rehabilitation credits at a minimum 2:1 ratio. In the event that no mitigation credits are available at the Riverpark Mitigation Bank or other approved mitigation banks, then Mitigation Measure MM 4.4-1 requires that impacts to 0.05-acre (350 linear feet) of RWQCB jurisdiction,

0.05-acre (350 linear feet) of CDFW jurisdiction, and 0.05-acre of MSHCP Section 6.1.2 Riparian/Riverine resources shall be mitigated through the management (removal of non-native woody plant species) of the 0.23-acre of the riparian/riverine habitat that would be located within the on-site conservation easement, as this habitat currently supports invasive plant species that undermine the quality of the existing riparian/riverine habitat. In the event that no mitigation credits are available, the mitigation further requires the preparation and implementation of an HMMRP and the establishment of a non-wasting endowment to ensure long-term preservation of the 2.00-acre avoidance area. Implementation of any of the alternatives allowed by Mitigation Measure MM 4.4-1 would fully compensate for Project impacts ~~at a minimum 3:1 ratio through the purchase of mitigation credits from the Riverpark Mitigation Bank and/or other approved mitigation bank (i.e., Skunk Hollow). Preservation credits would be purchased out of the Skunk Hollow Mitigation bank if no other mitigation credits are available at a 4:1 ratio. Implementation of the required mitigation would reduce the Project's impacts~~ to 0.056-acre of RWQCB jurisdiction and 0.0527-acre of CDFW jurisdiction to less-than-significant levels.

4.5 CULTURAL RESOURCES

The analysis in this Subsection is based on two site-specific technical reports prepared by PaleoWest, LLC '(doing business as Chronicle Heritage; herein referred to as "Chronicle"). The first report is entitled, "Phase I Cultural Resources Assessment for the Cajalco & Seaton Warehouse and Park Project, Mead Valley, Riverside County, California" (herein, "Phase I CRA"), is dated August 21, 2023, and is included as *Technical Appendix E1* to this EIR (Chronicle, 2023). The second report is entitled, "Phase II Testing and Evaluation for the Cajalco and Seaton Warehouse and Park Project, Mead Valley, Riverside County, California" (herein, "Phase II ESA"), is dated February 22, 2024, and is included as EIR *Technical Appendix E2* (Chronicle, 2024). All references used in this Subsection are included in EIR Section 7.0, *References*.

It should be noted that confidential information has been redacted from *Technical Appendix E1* for purposes of public review. In addition, much of the written and oral communication between Native American tribes, the County of Riverside, and Chronicle is considered confidential in respect to places that have traditional tribal cultural significance (Gov. Code § 65352.4), and although relied upon in part to inform the preparation of this EIR Subsection, those communications are treated as confidential and are not available for public review. Under existing law, environmental documents must not include information about the location of archeological sites or sacred lands or any other information that is exempt from public disclosure pursuant to the Public Records Act (Cal. Code Regs. § 15120(d)).

4.5.1 EXISTING CONDITIONS

The Project site is located in unincorporated western Riverside County, California. The following provides a brief discussion on the prehistoric and historic context of the Project area for better understanding the relevance of resources identified within its proximity. Refer to Chapters 4 and 5 of the Project's Phase I CRA (*Technical Appendix E1*) for a complete discussion of the prehistoric and historic setting.

A. Prehistoric Setting

Archaeological research has established that humans have occupied the area that is now Riverside County for at least 11,000 years. Throughout the prehistoric period (ca. 10,000–200 years Before Present [B.P.]), this portion of Perris Valley was occupied by mobile groups that followed a generalized hunting and collecting subsistence strategy. The general framework of the prehistory of western Riverside County can be broken into three primary periods: Paleoindian, Archaic, and Late Prehistoric, which are further discussed below. These periods are discussed below. (Chronicle, 2023, p. 7)

1. Paleoindian Period

During the Paleoindian period, Native groups are believed to have been highly mobile nomadic hunters and gatherers organized into small bands. Sites from this period are thought to be very sparse across the landscape and may either yield meager evidence of human activity or be rich with flaked and ground stone tool kits, ecofacts, and possibly even structures; most are deeply buried, based on evidence of sites found outside of California dating to this time period. These sites may be found in large, protected caves above floodplains, near economically important resources in coastal, lake marsh, and valley/riparian environments. Sites may also be found at quarry locations, stable landforms above high stands of pluvial lakes, along ridge systems and in mountain passes, and on stable, old surfaces along the coast. It is believed that peoples of this period created

fluted spearhead bases designed to be hafted to wooden shafts. The distinctive method of thinning bifaces and spearhead preforms by removing long, linear flakes, serves as diagnostic Paleoindian markers at tool-making sites. Other artifacts associated with the Paleoindian toolkit include choppers, cutting tools, retouched flakes, and perforators. (Chronicle, 2023, pp. 7-8)

2. Archaic Period

The Archaic Period is the earliest defined period in the region and is presumed to have begun somewhat earlier than 9500 B.P. and lasted to perhaps 7000 B.P. During this time, a long period of human adaptation to environmental changes brought on by the transition from the late Pleistocene to the early Holocene geologic periods occurred. As conditions became more arid and warmer, megafauna died off and human populations responded to these environmental changes by becoming more focused on their subsistence efforts to procure a wider variety of food sources. (Chronicle, 2023, p. 8)

The early portion of the Archaic period was characterized by continued organization of Native groups as nomadic hunters and gatherers, but there is some evidence of semi-sedentary residential occupation. Early occupants of the region were thought to have been nomadic large-game hunters, but resulting from changing environmental factors over time, were forced to become more variable with their food sources. The presence of milling tools indicates the incorporation of vegetal food sources and seed preparation. Archaic sites in the Project region are characterized by abundant lithic scatters of considerable size with many biface thinning flakes, manos and milling stones, bifacial preforms broken during manufacture, and well-made ground stone bowls and basin metates. As a consequence of making dart points, many biface thinning waste flakes were generated at individual production stations; but archaeological assemblages of this period can vary depending on the differences between subsistence processes at inland and coastal sites. Sites more toward the coast of southern California and outside of the Project area typically present fewer projectile points, as more focus was placed on fishing practices than hunting game. (Chronicle, 2023, p. 8)

Archaic period sites in the region that present stratified cultural deposits indicate seasonal or longer-term occupation at some of these sites, which further indicates possible sedentary habitation or occupation patterns. It is thought that the general settlement-subsistence patterns in the vicinity of the Project area during the Archaic Period were characterized by a greater emphasis on seed gathering and shallow midden concentrations at sites suggesting seasonal camping. Based on archaeological assemblages, distribution of sites, and midden depths, it is believed that Native Americans in the area followed a central-based wandering pattern that shifted based on the need to exploit seasonal floral resources. This semisedentary pattern involved a base camp that was occupied during a portion of the year, while other more satellite camps were occupied by smaller groups of people to exploit seasonal resources, such as grass seeds, berries, tubers, and nuts. The exploitation of terrestrial faunal resources was also important, but the population and degree of sedentism at these camps was based on the availability and reliability of water resources. It is thought that coastal groups during this period seem to display a higher degree of sedentism compared to the inhabitants of the desert/inland regions in southern California, due to the more reliable and abundant resource base near the ocean. (Chronicle, 2023, pp. 8-9)

3. Late Prehistoric Period

The Late Prehistoric period is characterized by cooler temperatures and greater precipitation, which resulted in more easily accessible food and water sources. Sedentary villages formed and the subsistence base during this time broadened. Native American groups in the region began manufacturing ceramics, such as vessels, using the paddle-and-anvil technique. The technological advancement of the mortar and pestle may also indicate the utilization of acorns as a resource and the practice of storing food resources. (Chronicle, 2023, p. 9)

Trade and travel are also seen in the distribution of localized resources, such as obsidian from Obsidian Butte, wonderstone from the south end of the Santa Rosa Mountains and from Cerro Colorado in northern Baja California, soapstone presumed to have come from the mountains to the west, marine shell from both the Gulf of California and the Pacific coast, and ceramic types that were not locally manufactured. Sites from this period typically contain small lithic scatters from the manufacture of small projectile points; expedient ground stone tools, such as tabular metates and unshaped manos; wooden mortars with stone pestles; acorn or mesquite bean granaries; ceramic vessels; shell beads suggestive of extensive trading networks; and steatite implements, such as pipes and shaft straighteners. Other characteristics of this period include the appearance of bone and antler elements within the artifact assemblage and the use of asphaltum. This period also is marked by the appearance of the bow and arrow points and arrow shaft straighteners. (Chronicle, 2023, p. 9)

The cultural patterns of the Late Prehistoric period were similar to the previous period; however, the material culture at many coastal sites appears to have become more complex and elaborate. This may be indicative of an increase in sociopolitical complexity, an increased efficiency in subsistence strategies (e.g., the utilization of the bow and arrow), or progressive economic changes that included increased trade activities with other regions. Indicative of increased trade practices during this period between coastal and inland Native groups are the presence of both Haliotis and Olivella shells and beads, as well as ornaments and split-twig animal figurines at sites in the Project region. (Chronicle, 2023, p. 9)

The presence of sites post-dating 500 B.P., along with the high frequency of processing sites and the abundance of a variety of plant resources, faunal remains, and artifacts, suggests that the use of the Perris valley intensified during the Late Prehistoric period. It has been suggested that this increase in use was the result of the influx of Native American peoples from the surrounding desert region. This shift in population is also believed to coincide with the evaporation of freshwater Lake Cahuilla in the Salton Basin, which could have prompted people to move to a more hospitable environment. Terminal dates for occupation at these sites in the latter half of the Late Prehistoric period are set at approximately 200 years ago, and it is thought that, by historical times, the Native American occupation of the Perris Valley appears to have ceased. (Chronicle, 2023, pp. 9-10)

B. Ethnohistory

At the time of European contact, the area that now occupies the Perris Valley was inhabited by the Luiseño and Cahuilla people. These groups followed the hunter-gatherer way of life, composed of small, highly mobile groups that tracked the seasonal availability of animal and plant resources. (Chronicle, 2023, p. 10).

Luiseño

Luiseño territory generally extended from present-day Riverside County south to Escondido, and to Oceanside in the west. Prior to the institution of the mission system, the Luiseño were likely divided between coastal groups and inland groups, or easterners and westerners. When Spanish settlers instituted the mission system in the 1770s, traditional social and political organization was disrupted. Luiseño villages were organized as autonomous neighboring groups loosely connected through a system of lineages and clans. Several clans or villages could be politically autonomous or allied under one chief. Luiseño chiefs were often aided by assistants and they were usually considered the elite and wealthy of their society. (Chronicle, 2023, p. 10)

The Luiseño were primarily hunters, gatherers, and harvesters. The landscape within the Luiseño traditional use area varied, and methods of subsistence largely depended on the region of settlement. Hunting and gathering places were owned by individuals, families, the chief, or by the collective community. Game animals included deer, cottontail rabbit, jackrabbit, woodrat, mice, ground squirrels, antelope, quail, doves, ducks, and other birds. Acorns, roots, leaves, seeds, and fruit of many other plants were also common sources of food. (Chronicle, 2023, p. 10)

The material culture of the Luiseño included a wide variety of utilitarian items, including projectile points, woven and skin mats, baskets, pottery ollas, shell and bone fishhooks, cooking slabs, digging stick weights, manos, metates, and mortars. Most Luiseño houses were constructed of locally available material; typically, they were conical and partially subterranean, and often featured an adjacent brush-covered ramada for domestic chores. The shelters were made of reeds, brush, or bark. A door within the side of the shelter of a short tunnel was used to enter the structure. Other buildings found in most villages included earth-covered sweat houses, ceremonial houses with fenced areas, and granaries for food storage. (Chronicle, 2023, p. 10)

The Luiseño understand the universe in terms of power, and that this power is the cause for all phenomena. Natural phenomena are viewed as repositories or concentrations of power and features such as mountain tops, springs, unusual rock formations, and rivers are revered and viewed as especially sacred to the Luiseño. Additionally, many species of birds, especially eagles and birds of prey and their symbolic representations, are held as sacred beings of great power. Birds were often ritually killed for ceremonies, and bird cremation sites are also held sacred. Rituals and ceremonies were a constant practice of the Luiseño. Some were regularly scheduled (e.g., birth, death, and puberty), and others were more sporadic (e.g., bird dance, rain rituals, and enemy songs). (Chronicle, 2023, pp. 10-11)

It is estimated that when Spanish colonization of Alta California began in 1769, the Luiseño had approximately 50 active villages with an average population of 200 each, although other estimates place the total Luiseño population between 4,000 and 5,000. Ultimately, the Luiseño population declined rapidly after European contact. This was the result of diseases, such as smallpox, and harsh living conditions at the missions and subsequently at ranchos, where the Native American people often worked as seasonal ranch hands. By the 1840s, many of the Native American populations in what is now southern California had experienced years of extreme social stress and had become estranged from many of their traditional cultural practices, their lands, political autonomy, and had even become enslaved and killed. (Chronicle, 2023, p. 11)

After the American annexation of California, the influx of American settlers further eroded the foundation of the traditional Luiseño society. During the latter half of the nineteenth century, almost all the remaining

Luiseño villages were displaced, and their occupants were eventually removed to the various reservations. Many of the displaced Native Americans at this time also joined the non-missionized Native Americans in the inland mountain and deserts of the region. Today, the nearest Native American groups of Luiseño heritage are associated with the Soboba, Pechanga, and Pala reservations. (Chronicle, 2023, p. 11)

Cahuilla

The Cahuilla are generally divided into three groups based on their geographic setting: the Pass Cahuilla of the Beaumont/Banning area; the Mountain Cahuilla of the San Jacinto and Santa Rosa Mountains; and the Desert Cahuilla from the Coachella Valley, as far south as the Salton Sea. Prior to European contact, population estimates for the Cahuilla range from 3,600 to 10,000. Villages were located near canyons that received substantial rain or were adjacent to streams and springs. The Cahuilla were socially organized based on a system of lineages or clans composed of three to 10 lineages. Clans would often own a large territory in which each lineage owned a village site or resource areas and would cooperate in large, communal subsistence activities and perform rituals together. Founding lineages often owned the role of ceremonial leader within their village, the ceremonial house, and a ceremonial bundle. (Chronicle, 2023, p. 11)

The Cahuilla were hunters, gatherers, and harvesters. Common sources of food included acorns, screw beans, mesquite, piñon, cactus fruits, seeds, wild berries, tubers, roots, and greens. Common game animals included deer, antelope, big horn sheep, rabbits, and wood rats. The Cahuilla did not have access to fishing and additional gathering sites along the coast, as their traditional territories were limited to the inland desert foothills, mountain areas, ancient Lake Cahuilla, and the surrounding valleys. (Chronicle, 2023, p. 11)

The material culture of the Cahuilla included a wide variety of utilitarian items, including projectile points, manos and metates, mortars and pestles, hammerstones, fire drills, awls, shaft straighteners, and stone knives and scrapers. The Cahuilla also manufactured pottery for items such as ollas and cooking pots. House structures of the Cahuilla ranged from brush shelters, some wattled and plastered with adobe mud, or dome-shaped structures during the pre-contact period, to rectangular structures measuring 15 to 20 feet long in the post-contact period. The entry into the shelters were often covered by hides or woven mats. The chief's house was usually the largest of the village and built next to the ceremonial house. Oftentimes, domestic activities took place outside of the shelters under shaded ramada structures. Cahuilla village sites also included a sweat house and several granaries. (Chronicle, 2023, pp. 11-12)

Like the Luiseño, the Cahuilla understand the universe in terms of power, and that this power is the cause for all phenomena. Natural phenomena are viewed as repositories or concentrations of power. Features such as mountain tops, springs, unusual rock formations, and rivers are revered and viewed as especially sacred to the Cahuilla. Many natural features in the region of the Project are considered sacred, and ceremonies were traditionally performed at them; some features also were incorporated into ceremonies. Additionally, many species of birds, especially eagles and birds of prey and their symbolic representations, are held as sacred beings of great power to the Cahuilla. Birds were often ritually killed for ceremonies, and bird cremation sites are also held sacred. Rituals and ceremonies were a constant practice of the Cahuilla. Some were regularly scheduled (e.g., birth, death, and puberty), and others were more sporadic (e.g., bird dance, rain rituals, and enemy songs). (Chronicle, 2023, p. 12)

As a result of European diseases, most notably smallpox, the Cahuilla population was decimated during the nineteenth century. The Cahuilla experienced similar conditions to the Luiseño and were also displaced from their traditional cultural practices and lands, enslaved, killed, and forced into the mission system. After the establishment of ranchos and property grants, many Cahuilla also became ranch hands after being forced to leave the mission. Many individuals were left to fend for themselves and often joined non-missionized Native American in the region or were sent to nearby reservations. Today, Native Americans with Cahuilla affiliation are associated with the Agua Caliente Band of Cahuilla Indians, Augustine Band of Cahuilla Indians, Cabazon Band of Mission Indians, Cahuilla Band of Mission Indians, Los Coyotes Band of Cahuilla and Cupeño Indians, Morongo Band of Mission Indians, Ramona Band of Cahuilla Indians, Santa Rosa Band of Cahuilla Indians, and Torres-Martinez Desert Cahuilla Indians. (Chronicle, 2023, p. 12)

C. *Historic Setting*

At historic contact, the region was occupied by the Serrano tribe. Settlement by Euro-Americans began in the mid-to-late nineteenth century with the establishment of ranching operations, which were soon followed by the arrival of homesteaders drawn to the area. By the end of the nineteenth century, the California Southern Railway was constructed through the region, triggering the development of several towns along the railroad corridor. Development in the Perris Valley continued steadily through the first decades of the nineteenth century. With the arrival of World War I (WWI), the United States (U.S.) rushed to build its military forces in anticipation of participating in the contingency. The establishment of Camp Haan and, successively, March Air Force Base brought a boom in construction and development to the northern portion of Perris Valley. (Chronicle, 2023, p. 12)

1. *Spanish Exploration and Mission Period: 1771-1821*

Spanish settlement of Alta California began in 1769, with the establishment of a presidio and mission near San Diego. In 1770, a second presidio and mission were founded in Monterey. These two settlements were used as bases from which to colonize the rest of California. The Spanish also laid out pueblos, or towns, along the coast. Providing supplies, animals, and colonists to the Spanish missions and presidios by way of ship was difficult, time-consuming, expensive, and dangerous. Thus, an overland route was necessary to initiate a strong colonizing effort in Alta California. In 1774, Captain Juan Bautista de Anza crossed the San Jacinto plains with a small party of soldiers to establish an overland route through Alta California. (Chronicle, 2023, p. 13)

Within the mission system, the Riverside County area was considered part of the lands administered by the San Diego presidio and Mission San Luis Rey. Mission San Luis Rey was founded in 1798 by Padre Fermín Lasuén. San Luis Rey was one of the most prolific missions in California. The mission controlled approximately 950,400 acres of land and contained over 3,000 converted Native people that helped tend the land and care for approximately 50,000 heads of livestock. (Chronicle, 2023, p. 13)

2. *Mexican (Rancho) Period: 1821–1848*

The prosperity of the mission system was cut short when Mexico gained its independence from Spain in 1821. Soon after, the Mexican government enacted the Secularization Act of 1833, which dissolved the mission system. Former mission lands were fragmented and redistributed to new owners. In 1842, Don Jose Antonio Estudillo was granted the Rancho San Jacinto Viejo, a 35,000-acre parcel, by Mexican Governor Juan B. Alvarado. The rancho, which included an area encompassing the present areas of Hemet, San Jacinto, Valle

Vista, and Winchester, was used to graze cattle. The upper portions of the Perris and San Jacinto valleys were granted to Miguel de Pedrorena by Governor Pio Pico on January 14, 1846; the rancho covered 48,861acres and was known as Rancho San Jacinto Nuevo y Potrero. Later that year, Pico granted 48,847 acres in the western half of Perris to Maria del Rosario Estudillo de Aguirre; the Rancho El Sobrante de San Jacinto included portions of western Perris Valley, the Canyon Lake area, and the Lake Mathews region. The Project area lies between the two rancho territories. Cattle and agriculture were the economic engine that drove the rancho way of life, which continued until the second half of the nineteenth century with the arrival of American and other new settlers into California. (Chronicle, 2023, p. 13)

3. American Period: 1849–Present

Perris Valley and the Town of Alessandro

In 1848, the Mexican American War came to an end with the signing of the Treaty of Guadalupe Hidalgo. California became a U.S. territory and was granted statehood in 1850. Before the California Southern Railroad built a route connecting San Diego to San Bernardino by way of Temescal Canyon, the area where the future town of Perris would be founded was known as the San Jacinto Plains. With the success of the agricultural activities in the newly established city of Riverside to the west, farmers headed east to the San Jacinto plains in the 1880s to pursue ranching and dry farming. American settlement in the region was slow and sporadic, but settlement in the Perris Valley received a major boost when the California Southern Railroad was constructed through the Perris Valley in 1882–1883. The local railroad station was named after Frederick Thomas Perris, the chief engineer of the California Southern Railroad. The route resulted in the establishment of several towns within the Perris Valley along the railroad corridor. (Chronicle, 2023, pp. 13-14)

Perris incorporated in 1911. In its early days, Perris was largely an agricultural community reliant on dry farming. When it came time in the early 1900s to consider how to provide the growing cities of southern California with water, surveyors proposed a path that went from the Colorado River near Blythe and headed west through the Coachella Valley and Riverside. The Department of Interior set aside land starting in 1902 for the above ground and underground alignments of a conduit to connect a series of reservoirs located between Riverside and Los Angeles. Between 1933 and 1939, the Metropolitan Water District (MWD) constructed the 242-mile-long Colorado River Aqueduct, which consists of open canals, covered conduits, siphons, tunnels, and pumping plants that carry water to the coastal regions of southern California. The aqueduct is subterranean at this location and traverses below the Project area. The U.S. Government purchased land in Section 12 and held it until the completion of the Val Verde Tunnel of the MWD's Colorado River Project in 1941. March Air Field is located northeast of the Project area and was constructed in 1917 in response to World War I. March Air Field attracted residents to the area as it provided jobs. Today, Perris is known as a popular spot for parachuting and is largely a bedroom community with residents commuting to Riverside and Temecula for work. (Chronicle, 2023, p. 14)

March Air Force Base

The deployment of the U.S. Army on Alessandro Aviation Field in 1918 started a long history of military presence in the area. After the arrival of the U.S. Army, Alessandro Field was renamed March Field on March 20, 1918, in honor of Second Lieutenant Peyton C. March, Jr., son of the Army Chief of Staff, who had been killed in a flying accident in Texas the previous month. The agricultural landscape surrounding the air field was transformed into a fully functional military training base that included 12 hangers, six barracks equipped

for 150 men each, mess halls, a machine shop, a post exchange, a hospital, a supply depot, an aero repair building, bachelor officer's quarters and a residence for the commanding officer. By 1923 the base had closed its doors and military activity remained silent for a few short years. In 1926, the creation of the Army Air Corps and commissioning of the Army's five-year plan by Congress prompted an expansion in pilot training and the activation of tactical units. The establishment of more military training installations across the nation allowed March Field to transition from a military training installation to an operational base in 1931. Before the end of the year, March Field became home of the Air Corp's heaviest aircraft, as well as an assortment of fighters. (Chronicle, 2023, p. 14)

Training activities resumed at March Field after the attack on Pearl Harbor in December of 1941. During this period, the base doubled in size, and at the climax of the war effort, it supported approximately 75,000 troops. That same year, the government purchased a similar-sized tract of land west of the Perris highway and established Camp Haan as an anti-aircraft artillery training facility. During WWII, the camp supported as many as 85,000 troops at its height of activity. Soon after the war, Camp Haan was decommissioned, and in 1946 its grounds became part of March's real estate holding. (Chronicle, 2023, pp. 14-15)

After the war, March Field reverted to its operational role and became a Tactical Air Command base, and on January 13, 1948, was renamed March Air Force Base (MAFB). In 1949, MAFB became part of the Strategic Air Command during the postwar reorganization of the Army Air Force. Soon thereafter, the Fifteenth Air Force Headquarters, along with the 33rd Communications Squadron and the 22nd Bombardment Wing, made MAFB their home. These three units remained as dominant features of base activities for years to come. From 1949 to 1953, the B-29 Superfortresses dominated the hangars at MAFB. During the Korean War, the 22nd Bombardment Wing converted from the huge propeller-driven B-29s to the sleek B-47 jet bombers and their supporting tankers, the KC-97s. The new planes represented a leap in technology, and planes, along with crews, began breaking altitude and distance records. The new refueling planes also allowed for a significant increase in operational range. (Chronicle, 2023, p. 15)

In 1960, the first Reserve unit was assigned to MAFB, flying C-119s. Throughout the 1960s, the base saw the replacement of the B-47s bombers and KC-97s tankers for the B-52B giant bombers, along with the new KC-135 jet "Stratotankers." In the 1980s, MAFB saw major restructuring of its units. These changes included the retirement of the wing's last B-52 bomber, the reassignment of the 22nd Bombardment Wing as an air refueling wing with the new KC-10 tanker, and the arrival of the California Air National Guard with their F-4C's. In 1993, MAFB was selected for realignment. Between 1993 and 1994, the 445th Airlift Wing was transferred to MAFB from Norton Air Force Base, California, the 22nd Air Refueling Wing was transferred to McConnell Air Force Base, Kansas, and the 722nd Air Refueling Wing stood up at March Air Reserve Base (MARB). Additionally, the MAFB's two Reserve units, the 445th Airlift Wing and the 452nd Air Refueling Wing were deactivated, and their personnel and equipment joined under the 452nd Air Mobility Wing. On April 1, 1996, MAFB officially became March Air Reserve Base. (Chronicle, 2023, p. 15)

D. Methods

The cultural resources assessment involved both background research and fieldwork. The research included a records search at the Eastern Information Center (EIC) at the University of California, Riverside to identify prior studies and previously recorded cultural resources within 0.5 mile of the Project area, and an examination of additional sources during the cultural resource literature review and records search, including the National

Register of Historic Places (NRHP), the CRHR, the Office of Historic Preservation (OHP) Archaeological Determinations of Eligibility, the OHP Directory of Properties in the Historic Property Data File, historical aerial images and topographic maps, and BLM GLO land patents and survey plats. Based on a Sacred Lands File (SLF) search, a total of 25 Native American individuals/organizations that may have unique knowledge of cultural resources in the area were contacted by email and telephone. In addition, Chronicle conducted an intensive pedestrian survey for the Project site and off-site improvement areas. Refer to Section 7 of the Project's Phase I CRA (*Technical Appendix E1*) for a detailed discussion of the methodology used to identify and evaluate the potential significance of historic and pre-historic resources as part of the Project's Phase I CRA. (Chronicle, 2023, pp. 18-20)

❑ Phase II ESA Field Survey Methods

Based on the results of the Project's Phase I ESA, Phase II field work was undertaken by Chronicle for sites CA-RIV-8681/P-33-016534 and CA-RIV-8683/H/P-33-016536. The Phase II field work consisted of an intensive concentrated survey, and excavation of 35 shovel test probes (STPs) in a predetermined distribution throughout these two sites. Twenty-nine STPs were proposed within CA-RIV-8681/P-33-016534 among the 22 milling features, and the artifact and lithic scatters; 6 STPs were planned within CA-RIV-8683/H/P-33-016536 among the five milling features. Refer to Section 7 of the Project's Phase II CRA (*Technical Appendix E2*) for a more thorough discussion of the methodology employed as part of the (Chronicle, 2024, p. 20)

❑ Evaluation of Cultural Resources

CEQA defines historically significant resources as "resources listed or eligible for listing in the California Register of Historic Resources [CRHR]" (Public Resources Code Section 5024.1). A cultural resource may be considered historically significant if the resource is 45 years old or older, possesses integrity of location, design, setting, materials, workmanship, feeling, and association, and meets any of the following criteria for listing on the CRHR: (Chronicle, 2024, p. 6)

1. Criterion No. 1: Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. Criterion No. 2: Is associated with the lives of persons important in our past;
3. Criterion No. 3: Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or,
4. Criterion No. 4: Has yielded, or may be likely to yield, information important in prehistory or history (Public Resources Code Section 5024.1).

Cultural resources are buildings, sites, humanly modified landscapes, traditional cultural properties, structures, or objects that may have historical, architectural, cultural, or scientific importance (Chronicle, 2024, p. 6).

E. Results

Provided below is a summary of the results of the Project's Phase I CRA (*Technical Appendix E1*) and Phase II CRA (*Technical Appendix E2)*. Refer to Chapter 8 of the Phase I CRA for a complete description of the results of the cultural resources investigation.

1. Records Search Results

Chronicle conducted a records search as part of the Phase I study. The records search results indicate that since 1977, 58 previous cultural resource investigations have been conducted within 0.5-mile of the Project area. Seven of these studies intersect the Project area. Together, these studies inventoried approximately 20 percent of the Project area. Copies of the previous project reports on file at the EIC are provided in Appendix B of the CRA. (Chronicle, 2023, p. 20)

The results of the records search indicate that a total of 209 cultural resources have been recorded within 0.5-mile of the Project area. These resources include 171 prehistoric sites, 5 prehistoric isolated objects, 5 multicomponent archaeological sites, 15 historic period archaeological sites, 3 historic period isolated objects, 9 historic period built-environment resources, and 1 element of a historic district. Most of the prehistoric resources consist of bedrock milling sites. Twelve of the previously recorded resources are within the Project area, including seven prehistoric sites, three prehistoric isolates, one multicomponent site with both prehistoric and historic period components, and one historic district element. Descriptions of these resources are provided in subsection 8.1.2 of the Project's CRA (*Technical Appendix E1*). (Chronicle, 2023, pp. 24-25)

Chronicle also conducted a review of topographic maps and aerial images, which determined that, aside from the presence of sparse homesteads along what is now known as Cajalco Road, Seaton Avenue, and Camino del Sol, the Project area was largely undeveloped land during the first half of the twentieth century. Development at this time in the surrounding area included the construction of multiple roadways, what appears to be early development of the Perris community, and the presence of a segment of Southern California Railroad (later known as Atchison Topeka and Santa Fe Railroad) just east and northeast of the Project area. The 1942 Riverside, California 15-minute and 1942 Steele Peak, California 7.5-minute USGS quadrangle maps indicate that by the early 1940s, several structures/residences and roads were present in the eastern portion of the Project area. A quarry lies south of the Project area with a spur of the Atchison Topeka and Santa Fe Railroad running from the quarry toward the main rail line. A review of BLM GLO records identified two land patents associated with the Project area. These include a Serial Patent for the Southern Pacific Railroad Company for Section 11 issued in October of 1891 and a State Volume Patent for 160 acres in the northwest quarter of Section 12 to John Schneider in October 1891. It does not appear that there are any structures within the Project area that are associated with the two land patents. (Chronicle, 2023, p. 34)

Finally, an SLF search of the Project area was conducted by the NAHC on February 7, 2023. The search was completed with positive results and the NAHC requested that the Pechanga Band of Mission Indians be contacted for further information. Additionally, the NAHC suggested that 25 individuals representing 18 Native American tribal groups be contacted to elicit information regarding cultural resource issues related to the proposed Project. Chronicle sent outreach letters to the 25 recommended tribal contacts on May 25, 2023, and made follow up phone calls on June 9, 2023. Outreach to the Native American tribes resulted in eight responses: (Chronicle, 2023, pp. 35-36)

- On May 30, 2023, Claritsa Duarte, the Agua Caliente Band of Cahuilla Indians (ACBCI) Cultural Resources Analyst, responded that the Project area is not within the boundaries of the ACBCI Reservation, but it is within the Traditional Use Area. The tribe requested copies of cultural resource documentation, copies of all reports and records obtained from the EIC, the presence of an approved tribal resource monitor and Secretary of Interior qualified archaeologist during ground disturbing activities, a construction stoppage protocol in the event of an unanticipated discovery, a cultural resource inventory of the Project area by a qualified archaeologist, and tribal notification when ground disturbance begins.
- On May 30, 2023, Geramy Martin, the Tribal Secretary for the Augustine Band of Cahuilla Mission Indians, responded that the Tribe is unaware of specific cultural resources that may be affected by the Project; however, in the event of discovering any cultural resources during the development of the Project, the Tribe requests that they are contacted immediately for further evaluation.
- On May 30, 203, Jill McCormick, Historic Preservation Officer for the Quechan Tribe of the Fort Yuma Reservation, responded that the Tribe does not wish to provide comments on the Project.
- On May 31, 2023, BobbyRay Esparza, the Cahuilla Band of Indians' (Cahuilla Band) Cultural Director, responded that the tribe would like to request all cultural materials associated with the Project for review. According to the Project map, the Project is within Cahuilla Band's traditional land use area.
- On June 9, 2023, Michael Garcia, Vice Chairperson of the Ewiiaapaayp Band of Kumeyaay Indians, responded that the Tribe does not have any comments on the Project.
- On June 9, 2023, staff from the Los Coyotes Band of Cahuilla and Cupeño Indians' Environmental Department responded that the Tribe does not have any comments on the Project.
- On June 9, 2023, administrative staff from the Mesa Grande Band of Diegueno Mission Indians responded that if Chairperson Teresa Hernandez has not responded, then there likely is no comment from the Tribe on the Project.
- On June 13, 2023, Shuuluk Linton, Tribal Historic Preservation Office Coordinator for the Rincon Band of Luiseno Indians, responded that the Project is within the Traditional Use Area of the Luiseno people and within the Tribe's Area of Historic Interest. However, after review of the Tribe's internal information, no cultural resource information is available to share, the Tribe does not have any additional comments and does not request consultation at this time. The Tribe requested a copy of the final cultural resource investigation.

2. Field Investigation Results

Chronicle completed the survey of the approximately 100-acre Study Area from June 26 through June 28, 2023, with a follow up survey conducted on August 11, 2023. During the cultural resources survey, the mapped locations of the 12 previously recorded resources were revisited and assessed for changes since their last recording. Due to the close proximity of the bedrock milling sites to each other (30 m or less), seven of the previously recorded sites were combined into two larger sites, CA-RIV-8681/P-33-016534 and CA-RIV-8683/H/P-33-016536. Additionally, one newly identified bedrock milling feature was documented at CA-RIV-

8681/P-33-016534. Finally, the previously recorded bedrock milling site of P-33-016813, along with the three isolated finds, were not re-identified at their mapped locations. Site P-33-016813, which consists of a single bedrock milling slick, appears to have been misplotted as no bedrock outcrops are apparent in the vicinity of the mapped location. The isolates have likely been destroyed or buried by residential development. (Chronicle, 2023, p. 36)

Historic built-environment resources identified during the survey include a previously recorded segment of the Colorado River Aqueduct and four historic period residences. Descriptions and eligibility recommendations for these five resources are summarized below. (Chronicle, 2023, p. 36)

Additionally, in January and February 2024, Chronical conducted a Phase II cultural resources investigation for sites CA-RIV-8681/P-33-016534 and CA-RIV-8683/H/P-33-016536, the results of which are presented in the Project's Phase II CRA (*Technical Appendix E2*) and discussed below.

Archaeological Sites

- **Site CA-RIV-8681/P-33-016534**

Site CA-RIV-8681/P-33-016534 originally was recorded as four bedrock milling slicks with an associated artifact scatter in the southern extent of the Project site. A revisit to the site found that the site is within 30 m of four previously recorded bedrock milling sites: CA-RIV-8685, CA-RIV-8680 CA-RIV-8686, and CA-RIV-8688. In addition, one new bedrock milling feature was recorded approximately 25 m west of the previously recorded sites. Given the proximity of these features in relation to one another, they have been combined into CA-RIV-8681/P-33-016534. Each bedrock milling feature has been reclassified as a locus, with the site now consisting of six loci. Refer pages 41 and 43 of the Project's Phase I CRA (*Technical Appendix E1*) for a discussion of the current conditions at Site CA-RIV-8681/P-33-016534 and for a detailed description of each of the six loci, which generally consist of milling slicks on bedrock outcrops, cup mortars, and/or lithic scatter. (Chronicle, 2023, pp. 37, 40)

Based on the results of the Phase I CRA, Chronical performed a Phase II investigation of Site CA-RIV-8681/P-33-016534 that included a series of manually excavated STPs. All the STPs provided negative results for prehistoric cultural materials, and little to no visible subsurface disturbances, to include flora and fauna. Information about the STPs and their soil conditions are available in *Technical Appendix E2* (Chronicle, 2024, pp. 23-24)

Site CA-RIV-8681/P-33-016534 does not appear to have been previously evaluated for listing in the CRHR. Chronicle evaluated the site as part of the Phase II CRA. Although bedrock outcrop milling sites are broadly associated with subsistence and settlement strategies of the local Native American occupation of the Riverside region during the prehistoric period, the results of the testing indicate that the site is not associated or connected with significant events, nor does it contain any attributes that convey specific association with an important person of significance. As such, the resource is not eligible for listing in the CRHR under Criteria 1 or 2. The site also does not embody the distinctive characteristics of a type, period, or method of construction, nor does it represent the work of a master or possess artistic value; therefore, the resource is not eligible for listing in the CRHR under Criterion 3. The results of the testing and the general surface condition of the site indicate that the site lacks subsurface deposits, or subsurface components altogether. Combined with the exhaustive

recording of the surface artifacts and bedrock milling features, the site is not likely to yield additional information important to the further understanding of the history of Riverside County. The research potential of the site has been exhausted by recordation; therefore, Site CA-RIV-8681/P-33-016534 also is not eligible for listing in the CRHR under Criterion 4. Site CA-RIV-8681/P-33-016534 is determined to not be eligible for listing in the CRHR under any criteria. (Chronicle, 2024, pp. 26-27)

- **Site CA-RIV-8683/H/P-33-016536**

Site CA-RIV-8683/H/P-33-016536 was originally recorded as a single milling slick. The revisit found that the site is less than 30 m from CA-RIV-8684/H/P-33-016536, a multicomponent site consisting of a four bedrock milling slicks and historic refuse scatter. Because these resources are within 30 m of each other, they have been combined into one site under CA-RIV-8683/H/P-33-016536. Each resource has been reclassified as a locus, with the site now consisting of two loci. As more fully described in subsection 8.3.1 of the Project's Phase I CRA (*Technical Appendix E1*), Locus 1 was previously recorded as a single milling slick on a bedrock outcrop with no associated artifacts. During the current survey, the bedrock outcrop and milling slick were identified and found to be in similar condition as previously recorded. Locus 2 was previously recorded as four milling slicks on three bedrock outcrops and two fragments of sun colored amethyst glass. During the current survey, the milling slicks were identified, but the previously recorded glass fragments were not identified due to the lack of ground visibility. (Chronicle, 2023, pp. 44-45)

Based on the results of the Phase I CRA as described above, Chronical performed a Phase II investigation of Site CA-RIV-8683/H/P-33-016536. As more fully described in subsection 8.2.2 of the Project's Phase II ESA (*Technical Appendix E2*), a total of six STPs were excavated in CA-RIV-8383/H/P-33-016536. (Chronicle, 2024, p. 27) All STPs within the site returned negative results, having no cultural constituents, and little to no visible subsurface disturbances, to include flora and fauna. Additional information about the STPs and their soil conditions are available in *Technical Appendix E2* (Chronicle, 2024, p. 27)

Site CA-RIV-8683/H/P-33-016536 does not appear to have been previously evaluated for listing in the CRHR. Chronicle Heritage evaluated the site as part of the Phase II study. Although bedrock outcrop milling sites are broadly associated with subsistence and settlement strategies of the local Native American occupation of the Riverside region during the prehistoric period, the results of the testing indicate that the site is not associated or connected with significant events, nor does it contain any attributes that convey specific association with an important person of significance. As such, the resource is not eligible for listing in the CRHR under Criteria 1 or 2. The site also does not embody the distinctive characteristics of a type, period, or method of construction, nor does it represent the work of a master or possess artistic value; therefore, the resource is not eligible for listing in the CRHR under Criterion 3. The results of the testing and the general surface condition of the site indicate that the site lacks subsurface deposits, or subsurface components altogether. Combined with the exhaustive recording of the surface artifacts and bedrock milling features, the site is not likely to yield additional information important to the further understanding of the history of Riverside County. The potential of the site appears has been exhausted by recordation; therefore CA-RIV-8683/H/P-33-016536 is not eligible for listing in the CRHR under Criterion 4. Site CA-RIV-8683/H/P-33-016536 is determined to not be eligible for listing in the CRHR under any criteria. (Chronicle, 2024, p. 29)

Historic Period Districts

- **Site CA-RIV-6726H/P-33-011265**

Site CA-RIV-6726H/P-33-011265 was previously recorded as the Colorado River Aqueduct. The aqueduct has been recommended eligible for the National Register of Historic Places (NRHP) and CRHR under Criteria 1/A and 2/B, but an eligibility determination does not appear to have been made. The resource intersects the southern portion of the Project area in an east-west direction. During the current survey, Chronicle visited the segment of the resource within the Project area. The portion of the aqueduct that crosses the Project area is an actively maintained buried pipeline with no historic surface elements or character-defining features and it is unlikely that the condition of the resource has changed. (Chronicle, 2023, pp. 45-46)

Historic Period Built-Environmental Resources

- **Site 22675 Cajalco Road**

Site 22675 Cajalco Road is a one-story, Ranch-style, single-family residence located on Assessor Parcel Number (APN) 317-080-003. The building was constructed in 1964 and measures 1,170 ft^2. The residence is 'L'-shaped in plan with a cross-gabled roof clad in composition shingles and exterior walls covered in stucco. Fenestration consists of aluminum sliding and fixed-pane windows. Some of the windowpanes have been removed to allow for the installation of window-mounted air-conditioning units. The primary entrance is on the building's north façade with the roof projecting out to protect the entry way. Landscaping includes mature trees and grassy fields. The building permits were not available online and the site was improved in 1964 according to the Riverside County Assessor online records. The original architect, if any, and builder are unknown. The building appears to be unaltered. (Chronicle, 2023, p. 46)

The residence at 22675 Cajalco Road is a common and low-style example of a 1960s Ranch style home. Although the property is associated with post-World War II development in the Perris Valley, it is one of many residential properties that was established at this time in the Project vicinity. No evidence was found to indicate it is directly associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage. As such, it is not recommended eligible for listing in the CRHR under Criterion 1. Research in city directories, census records, and historic newspapers does not indicate persons who made demonstrably significant contributions to the history of the city, state, or nation are known to be associated with the 22675 Cajalco Road. Therefore, the property is not recommended eligible for listing in the CRHR under Criterion 2. The residential property does not possess distinctive features that embody the distinctive characteristics of a type, period, or method construction. Furthermore, it does not possess high artistic value, nor is it known to be the work of a master. As such, it is not recommended eligible for listing in the CRHR under Criterion 1. Finally, additional study of the building at 22675 Cajalco Road is unlikely to yield significant information on historic period settlement in the Perris Valley. As a result, the resource is not significant for listing on CRHR under Criterion 4. (Chronicle, 2023, pp. 46-47)

- **Site 22765 Cajalco Road**

Site 22765 Cajalco Road is a 500 ft^2 vernacular mobile home located on APN 317080007 that was installed at this site in 1973. The building is rectangular in plan and the flat roof is clad in composition roll. The exterior walls are clad in T1-11 siding and the aluminum sliding windows appear to be original. The primary entrance is raised and accessed via a wood deck with stairs that is sheltered by a plywood shed roof. Landscaping

consists of mature trees and grassy fields. Because the mobile home is located on a parcel that also contains a residence built in 1980, the analyzed boundary is limited to the footprint of the building. The building permits were not available on the Riverside County Assessor online records. The building is a mass-produced mobile home. The manufacturer is unknown. (Chronicle, 2023, p. 47)

The residence at 22765 Cajalco Road is a common and low-style example of a 1970s mobile home. Although the property is associated with post-World War II development in the Perris Valley, it is one of many residential properties that was established at this time in the Project vicinity. No evidence was found to indicate it is directly associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage. As such, it is not recommended eligible for listing in the CRHR under Criterion 1. Research in city directories, census records, and historic newspapers does not indicate persons who made demonstrably significant contributions to the history of the city, state, or nation are known to be associated with the 22765 Cajalco Road. Therefore, the property is not recommended eligible for listing in the CRHR under Criterion 2. The mobile home was mass produced and does not possess significant architectural detailing nor does it possess distinctive features that embody the distinctive characteristics of a type, period, or method construction. It does not possess high artistic value and is not known to be the work of a master. As such, it is not recommended eligible for listing in the CRHR under Criterion 1. Finally, additional study of the mobile home at 22765 Cajalco Road is unlikely to yield significant information on historic period settlement in the Perris Valley. As a result, the resource is not significant for listing on CRHR under Criterion 4. (Chronicle, 2023, p. 48)

- ❑ **Site 22775 Cajalco Road**

Site 22775 Cajalco Road is a one-story Ranch-style residence located on APN 317080008 that was constructed in 1964 and measures 3,714 ft^2. The building is generally rectangular in plan. The side-gabled roof is clad in composition shingles and the exterior walls are clad in stucco and brick veneer. The aluminum sliding windows appear to be original. The primary entrance is at grade and recessed, with a primary entry door that has been replaced with a modern paneled hollow-core metal door. A brick chimney is prominently featured on the primary façade. A large two-car garage with apartment appears to be an addition based upon the roof transition over the breezeway. The garage addition is clad in stucco and the fenestration is not discernable from the public right-of-way. The building permits were not available online and the site was improved in 1964 according to the Riverside County Assessor online records. The original architect, if any, and builder are unknown. (Chronicle, 2023, pp. 48-49)

The residence at 22775 Cajalco Road is a common and low-style example of a 1960s Ranch-style home. Although the property is associated with post-World War II development in the Perris Valley, it is one of many residential properties that was established at this time in the Project vicinity. No evidence was found to indicate it is directly associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage. As such, it is not recommended eligible for listing in the CRHR under Criterion 1. Research in city directories, census records, and historic newspapers does not indicate persons who made demonstrably significant contributions to the history of the city, state, or nation are known to be associated with the 22775 Cajalco Road. Therefore, the property is not recommended eligible for listing in the CRHR under Criterion 2. The residential property does not possess distinctive features that embody the distinctive characteristics of a type, period, or method construction. Furthermore, it does not possess high artistic value, nor is it known to be the work of a master. As such, it is not recommended eligible for listing in

the CRHR under Criterion 1. Finally, additional study of the building at 22775 Cajalco Road is unlikely to yield significant information on historic period settlement in the Perris Valley. As a result, the resource is not significant for listing on CRHR under Criterion 4. (Chronicle, 2023, pp. 49-50)

❑ 19641 Seaton Avenue

Site 19641 Seaton Avenue was originally constructed as a 1,716 ft^2, Ranch-style, single-family residence on APN 317080021 in 1963. The building was converted to an industrial use at an unknown date. The building is rectangular in plan. The side-gabled roof is clad in composition shingles. The exterior walls are clad in rough textured stucco, which appears to be an alteration. The windows are aluminum sliding units. The primary entrance is at grade. The roof extends the entire primary façade to create a sheltered porch and is supported by square columns. A large shade structure addition was constructed circa 2011 based upon a review of historic photographs. Landscaping is minimal and consists of a paved surface parking lot and an unpaved parking area. The building permits were not available online and the site was improved in 1963 according to the Riverside County Assessor online records. The original architect, if any, and builder are unknown. (Chronicle, 2023, p. 50)

The residence at 19641 Seaton Avenue is a common and low-style example of a 1960s Ranch-style home. Although the property is associated with post-World War II development in the Perris Valley, it is one of many residential properties that was established at this time in the Project vicinity. No evidence was found to indicate it is directly associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage. As such, it is not recommended eligible for listing in the CRHR under Criterion 1. Research in city directories, census records, and historic newspapers does not indicate persons who made demonstrably significant contributions to the history of the city, state, or nation are known to be associated with 19641 Seaton Avenue. Therefore, the property is not recommended eligible for listing in the CRHR under Criterion 2. The residential property does not possess distinctive features that embody the distinctive characteristics of a type, period, or method construction. Furthermore, it does not possess high artistic value, nor is it known to be the work of a master. As such, it is not recommended eligible for listing in the CRHR under Criterion 1. Finally, additional study of the building at 19641 Seaton Avenue is unlikely to yield significant information on historic period settlement in the Perris Valley. As a result, the resource is not significant for listing on CRHR under Criterion 4. (Chronicle, 2023, pp. 50-51)

3. Summary of Results

The Phase I cultural resource study identified seven cultural resources in the Project area including two archaeological sites – a prehistoric bedrock milling site (CA-RIV-8681/P-33-016534) and a prehistoric milling site with associated historic-era refuse (CA-RIV-8683/H/P-33-016536). A Phase II testing program was conducted at sites CA-RIV-8681/P-33-016534 and at CA-RIV-8683/H/P-33-016536 to collect necessary data with which to assess the archaeological significance of the sites. As described above, and based on the results of the Phase II CRA (*Technical Appendix E2*), Sites CA-RIV-8681/P-33-016534 and CA-RIV-8683/H/P-33-016536 were determined to not be eligible for listing in the CRHR under Criteria 1, 2, 3, or 4. As such, Chronicle determined that sites CA-RIV-8681/P-33-016534 and CA-RIV-8683/H/P-33-016536 are not eligible for listing in the CRHR under any criteria. As such, sites CA-RIV-8681/P-33-016534 and CA-RIV-8683/H/P-33-016536 are not considered to comprise significant archaeological or historical resources pursuant to the criteria listed in Section 15064.5 of the State CEQA Guidelines.

Additionally, five historic-period built-environment resources were identified in the Project. One of these resources, the Colorado River Aqueduct (CA-RIV-6426H), was previously determined eligible for listing on the NRHP and CRHR under Criteria 1/A and 2/B. Within the proposed Project area, Colorado River Aqueduct is underground and no historic surface elements or character-defining features were apparent. The four remaining historic built-environment resources consist of residential properties (22675 Cajalco Road, 22765 Cajalco Road, 22775 Cajalco Road, and 19641 Seaton Avenue). Evaluations of significance found that none of the residences meet the criteria for listing on the CRHR. No further cultural resources management is recommended for these four properties. (Chronicle, 2023, p. 51)

4.5.2 Applicable Environmental Regulations

A. Federal Regulations

1. National Register of Historic Places (NRHP)

The NRHP is the official list of the Nation's historic places worthy of preservation. Authorized by the National Historic Preservation Act (NHPA) of 1966, the National Park Service (NPS)'s NRHP is part of a national program to coordinate and support public and private efforts to identify, evaluate, and protect America's historic and archaeological resources. (NPS, n.d.18)

To be considered eligible, a property must meet the National Register Criteria for Evaluation. This involves examining the property's age, integrity, and significance, as follows:

- Age and Integrity. Is the property old enough to be considered historic (generally at least 50 years old) and does it still look much the way it did in the past?

- Significance. Is the property associated with events, activities, or developments that were important in the past? With the lives of people who were important in the past? With significant architectural history, landscape history, or engineering achievements? Does it have the potential to yield information through archaeological investigation about our past? (NPS, n.d.18)

Nominations can be submitted to a SHPO from property owners, historical societies, preservation organizations, governmental agencies, and other individuals or groups. The SHPO notifies affected property owners and local governments and solicits public comment. If the owner (or a majority of owners for a district nomination) objects, the property cannot be listed but may be forwarded to the NPS for a Determination of Eligibility (DOE). Listing in the NRHP provides formal recognition of a property's historical, architectural, or archaeological significance based on national standards used by every state. (NPS, n.d.18)

Under Federal Law, the listing of a property in the National Register places no restrictions on what a non-federal owner may do with their property up to and including destruction, unless the property is involved in a project that receives Federal assistance, usually funding or licensing/permitting. National Register listing does not lead to public acquisition or require public access. (NPS, n.d.18)

2. National Historic Landmarks Program

National Historic Landmarks (NHLs) are nationally significant historic places designated by the Secretary of the Interior because they possess exceptional value or quality in illustrating or interpreting the heritage of the United States. Today, over 2,600 historic places bear this national distinction. Working with citizens throughout the nation, the NHL Program draws upon the expertise of NPS staff who guide the nomination process for new Landmarks and provide assistance to existing Landmarks. (NPS, n.d.19)

3. American Indian Religious Freedom Act

The American Indian Religious Freedom Act (AIRFA) requires each executive branch agency with statutory or administrative responsibility for the management of Federal lands, to the extent practicable, permitted by law, and not clearly inconsistent with essential agency functions, to accommodate access to and ceremonial use of Indian sacred sites by Indian religious practitioners and avoid adversely affecting the physical integrity of such sacred sites. Where appropriate, agencies are also required to maintain the confidentiality of sacred sites. Each executive branch agency with statutory or administrative responsibility for the management of Federal lands are required to implement procedures to ensure reasonable notice is provided of proposed actions or land management policies that may restrict future access to or ceremonial use of, or adversely affect the physical integrity of, sacred sites. (NOAA, n.d.20)

4. Federal Antiquities Act

The Antiquities Act is the first law to establish that archaeological sites on public lands are important public resources. It obligates federal agencies that manage the public lands to preserve for present and future generations the historic, scientific, commemorative, and cultural values of the archaeological and historic sites and structures on these lands. It also authorizes the President to protect landmarks, structures, and objects of historic or scientific interest by designating them as National Monuments. (NPS, 2023a)

B. State Regulations

1. California Administrative Code, Title 14, Section 4308

Section 4308, *Archaeological Features*, of Title 14 of the California Administrative Code provides that: "No person shall remove, injure, disfigure, deface, or destroy any object of archaeological, or historical interest or value." (NPS, n.d.21)

2. California Code of Regulations Title 14, Section 1427

California Code of Regulations Title 14, Section 1427 provides that: "No person shall collect or remove any object or thing of archaeological or historical interest or value, nor shall any person injure, disfigure, deface or destroy the physical site, location or context in which the object or thing of archaeological or historical interest or value is found." (NAHC, n.d.22)

3. California Register of Historic Resources

The State Historical Resources Commission has designed this program for use by state and local agencies, private groups, and citizens to identify, evaluate, register, and protect California's historical resources. The Register is the authoritative guide to the state's significant historical and archaeological resources. The

California Register program encourages public recognition and protection of resources of architectural, historical, archaeological, and cultural significance; identifies historical resources for state and local planning purposes; determines eligibility for state historic preservation grant funding; and affords certain protections under CEQA. (OHP, n.d.23)
In order for a resource to be included on the Register of Historic Resources, the resources must meet one of the following criteria:

- Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States (Criterion 1).
- Associated with the lives of persons important to local, California or national history (Criterion 2).
- Embodies the distinctive characteristics of a type, period, region, or method of construction or represents the work of a master or possesses high artistic values (Criterion 3).
- Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation (Criterion 4). (OHP, n.d.23)

For resources included on the Register of Historic Resources, environmental review may be required under CEQA if property is threatened by a project. Additionally, local building inspectors must grant code alternatives provided under State Historical Building Code. Further, the local assessor may enter into contract with property owner for property tax reduction pursuant to the Mills Act. A property owner also may place his or her own plaque or marker at the site of the resource. (OHP, n.d.23)

Consent of owner is not required, but a resource cannot be listed over an owner's objections. The State Historical Resources Commission (SHRC) can, however, formally determine a property eligible for the California Register if the resource owner objects. (OHP, n.d.23)

4. Traditional Tribal Cultural Places Act (Senate Bill 18, "SB 18")

Senate Bill 18 (SB 18) requires local (city and county) governments to consult with California Native American tribes to aid in the protection of traditional tribal cultural places ("cultural places") through local land use planning. SB 18 also requires the Governor's Office of Planning and Research (OPR) to include in the General Plan Guidelines advice to local governments for how to conduct these consultations. (OPR, 2005)

The intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places. The purpose of involving tribes at these early planning stages is to allow consideration of cultural places in the context of broad local land use policy, before individual site-specific, project-level land use decisions are made by a local government. (OPR, 2005)

SB 18 requires local governments to consult with tribes prior to making certain planning decisions and to provide notice to tribes at certain key points in the planning process. These consultation and notice requirements apply to adoption and amendment of both general plans (defined in Government Code § 65300 et seq.) and specific plans (defined in Government Code § 65450 et seq.). Although SB 18 does not specifically mention consultation or notice requirements for adoption or amendment of specific plans, existing state planning law requires local governments to use the same processes for adoption and amendment of specific

plans as for general plans (see Government Code § 65453). Therefore, where SB 18 requires consultation and/or notice for a general plan adoption or amendment, the requirement extends also to a specific plan adoption or amendment. (OPR, 2005)

5. Assembly Bill 52 (AB 52)

California Assembly Bill 52 (AB 52) (2014) Chapter 532 amended Section 5097.94 of, and added Sections 21073, 21074, 21080.3.1, 21080.3.2, 21802.3, 21083.09, 21084.2 and 21084.3 to the California Public Resources Code, relating to Native Americans. AB 52 was approved on September 25, 2014. By including tribal cultural resources early in the CEQA process, the legislature intended to ensure that local and Tribal governments, public agencies, and project proponents would have information available, early in the project planning process, to identify and address potential adverse impacts to tribal cultural resources. By taking this proactive approach, the legislature also intended to reduce the potential for delay and conflicts in the environmental review process. (OPR, 2017b)

The Public Resources Code now establishes that "[a] project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment." (Pub. Resources Code, § 21084.2.) To help determine whether a project may have such an effect, the Public Resources Code requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project. That consultation must take place prior to the determination of whether a negative declaration, mitigated negative declaration, or environmental impact report is required for a project. (Pub. Resources Code, § 21080.3.1.) (OPR, 2017b)

If a lead agency determines that a project may cause a substantial adverse change to tribal cultural resources, the lead agency must consider measures to mitigate that impact. Public Resources Code § 20184.3 (b)(2) provides examples of mitigation measures that lead agencies may consider to avoid or minimize impacts to tribal cultural resources. These rules apply to projects that have a notice of preparation for an environmental impact report or negative declaration or mitigated negative declaration filed on or after July 1, 2015. (OPR, 2017b)

§ 21074 of the Public Resources Code defines "tribal cultural resources." In brief, in order to be considered a "tribal cultural resource," a resource must be either:

(1) listed, or determined to be eligible for listing, on the national, state, or local register of historic resources, or

(2) a resource that the lead agency chooses, in its discretion, to treat as a tribal cultural resource. (OPR, 2017b)

In the latter instance, the lead agency must determine that the resource meets the criteria for listing in the state register of historic resources. In applying those criteria, a lead agency must consider the value of the resource to the tribe. (OPR, 2017b)

6. State Health and Safety Code

California Health and Safety Code (HSC) § 7050.5(b) requires that excavation and disturbance activities must cease "In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery…" until the coroner can determine regarding the circumstances, manner, and cause of any death. The coroner is then required to make recommendations concerning the treatment and disposition of the human remains. Further, this section of the code makes it a misdemeanor to intentionally disturb, mutilate or remove interred human remains. HSC § 7051 specifies that the removal of human remains from "internment or a place of storage while awaiting internment" with the intent to sell them or to dissect them with "malice or wantonness" is a public offense punishable by imprisonment in a state prison. Lastly, HSC §§ 8010-8011 establish the California Native American Graves Protection and Repatriation Act consistent with the federal law addressing the same. The Act stresses that "all California Indian human remains and cultural items are to be treated with dignity and respect." It encourages voluntary disclosure and return of remains and cultural items by publicly funded agencies and museums in California. It also outlines the need for aiding California Indian tribes, including non-federally recognized tribes, in filing repatriation claims. (CA Legislative Info, n.d.24)

California Health and Safety Code, Section 5097.98 states that whenever the commission receives notification of a discovery of Native American human remains pursuant to HSC subdivision (c) of Section 7050.5, it shall immediately notify those persons that are the most likely descendants. The descendants may inspect the site and make recommendations to the landowner as to the treatment of the human remains. The landowner shall ensure that the immediate vicinity around the remains is not damaged or disturbed by further development activity until coordination has occurred with the descendants regarding their recommendations for treatment, taking into account the possibility of multiple human remains. The descendants shall complete their inspection and make recommendations within 48 hours of being granted access to the site. (CA Legislative Info, n.d.25)

7. California Code of Regulations Section 15064.5

The California Code of Regulations, Title 14, Chapter 3, § 15064.5 (the State CEQA Guidelines) establishes the procedure for determining the significance of impacts to archaeological and historical resources, as well as classifying the type of resource. Cultural resources are aspects of the environment that require identification and assessment for potential significance. The evaluation of cultural resources under CEQA is based upon the definitions of resources provided in State CEQA Guidelines § 15064.5, as follows: (OPR, 2023)

- *A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code § 5024.1, Title 14 CCR, Section 4850 et seq.).*
- *A resource included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.*
- *Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic,*

agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code § 5024.1, Title 14 CCR, Section 4852) including the following:

1. *Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;*
2. *Is associated with the lives of persons important in our past;*
3. *Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or*
4. *Has yielded, or may be likely to yield, information important in prehistory or history.*

- *The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code sections 5020.1(j) or 5024.1.*

C. Local Regulations

1. Ordinance No. 578 - Establishment of Historic Preservation Districts

This ordinance is intended to facilitate the preservation of areas deemed historically important to the County of Riverside. The ordinance specifies that a Historic Preservation District may be established if the Riverside County Board of Supervisors adopts a resolution that includes the boundaries of the Historic Preservation District and finds that the proposed Historic Preservation District is in conformity with the Cultural and Paleontological section of the Multipurpose Open Space Element of the Riverside County General Plan. It must also find that, for the county, state or nation: the area exemplifies or reflects significant aspects of the cultural, political, economic or social history; the area is identified with historic personages or with important events in history; or, that the area embodies the distinguishing characteristics of a significant architectural period which is inherently valuable for the study of architecture unique to the history of the county, state or nation. (Riverside County, 2015a, p. 4.9-25)

Under this ordinance, no building or structure within the boundaries of an adopted Historic Preservation District can be constructed or altered, except in strict compliance with the plans approved in conjunction with the issuance of a Historic District Alteration Permit by the Riverside County Planning Director. The ordinance also outlines how such certificates are to be reviewed and processed in order to preserve the "historical significance and related construction theme" of the Historic District. (Riverside County, 2015a, p. 4.9-26)

2. Riverside County Historic Preservation Commission

The Riverside County Historical Commission was established in 2005 to advise the Board of Supervisors on historical preservation matters. It is tasked with working to discover and identify persons, events and places of

historical importance within Riverside County, and to make recommendations relating to the preservation of appropriate historic sites and structures. To accomplish this, the Commission established criteria and procedures to identify and recognize historic landmarks in Riverside County. These criteria should be used when reviewing a potentially historically or culturally significant site that could be affected by the proposed development. Such resources are noted in the countywide list provided in Table 4.9-A of Riverside County EIR No. 521. (Riverside County, 2015a, p. 4.9-26)

3. Riverside County Planning Department Procedures

The Riverside County Archeologist reviews all proposed land use projects subject to CEQA and not otherwise deemed categorically exempt. The Riverside County Archeologist reviews various internal databases for information that might pertain to the age of any buildings found on site, grading permits, ground disturbance activities and building permits. Where buildings are 45 years or older, the project applicant is required to perform an architectural history evaluation to assess potential historic value as part of a Phase I Cultural Resources study. When the study is completed, and if historic-period resources were identified during a survey, a copy of the report is transmitted to the Riverside County Historic Preservation Officer (CHPO) for review and comment. The CHPO sends relevant comments back to the Riverside County Archeologist. (Riverside County, 2015a, p. 4.9-26)

Vacant parcels within areas known to have prehistoric or historic resources trigger a Phase I Cultural Resources study. Similarly, any parcels with environmental, geomorphological or vegetative features known to increase the likelihood of cultural resources being present trigger a "Phase I" cultural resources study. Such studies are required to follow the reporting formula found on the Riverside County Planning Department's website which mirror the recommendations published by the State Historic Preservation Office (SHPO) in 1987. (Riverside County, 2015a, p. 4.9-26)

The Riverside County Archeologist reviews all Phase I cultural resources studies for completeness and reasonable conclusions based on current industry standards in archeology. The Phase I study serves to advise the Riverside County Archeologist on matters relating to any identified prehistoric or historic resources, provide the requisite information to complete the project-related CEQA analysis and guide the Riverside County Archeologist in determining which land use conditions of approval and/or mitigation measures apply to the proposed project. (Riverside County, 2015a, p. 4.9-26)

Copies of studies are provided to tribes, upon their request, as a confidential document. If a proposed project is subject to the requirements of the Traditional Tribal Places Act (commonly referred to as Senate Bill 18), a Phase 1 report is forwarded to tribes who request it as part of consultation under SB 18. Typically, official tribal consultations are scheduled after the report has been sent to the tribe(s) to maximize consultation efforts. (Riverside County, 2015a, p. 4.9-26)

4.5.3 Basis for Determining Significance

Section V of Appendix G to the State CEQA Guidelines addresses typical adverse effects to cultural resources, and includes the following threshold questions to evaluate the Project's impacts on cultural resources. (OPR, 2023)

- *Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?*
- *Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?*
- *Would the Project disturb any human remains, including those interred outside of formal cemeteries?*

Significance thresholds set forth in Riverside County's Environmental Assessment Checklist, are derived from Section V of Appendix G to the State CEQA Guidelines (listed above), and state that the proposed Project would have a significant impact on cultural resources if construction and/or operation of the Project would:

a. *Alter or destroy an historic site;*
b. *Cause a substantial adverse change in the significance of a historical resource as defined in California Code of Regulations, § 15064.5;*
c. *Alter or destroy an archaeological site;*
d. *Cause a substantial adverse change in the significance of an archaeological resource, pursuant to California Code of Regulations, § 15064.5;*
e. *Disturb any human remains, including those interred outside of formal cemeteries.*

The significance thresholds set forth in the Riverside County's Environmental Assessment Checklist form, as modified by the 2018 updates to the State CEQA Guidelines, were used to evaluate the significance of the proposed Project's impacts on cultural resources.

4.5.4 Impact Analysis

Threshold a:	***Would the Project alter or destroy a historic site?***
Threshold b:	***Would the Project cause a substantial adverse change in the significance of a historical resource as defined in California Code of Regulations, Section 15064.5?***

As discussed in detail above in subsection 4.5.1.E, based on the results of the Phase I CRA prepared for the Project site, five historic-period built-environment resources were identified at the Project site. One of these resources, the Colorado River Aqueduct (CA-RIV-6426H), was previously determined eligible for listing on the NRHP and CRHR under Criteria 1/A and 2/B. However, within the proposed Project site, Colorado River Aqueduct is underground and no historic surface elements or character-defining features were apparent. Thus, it is not anticipated that the Colorado River Aqueduct would be impacted by the proposed Project. The four remaining historic built-environment resources consist of residential properties: 22675 Cajalco Road; 22765 Cajalco Road; 22775 Cajalco Road; and 19641 Seaton Avenue. Evaluations of significance found that none of the residences meet the criteria for listing on the CRHR and no further cultural resources management is recommended by Chronicle on these four properties. Thus, implementation of the Project is not anticipated to alter or destroy or cause a substantial adverse change in the significance of existing historical resources identified at the Project site, and impacts to known historical resources would therefore be less than significant.

However, there is the potential for the Project area to contain unidentified subsurface historical resources. Thus, there is a potential that previously-undiscovered historical resources may be uncovered during on- or off-site grading or ground-disturbing activities. This is evaluated as a potentially significant impact for which mitigation would be required.

Threshold c: ***Would the Project alter or destroy an archaeological site?***

Threshold d: ***Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to California Code of Regulations, Section 15064.5?***

As previously summarized above in subsection 4.5.1.E, the Phase I CRA identified seven cultural resources in the Project area including two archaeological sites – a prehistoric bedrock milling site (CA-RIV-8681/P-33-016534) and a prehistoric milling site with associated historic-era refuse (CA-RIV-8683/H/P-33-016536). Based on the proposed Project design, Locus 6 of CA-RIV-8681/P-33-016534 will be avoided and not impacted by implementation of the Project. A Phase II testing program was conducted at sites CA-RIV-8681/P-33-016534 and CA-RIV-8683/H/P-33-016536 as part of the Project's Phase II CRA (*Technical Appendix E2*). As described above in subsection 4.5.1.E, and based on the results of the Phase II CRA (*Technical Appendix E2*), the bedrock milling features within the sites and surrounding area fit into a larger theme of prehistoric archaeological sites that have been heavily impacted by historical and modern processes combined with natural environmental factors, both of which have further deteriorated the integrity of these sites. The testing indicated that there are no subsurface deposits or subsurface components at either site. Combined with the poor surface condition, the sites do not maintain the potential of providing greater insights into patterns of subsistence and settlement within the sites or within the region. It is the professional opinion of Chronicle that Sites CA-RIV-8681/P-33-016534 and CA-RIV-8683/H/P-33-016536 are not eligible for listing in the CRHR under Criteria 1, 2, 3, or 4. As such, although the Project would result in physical impacts at Sites CA-RIV-8681/P-33-016534 and CA-RIV-8683/H/P-33-016536, because these resources are not considered to comprise significant archaeological or historical resources pursuant to the criteria listed in Section 15064.5 of the State CEQA Guidelines, Project impacts to sites CA-RIV-8681 and at CA-RIV-8683/H would be less than significant requiring no mitigation.

Notwithstanding, both the Project site and off-site improvement areas have the potential to contain unidentified archaeological resources. Given the presence of previously-identified archaeological resources within the Project vicinity, including within the Project site, there is a potential for the Project site or off-site improvement areas to contain unidentified surface or subsurface archaeological resources. Therefore, Project impacts to previously-undiscovered archaeological resources that may occur in the on- or off-site impact areas of the proposed Project would be potentially significant prior to mitigation.

Threshold e: ***Would the Project disturb any human remains, including those interred outside of formal cemeteries?***

The Project site does not contain a cemetery and no known cemeteries are located within the immediate Project site vicinity. Field surveys conducted on the Project site by Chronicle did not identify the presence of any human remains and no human remains are known to exist beneath the surface of the site. Nevertheless, the remote potential exists that human remains may be unearthed during grading and excavation activities associated with Project construction.

If human remains are unearthed during Project construction, the construction contractor would be required by law to comply with California Health and Safety Code, § 7050.5, "Disturbance of Human Remains." According to § 7050.5(b) and (c), if human remains are discovered, the County Coroner must be contacted and if the Coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, the Coroner is required to contact the NAHC by telephone within 24 hours. Pursuant to California Public Resources Code § 5097.98, whenever the NAHC receives notification of a discovery of Native American human remains from a county coroner, the NAHC is required to immediately notify those persons it believes to be most likely descended from the deceased Native American. The descendants may, with the permission of the owner of the land, or their authorized representative, inspect the site of the discovery of the Native American human remains and may recommend to the owner or the person responsible for the excavation work means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods. The descendants shall complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. According to Public Resources Code § 5097.94(k), the NAHC is authorized to mediate disputes arising between landowners and known descendants relating to the treatment and disposition of Native American human burials, skeletal remains, and items associated with Native American burials.

Notwithstanding the requirements of California Health and Safety Code § 7050.5 and California Public Resources Code § 5097.98, due to the potential to discover buried human remains during Project construction activities (i.e., grading), a potentially significant impact would occur, and mitigation would be required.

4.5.5 Cumulative Impact Analysis

This cumulative impact analysis considers development of the proposed Project in conjunction with other development projects and planned development within western Riverside County. This study area was selected for evaluation because it encompasses a broad region with similar geological, biological, and climatic conditions.

As noted above under Thresholds a. and b., five historic-period built-environment resources were identified at the Project site. One of these resources, the Colorado River Aqueduct (CA-RIV-6426H), was previously determined eligible for listing on the NRHP and CRHR under Criteria 1/A and 2/B. However, within the proposed Project site, Colorado River Aqueduct is underground and no historic surface elements or character-defining features were apparent. Thus, it is not anticipated that the Colorado River Aqueduct would be impacted by the proposed Project. The four remaining historic built-environment resources consist of residential properties of which none meet the CEQA or CRHR definitions for historical resources. As such, the Project would not result in any cumulatively-considerable impacts to known historical resources. However, there is a possibility that subsurface historical resources may be impacted by development of the Project as proposed. Other developments envisioned with buildout of the Riverside County General Plan and the general plans of cities within the County also have the potential to result in impacts to historical sites or resources, including sites or resources that may be buried beneath the ground surface. As such, the Project's potential impacts to previously-discovered historical resources on the Project site would be cumulatively considerable prior to mitigation.

As indicated under the analysis of Thresholds c. and d., the Phase I CRA identified seven cultural resources in the Project area including two archaeological sites – a prehistoric bedrock milling site (CA-RIV-8681/P-33-016534) and a prehistoric milling site with associated historic-era refuse (CA-RIV-8683/H/P-33-016536). The Phase II testing program determined that sites CA-RIV-8681/P-33-016534 and CA-RIV-8683/H/P-33-016536 are not eligible for listing in the CRHR under Criteria 1, 2, 3, or 4. As such, although the Project would result in physical impacts at sites CA-RIV-8681/P-33-016534 and CA-RIV-8683/H/P-33-016536, because these resources are not considered to comprise significant archaeological or historical resources pursuant to the criteria listed in Section 15064.5 of the State CEQA Guidelines, Project impacts to sites CA-RIV-8681 and at CA-RIV-8683/H would not be cumulatively considerable. Notwithstanding, there is a potential for the Project site or off-site improvement areas to contain unidentified surface or subsurface archaeological resources. As other cumulative developments within the study area similarly have the potential to result in impacts to known or previously-undiscovered resources, the Project's impacts to archaeological resources would be cumulatively considerable prior to mitigation.

As discussed under Threshold e., although the Project would be subject to compliance with the provisions of California Health and Safety Code § 7050.5 as well as Public Resources Code § 5097 et. seq., there is a potential that buried human remains could be uncovered during construction of the proposed Project. Other cumulative developments similarly would have the potential to uncover buried human remains. Accordingly, the Project's potential impacts to human remains would be cumulatively considerable prior to mitigation.

4.5.6 Significance of Impacts Before Mitigation

Thresholds a. and b.: Significant Direct and Cumulatively-Considerable Impact. Five historic-period built-environment resources were identified at the Project site. One of these resources, the Colorado River Aqueduct (CA-RIV-6426H), was previously determined eligible for listing on the NRHP and CRHR under Criteria 1/A and 2/B. However, within the proposed Project site, Colorado River Aqueduct is underground and no historic surface elements or character-defining features were apparent. Thus, it is not reasonably foreseeable that the Colorado River Aqueduct would be impacted by the proposed Project. The four remaining historic built-environment resources consist of residential properties of which none meet the CEQA or CRHR definitions for historical resources. However, there is a potential for previously-undiscovered historical resources to occur on the site surface or beneath the surface of areas planned for physical impact (i.e., grading) as part of the Project. Potential impacts to previously-undiscovered historical resources on site or within the off-site improvement areas would be significant on both a direct and cumulatively-considerable basis prior to mitigation.

Threshold c. & d.: Significant Direct and Cumulatively-Considerable Impact. Seven cultural resources are known to exist in the Project's impact footprint including two archaeological sites – a prehistoric bedrock milling site (CA-RIV-8681/P-33-016534) and a prehistoric milling site with associated historic-era refuse (CA-RIV-8683/H/P-33-016536). The testing indicated that there are no subsurface deposits or subsurface components at either site. Combined with the poor surface condition, the sites do not maintain the potential of providing greater insights into patterns of subsistence and settlement within the sites or within the region. Although the Project would result in physical impacts at sites CA-RIV-8681/P-33-016534 and CA-RIV-8683/H/P-33-016536, because these resources do not comprise significant archaeological or historical resources pursuant to the criteria listed in Section 15064.5 of the State CEQA Guidelines, Project impacts to sites CA-RIV-8681 and CA-RIV-8683/H would be less than significant requiring no mitigation.

Notwithstanding, given the presence of known archaeological resources within the Project site's vicinity, including within the Project site, there is a potential for the Project's ground-disturbing construction activities to encounter and disturb potentially significant subsurface archaeological resources. Therefore, potential impacts to previously unidentified subsurface pre-historic resources represent potentially significant impacts for which mitigation would be required.

Threshold e.: Significant Direct and Cumulatively-Considerable Impact. The Project site and off-site improvement areas do not contain a cemetery and no known cemeteries are located within the immediate site vicinity. Although the Project Applicant would be required to comply with the applicable provisions of California Health and Safety Code § 7050.5 and California Public Resources Code § 5097 et. seq., the Project's potential impacts to buried human remains would be significant on a direct and cumulatively-considerable basis prior to mitigation.

4.5.7 County Regulations, Design Requirements, and Mitigation

Applicable County Regulations and Design Requirements

The following are applicable regulations and design requirements within Riverside County. Although these requirements technically do not meet CEQA's definition for mitigation, they are imposed herein to ensure Project compliance with applicable County regulations and design requirements.

- Unless otherwise required by law, the site of any reburial of Native American human remains or associated grave goods shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act. The Coroner, pursuant to the specific exemption set forth in California Government Code Section 6254 (r), parties, and Lead Agencies, will be asked to withhold public disclosure information related to such reburial, pursuant to the specific exemption set forth in California Government Code 6254 (r).

Mitigation

The County shall require compliance with the following mitigation measures with respect to historic and archaeological resources. It should be noted that in February 2025, the Pechanga and Soboba tribes provided additional recommendations to the County that are considered confidential and are not included in the mitigation measures below. The County will carefully consider the recommendations and the feasible recommendations will be addressed in the Cultural Resource Monitoring Program (CRMP) that is required by Mitigation Measure MM 4.5-2 prior to the issuance of a grading permit.

MM 4.5-1 **Native American Monitor:** Prior to the issuance of grading permits, the developer/permit applicant shall enter into an agreement with the consulting tribe(s) for a Native American Monitor. The Native American Monitor(s) shall be on-site during all initial ground disturbing activities and excavation of each portion of the project site including clearing, grubbing, tree removals, grading and trenching. In conjunction with the Archaeological Monitor(s) required pursuant to Mitigation Measure MM 4.5-2, the Native American Monitor(s) shall have the authority to temporarily divert, redirect or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources. The developer/permit

applicant shall submit a fully executed copy of the agreement to the County Archaeologist to ensure compliance with this condition of approval. Upon verification, the Archaeologist shall clear this condition. This agreement shall not modify any condition of approval or mitigation measure.:

MM 4.5-2 **Project Archaeologist**. Prior to issuance of grading permits: The applicant/developer shall provide evidence to the County of Riverside Planning Department that a County certified professional archaeologist (Project Archaeologist) has been contracted to implement a Cultural Resource Monitoring Program (CRMP). A CRMP shall be developed in coordination with the consulting tribe(s) that addresses the details of all activities and provides procedures that must be followed in order to reduce the impacts to cultural, tribal cultural, and historic resources to a level that is less than significant as well as address potential impacts to undiscovered buried archaeological resources. A fully executed copy of the contract and a wet-signed copy of the Monitoring Plan shall be provided to the County Archaeologist to ensure compliance with this mitigation measure. Working directly under the Project Archaeologist, an adequate number of qualified Archaeological Monitors shall be present to ensure that all earth moving activities are observed and shall be on-site during all grading activities for areas to be monitored including off-site improvements. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections will be determined by the Project Archaeologist. The Project Archaeologist may submit a detailed letter to the County of Riverside during grading requesting a modification to the monitoring program if circumstances are encountered that reduce the need for monitoring.

MM 4.5-3 **Pre-Grading Meeting**. Prior to the issuance of a grading permit, the Project Applicant or construction contractor shall provide evidence to Riverside County that the construction site supervisors and crew members involved with grading operations are trained during a mandatory pre-grading meeting by the Project Archaeologist and Native American Monitor to recognize archaeological or historical resources should such resources be unearthed during ground-disturbing construction activities. Training shall include a brief review of cultural sensitivity of the Project and surrounding area; what resources could potentially be identified during earthmoving activities; the requirements of the monitoring program; the protocols that apply in the event inadvertent discoveries of cultural resources are identified, including who to contact and appropriate avoidance measures until the find(s) can be properly evaluated; and any other appropriate protocols as determined by the County-approved Project Archaeologist. If a suspected archaeological or historical resource is identified on the property, the construction supervisor shall be required by contract to immediately halt and redirect grading operations in a 60-foot radius around the find and seek identification and evaluation of the suspected resource by the Project Archaeologist. This requirement shall be noted on all grading plans and the construction contractor shall be obligated to comply with the note. The Project Archaeologist shall evaluate the suspected resource and make a determination of significance pursuant to California Public Resources Code Section 21083.2.

MM 4.5-4 **Monitoring during Grading**. During the original cutting of previously-undisturbed deposits, the archaeological monitor(s) and tribal representative shall be on-site, as determined by the Project Archaeologist, to perform periodic inspections of the excavations. The frequency of inspections will depend upon the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The Project Archaeologist shall have the authority to modify the monitoring program if the potential for cultural resources appears to be less than anticipated.

MM 4.5-5 **Sites CA-RIV-8681/P-33-016534 and CA-RIV-8683/H/P-33-016536 Feature Avoidance or Relocation:** During final engineering of the public park site, the Project Applicant shall attempt to avoid disturbance to features associated with Sites CA-RIV-8681/P-33-016534 and CA-RIV-8683/H/P-33-016536. For features that cannot be avoided through redesign of areas planned for grading within the public park, then prior to grading permit issuance, the Project Applicant, Project Archaeologist, and Tribal representative shall meet onsite to determine the strategy for relocating the milling features to a permanent open space area predetermined and designated on a confidential map. Before construction activities are allowed to start and using professional archaeological methods, any visible artifacts shall be recovered and recorded, photo documentation of each feature in situ shall occur. The current Department of Parks and Recreation forms for the sites shall be updated, detailing which features were relocated, the process through which this was done, and updated maps using sub meter GIS technology to document the new location of each feature. The relocation information shall be included in the Phase IV Monitoring Report. Controlled Grading- Bedrock milling features at cultural site(s) CA-RIV-8681/P-33-016534 and CA-RIV-8683/H/P-33-016536 will be impacted during construction activities and the soils surrounding them will be disturbed. To address controlled grading in this area, a plan will be developed by the Project Archaeologist. The controlled grading plan shall require the systematic removal of the ground surface to allow for the identification, documentation, and recovery of any subsurface cultural deposits. Results of the controlled grading program shall be included in the Phase IV monitoring report.

MM 4.5-6 **Unanticipated Discoveries**. In the event that previously unidentified archaeological or historical resources are discovered, the Project Archaeologist shall have the authority to divert or temporarily halt ground disturbance operation within 100 feet of the area of discovery to allow for the evaluation of potentially significant cultural resources. The Project Archaeologist shall contact the Lead Agency (Riverside County) at the time of discovery. The Project Archaeologist, in consultation with the County Archaeologist and Native American Monitor, shall determine the significance of the discovered resources. The Lead Agency must concur with the evaluation before construction activities will be allowed to resume in the affected area. For significant cultural resources, a Research Design and Data Recovery Program to mitigate impacts shall be prepared by the Project Archaeologist in consultation with the Native American Monitor and approved by the Lead Agency before being carried out using professional archaeological methods. If any human bones are discovered, the county coroner and lead agency shall be contacted. In the event that the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), as identified by the NAHC, shall be

contacted in order to determine proper treatment and disposition of the remains. Before construction activities are allowed to resume in the affected area, the artifacts shall be recovered and features recorded using professional archaeological methods. The Project Archaeologist shall determine the amount of material to be recovered for an adequate artifact sample for analysis. Isolates and clearly non-significant deposits will be minimally documented in the field so the monitored grading can proceed. Evidence of compliance with this mitigation measure, if a significant archaeological resource is found, shall be provided to Riverside County upon the completion of a treatment plan and final report detailing the significance and treatment finding.

MM 4.5-7 **Artifact Disposition**: Prior to Grading Permit Final Inspection, the landowner(s) shall relinquish ownership of all cultural resources that are unearthed on the Project property during any ground-disturbing activities, including previous investigations and/or Phase III data recovery.

a. Historical Resources: All historic archaeological materials recovered during the archaeological investigations (this includes collections made during an earlier project, such as testing of archaeological sites that took place years ago) shall be curated at the Western Science Center, a Riverside County curation facility that meets State Resources Department Office of Historic Preservation Guidelines for the Curation of Archaeological Resources ensuring access and use pursuant to the Guidelines Prehistoric Resources-

b. Prehistoric Resources: For any prehistoric resources on site that are proposed to be preserved or relocated, one of the following treatments shall be applied.

   i. Reburial of the resources on the Project site: The measures for reburial shall include, at least, the following: (a) Measures to protect the reburial area from any future impacts; (b) Reburial shall not occur until all required cataloguing, analysis and studies have been completed on the cultural resources, with an exception that sacred items, burial goods and Native American human remains are excluded; (c) Any reburial processes shall be culturally appropriate; (d) Listing of contents and location of the reburial shall be included in the confidential Phase IV Report; and (e) The Phase IV Report shall be filed with the County under a confidential cover and not subject to a Public Records Request.

   ii. If reburial is not agreed upon: If reburial is not agreed upon by the Consulting Tribes, then the resources shall be curated at a culturally appropriate manner at the Western Science Center, a Riverside County curation facility that meets State Resources Department Office of Historic Preservation Guidelines for the Curation of Archaeological Resources ensuring access and use pursuant to the Guidelines. The collection and associated records shall be transferred, including title, and are to be accompanied by payment of the fees necessary for permanent curation. Evidence of curation in the form of a letter from the curation facility stating that subject archaeological materials have been received and that all fees have been paid, shall be provided by the landowner to the County. There shall be no destructive or invasive testing on sacred items, burial goods and Native American human remains.

MM 4.5-8 **Phase IV Monitoring Report**: Prior to Grading Permit Final Inspection, a Phase IV Cultural Resources Monitoring Report shall be submitted that complies with the Riverside County Planning Department's requirements for such reports for all ground disturbing activities associated with this grading permit. The report shall follow the County of Riverside Planning Department Cultural Resources (Archaeological) Investigations Standard Scopes of Work posted on the TLMA website. The report shall include (at a minimum) the following: a discussion of the monitoring methods and techniques used; the results of the monitoring program including any artifacts recovered; an inventory of any resources recovered; updated Department of Parks and Recreation Primary and Archaeological Site Forms for any new resources identified, and all sites affected by the development; final disposition of the resources including GPS data; artifact catalog; and any additional recommendations as may be determined by Riverside County. A final copy shall be submitted to the Riverside County Planning Department, the Project Applicant, the Eastern Information Center, and the affected Tribe (if Native American resources are uncovered).

MM 4.5-9 **Human Remains**: In the event that human remains are encountered during ground-disturbing construction activities on site or within the Project's off-site improvement areas, compliance with California Health and Safety Code § 7050.5 and Public Resources Code § 5097 et. seq. shall be required. State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the Riverside County Coroner has made the necessary findings as to the origin. Further, pursuant to Public Resource Code Section 5097.98(b) remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. The County Coroner shall determine that no investigation of the cause of death is required and determine if the remains are of Native American origin. In the event that the remains are determined to be of Native American origin, the Native American Heritage Commission (NAHC) shall be contacted within the period specified by law (24 hours). Subsequently, the Native American Heritage Commission shall identify the "Most Likely Descendant." The Most Likely Descendant shall then make recommendations and engage in consultation concerning the treatment of the remains as provided in Public Resources Code Section 5097.98. If the NAHC is unable to identify a Most Likely Descendant, or if the Most Likely Descendant failed to make a recommendation within 48 hours after being notified by the NAHC, or the Project Applicant rejects the recommendation of the Most Likely Descendent, the Project Applicant shall rebury the Native American human remains and associated grave goods on the property in a location not subject to further ground disturbance. Evidence of compliance with this mitigation measure, if human remains are found, shall be provided to Riverside County upon the completion of a treatment plan and final report detailing the significance and treatment finding.

4.5.8 Significance of Impacts After Mitigation

Thresholds a. and b.: Less-than-Significant Impact with Mitigation. Implementation of Mitigation Measures MM 4.5-1 through MM 4.5-4 and Mitigation Measures MM 4.5-6 through MM 4.5-8 would ensure that any historical resources identified on site or within the Project's off-site improvement areas during ground-

disturbing activities are appropriately treated, including if necessary curation of the historical artifact(s) at the Western Science Center in Hemet or as directed by the County Archaeologist. Implementation of the required mitigation would ensure that any potential impacts to subsurface historical sites or resources would be reduced to less-than-significant levels.

Thresholds c. and d.: Less-than-Significant Impact with Mitigation. Implementation of Mitigation Measure MM 4.5-1 through MM 4.5-4 and Mitigation Measures MM 4.5-6 through MM 4.5-8 would ensure that any previously-undiscovered archaeological sites or resources identified on site or within the Project's off-site improvement areas during ground-disturbing activities are appropriately treated as directed by the Archaeological Monitor, County Archaeologist, and Native American Monitor. Although Sites CA-RIV-8681/P-33-016534 and CA-RIV-8683/H/P-33-016536 do not comprise significant archaeological resources under CEQA, Mitigation Measure MM 4.5-5 would ensure that Sites CA-RIV-8681/P-33-016534 and CA-RIV-8683/H/P-33-016536 are avoided or relocated as part of site grading activities. Implementation of the required mitigation would further reduce the Project's less-than-significant impacts to Sites CA-RIV-8681/P-33-016534 and CA-RIV-8683/H/P-33-016536.

Threshold e.: Less-than-Significant Impact with Mitigation. In the event that human remains are discovered during construction activities, Mitigation Measure MM 4.5-9 would require the Project Applicant to comply with the applicable provisions of California Health and Safety Code § 7050.5 and California Public Resources Code § 5097 et. seq. Mandatory compliance with Mitigation Measure MM 4.5-9, State law, and applicable regulatory requirements would reduce the Project's potential impacts to buried human remains to less-than-significant-levels.

4.6 ENERGY

The subsection 4.6 is based in part on the information contained in the Project's Energy Analysis Report, titled "Mead Valley Commerce Center (PPT220050) Energy Analysis" (herein, "EA"), dated November 8, 2023, and appended to this EIR as *Technical Appendix F* (Urban Crossroads, 2023). Refer to Section 7.0, *References,* for a complete list of reference sources.

4.6.1 EXISTING CONDITIONS

A. Overview

The most recent data for California's estimated total energy consumption and natural gas consumption is from 2021, released by the United States (U.S.) Energy Information Administration's (EIA) California State Profile and Energy Estimates in 2021 and included the following consumption estimates (Urban Crossroads, 2023, p. 7)

- As of 2021, approximately 7,359 trillion British Thermal Unit (BTU) of energy was consumed
- As of 2021, approximately 605 million barrels of petroleum
- As of 2021, approximately 2,101 billion cubic feet of natural gas
- As of 2021, approximately 1 million short tons of coal

According to the EIA, in 2022 the U.S. petroleum consumption comprised about 90% of all transportation energy use, excluding fuel consumed for aviation and most marine vessels. In 2022, about 251,923 million gallons (or about 5.99 million barrels) of finished petroleum products were consumed in the U.S., an average of about 690 million gallons per day (or about 16.4 million barrels per day). In 2021, California consumed approximately 12,157 million gallons in motor gasoline (33.31 million per day) and approximately 3,541 million gallons of diesel fuel (9.7 million per day). (Urban Crossroads, 2023, p. 7)

The most recent data provided by the EIA for energy use in California is reported from 2021 and provided by demand sectors as follows (Urban Crossroads, 2023, p. 7):

- Approximately 37.8% transportation sector;
- Approximately 23.2% industrial sector;
- Approximately 20.0% residential sector; and
- Approximately 19.0% commercial sector

According to the EIA, California used approximately 247,250 gigawatt hours of electricity in 2021. By sector in 2021, residential uses utilized 36.5% of the state's electricity, followed by 43.9% for commercial uses, 19.2% for industrial uses, and 0.3% for transportation. Electricity usage in California for differing land uses varies substantially by the type of uses in a building, type of construction materials used in a building, and the efficiency of all electricity-consuming devices within a building. (Urban Crossroads, 2023, p. 7)

According to the EIA, California used approximately 200,871 million therms of natural gas in 2021. In 2021 (the most recent year for which data is available), by sector, industrial uses utilized 33% of the state's natural gas, followed by 30% used as fuel in the electric power sector, 21% from residential, 11% from commercial, 1% from transportation uses and the remaining 3% was utilized for the operations, processing and production of natural gas itself. While the supply of natural gas in the United States and production in the lower 48 states has increased greatly since 2008, California produces little, and imports 90% of its supply of natural gas. (Urban Crossroads, 2023, pp. 7-8)

In 2022, the total system electric generation for California was 287,220 gigawatt hours (GWh). California's massive electricity in-state generation system generated approximately 203,257GWh which accounted for approximately 71% of the electricity it uses; the rest was imported from the pacific Northwest (12%) and the U.S. Southwest (17%). Natural gas is the main source for electricity generation at 47.46 of the total in-state electric generation power as shown in Table 4.6-1, *Total Electricity System Power (California 2022*). (Urban Crossroads, 2023, p. 8)

Table 4.6-1 Total Electricity System Power (California 2022)

Fuel Type	California In-State Generation (GWh)	% of California In-State Generation	Northwest Imports (GWh)	Southwest Imports (GWh)	Total Imports (GWh)	Total California Energy Mix (GWh)	Total California Power Mix
Coal	273	0.13%	181	5,716	5,897	6,170	2.15%
Natural Gas	96,457	47.46%	44	7,994	8,038	104,495	36.38%
Oil	65	0.03%	-	-	-	65	0.2%
Other (Waste Heat/Petroleum Coke)	315	0.15%	-	-	-	315	0.11%
Unspecified	-	0.0%	12,485	7,943	20,428	20,428	7.11%
Total Thermal and Unspecified	**97,110**	**47.78%**	**12,710**	**21,653**	**34,363**	**121,473**	**45.77%**
Nuclear	17,627	8.67%	397	8,342	8,739	26,366	9.18%
Large Hydro	14,607	7.19%	10,803	1,118	11,921	26,528	9.24%
Biomass	5,366	2.64%	771	25	797	6,162	2.15%
Geothermal	11,110	5.47%	253	2,048	2,301	13,412	4.67%
Small Hydro	3,005	1.48%	211	13	225	3,230	1.12%
Solar	40,494	19.92%	231	8,225	8,456	48,950	17.04%
Wind	13,938	6.86%	8,804	8,357	17,161	31,099	10.83%
Total Non-GHG and Renewables	**106,147**	**52.22%**	**21,471**	**28,129**	**49,599**	**155,747**	**54.23%**
SYSTEM TOTALS	***203,257***	***100.0%***	***34,180***	***49,782***	***83,962***	***287,220***	***100.0%***

Source: CECs 2022 Total System Electric Generation

(Urban Crossroads, 2023, Table 2-1)

An updated summary of, and context for energy consumption and energy demands within the State is presented in "U.S. Energy Information Administration, California State Profile and Energy Estimates, Quick Facts" excerpted below (Urban Crossroads, 2023, p. 8):

- In 2022, California was the seventh-largest producer of crude oil among the 50 states, and, as of January 2022, the State ranked third in crude oil refining capacity.

- California is the largest consumer of jet fuel and second-largest consumer of motor gasoline among the 50 states.

- In 2020, California was the second-largest total energy consumer among the states, but its per capita energy consumption was less than in all but three other states.

- In 2022, renewable resources, including hydroelectric power and small-scale, customer-sited solar power, accounted for 49% of California's in-state electricity generation. Natural gas fueled another 42%. Nuclear power supplied almost all the rest.

- In 2022, California was the fourth-largest electricity producer in the nation. The state was also the nation's third-largest electricity consumer, and additional needed electricity supplies came from out-of-state generators.

As indicated above, California is one of the nation's leading energy-producing states, and California's per capita energy use is among the nation's most efficient. (Urban Crossroads, 2023, p. 8)

B. Electricity

The Southern California region's electricity reliability has been of concern for the past several years due to the planned retirement of aging facilities that depend upon once-through cooling technologies, as well as the June 2013 retirement of the San Onofre Nuclear Generating Station (San Onofre). While the once-through cooling phase-out has been ongoing since the May 2010 adoption of the State Water Resources Control Board's once-through cooling policy, the retirement of San Onofre complicated the situation. California Independent Service Operator (ISO) studies revealed the extent to which the South Coast Air Basin (SCAB) and the San Diego Air Basin (SDAB) region were vulnerable to low-voltage and post-transient voltage instability concerns. A preliminary plan to address these issues was detailed in the 2013 Integrative Energy Policy Report (IEPR) after a collaborative process with other energy agencies, utilities, and air districts. Similarly, the subsequent 2022 IEPR's provides information and policy recommendations on advancing a clean, reliable, and affordable energy system. (Urban Crossroads, 2023, p. 10)

California's electricity industry is an organization of traditional utilities, private generating companies, and state agencies, each with a variety of roles and responsibilities to ensure that electrical power is provided to consumers. The California ISO is a nonprofit public benefit corporation and is the impartial operator of the State's wholesale power grid and is charged with maintaining grid reliability, and to direct uninterrupted electrical energy supplies to California's homes and communities. While utilities still own transmission assets, the ISO routes electrical power along these assets, maximizing the use of the transmission system and its power generation resources. The ISO matches buyers and sellers of electricity to ensure that enough power is available to meet demand. To these ends, every five minutes the ISO forecasts electrical demands, accounts for operating

reserves, and assigns the lowest cost power plant unit to meet demands while ensuring adequate system transmission capacities and capabilities. (Urban Crossroads, 2023, p. 10)

Part of the ISO's charge is to plan and coordinate grid enhancements to ensure that electrical power is provided to California consumers. To this end, utilities file annual transmission expansion/modification plans to accommodate the State's growing electrical needs. The ISO reviews and either approves or denies the proposed additions. In addition, and perhaps most importantly, the ISO works with other areas in the western United States electrical grid to ensure that adequate power supplies are available to the State. In this manner, continuing reliable and affordable electrical power is assured to existing and new consumers throughout the State. (Urban Crossroads, 2023, p. 10)

Electricity currently is provided to the Project site by Southern California Edison (SCE). SCE provides electric power to more than 15 million persons in 15 counties and in 180 incorporated cities, within a service area encompassing approximately 50,000 square miles. Based on SCE's 2022 Power Content Label Mix, SCE derives electricity from varied energy resources including: fossil fuels, hydroelectric generators, nuclear power plants, geothermal power plants, solar power generation, and wind farms. SCE also purchases from independent power producers and utilities, including out-of-state suppliers. (Urban Crossroads, 2023, p. 10)

Table 4.6-2, *SCE 2022 Power Content Mix,* identifies SCE's specific proportional shares of electricity sources in 2021. As indicated in Table 4.6-2, the 2022 SCE Power Mix has renewable energy at 33.2% of the overall energy resources. Geothermal resources are at 5.7%, wind power is at 9.8%, large hydroelectric sources are at 3.4%, solar energy is at 17.0%, and local coal is at 0%. (Urban Crossroads, 2023, pp. 10-11)

C. Natural Gas

The following summary of natural gas customers and volumes, supplies, delivery of supplies, storage, service options, and operations is excerpted from information provided by the California Public Utilities Commission (CPUC) (Urban Crossroads, 2023, p. 11)

> *"The CPUC regulates natural gas utility service for approximately 10.8 million customers that receive natural gas from Pacific Gas and Electric (PG&E), Southern California Gas (SoCalGas), San Diego Gas & Electric (SDG&E), Southwest Gas, and several smaller natural gas utilities. The CPUC also regulates independent storage operators: Lodi Gas Storage, Wild Goose Storage, Central Valley Storage and Gill Ranch Storage.*
>
> *California's natural gas utilities provide service to over 11 million gas meters. SoCalGas and PG&E provide service to about 5.9 million and 4.3 million customers, respectively, while SDG&E provides service to over 800, 000 customers. In 2018, California gas utilities forecasted that they would deliver about 4740 million cubic feet per day (MMcfd) of gas to their customers, on average, under normal weather conditions.*

Table 4.6-2 SCE 2022 Power Content Mix

Energy Resources	2022 SCE Power Mix
Eligible Renewable	**33.2%**
Biomass & Waste	0.1%
Geothermal	5.7%
Eligible Hydroelectric	0.5%
Solar	17.0%
Wind	9.8%
Coal	**0.0%**
Large Hydroelectric	**3.4%**
Natural Gas	**24.7%**
Nuclear	**8.3%**
Other	**0.1%**
Unspecified Sources of power*	30.3%
Total	**100%**

* "Unspecified sources of power" means electricity from transactions that are not traceable to specific generation sources

(Urban Crossroads, 2023, Table 2-2)

The overwhelming majority of natural gas utility customers in California are residential and small commercials customers, referred to as "core" customers. Larger volume gas customers, like electric generators and industrial customers, are called "noncore" customers. Although very small in number relative to core customers, noncore customers consume about 65% of the natural gas delivered by the state's natural gas utilities, while core customers consume about 35%.

A significant amount of gas (about 19%, or 1131 MMcfd, of the total forecasted California consumption in 2018) is also directly delivered to some California large volume consumers, without being transported over the regulated utility pipeline system. Those customers, referred to as "bypass" customers, take service directly from interstate pipelines or directly from California producers.

SDG&E and Southwest Gas' southern division are wholesale customers of SoCalGas, i.e., they receive deliveries of gas from SoCalGas and in turn deliver that gas to their own customers. (Southwest Gas also provides natural gas distribution service in the Lake Tahoe area.) Similarly, West Coast Gas, a small gas utility, is a wholesale customer of PG&E. Some other wholesale customers are municipalities like the cities of Palo Alto, Long Beach, and Vernon, which are not regulated by the CPUC.

Natural gas from out-of-state production basins is delivered into California via the interstate natural gas pipeline system. The major interstate pipelines that deliver out-of-state natural gas to California gas utilities are Gas Transmission Northwest Pipeline, Kern River Pipeline, Transwestern Pipeline, El Paso Pipeline, Ruby Pipeline, Mojave Pipeline, and Tuscarora. Another pipeline, the North Baja - Baja Norte Pipeline takes gas off the El Paso Pipeline at the California/Arizona border and delivers

that gas through California into Mexico. While the Federal Energy Regulatory Commission (FERC) regulates the transportation of natural gas on the interstate pipelines, and authorizes rates for that service, the California Public Utilities Commission may participate in FERC regulatory proceedings to represent the interests of California natural gas consumers.

The gas transported to California gas utilities via the interstate pipelines, as well as some of the California-produced gas, is delivered into the PG&E and SoCalGas intrastate natural gas transmission pipelines systems (commonly referred to as California's "backbone" pipeline system). Natural gas on the utilities' backbone pipeline systems is then delivered to the local transmission and distribution pipeline systems, or to natural gas storage fields. Some large volume noncore customers take natural gas delivery directly off the high-pressure backbone and local transmission pipeline systems, while core customers and other noncore customers take delivery off the utilities' distribution pipeline systems. The state's natural gas utilities operate over 100,000 miles of transmission and distribution pipelines, and thousands more miles of service lines.

Bypass customers take most of their deliveries directly off the Kern/Mojave pipeline system, but they also take a significant amount of gas from California production.

PG&E and SoCalGas own and operate several natural gas storage fields that are located within their service territories in northern and southern California, respectively. These storage fields, and four independently owned storage utilities - Lodi Gas Storage, Wild Goose Storage, Central Valley Storage, and Gill Ranch Storage - help meet peak seasonal and daily natural gas demand and allow California natural gas customers to secure natural gas supplies more efficiently. PG&E is a 25% owner of the Gill Ranch Storage field. These storage fields provide a significant amount of infrastructure capacity to help meet California's natural gas requirements, and without these storage fields, California would need much more pipeline capacity in order to meet peak gas requirements

.

Prior to the late 1980s, California regulated utilities provided virtually all natural gas services to all their customers. Since then, the Commission has gradually restructured the California gas industry in order to give customers more options while assuring regulatory protections for those customers that wish to, or are required to, continue receiving utility-provided services.

The option to purchase natural gas from independent suppliers is one of the results of this restructuring process. Although the regulated utilities procure natural gas supplies for most core customers, core customers have the option to purchase natural gas from independent natural gas marketers, called "core transport agents" (CTA). Contact information for core transport agents can be found on the utilities' web sites. Noncore customers, on the other hand, make natural gas supply arrangements directly with producers or with marketers.

Another option resulting from the restructuring process occurred in 1993, when the Commission removed the utilities' storage service responsibility for noncore customers, along with the cost of this service from noncore customers' transportation rates. The Commission also encouraged the

development of independent storage fields, and in subsequent years, all the independent storage fields in California were established. Noncore customers and marketers may now take storage service from the utility or from an independent storage provider (if available), and pay for that service, or may opt to take no storage service at all. For core customers, the Commission assures that the utility has adequate storage capacity set aside to meet core requirements, and core customers pay for that service.

In a 1997 decision, the Commission adopted PG&E's "Gas Accord", which unbundled PG&E's backbone transmission costs from noncore transportation rates. This decision gave customers and marketers the opportunity to obtain pipeline capacity rights on PG&E's backbone transmission pipeline system, if desired, and pay for that service at rates authorized by the Commission. The Gas Accord also required PG&E to set aside a certain amount of backbone transmission capacity in order to deliver gas to its core customers. Subsequent Commission decisions modified and extended the initial terms of the Gas Accord. The "Gas Accord" framework is still in place today for PG&E's backbone and storage rates and services and is now simply referred to as PG&E Gas Transmission and Storage (GT&S).

In a 2006 decision, the Commission adopted a similar gas transmission framework for Southern California, called the "firm access rights" system. SoCalGas and SDG&E implemented the firm access rights (FAR) system in 2008, and it is now referred to as the backbone transmission system (BTS) framework. As under the PG&E backbone transmission system, SoCalGas backbone transmission costs are unbundled from noncore transportation rates. Noncore customers and marketers may obtain, and pay for, firm backbone transmission capacity at various receipt points on the SoCalGas system. A certain amount of backbone transmission capacity is obtained for core customers to assure meeting their requirements.

Many if not most noncore customers now use a marketer to provide for several of the services formerly provided by the utility. That is, a noncore customer may simply arrange for a marketer to procure its supplies, and obtain any needed storage and backbone transmission capacity, in order to assure that it will receive its needed deliveries of natural gas supplies. Core customers still mainly rely on the utilities for procurement service, but they have the option to take procurement service from a CTA. Backbone transmission and storage capacity is either set aside or obtained for core customers in amounts to assure very high levels of service.

In order properly operate their natural gas transmission pipeline and storage systems, PG&E and SoCalGas must balance the amount of gas received into the pipeline system and delivered to customers or to storage fields. Some of these utilities' storage capacity is dedicated to this service, and under most circumstances, customers do not need to precisely match their deliveries with their consumption. However, when too much or too little gas is expected to be delivered into the utilities' systems, relative to the amount being consumed, the utilities require customers to more precisely match up their deliveries with their consumption. And, if customers do not meet certain delivery requirements, they could face financial penalties. The utilities do not profit from these financial penalties - the amounts are then returned to customers as a whole. If the utilities find that they are unable to deliver all the gas

that is expected to be consumed, they may even call for a curtailment of some gas deliveries. These curtailments are typically required for just the largest, noncore customers. It has been many years since there has been a significant curtailment of core customers in California."

As indicated in the preceding discussions, natural gas is available from a variety of in-State and out-of-State sources and is provided throughout the State in response to market supply and demand. Complementing available natural gas resources, biogas may soon be available via existing delivery systems, thereby increasing the availability and reliability of resources in total. The CPUC oversees utility purchases and transmission of natural gas to ensure reliable and affordable natural gas deliveries to existing and new consumers throughout the State. (Urban Crossroads, 2023, pp. 11-14)

D. Transportation Energy Resources

The Department of Motor Vehicles (DMV) identified 36.2 million registered vehicles in California and those vehicles consume an estimated 17.2 billion gallons of fuel each year. Gasoline (and other vehicle fuels) are commercially provided commodities and would be available to the Project patrons and employees via commercial outlets. (Urban Crossroads, 2023, pp. 14-15)

California's on-road transportation system includes 396,616 lane miles, more than 26.6 million passenger vehicles and light trucks, and almost 9.0 million medium- and heavy-duty vehicles. While gasoline consumption has been declining since 2008 it is still by far the dominant fuel. California is the second-largest consumer of petroleum products, after Texas, and accounts for 8% of the nation's total consumption. The State is the largest U.S. consumer of motor gasoline and jet fuel, and 83% of the petroleum consumed in California is used in the transportation sector. (Urban Crossroads, 2023, p. 15)

California accounts for less than 1% of total U.S. natural gas reserves and production. As with crude oil, California's natural gas production has experienced a gradual decline since 1985. In 2021, about 33% of the natural gas delivered to consumers went to the State's industrial sector, and about 31% was delivered to the electric power sector. Natural gas fueled more than two fifths of the State's utility-scale electricity generation in 2021. The residential sector, where three-fifths of California households use natural gas for home heating, accounted for 22% of natural gas deliveries. The commercial sector received 12% of the deliveries to end users and the transportation sector consumed the remaining 1%. (Urban Crossroads, 2023, p. 15)

4.6.2 Applicable Regulatory Requirements

The following is a brief description of the federal, State, and local environmental laws and related regulations related to energy use and conservation.

A. Federal Regulations

1. Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA)

The Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA) promoted the development of inter-modal transportation systems to maximize mobility as well as address national and local interests in air quality

and energy. ISTEA contained factors that Metropolitan Planning Organizations (MPOs) were to address in developing transportation plans and programs, including some energy-related factors. To meet the new ISTEA requirements, MPOs adopted explicit policies defining the social, economic, energy, and environmental values guiding transportation decisions. The applicable MPO for Riverside County is the Southern California Association of Governments (SCAG). SCAG's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) is the applicable planning document for the area. (FHWA, n.d.)

2. The Transportation Equity Act for the 21st Century (TEA-21)

The TEA-21 was signed into law in 1998 and builds upon the initiatives established in the ISTEA legislation, discussed above. TEA-21 authorizes highway, highway safety, transit, and other efficient surface transportation programs. TEA-21 continues the program structure established for highways and transit under ISTEA, such as flexibility in the use of funds, emphasis on measures to improve the environment, and focus on a strong planning process as the foundation of good transportation decisions. TEA-21 also provides for investment in research and its application to maximize the performance of the transportation system through, for example, deployment of Intelligent Transportation Systems, to help improve operations and management of transportation systems and vehicle safety. (Urban Crossroads, 2023, p. 17)

B. State Regulations

1. Integrated Energy Policy Report (IEPR)

Senate Bill 1389 (Bowen, Chapter 568, Statutes of 2002) requires the California Energy Commission (CEC) to prepare a biennial integrated energy policy report that assesses major energy trends and issues facing California's electricity, natural gas, and transportation fuel sectors and provides policy recommendations to conserve resources; protect the environment; ensure reliable, secure, and diverse energy supplies; enhance the State's economy; and protect public health and safety (Public Resources Code § 25301a). The CEC prepares these assessments and associated policy recommendations every two years, with updates on alternate years, as part of the Integrated Energy Policy Report (IEPR). (CEC, n.d.2)

The 2022 IEPR was adopted February 2023, and continues to work towards improving electricity, natural gas, and transportation fuel energy use in California. The 2022 IEPR introduces a new framework for embedding equity and environmental justice at the CEC and California Energy Planning Library which allows for easier access to energy data and analytics for a wide range of users. Additionally, energy reliability, western electricity integration, gasoline cost factors and price spikes, the role of hydrogen in California's clean energy future, fossil gas transition and distributed energy resources are topics discussed within the 2022 IEPR. (CEC, n.d.2)

2. State California Energy Plan

The CEC is responsible for preparing the State Energy Plan, which identifies emerging trends related to energy supply, demand, conservation, public health and safety, and the maintenance of a healthy economy. The Plan calls for the state to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To

further this policy, the plan identifies several strategies, including assistance to public agencies and fleet operators and encouragement of urban designs that reduce vehicle miles traveled (VMT) and accommodate pedestrian and bicycle access. (Urban Crossroads, 2023, p. 18)

3. California Code Title 24, Part 6, Energy Efficiency Standards

California Code Title 24, Part 6 (also referred to as the California Energy Code) was promulgated by the CEC in 1978 in response to a legislative mandate to create uniform building codes to reduce California's energy consumption. To these ends, the California Energy Code provides energy efficiency standards for residential and nonresidential buildings. California's building efficiency standards are updated on an approximately three-year cycle. The 2019 Standards for building construction, which went into effect on January 1, 2020, improved upon the former 2016 Standards for residential and nonresidential buildings. The CEC anticipates that single-family homes built with the 2019 standards will use approximately 7% less energy compared to the residential homes built under the 2016 standards. Additionally, after implementation of solar PV systems, homes built under the 2019 standards will use about 53% less energy than homes built under the 2016 standards. Nonresidential buildings will use approximately 30% less energy due to lighting upgrades compared to the prior code. The 2022 version of Title 24 was adopted by the CEC and will be effective on January 1, 2023. The 2022 Title 24 standards require solar photovoltaic systems for new homes, establish requirements for newly constructed healthcare facilities, encourage demand responsive technologies for residential buildings, and update indoor and outdoor lighting standards for nonresidential buildings. (CEC, n.d.3)

4. California Renewable Portfolio Standards (RPS)

The California Energy Commission (CEC) implements and administers portions of California's Renewables Portfolio Standard (RPS). Under the existing RPS, 25% of retail sales are required to be from renewable sources by December 31, 2016, 33% by December 31, 2020, 40% by December 31, 2024, 45% by December 31, 2027, and 50% by December 31, 2030. SB 100 raises California's RPS requirement to 50% renewable resources target by December 31, 2026, and to achieve a 60% target by December 31, 2030. SB 100 also requires that retail sellers and local publicly owned electric utilities procure a minimum quantity of electricity products from eligible renewable energy resources so that the total kilowatt hours (kWh) of those products sold to their retail end-use customers achieve 44% of retail sales by December 31, 2024, 52% by December 31, 2027, and 60% by December 31, 2030. In addition to targets under AB 32 and SB 32, Executive Order B-55-18 establishes a carbon neutrality goal for the state of California by 2045; and sets a goal to maintain net negative emissions thereafter. The Executive Order directs the California Natural Resources Agency (CNRA), California Environmental Protection Agency (CalEPA), the Department of Food and Agriculture (CDFA), and California Air Resources Board (CARB) to include sequestration targets in the Natural and Working Lands Climate Change Implementation Plan consistent with the carbon neutrality goal. (CEC, 2017)

5. Pavley Fuel Efficiency Standards (AB 1493)

In California, AB 1493 establishes fuel efficiency ratings for model year 2009-2016 passenger cars and light trucks. (CARB, n.d.6)

6. Senate Bill 350 (SB 350) – Clean Energy and Pollution Reduction Act of 2015

In October 2015, the legislature approved, and the Governor signed, SB 350, which reaffirms California's commitment to reducing its GHG emissions and addressing climate change. Key provisions include an increase in the renewables portfolio standard (RPS), higher energy efficiency requirements for buildings, initial strategies towards a regional electricity grid, and improved infrastructure for electric vehicle charging stations. Specifically, SB 350 requires the following to reduce statewide GHG emissions: (CA Legislative Info, n.d.44)

- Increase the amount of electricity procured from renewable energy sources from 33 percent to 50 percent by 2030, with interim targets of 40 percent by 2024, and 25 percent by 2027.
- Double the energy efficiency in existing buildings by 2030. This target will be achieved through the California Public Utility Commission (CPUC), the CEC, and local publicly owned utilities.
- Reorganize the Independent System Operator (ISO) to develop more regional electrify transmission markets and to improve accessibility in these markets, which will facilitate the growth of renewable energy markets in the western United States.

7. Advanced Clean Cars Program

In 2012, the California Air Resources Board (CARB) adopted a set of regulations to control emissions from passenger vehicle model years 2017 through 2025, collectively called Advanced Clean Cars. Advanced Clean Cars, developed in coordination with the United States Environmental Protection Agency (EPA) and National Highway Traffic Safety Administration (NHTSA), combined the control of smog-causing (criteria) pollutants and greenhouse gas (GHG) emissions into a single coordinated package of regulations: the Low-Emission Vehicle III Regulation for criteria (LEV III Criteria) and GHG (LEV III GHG) emissions, and a technology-forcing mandate for zero-emission vehicles (ZEV). The goal of the program is to guide the development of environmentally advanced cars that would continue to deliver the performance, utility, and safety car owners have come to expect. Advanced Clean Cars includes the following elements (CARB, 2020c):

LEV III Criteria: Reducing Smog-Forming Pollution. CARB adopted new emission standards to reduce smog-forming emissions (also known as "criteria pollutants") beginning with 2015 model year vehicles. The goal of this regulation is to have cars emit 75 percent less smog-forming pollution than the average car sold in 2012 by 2025.

LEV III GHG: Reducing GHG Emissions. California's GHG regulations are projected to reduce GHG emissions from new vehicles by approximately 40 percent (from 2012 model vehicles) in 2025.

ZEV Regulation: Promoting the Cleanest Cars. The ZEV regulation is designed to achieve the State's long-term emission reduction goals by requiring auto manufacturers to offer for sale specific numbers of the very cleanest cars available. These vehicle technologies include full battery-electric, hydrogen fuel cell, and plug-in hybrid-electric vehicles. Updated estimates using publicly available information show about 8 percent of California new vehicle sales in 2025 will be ZEVs and plug-in hybrids.

8. Advanced Clean Trucks Program

In June, 2020, CARB adopted a new Rule requiring truck manufacturers to transition from diesel trucks and vans to electric zero-emission trucks beginning in 2024 (CARB, 2021). By 2045, every new truck sold in California will be required to be zero-emission (ibid.). Manufacturers who certify Class 2b-8 chassis or complete vehicles with combustion engines would be required to sell zero-emission trucks as an increasing percentage of their annual California sales from 2024 to 2035 (ibid.). By 2035, zero-emission truck/chassis sales would need to be 55% of Class 2b – 3 truck sales, 75% of Class 4 – 8 straight truck sales, and 40% of truck tractor sales (ibid.). CARB reports that as of 2020, most commercially-available models of zero-emission vans, trucks and buses operate less than 100 miles per day (ibid.). Commercial availability of electric-powered long-haul trucks is very limited (ibid.). However, as technology advances over the next 20 years, zero-emission trucks will become suitable for more applications, and several truck manufacturers have announced plans to introduce market ready zero-emission trucks in the future (ibid.). When commercial availability of electric-powered long-haul trucks is more readily available, implementation of the Advanced Clean Trucks Regulation is anticipated to significantly reduce GHG emissions and energy usage statewide.

9. Senate Bill 1020 – Clean Energy, Jobs, and Affordability Act of 2022

SB 1020, also known as the Clean Energy, Jobs, and Affordability Act of 2022, revised State policy to include interim targets requiring that eligible renewable energy resources and zero-carbon resources supply 90 percent of all retail sales of electricity to California end-use customers by December 31, 2035, 95 percent of all retail sales of electricity to California end-use customers by December 31, 2040, 100 percent of all retail sales of electricity to California end-use customers by December 31, 2045, and 100 percent of electricity procured to serve all state agencies by December 31, 2035. SB 1020 also requires each State agency to ensure that zero-carbon resources and eligible renewable energy resources supply 100 percent of electricity procured to serve their agency by December 31, 2035. In addition, SB 1020 requires the State Water Project (SWP) to procure eligible renewable energy and zero-carbon resources as necessary to meet the clean energy requirements specified for all State agencies. Finally, SB 1020 requires the California Public Utilities Commission (CPUC) to develop utility affordability metrics for both electricity and gas service. (CA Legislative Info, n.d.27)

C. Local Regulations

1. Riverside County Climate Action Plan (CAP)

Riverside County's most current Climate Action Plan, updated in November 2019 uses several methods to promote renewable energy and energy efficiency. The regulation most relevant to the project is R2-CE1: Clean Energy, which states:

- *On-site renewable energy production (including but not limited to solar) shall apply to any tentative tract map, plot plan, or conditional use permit that proposes to add more than 75 new dwelling units of residential development or one or more new buildings totaling more than 100,000 gross square feet of commercial, office, industrial, or manufacturing development. Renewable energy production shall be onsite generation of at least 20 percent of energy demand for commercial, office, industrial or manufacturing development, meet or exceed 20 percent of energy demand for multi-family residential*

development, and meet or exceed 30 percent of energy demand for single-family residential development. (Riverside County, 2019, pp. 4-11 and 4-12)

The County of Riverside also has several other non-mandatory regulations that would serve to benefit the Project. For example, CAP measure R2-L1, *Tree Planting for Shading and Energy Saving*, encourages residents and developers to plant trees to lower outdoor summer temperatures. CAP measure R2-L2, *Light Reflecting Surfaces for Energy Saving*, advocates for coating surfaces such as roofs and asphalt with substances that reflect sunlight, for example by painting them white or installing rooftop gardens. Other potential measures from the CAP Screening Tables are listed are listed in Appendix 3.4 of the Project's Greenhouse Gas Analysis (GHGA), which is appended to this EIR as *Technical Appendix H* (Urban Crossroads, 2023d).

4.6.3 Basis for Determining Significance

Section VI of Appendix G to the California Environmental Quality Act (CEQA) Guidelines addresses typical adverse effects due to energy consumption, and includes the following threshold questions to evaluate a project's impacts on energy resources.

- Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

- Would the project conflict with or obstruct a State or local plan for renewable energy or energy efficiency?

The following thresholds are derived directly from Section VI of Appendix G to the CEQA Guidelines and the County's Environmental Assessment form. The proposed Project would have a significant impact on energy resources if construction and/or operation of the Project would:

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

b. *Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.*

4.6.4 Impact Analysis

A. Methodology for Calculating Project Energy Demands

Information from the CalEEMod Version 2022 outputs for the Mead Valley Commerce Center (PPT220050) Air Quality Impact Analysis ("AQIA"; EIR *Technical Appendix C1*) was utilized in this analysis, detailing Project related construction equipment, transportation energy demands, and facility energy demands. (Urban Crossroads, 2023, p. 23)

In May 2023, the SCAQMD, in conjunction with the California Air Pollution Control Officers Association (CAPCOA) and other California air districts, released the latest version of the CalEEMod Version 2022.1.1.12. The purpose of this model is to calculate construction-source and operational-source criteria pollutants and

GHG emissions from direct and indirect sources as well as energy usage. Accordingly, the latest version of CalEEMod has been used to determine the proposed Project's anticipated transportation and facility energy demands. Outputs from the annual model runs are provided in Appendices 4.1 through 4.3 of the Project's EA (*Technical Appendix F)* for annual operation emissions. (Urban Crossroads, 2023, p. 23)

On May 2, 2022, the EPA approved the 2021 version of the EMissions FACtor model (EMFAC2021) web database for use in State Implementation Plan and transportation conformity analyses. EMFAC2021 is a mathematical model that was developed to calculate emission rates, fuel consumption, VMT from motor vehicles that operate on highways, freeways, and local roads in California and is commonly used by the CARB to project changes in future emissions from onroad mobile sources (26). This energy study utilizes the different fuel types for each vehicle class from the annual EMFAC2021 emission inventory in order to derive the average vehicle fuel economy which is then used to determine the estimated annual fuel consumption associated with vehicle usage during Project construction and operational activities. For purposes of Mead Valley Commerce Center Energy Analysis 2023-08-22 Energy Report 24 analysis, the 2024 through 2026 analysis years were utilized to determine the average vehicle fuel economy used throughout the duration of the Project. Outputs from the EMFAC2021 model run is provided in Appendix 4.4. of the Project's EA. (Urban Crossroads, 2023, pp. 23-24)

Threshold a.: ***Would the Project result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?***

Provided below is an assessment of the Project's potential construction-related impacts, as well as operational impacts that would be associated with implementation of the Project.

A. Construction Energy Demands

1. Construction Power Cost

The focus within this subsection is the energy implications of the construction process, specifically the power cost from on-site electricity consumption during construction of the proposed Project. For purposes of analysis, construction of Project is expected to commence in September 2024 and would last through December 2025. The construction schedule utilized in the analysis, previously depicted in EIR Table 3-1, *Construction Duration*, represents a "worst-case" analysis scenario. The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet. (Urban Crossroads, 2023, p. 24)

Based on the *2023 National Construction Estimator*, the typical power cost per 1,000 sf of construction per month is $2.50. The proposed Project includes the development of a 1,003,510 s.f. warehouse and associated parking area and a public park, which would include amenities such as play fields, hard surface sport courts, a playground, dog park, and walking path. Based on Table 4.6-3, *Construction Power Cost*, the total power cost of the on-site electricity usage during the construction of the Project is estimated to be approximately $106,058.93. (Urban Crossroads, 2023, p. 24)

Table 4.6-3 Construction Power Cost

Land Use	Power Cost (per 1,000 SF of construction per month)	Size (1,000 SF)	Construction Duration (months)	Project Construction Power Cost
High-Cube Fulfillment	$2.50	852.98	15	$31,986.90
High-Cube Cold Storage	$2.50	150.53	15	$5,644.73
City Park	$2.50	579.35	15	$21,725.55
Parking Lot	$2.50	165.09	15	$6,190.95
Other Asphalt Surfaces	$2.50	1,080.29	15	$40,510.80
			CONSTRUCTION POWER COST	***$106,058.93***

(Urban Crossroads, 2023, Table 4-2)

2. Construction Electricity Usage

The total Project construction electricity usage is the summation of the products of the power cost by the utility provider cost per kilowatt hour (kWh) of electricity. The SCE's general service rate schedule was used to determine the Project's electrical usage. As of January 1, 2023, SCE's general service rate is $0.13 per kilowatt hours (kWh) of electricity for industrial services. As shown on Table 4.6-4, *Construction Electricity Usage,* the total electricity usage from on-site Project construction related activities is estimated to be approximately 805,185kWh. (Urban Crossroads, 2023, p. 25)

Table 4.6-4 Construction Electricity Usage

Land Use	Cost per kWh	Project Construction Electricity Usage (kWh)
High-Cube Fulfillment	$0.13	242,840
High-Cube Cold Storage	$0.13	42,854
City Park	$0.13	164,937
Parking Lot	$0.13	47,001
Other Asphalt Surfaces	$0.13	307,552
CONSTRUCTION ELECTRICITY USAGE		***805,185***

(Urban Crossroads, 2023, Table 4-3)

3. Construction Equipment Fuel Estimates

Fuel consumed by construction equipment would be the primary energy resource expended over the course of Project construction. A summary of construction equipment by phase is provided in EIR Table 3-2, *Construction Equipment Assumptions*. Consistent with industry standards and typical construction practices, each piece of equipment listed in EIR Table 3-2 would operate up to a total of eight (8) hours per day, or more

than two-thirds of the period during which construction activities are allowed pursuant to the County Code. In accordance with the County of Riverside Good Neighbor Policy for Logistics and Warehouse/Distribution uses, it was assumed that equipment rated 50 or less horsepower would meet at least CARB Tier 3 emissions standards, and equipment rated more than 50 horsepower would meet at least CARB Tier 4 Interim emissions standards. (Urban Crossroads, 2023, pp. 25-26)

Project construction activity timeline estimates, construction equipment schedules, equipment power ratings, load factors, and associated fuel consumption estimates are presented in Table 4.6-5, *Construction Equipment Fuel Consumption Estimates*[1]. The aggregate fuel consumption rate for all equipment is estimated at 18.5 horsepower hour per gallon (hp-hr-gal.), obtained from CARB 2018 Emissions Factors Tables and cited fuel consumption rate factors presented in Table D-24 of the Moyer guidelines. For the purposes of this analysis, the calculations are based on all construction equipment being diesel-powered, which is consistent with industry standards. (Urban Crossroads, 2023, p. 27)

Diesel fuel would be supplied by existing commercial fuel providers serving the Project area and region. As shown above in Table 4.6-5, Project construction activities would consume an estimated 93,821 gallons of diesel fuel. Project construction would represent a "single-event" diesel fuel demand and would not require ongoing or permanent commitment of diesel fuel resources for this purpose. (Urban Crossroads, 2023, p. 29)

4. Construction Trips and Vehicle Miles Travelled (VMT)

Construction generates on-road vehicle emissions from vehicle usage for workers, vendors, and haul truck commuting to and from the site. The number of workers, vendor, and haul trips are presented in Table 4.6-6, *Construction Trips and VMT*. It should be noted that for vendor trips, specifically, CalEEMod only assigns vendor trips to the Building Construction phase. Vendor trips would likely occur during all phases of construction. As such, the CalEEMod defaults for vendor trips have been adjusted based on a ratio of the total vendor trips to the number of days of each subphase of activity. (Urban Crossroads, 2023, p. 29)

5. Construction Worker Fuel Estimates

With respect to estimated VMT for the Project, the construction worker trips (personal vehicles used by workers commuting to the Project from home) would generate an estimated 1,488,418 VMT during the 15 months of construction. Based on CalEEMod methodology, it is assumed that 50% of all construction worker trips are from light-duty-auto vehicles (LDA), 25% are from light-duty-trucks (LDT1[2]), and 25% are from light-duty-trucks (LDT2[3]). Data regarding Project related construction worker trips were based on CalEEMod defaults utilized within the Project's AQIA (*Technical Appendix C1)*. (Urban Crossroads, 2023, p. 29)

[1] Based on Appendix A of the CalEEMod User's Guide, Construction consists of several types of off-road equipment. Since the majority of the off-road construction equipment used for construction projects are diesel fueled, CalEEMod assumes all of the equipment operates on diesel fuel.
[2] Vehicles under the LDT1 category have a gross vehicle weight rating (GVWR) of less than 6,000 lbs. and equivalent test weight (ETW) of less than or equal to 3,750 lbs.
[3] Vehicles under the LDT2 category have a GVWR of less than 6,000 lbs. and ETW between 3,751 lbs. and 5,750 lbs.

Table 4.6-5 Construction Equipment Fuel Consumption Estimates

Construction Activity	Duration (Days)	Equipment	HP Rating	Quantity	Usage Hours	Load Factor	HP-hrs/day	Total Fuel Consumption
Demolition	55	Concrete/Industrial Saws	33	1	8	0.73	193	573
		Excavators	36	3	8	0.38	328	976
		Rubber Tired Dozers	367	2	8	0.4	2,349	6,983
Site Preparation	22	Rubber Tired Dozers	367	3	8	0.4	3,523	10,474
		Crawler Tractors	84	4	8	0.37	995	2,957
Grading	63	Excavators	36	2	8	0.38	219	651
		Graders	148	2	8	0.41	971	2,886
		Rubber Tired Dozers	367	2	8	0.4	2,349	6,983
		Scrapers	423	5	8	0.48	8,122	24,145
		Crawler Tractors	84	3	8	0.37	746	2,218
		Generator Sets	14	1	8	0.74	83	246
		Bore/Drill Rigs	155	1	8	0.5	620	1,843
		Crushing/Proc. Equipment	12	1	8	0.85	82	243
Building Construction	195	Cranes	367	1	8	0.29	851	8,975
		Forklifts	82	4	8	0.2	525	5,532
		Generator Sets	14	3	8	0.74	249	2,621
		Tractors/Loaders/Backhoes	84	3	8	0.37	746	7,862
		Welders	46	3	8	0.45	497	5,237
Paving	15	Pavers	81	2	8	0.42	544	441
		Paving Equipment	89	2	8	0.36	513	416
		Rollers	36	2	8	0.38	219	177
Architectural Coating	90	Air Compressors	37	2	8	0.48	284	1,382
						CONSTRUCTION FUEL DEMAND (GALLONS FUEL)		***93,821***

(Urban Crossroads, 2023, Table 4-5)

Table 4.6-6 Construction Trips and VMT

Construction Activity	Worker Trips Per Day	Vendor Trips Per Day	Hauling Trips Per Day
Demolition	15	27	9
Site Preparation	18	11	0
Grading	43	31	200
Building Construction	421	95	0
Paving	15	0	0
Architectural Coating	84	0	0

(Urban Crossroads, 2023c, Table 4-6)

Vehicle fuel efficiencies for LDA, LDT1, and LDT2 were estimated using information generated within the 2021 version of the EMFAC developed by CARB. EMFAC2021 is a mathematical model that was developed to calculate emission rates, fuel consumption, and VMT from motor vehicles that operate on highways, freeways, and local roads in California and is commonly used by the CARB to project changes in future emissions from on-road mobile sources. EMFAC2021 was run for the LDA, LDT1, and LDT2 vehicle class within the San Bernardino (SC) sub-area for the 2024 through 2026 calendar years. Data from EMFAC2021 are shown in Appendix 4.4 to the Project's EA (*Technical Appendix F).* (Urban Crossroads, 2023, pp. 29-30)

As shown in Table 4.6-7, *Construction Worker Fuel Consumption Estimates,* the estimated annual fuel consumption resulting from Project construction worker trips is 51,302 gallons during full construction of the Project. It should be noted that construction worker trips would represent a "single-event" gasoline fuel demand and would not require ongoing or permanent commitment of fuel resources for this purpose. (Urban Crossroads, 2023, p. 31)

6. Construction Vendor/Hauling Fuel Estimates

With respect to estimated VMT, the construction vendor trips (vehicles that deliver materials to the site during construction) would generate an estimated 491,808 VMT along area roadways for the Project over the duration of construction activity. It is assumed that 50% of all vendor trips are from medium-heavy duty trucks (MHD), 50% of all vendor trips are from heavy-heavy duty trucks (HHD), and 100% of all hauling trips are from HHDs. These assumptions are consistent with the CalEEMod defaults utilized within the within the Project's AQIA (EIR *Technical Appendix C1*). Vehicle fuel efficiencies for MHDs and HHDs were estimated using information generated within EMFAC2021. EMFAC2021 was run for the MHD and HHD vehicle classes within the San Bernardino (SC) sub-area for the 2024 through 2026 calendar years. Data from EMFAC2021 is shown in Appendix 4.4 to the Project's EA (*Technical Appendix F).* (Urban Crossroads, 2023, p. 31)

Based on Table 4.6-8, *Construction Vendor Fuel Consumption Estimates*, it is estimated that 75,260 gallons of fuel would be consumed related to construction vendor trips during full construction of the Project. It should be noted that Project construction vendor trips would represent a "single-event" diesel fuel demand and would not require on-going or permanent commitment of diesel fuel resources for this purpose. (Urban Crossroads, 2023, p. 32)

7. Construction Energy Efficiency/Conservation Measures

Starting in 2014, CARB adopted the nation's first regulation aimed at cleaning up off-road construction equipment such as bulldozers, graders, and backhoes. These requirements ensure fleets gradually turnover the oldest and dirtiest equipment to newer, cleaner models and prevent fleets from adding older, dirtier equipment. As such, the equipment used for Project construction would conform to CARB regulations and California emissions standards. It should also be noted that there are no unusual Project characteristics or construction processes that would require the use of equipment that would be more energy intensive than is used for comparable activities; or equipment that would not conform to current emissions standards (and related fuel efficiencies). Equipment employed in construction of the Project would therefore not result in inefficient wasteful, or unnecessary consumption of fuel. (Urban Crossroads, 2023, p. 32)

Table 4.6-7 Construction Worker Fuel Consumption Estimates

Year	Construction Activity	Duration (Days)	Worker Trips/Day	Trip Length (miles)	VMT	Average Vehicle Fuel Economy (mpg)	Estimated Fuel Consumption (gallons)
2024	LDA						
	Demolition	55	8	18.5	8,140	31.57	258
	Site Preparation	22	9	18.5	3,663	31.57	116
	Grading	10	22	18.5	4,070	31.57	129
	LDT1						
	Demolition	55	4	18.5	4,070	24.59	166
	Site Preparation	22	5	18.5	2,035	24.59	83
	Grading	10	11	18.5	2,035	24.59	83
	LDT2						
	Demolition	55	4	18.5	4,070	24.51	166
	Site Preparation	22	5	18.5	2,035	24.51	83
	Grading	10	11	18.5	2,035	24.51	83
2025	LDA						
	Grading	53	22	18.5	21,571	32.57	662
	Building Construction	195	211	18.5	761,183	32.57	23,373
	Paving	15	8	18.5	2,220	32.57	68
	Architectural Coating	90	42	18.5	69,930	32.57	2,147
	LDT1						
	Grading	53	106	18.5	103,933	25.11	4,138
	Building Construction	195	4	18.5	14,430	25.11	575
	Paving	15	21	18.5	5,828	25.11	232
	Architectural Coating	90	106	18.5	176,490	25.11	7,027
	LDT2						
	Grading	53	106	18.5	103,933	25.24	4,118
	Building Construction	195	4	18.5	14,430	25.24	572
	Paving	15	21	18.5	5,828	25.24	231
	Architectural Coating	90	106	18.5	176,490	25.24	6,993
TOTAL CONSTRUCTION WORKER FUEL CONSUMPTION							***51,302***

(Urban Crossroads, 2023, Table 4-7)

Table 4.6-8 Construction Vendor Fuel Consumption Estimates

Year	Construction Activity	Duration (Days)	Vendor Trips/Day	Trip Length (miles)	VMT	Average Vehicle Fuel Economy (mpg)	Estimated Fuel Consumption (gallons)
2024	MHD						
	Demolition	55	14	10.2	7,854	8.34	942
	Site Preparation	22	6	10.2	1,346	8.34	161
	Grading	10	16	10.2	1,632	8.34	196
	HHD (Vendor)						
	Demolition	55	14	10.2	7,854	6.03	1,304
	Site Preparation	22	6	10.2	1,346	6.03	223
	Grading	10	16	10.2	1,632	6.03	271
	HHD (Hauling)						
	Demolition	55	9	20	9,900	6.03	1,643
	Grading	10	200	20	40,000	6.03	6,639
2025	MHD						
	Grading	53	16	10.2	8,650	8.46	1,023
	Building Construction	195	48	10.2	95,472	8.46	11,288
	HHD (Vendor)						
	Grading	53	16	10.2	8,650	6.13	1,411
	Building Construction	195	48	10.2	95,472	6.13	15,575
	HHD (Hauling)						
	Grading	53	200	20	212,000	6.13	34,585
TOTAL CONSTRUCTION VENDOR FUEL CONSUMPTION							***75,260***

(Urban Crossroads, 2023, Table 4-8)

Construction contractors would be required to comply with applicable CARB regulation regarding retrofitting, repowering, or replacement of diesel off-road construction equipment. Additionally, CARB has adopted the Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other Toxic Air Contaminants. Compliance with anti-idling and emissions regulations would result in a more efficient use of construction-related energy and the minimization or elimination of wasteful or unnecessary consumption of energy. Idling restrictions and the use of newer engines and equipment would result in less fuel combustion and energy consumption. (Urban Crossroads, 2023, p. 32)

Additional construction-source energy efficiencies would occur due to required California regulations and best available control measures (BACM). For example, CCR Title 13, Motor Vehicles, section 2449(d)(3) Idling, limits idling times of construction vehicles to no more than five minutes, thereby precluding unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. Section 2449(d)(3) requires that grading plans shall reference the requirement that a sign shall be posted on-site stating that construction workers need to shut off engines at or before five minutes of idling." In this manner, construction equipment operators are required to be informed that engines are to be turned off at or prior to five minutes of idling. Enforcement of idling limitations is realized through periodic site inspections conducted by County building officials, and/or in response to citizen complaints. (Urban Crossroads, 2023, p. 32)

A full analysis related to the energy needed to form construction materials is not included in this analysis due to a lack of detailed Project-specific information on construction materials. At this time, an analysis of the energy needed to create Project-related construction materials would be extremely speculative and thus has not been prepared. (Urban Crossroads, 2023, pp. 32-33)

In general, construction processes promote conservation and efficient use of energy by reducing raw materials demands, with related reduction in energy demands associated with raw materials extraction, transportation, processing, and refinement. Use of materials in bulk reduces energy demands associated with preparation and transport of construction materials as well as the transport and disposal of construction waste and solid waste in general, with corollary reduced demands on area landfill capacities and energy consumed by waste transport and landfill operations. (Urban Crossroads, 2023, p. 33)

B. Operational Energy Demands

Energy consumption in support of or related to Project operations would include transportation fuel demands (fuel consumed by passenger car and truck vehicles accessing the Project site), fuel demands from operational equipment, and facilities energy demands (energy consumed by building operations and site maintenance activities). (Urban Crossroads, 2023, p. 33)

1. Transportation Energy Demands

Energy that would be consumed by Project-generated traffic is a function of total VMT and estimated vehicle fuel economies of vehicles accessing the Project site. The VMT per vehicle class can be determined by evaluated in the vehicle fleet mix and the total VMT. As with worker and vendors trips, operational vehicle fuel efficiencies were estimated using information generated within EMFAC2021 developed by CARB. EMFAC2021 was run for the San Bernardino (SC) sub-area for the 2024 through 2026 calendar years. Data from EMFAC2021 is shown in Appendix 4.4 of the Project's EA (*Technical Appendix F).* (Urban Crossroads, 2023, p. 33)

In order to account for the possibility of up to 150,526 sf of high-cube cold storage warehouse within the proposed warehouse building, it is assumed that all trucks accessing this portion of the building would consist of transport refrigeration units (TRUs). Therefore, for modeling purposes 57 trucks are assumed to be trucks

with TRUs. TRUs are also accounted for during on-site and off-site travel. TRU calculations are based on EMFAC2021. (Urban Crossroads, 2023c, p. 33)

The estimated transportation energy demands are summarized in Table 4.6-9, *Total Project-Generated Traffic Annual Fuel Consumption*. As summarized in Table 4.6-9, the Project would result in a 14,041,886 annual VMT and an estimated annual fuel consumption of 713,433 gallons of fuel. (Urban Crossroads, 2023, p. 33)

2. On-site Cargo Handling Equipment Fuel Demands

It is common for industrial buildings to require the operation of exterior cargo handling equipment in the building's truck court areas. For this particular Project, on-site modeled operational equipment includes up to five (5) 175 horsepower (hp), natural gas-powered cargo handling equipment – port tractors operating at 4 hours a day for 365 days of the year. Project operational activity estimates and associated fuel consumption estimates are based on the annual EMFAC2021 offroad emissions for the 2026 operational year and was used to derive the total annual fuel consumption associated on-site equipment. As presented in Table 4.6-10, *On-Site Cargo Handling Equipment Fuel Consumption Estimates*, Project on-site equipment would consume an estimated 23,209 gallons of natural gas. (Urban Crossroads, 2023, p. 34)

3. Facility Energy Demands

Project building operations activities would result in the consumption of electricity, which would be supplied to the Project by SCE. Electricity usage associated with the Project was calculated based on client provided data and includes 20% of the building user's electric power from renewable sources, in accordance with the Riverside County Climate Action Plan (CAP) Update Measure R2-CE1 (refer to EIR Subsection 4.8, *Greenhouse Gas Emissions*, for a discussion of CAP Update requirements). As summarized in Table 4.6-11, *Project Annual Operational Energy Demand Summary*, the Project would result in 3,225,232 kWh/year of electricity. Based on information provided by the Project Applicant, the Project would not use natural gas for the building envelope. As such, natural gas consumption has not been analyzed in the Project's EA. (Urban Crossroads, 2023, p. 35)

4. Operational Energy Efficiency/Conservation Measures

Energy efficiency/energy conservation attributes of the Project would be complemented by increasingly stringent State and federal regulatory actions addressing vehicle fuel economies and vehicle emissions standards, and enhanced building/utilities energy efficiencies mandated under California building codes (e.g., Title 24, California Green Building Standards Code). (Urban Crossroads, 2023, p. 35)

Project annual fuel consumption estimates presented previously in Table 4.6-9 represent likely potential maximums that would occur for the Project. Under subsequent future conditions, average fuel economies of vehicles accessing the Project site can be expected to improve as older, less fuel-efficient vehicles are removed from circulation, and in response to fuel economy and emissions standards imposed on newer vehicles entering the circulation system. (Urban Crossroads, 2023, p. 35)

Table 4.6-9 Total Project-Generated Traffic Annual Fuel Consumption

Vehicle Type	Average Vehicle Fuel Economy (mpg)	Annual VMT	Estimated Annual Fuel Consumption (gallons)
LDA	33.47	6,659,393	198,939
LDT1	25.64	519,770	20,268
LDT2	25.93	2,715,048	104,696
MDV	21.11	2,136,721	101,233
LHDT1	16.62	277,201	16,678
LHDT2	15.58	79,028	5,073
MHDT	8.59	187,811	21,871
HHDT	6.24	1,120,024	179,484
OBUS	6.38	2,436	382
UBUS	5.04	1,564	310
MCY	42.30	313,131	7,403
SBUS	6.46	5,410	837
MH	5.80	24,348	4,197
TRUs			52,060
TOTAL (ALL VEHICLES)		***14,041,886***	***713,433***

(Urban Crossroads, 2023, Table 4-9)

Table 4.6-10 On-Site Cargo Handling Equipment Fuel Consumption Estimates

Equipment	Quantity	Usage Hours	Days of Operation	EMFAC2021 Fuel Consumption (gal./yr)	EMFAC2021 Activity (hrs./yr)	Total Fuel Consumption
Cargo Handling Equipment	5	4	365	17,909	5,633	23,209
ON-SITE CARGO HANDLING EQUIPMENT FUEL DEMAND (GALLONS FUEL)						***23,209***

(Urban Crossroads, 2023, Table 4-10)

Table 4.6-11 Project Annual Operational Energy Demand Summary

Land Use	Electricity Demand (kWh/year)
High-Cube Fulfillment Center	1,767,203
High-Cube Cold Storage	1,458,028
TOTAL PROJECT ENERGY DEMAND	***3,225,232***

(Urban Crossroads, 2023, Table 4-11)

Enhanced fuel economies realized pursuant to federal and State regulatory actions, and related transition of vehicles to alternative energy sources (e.g., electricity, natural gas, biofuels, hydrogen cells) would likely decrease future gasoline fuel demands per VMT. Location of the Project proximate to regional and local roadway systems tends to reduce VMT within the region, acting to reduce regional vehicle energy demands. (Urban Crossroads, 2023, p. 35)

C. Conclusion

As supported by the preceding analyses, Project construction and operations would not result in the inefficient, wasteful, or unnecessary consumption of energy. Further, the energy demands of the Project can be accommodated within the context of available resources and energy delivery systems. Future building permit applications associated with the Project would be required to comply with the applicable Title 24 standards. As such, energy consumed by the Project's operation is calculated to be comparable to, or less than, energy consumed by other older warehouse uses of similar scale and intensity that are constructed and operating in California. Additionally, the Project's proximity to the Interstate freeway system would reduce VMT and therefore decrease reliance on fossil fuels. On this basis, the Project would not result in the inefficient, wasteful, or unnecessary consumption of energy. The Project would therefore not cause or result in the need for additional energy producing or transmission facilities. The Project would not engage in wasteful or inefficient uses of energy and aims to achieve energy conservations goals within the State of California. Therefore, the Project would not result in the wasteful, inefficient, or unnecessary consumption of energy resources, and impacts would be less than significant.

Threshold b.: ***Would the Project conflict with or obstruct a State or Local plan for renewable energy or energy efficiency?***

A summary of the Project's consistency with applicable regulations and requirements is provided below.

Consistency with Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA)

Transportation and access to the Project site is provided primarily by the local and regional roadway systems. The Project would not interfere with, nor otherwise obstruct intermodal transportation plans or projects that may be realized pursuant to the ISTEA because Southern California Association of Governments (SCAG) is not planning for intermodal facilities on or through the Project site.

Consistency with Transportation Equity Act for the 21st Century (TEA-21)

The Project site is located along major transportation corridors with proximate access to the Interstate freeway system. The site selected for the Project facilitates access, acts to reduce vehicle miles traveled, takes advantage of existing infrastructure systems, and promotes land use compatibilities through collocation of similar uses. The Project supports the strong planning processes emphasized under TEA-21. The Project is therefore consistent with, and would not otherwise interfere with, nor obstruct implementation of TEA-21.

Consistency with 2021 Integrative Energy Policy Report (IEPR)

Electricity would be provided to the Project site by SCE, and SoCalGas would provide natural gas. SCE's Clean Power and Electrification Pathway (CPEP) white paper builds on existing state programs and policies. As such, the Project is consistent with, and would not otherwise interfere with, nor obstruct implementation the goals presented in the 2021 IEPR. Additionally, the Project would comply with the applicable Title 24 standards which would ensure that the Project energy demands would not be inefficient, wasteful, or otherwise unnecessary. As such, development of the proposed Project would support the goals presented in the 2021 IEPR.

Consistency with Energy Action Plan

The Project site is located along major transportation corridors with proximate access to the interstate freeway system. The site selected for the Project facilitates access, acts to reduce VMT, and takes advantage of existing infrastructure systems. The Project therefore supports urban design and planning processes identified under the Energy Action Plan, is consistent with, and would not otherwise interfere with, nor obstruct implementation of the State of California Energy Plan.

Consistency with California Code Title 24, Part 6, Energy Efficiency Standards

The 2022 version of Title 24 was adopted by the CEC and became effective on January 1, 2023. The proposed Project would be required to comply with the Title 24 standards in place at the time plan check submittals are made. Therefore, the Project is would not result in a significant impact on energy resources. The proposed Project would be subject to Title 24 standards. As such, the Project would not conflict with or obstruct implementation of the 2022 Title 24 standards.

Consistency with AB 1493

AB 1493 is not applicable to the Project as it is a Statewide measure establishing vehicle emissions standards. No feature of the Project would interfere with implementation of the requirements under AB 1493.

Consistency with Renewable Portfolio Standard (RPS)

California's Renewable Portfolio Standard is not applicable to the Project as it is a Statewide measure that establishes a renewable energy mix. No feature of the Project would interfere with implementation of the requirements under RPS.

Consistency with SB 350

The proposed Project would use energy from SCE, which has committed to diversify their portfolio of energy sources by increasing energy from wind and solar sources. No feature of the Project would interfere with implementation of SB 350. Additionally, the Project would be designed and constructed to implement the energy efficiency measures for new industrial developments and would include several measures designed to reduce energy consumption.

Consistency with the County of Riverside Climate Action Plan (CAP)

The Project would be required to comply with the 2022 Title 24 standards. The Project Applicant would be required to install solar panels on future buildings to achieve more than 20% of energy from on-site renewable sources as required by CAP Update measure R2-CE1, *Clean Energy*. The Project Applicant also would be required to incorporate environmentally sound landscaping into the project, as required by CAP measure R2-L1, *Tree Planting for Shading and Energy Saving*. Additionally, and as documented in EIR Subsection 4.8, *Greenhouse Gas Emissions*, the Project would be required to achieve a minimum of 100 points pursuant to the CAP Update Screening Tables (CAP Update Appendix D). As such, no feature of the Project would conflict with the County of Riverside Climate Action Plan.

Conclusion

As indicated in the preceding analysis, the Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. Thus, impacts would be less than significant.

4.6.5 Cumulative Impact Analysis

As indicated under the analysis of Threshold a., there are no components of the proposed Project that would result in the wasteful, inefficient, or unnecessary consumption of energy resources. Although it is possible other cumulative developments could result in the wasteful, inefficient, or unnecessary consumption of energy resources, the Project's projected energy demand during construction and long-term operations would be less-than-cumulatively considerable with mandatory compliance with applicable regulations.

As indicated under the analysis of Threshold b., the Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. As such, the Project has no potential to result in cumulatively-considerable impacts due to a conflict with or obstruction of such plans.

4.6.6 Significance of Impacts Before Mitigation

Threshold a.: Less-than-Significant Impact. Project construction and operations would not result in the inefficient, wasteful, or unnecessary consumption of energy. Further, the energy demands of the Project can be accommodated within the context of available resources and energy delivery systems. The Project would therefore not cause or result in the need for additional energy producing or transmission facilities. The Project would not engage in wasteful or inefficient uses of energy and aims to achieve energy conservations goals within the State of California. As such, Project impacts due to wasteful, inefficient, or unnecessary consumption of energy resources would be less than significant requiring no mitigation.

Threshold b.: Less-than-Significant Impact. Energy consumed by the Project's operation is calculated to be comparable to, or less than, energy consumed by other warehouse projects of similar scale and intensity that are operating in California, as the Project would be subject to current regulatory requirements. Based on the analysis presented herein, the Project would not conflict with or obstruct a federal or State plan for renewable energy or energy efficiency, and impacts would be less than significant.

4.6.7 County Regulations, Design Requirements, and Mitigation

Applicable County Regulations and Design Requirements

The following are regulations and design requirements that apply to the proposed Project and that reduce or preclude energy consumption. Although compliance with mandatory regulatory requirements does not technically meet CEQA's definition for mitigation, they are specified herein as requirements for the Project.

- Pavley Fuel Efficiency Standards (AB1493). Establishes fuel efficiency ratings for new vehicles.

- Renewable Portfolio Standards (SB 100). Increases California's RPS requirement to 50% renewable resources target by December 31, 2026, and to achieve a 60% target by December 31, 2030. SB 100 also requires that retail sellers and local publicly owned electric utilities procure a minimum quantity of electricity products from eligible renewable energy resources so that the total kilowatt hours (kWh) of those products sold to their retail end-use customers achieve 44% of retail sales by December 31, 2024, 52% by December 31, 2027, and 60% by December 31, 2030. In addition to targets under AB 32 and SB 32, Executive Order B-55-18 establishes a carbon neutrality goal for the state of California by 2045; and sets a goal to maintain net negative emissions thereafter. The Executive Order directs the California Natural Resources Agency (CNRA), California Environmental Protection Agency (CalEPA), the California Department of Food and Agriculture (CDFA), and CARB to include sequestration targets in the Natural and Working Lands Climate Change Implementation Plan consistent with the carbon neutrality goal.

- CCR Title 13, Motor Vehicles, Section 2449(d)(3), *Idling*. Grading plans shall reference the requirement that a sign shall be posted on-site stating that construction workers need to shut off engines at or before five minutes of idling.

Mitigation

Project impacts due to energy consumption would be less than significant; therefore, mitigation measures are not required.

4.7 GEOLOGY AND SOILS

This Subsection 4.7 assesses the existing surface and subsurface geologic conditions and features of the Project site and determines the potential for impacts associated with these features. The analysis in this subsection is based, in part, on information from the report titled, "Geotechnical Investigation, Proposed Warehouse Development, SWC Cajalco Road and Seaton Avenue," prepared by Southern California Geotechnical (herein, "SCG"), dated December 9, 2022, and included as EIR *Technical Appendix G* (SCG, 2022).

4.7.1 EXISTING CONDITIONS

A. Regional Geology

The Project site is located in the Peninsular Ranges geomorphic province of California. The Peninsular Ranges province extends from the Los Angeles Basin southeast to Baja California and from the Pacific Ocean eastward to the Coachella Valley and Colorado Desert. The province consists of numerous northwest to southeast-trending mountain ranges and valleys that are geologically controlled by several major active faults. The Project site is located within and near the central part of the Perris block, which is bounded on the northeast by the San Jacinto fault zone, on the north by the Sierra Madre-Cucamonga fault zone, and on the west by the Elsinore Fault zone.

B. Local Geology

The Project site is predominantly underlain by early Pleistocene (Map Symbol Qvof) old alluvial valley deposits in the eastern portion and some Val Verde tonalite (Map Symbol Kvt) formation in the western portion of the site. The older alluvium deposits are described as predominantly composed of moderately indurated, slightly dissected, sandy alluvium, containing lesser silt, and clay-bearing alluvium. The Val Verde tonalite formation is described as gray-weathering, relatively homogeneous, massive to well-foliated, medium to coarse grained, hypautomorphic granular biotite-hornblende tonalite. The geologic conditions encountered at the site are consistent with the mapped geologic conditions. (SCG, 2022, p. 7)

Based on a field investigation and a review of previous studies conducted by SCG for the Project site, it was determined that the Project site has the following geotechnical conditions:

- Younger Alluvium: Native younger alluvium was encountered at the ground surface of several boring locations, extending to depths ranging from approximately 2.5 to 8 feet below the existing site grades. The younger alluvium encountered at these boring locations generally consists of loose to medium dense silty sands and sandy silts with varying clay and fine gravel content. (SCG, 2022, p. 6)

- Older Alluvium: Older alluvium was encountered at the ground surface or beneath the younger alluvium at several boring locations, extending to depths ranging from the ground surface to 20 feet below existing site grades. The older alluvium consists of medium dense to very dense silty sands, medium dense sands, and medium dense to very dense sandy silts. Varying quantities of clay were occasionally encountered in the older alluvium. (SCG, 2022, pp. 6-7)

- Bedrock: Val Verde Tonalite (Kvt) bedrock was encountered at the ground surface or beneath the alluvium at all but two boring locations, extending to depths ranging from the ground surface to at least the maximum depth explored of approximately 30 feet below existing site grades. The bedrock consists of fine to coarse-grained Tonalite which is phaneritic, friable, weathered, and weakly cemented. (SCG, 2022, p. 7)

C. *Site Topography*

As previously shown on EIR Figure 2-8, the topography of the northern 50.04 acres of the Project site slope gently in a west-to-east orientation, with elevations in this portion of the Project site ranging from approximately 1,535 feet above mean sea level (amsl) at the northeast corner of this portion of the Project site to approximately 1,600 feet amsl along the central portion of the western site boundary. As also shown on Figure 2-8, the southern 14.93 acres of the Project site also slope gently in a west-to-east orientation, with elevations in this portion of the Project site ranging from approximately 1,569 feet amsl near the southeastern corner to 1,622 feet amsl near the southwestern corner. It should be noted that the southern portions of the Project site contain several large rock outcroppings in the southern and eastern portions of the site, which exhibit variable topography.

D. *Faulting and Seismicity*

Research of available maps indicates that the Project site is not located within an Alquist-Priolo (A-P) Earthquake Fault Zone. Additionally, the Project site is not located within a Riverside County fault zone. Therefore, the possibility of significant fault rupture on the site is considered to be low. (SCG, 2022, p. 10)

E. *Groundwater*

Groundwater was not encountered at any of the borings conducted at the Project site by SCG. Based on the lack of any water within the borings, and the moisture contents of the recovered soil samples, at the time of the subsurface investigation the static groundwater table was considered to have existed at a depth in excess of approximately 30 feet below existing site grades. Recent water level data was obtained from the California State Water Resources Control Board website. The nearest monitoring well on record is located approximately 1.78 miles west of the Project site. Water level readings within this monitoring well indicate a high groundwater level of approximately 4.5 feet below the ground surface in February 2010. (SCG, 2022, p. 7)

F. *Liquefaction*

Liquefaction is the loss of strength in generally cohesionless, saturated soils when the pore-water pressure induced in the soil by a seismic event becomes equal to or exceeds the overburden pressure. The primary factors which influence the potential for liquefaction include groundwater table elevation, soil type and plasticity characteristics, relative density of the soil, initial confining pressure, and intensity and duration of ground shaking. The depth within which the occurrence of liquefaction may impact surface improvements is generally identified as the upper 50 feet below the existing ground surface. Liquefaction potential is greater in saturated, loose, poorly graded fine sands with a mean grain size in the range of 0.075 to 0.2 mm. Non-sensitive clayey (cohesive) soils which possess a plasticity index of at least 18 are generally not considered to be

susceptible to liquefaction, nor are those soils which are above the historic static groundwater table. (SCG, 2022, p. 11)

According to Riverside County GIS, the Project site is located within a zone of "low to moderate" liquefaction susceptibility. However, according to SCG, the subsurface conditions encountered at the boring locations are not considered to be conducive to liquefaction. These conditions include near-surface soils consisting of older alluvium; relatively shallow, very dense tonalite bedrock; and the lack of a static groundwater table within the upper approximately 30 feet. Based on these factors, liquefaction is not considered to be a design concern for the Project site. (SCG, 2022, pp. 11-12)

G. Expansive Soils

Laboratory testing performed on representative samples of the near surface soils indicates that these materials possess a very low to low expansion potential (Expansion Index [EI] = 6 to 32). Based on the presence of expansive soils at the Project site, care should be given to proper moisture conditioning of all building pad subgrade soils during site grading. In addition to adequately moisture conditioning the subgrade soils and fill soils during grading, special care should be taken to maintaining moisture content of these soils at 2 to 4 percent above the optimum moisture content. Civil and structural design recommendations are presented in the Geotechnical Investigation (EIR *Technical Appendix G*). (SCG, 2022, p. 12)

H. Seiches

A seiche is an underwater wave that oscillates through a body of water which may be triggered by earthquakes or landslides. In general, seiches are small (on the order of a few inches) and are present in larger lakes as a result of the depth, temperature, and contours of the body of water. Due to the lack of an on-site body of water, the potential for the Project site to be impacted by seiches is considered low. Additionally, according to Figure 5 of the Riverside County General Plan Safety Element, the Project site is not located within a dam inundation area, thereby indicating that the Project site also is not subject to inundation by seiches (Riverside County, 2021a, Safety Element Figure 5).

I. Soil Types and Erosion Potential

Table 2-2, *On-Site Soils Summary*, previously presented in EIR Section 2.0, provides a summary of the soil types present on the Project site and their associated rate of runoff and erosion susceptibility. As shown, approximately 25.9% of the Project site contains soils with a slight rate of runoff and a slow slight to moderate susceptibility to erosion. Approximately 4.3% of the soils on the Project site have a slow rate of runoff and a slight susceptibility to erosion. Approximately 0.2% of the soils on site have a slow to medium rate of runoff, and a slight to moderate susceptibility to erosion. Approximately 60.3% of the Project site contains soils with a medium rate of runoff and a moderate susceptibility to erosion. Approximately 9.2% of the Project site contains soils with a rapid rate of runoff and a high susceptibility to erosion hazards. (USDA, 1971, pp. 24, 33, 46-47, 53-54, and 65; USDA, n.d.)

4.7.2 Applicable Regulatory Requirements

The following is a brief description of the federal, state, and local environmental laws and related regulations governing issues related to geology and soils.

A. Federal Regulations

1. Clean Water Act

The Clean Water Act (CWA) establishes the basic structure for regulating discharges of pollutants into the waters of the United States and regulating quality standards for surface waters. The basis of the CWA was enacted in 1948 and was called the Federal Water Pollution Control Act, but the Act was substantially reorganized and expanded in 1972. "Clean Water Act" became the Act's common name with amendments in 1972. Under the CWA, the Environmental Protection Agency (EPA) has implemented pollution control programs such as setting wastewater standards for industry, and also has set water quality standards for all contaminants in surface waters. The CWA made it unlawful to discharge any pollutant from a point source into navigable waters unless a permit was obtained. EPA's National Pollutant Discharge Elimination System (NPDES) permit program controls discharges. Point sources are discrete conveyances such as pipes or man-made ditches. Individual homes that are connected to a municipal system, use a septic system, or do not have a surface discharge do not need an NPDES permit; however, industrial, municipal, and other facilities must obtain permits if their discharges go directly to surface waters. (EPA, 2023e)

B. State Regulations

1. Alquist-Priolo Earthquake Fault Zoning Act (A-P Act)

The Alquist-Priolo Earthquake Fault Zoning Act (A-P Act) was passed in 1972 to mitigate the hazard of surface faulting to structures for human occupancy. The A-P Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The A-P Act only addresses the hazard of surface fault rupture and is not directed toward other earthquake hazards. The A-P Act requires the State Geologist to establish regulatory zones (known as Earthquake Fault Zones) around the surface traces of active faults and to issue appropriate maps. ["Earthquake Fault Zones" were called "Special Studies Zones" prior to January 1, 1994.] The maps are distributed to all affected cities, counties, and state agencies for their use in planning and controlling new or renewed construction. Local agencies must regulate most development projects within the zones. Projects include all land divisions and most structures for human occupancy. Single family wood-frame and steel-frame dwellings up to two stories not part of a development of four units or more are exempt. However, local agencies can be more restrictive than state law requires. (CA Legislative Info, n.d.11)

Before a project can be permitted, cities and counties must require a geologic investigation to demonstrate that proposed buildings will not be constructed across active faults. An evaluation and written report of a specific site must be prepared by a licensed geologist. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back from the fault (generally 50 feet). (CA Legislative Info, n.d.11)

2. Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act (SHMA) of 1990 (Public Resources Code, Chapter 7.8, § 2690-2699.6) directs the Department of Conservation, California Geological Survey to identify and map areas prone to liquefaction, earthquake-induced landslides, and amplified ground shaking. The purpose of the SHMA is to minimize loss of life and property through the identification, evaluation, and mitigation of seismic hazards. Staff geologists in the Seismic Hazards Program gather existing geological, geophysical, and geotechnical data from numerous sources to produce the Seismic Hazard Zone Maps. They integrate and interpret these data regionally in order to evaluate the severity of the seismic hazards and designate as Zones of Required Investigation (ZORI) those areas prone to liquefaction and earthquake–induced landslides. Cities and counties are then required to use the Seismic Hazard Zone Maps in their land use planning and building permit processes. (CDC, n.d.2)

The law requires the State Geologist to establish ZORI and to issue Seismic Hazard Zone maps. These maps are distributed to all affected cities, counties, and state agencies for their use in planning and controlling construction and development. Single-family wood-frame or steel-frame dwellings up to two stories not part of a development of four or more units are exempt from the State requirements. However, local agencies can be more restrictive than State law requires. (CDC, n.d.2; CGS, 2008, p. 5)

Before a development permit can be issued or a subdivision approved, cities and counties must require a site-specific investigation to determine whether a significant hazard exists at the site and, if so, recommend measures to reduce the risk to an acceptable level. The investigation must be performed by state-licensed engineering geologists and/or civil engineers. The SHMA requires site-specific geotechnical investigations be conducted within the ZORI to identify and evaluate seismic hazards and formulate mitigation measures prior to permitting most developments designed for human occupancy. (CDC, n.d.2)

3. Natural Hazards Disclosure Act

The Natural Hazards Disclosure Act, effective June 1, 1998 (as amended June 9, 1998), requires that sellers of real property and their agents provide prospective buyers with a "Natural Hazard Disclosure Statement" when the property being sold lies within one or more state-mapped hazard areas, including a Seismic Hazard Zone. The disclosure required is only a disclosure between the seller, the seller's agent, and the prospective buyer (CA Legislative Info, n.d.12)

4. Essential Services Buildings Seismic Safety Act

In 1986, the California Legislature determined that buildings providing essential services should be capable of providing those services to the public after a disaster. Their intent in this regard was defined in legislation known as the Essential Services Buildings Seismic Safety Act of 1986 and includes requirements that such buildings shall be "…designed and constructed to minimize fire hazards and to resist…the forces generated by earthquakes, gravity, and winds." This enabling legislation can be found in the California Health and Safety Code, Chapter 2, § 16000 through 16022. In addition, the California Building Code defines how the intent of the act is to be implemented in Title 24, Part 1 of the California Building Standards Administrative Code, Chapter 4, Articles 1 through 3. (CAB, n.d.)

5. *California Building Standards Code (Title 24)*

California Code of Regulations (CCR) Title 24 is reserved for State regulations that govern the design and construction of buildings, associated facilities, and equipment. These regulations are also known as building standards (reference California Health and Safety Code § 18909). Health and Safety Code (state law) § 18902 gives CCR Title 24 the name California Building Standards Code (CBSC). The CBSC in CCR Title 24 is published by the California Building Standards Commission and it applies to all building occupancies (see Health and Safety Code §§ 18908 and 18938) throughout the State of California. Cities and counties are required by State law to enforce CCR Title 24 (reference Health and Safety Code §§ 17958, 17960, 18938(b), and 18948). Cities and counties may adopt ordinances making more restrictive requirements than provided by CCR Title 24, because of local climatic, geological, or topographical conditions. Such adoptions and a finding of need statement must be filed with the California Building Standards Commission (Reference Health and Safety Code §§ 17958.7 and 18941.5). (CBSC, 2022)

6. *Porter-Cologne Water Control Act*

The Porter-Cologne Act is the principal law governing water quality regulation in California. It establishes a comprehensive program to protect water quality and the beneficial uses of water. The Porter-Cologne Act applies to surface waters, wetlands, and ground water and to both point and nonpoint sources of pollution. Pursuant to the Porter-Cologne Act (California Water Code § 13000 *et seq*.), the policy of the State is as follows:

- That the quality of all the waters of the State shall be protected;
- That all activities and factors affecting the quality of water shall be regulated to attain the highest water quality within reason; and,
- That the State must be prepared to exercise its full power and jurisdiction to protect the quality of water in the State from degradation. (SWRCB, 2014)

The Porter-Cologne Act established nine Regional Water Boards (based on hydrogeologic barriers) and the State Water Board, which are charged with implementing its provisions and which have primary responsibility for protecting water quality in California. The State Water Board provides program guidance and oversight, allocates funds, and reviews Regional Water Boards decisions. In addition, the State Water Board allocates rights to the use of surface water. The Regional Water Boards have primary responsibility for individual permitting, inspection, and enforcement actions within each of nine hydrologic regions. The State Water Board and Regional Water Boards have numerous non-point source (NPS) related responsibilities, including monitoring and assessment, planning, financial assistance, and management.

The Regional Water Boards regulate discharges under the Porter-Cologne Act primarily through issuance of NPDES permits for point source discharges and waste discharge requirements (WDRs) for NPS discharges. Anyone discharging or proposing to discharge materials that could affect water quality (other than to a community sanitary sewer system regulated by an NPDES permit) must file a report of waste discharge. The State Water Resources Control Board (SWRCB) and the Regional Water Quality Control Boards (RWQCBs)

can make their own investigations or may require dischargers to carry out water quality investigations and report on water quality issues. The Porter-Cologne Act provides several options for enforcing WDRs and other orders, including cease and desist orders, cleanup and abatement orders, administrative civil liability orders, civil court actions, and criminal prosecutions. (SWRCB, 2014)

The Porter-Cologne Act also implements many provisions of the Clean Water Act, such as the NPDES permitting program. The Porter-Cologne Act also requires adoption of water quality control plans that contain the guiding policies of water pollution management in California. In addition, regional water quality control plans (basin plans) have been adopted by each of the Regional Water Boards and are updated as necessary and practical. These plans identify the existing and potential beneficial uses of waters of the State and establish water quality objectives to protect these uses. The basin plans also contain implementation, surveillance, and monitoring plans. (SWRCB, 2014) The Project site is located in the Santa Ana River watershed, which is within the purview of the Santa Ana RWQCB. The Santa Ana River Basin Plan, as most recently updated in June 2019, is the governing water quality plan for the region.

7. California Administrative Code, Title 14, Section 4308

Section 4308, *Archaeological Features*, of Title 14 of the California Administrative Code provides that: "No person shall remove, injure, disfigure, deface, or destroy any object of archaeological, or historical interest or value." (CCR, n.d.4)

8. California Public Resources Code (PRC)

Public Resources Code § 5097.5 states that "A person shall not knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands." Public Resources Code § 30244 states that, "Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required." (CCR, n.d.1)

C. Local Regulations

1. Riverside County Ordinance No. 457 - Riverside County Building and Fire Codes

Every three years, Riverside County's Building and Fire Codes are adapted from the CBSC (CCR Title 24), which includes both building and fire codes. These codes establish site-specific investigation requirements, construction standards, and inspection procedures to ensure that development authorized by Riverside County does not pose a threat to the health, safety, or welfare of the public. The CBSC contains minimum baseline standards to guard against unsafe development. Riverside County Ordinance No. 457 also adopts, in some cases with modification to a stricter standard, a number of California State's Title 24 codes (fire, building, plumbing, electrical, etc.). The Riverside County Department of Building and Safety provides technical expertise in reviewing and enforcing these codes. (Riverside County, 2015a, p. 4.12-25)

2. Riverside County Ordinance No. 547 – Implementation of the Alquist-Priolo Earthquake Fault Zoning Act

This ordinance establishes the policies and procedures used by Riverside County to implement the A-P Act. Among other things, it requires all projects proposed within an "earthquake fault zone," as shown on the maps prepared by the State Geologist to comply with the provisions of the A-P Act. It establishes regulations for construction, including for grading, slopes and compaction, erosion control, retaining wall design, and earthquake fault zone setbacks. (Riverside County, 2015a, p. 4.12-25)

3. Riverside County Ordinance No. 484 – Control of Blowing Dust

This ordinance establishes requirements for the control of blowing sand within county-designated "Agricultural Dust Control Areas." It defines activities that may contribute to wind erosion, identifies restrictions on activities within these areas, establishes penalties for violation of the ordinance, and identifies procedures necessary to obtain a valid permit. (Riverside County, 2015a, p. 4.12-25)

4.7.3 Basis for Determining Significance

Section VI of Appendix G to the State CEQA Guidelines addresses typical adverse effects due to geological conditions, and includes the following threshold questions to evaluate the Project's impacts resulting from geologic or soil conditions:

- Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
  - Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.
  - Strong seismic ground shaking?
  - Seismic-related ground failure, including liquefaction?
  - Landslides?
- Result in substantial soil erosion or the loss of topsoil?
- Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?
- Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?
- Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Significance thresholds are set forth in Riverside County's Environmental Assessment Checklist, as modified based on the 2018 updates to Section VII of Appendix G to the State CEQA Guidelines (listed above), and indicate significant impacts would occur if the Project or any Project-related component would:

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

b. *Be subject to seismic-related ground failure, including liquefaction;*

c. *Be subject to strong seismic ground shaking;*

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

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

f. *Be subject to geologic hazards, such as seiche, mudflow, or volcanic hazard;*

g. *Change topography or ground surface relief features;*

h. *Create cut or fill slopes greater than 2:1 or higher than 10 feet;*

i. *Result in grading that affects or negates subsurface sewage disposal systems;*

j. *Result in substantial soil erosion or the loss of topsoil;*

k. *Be located on expansive soil, as defined in Section 1803.5.3 of the California Building Code (2022), creating substantial direct or indirect risks to life or property;*

l. *Have soils incapable of adequately supporting use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water;*

m. *Be impacted by or result in an increase in wind erosion and blow sand, either on or off site.*

The significance thresholds set forth in Riverside County's Environmental Assessment Checklist, as modified by the 2018 updates to the State CEQA Guidelines, were used to evaluate the significance of the proposed Project's impacts on geology and soils. It should be noted that impacts to paleontological resources and unique geologic features are addressed separately in Subsection 4.13, *Paleontological Resources*, of this EIR.

4.7.4 IMPACT ANALYSIS

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

Threshold c.: ***Would the Project be subject to strong seismic ground shaking?***

The Project site is not located in an Alquist-Priolo (A-P) earthquake fault zone (SCG, 2022, p. 10). The nearest fault zones to the Project site are the San Jacinto Fault, located approximately 10.8 miles northeast of the Project site, and the Glen Ivy North Fault, located approximately 11.5 miles southwest of the Project site (DOC, n.d.). The potential for surface fault rupture to occur at the site is considered low. Impacts due to rupture of a known earthquake would therefore be less than significant.

The Project site is located in a seismically active area of southern California and is expected to experience moderate to severe ground shaking during the lifetime of the Project. The risk is not considered substantially different than that of other similar properties in the southern California area. The Project is required to be constructed in accordance with the CBSC and the Riverside County Building Code. The CBSC and Riverside County Building Code have been designed to preclude significant adverse effects associated with strong seismic ground shaking. Additionally, the Project's Geotechnical Investigation (*Technical Appendix G*) includes site-specific recommendations to attenuate seismic-related hazards.

However, a significant impact could occur if the Project did not comply with the site-specific recommendations of the Project's Geotechnical Investigation (*Technical Appendix G*). The Project's Geotechnical Investigation includes recommendations that would reduce seismic risks to an "acceptable level" as defined by the California Code of Regulations. Accordingly, prior to mitigation implementing the geotechnical study recommendations, the proposed Project has the potential to expose people or structures to substantial adverse effects, including loss, injury, or death, as a result of strong seismic ground shaking. This is considered a significant impact for which mitigation is required.

Threshold b.: ***Would the Project be subject to seismic-related ground failure, including liquefaction?***

As previously discussed, according to Riverside County GIS, the Project site is located within a zone of "low to moderate" liquefaction susceptibility. However, according to SCG, the subsurface conditions encountered at the boring locations are not considered to be conducive to liquefaction. These conditions include near-surface soils consisting of older alluvium, relatively shallow, very dense tonalite bedrock, and the lack of a static groundwater table within the upper approximately 30 feet. Based on these factors, liquefaction is not considered to be a design concern for the Project site. (SCG, 2022, pp. 11-12) Accordingly, the Project would not be subject to seismic-related ground failure, including liquefaction, and no impact would occur.

Threshold d.: ***Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, collapse, or rockfall hazards?***

Landslide Hazards

The Project site and areas immediately surrounding the Project site do not contain steep slopes capable of producing landslide hazards that could affect development on the site. Although hillsides occur to the west and south, these existing hill forms exhibit an extensive amount of rock outcroppings, indicating a low hazard due to landslides. Accordingly, impacts due to landslide hazards would be less than significant.

Lateral Spreading

Lateral spreading is a type of liquefaction-induced ground failure associated with the lateral displacement of surficial blocks of sediment resulting from liquefaction in a subsurface layer. Once liquefaction transforms the subsurface layer into a fluid mass, gravity plus the earthquake inertial forces may cause the mass to move downslope towards a free face (such as a river channel or an embankment). Lateral spreading may cause large horizontal displacements and such movement typically damages pipelines, utilities, bridges, and structures. Due to the low to moderate probability of liquefaction to occur on site, the potential for lateral spreading also is considered low to moderate. Nonetheless, impacts could occur if proposed grading activities are not conducted in accordance with the site-specific recommendations of the geotechnical study contained as *Technical Appendix G*. This is considered a potentially significant direct impact of the proposed Project for which mitigation would be required.

Collapse Hazards

Static settlement of the Project site would be induced by grading the site for development and by the proposed structural building loads. Impacts due to collapse hazards could occur if proposed grading activities are not conducted in accordance with the site-specific recommendations of the geotechnical study included as *Technical Appendix G* to this EIR. This is considered a potentially significant direct impact of the proposed Project for which mitigation would be required.

Rockfall Hazards

A rockfall is a fragment of rock, or block of rocks, that detaches from a vertical to sub-vertical cliff or bluff in a downward motion. Although there are hill forms west of the northern portions of the Project site that contain rock outcroppings, these hill forms only occur at an elevation that is approximately 40 feet higher than the northern portions of the Project site. Additionally, the Project would be separated from these hills by undeveloped lands and the future extension of Decker Road. Moreover, there is no evidence that rockfall hazards occur in lands to the west of the Project site. Accordingly, impacts from rockfall hazards affecting the northern portions of the Project site would be less than significant. In addition, although the southern portions of the Project site contains rock outcroppings, the portions of the rock outcroppings within areas planned for grading as part of development of the park site would be removed, while the remaining rock outcroppings in the southeastern portion of the park site that would be preserved as open space occurs at a lower elevation than the portions proposed for improvement with park amenities. Although additional areas of rock outcroppings

occur off-site to the west, south, and east of the park site, the Project site either is buffered from these rock outcroppings by existing open space areas, or the rock outcroppings are located within the drainage with slopes oriented away from the Project site. Accordingly, potential impacts to the Project site due to rockfall hazards would be less than significant, and the Project would have no potential to induce rockfall conditions.

Blasting

As previously discussed in Section 3.0, portions of the Project site are underlain by non-rippable bedrock materials that are not conducive to standard grading techniques. In these areas, it is anticipated that blasting would be required during grading in order to break up the existing bedrock. A blasting contractor would be required to complete all blasting-related activities in compliance with applicable regulations of the Riverside County Sheriff's Department, the U.S. Bureau of Mines, the California Division of Occupational Safety and Health (Cal-OHSA), the Department of Homeland Security, and the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF). With compliance to applicable regulations of the aforementioned departments, potential impacts due to blasting would be less than significant.

Threshold e.: ***Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in ground subsidence?***

According to the Project's Geotechnical Report (*Technical Appendix G*), removal and recompaction of the near surface alluvial soils is estimated to result in an average shrinkage of 5 to 15 percent. Where very dense/hard older alluvium or bedrock is excavated and replaced as fill, bulking of 1 to 5 percent should be expected. Minor ground subsidence is expected to occur in the soils below the zone of removal, due to settlement and machinery working. The subsidence is estimated to be approximately 0.1-foot. (SCG, 2022, p. 14) Accordingly, a significant impact could occur if proposed grading activities are not conducted in accordance with the site-specific recommendations of the Project's geotechnical study (*Technical Appendix G*). This is considered a potentially significant direct impact of the proposed Project for which mitigation would be required.

Threshold f.: ***Would the Project be subject to geologic hazards, such as seiche, mudflow, or volcanic hazard?***

There are no volcanoes in the Project region; thus, no impacts due to volcanic hazards would occur (USGS, n.d.).

A seiche is an underwater wave that oscillates through a body of water which may be triggered by earthquakes or landslides. In general, seiches are small (on the order of a few inches) and are present in larger lakes as a result of the depth, temperature, and contours of the body of water. Due to the lack of an on-site body of water, the potential for the Project site to be impacted by seiches is considered low. Additionally, according to Figure 5 of the Riverside County General Plan Safety Element, the Project site is not located within a dam inundation area, thereby indicating that the Project site is not subject to inundation by seiches (Riverside County, 2021a, Safety Element Figure 5). As such, impacts due to seiches would be less than significant.

Although several existing hill forms occur to the south of the Project site, these hill forms contain rock outcroppings and limited surface soil, thereby indicating that the chance of mudflow hazards is low. Accordingly, impacts due to mudflow hazards would be less than significant.

Threshold g.: Would the Project change topography or ground surface relief features?

As discussed in EIR Section 3.0, the Project site would be graded in a manner that generally approximates the site's existing topographic conditions. As described in EIR Section 3.0, grading associated with the Project would require a total of 315,697 cy of cut and 98,818 cy of fill, requiring the net export of 216,879 cy of material. Although the Project would require a substantial amount of grading, the proposed grading still would maintain the overall topographic character of the Project site, and there would be no major changes to drainage patterns on either portion of the Project site. Grading proposed as part of the Project has been designed to provide for proper site drainage and sewer flows, and would not substantially change the topography of the Project site as compared to existing conditions. Accordingly, the Project would not substantially change the site's topography or ground surface relief features, and impacts would be less than significant.

Threshold h.: Would the Project create cut or fill slopes greater than 2:1 or higher than 10 feet?

According to the Project's Geotechnical Study (*Technical Appendix* G), due to on-site topography, cuts and fills up to approximately 15 to 20 feet are expected to be necessary in order to achieve the proposed Project site grades (SCG, 2022, p. 5) As previously depicted on EIR Figure 3-6, manufactured slopes are proposed primarily around the northern and western edges of the proposed light industrial building site. Within the northwestern corner of this portion of the Project site, a 2:1 (horizontal: vertical) slope is proposed measuring up to 22 feet in height and would be supported by a retaining wall measuring between three to five feet in height. Slopes along the northern side of the proposed warehouse building site would measure up to eight feet in height and would be supported by a retaining wall measuring up to six feet in height. Slopes in the western portion of the warehouse building site would measure up to 13 feet in height and would be supported by a retaining wall measuring up to 9.5 feet in height, with the size of proposed slopes generally decreasing from north to south. No major manufactured slopes are proposed along the eastern portion of the warehouse building site, while the southern edge of the industrial building site would include minimal areas of manufactured slopes and a proposed retaining wall measuring up to 9.5 feet in height. Grading within the park site is not anticipated to result in or require manufactured slopes steeper than 2:1 or higher than 10 feet. Accordingly, although the Project would not slope gradients steeper than 2:1, the Project would include slopes higher than 10 feet. Accordingly, a potentially significant impact could occur due to the proposed slopes higher than 10 feet if grading activities fail to incorporate the recommendations of the Project's geotechnical study (*Technical Appendix G*) or the future geotechnical evaluations required in association with grading permits. This is evaluated as a potentially significant impact for which mitigation would be required.

Threshold i.: Would the Project result in grading that affects or negates subsurface sewage disposal systems?

According to the Project's Phase I Environmental Site Assessment (*Technical Appendix I*) prepared by Group Delta Consultants, Inc. (Group Delta), based on the date of development of the existing residential structures

located on the Project site (circa 1963), septic systems may have existed on the Project site historically. Group Delta states that based on the residential nature of the structures, on-site septic systems that may be present are not expected to represent a significant environmental concern. (Group Delta, 2022, p. 12) As part of the Project, the existing residential units would be demolished, and septic systems, if present, would be removed from the Project site, and local regulatory guidelines would apply. With development of the Project site as proposed, all wastewater generated on site would be conveyed by a proposed sanitary sewer system, which would discharge into an existing sewer main located within Cajalco Road. Thus, although implementation of the Project may result in the removal of existing septic systems, Project impacts would be less than significant because all sewer flows generated on site would be conveyed via the Project's proposed sewer lines and existing sewer lines to either the Moreno Valley Regional Water Reclamation Facility (RWRF) or the Perris Valley RWRF for treatment. Additionally, there are no impacts associated with the Project's proposed sewer improvements that have not already been evaluated, and where necessary, mitigated to the maximum feasible extent by this EIR. Accordingly, the Project would not result in grading that affects or negates subsurface sewage disposal systems, and impacts would be less than significant.

Threshold j.: ***Would the Project result in substantial soil erosion or the loss of topsoil?***

Threshold m.: ***Would the Project be impacted by or result in an increase in wind erosion and blow sand, either on or off site?***

Implementation of the Project has the potential to result in soil erosion. The analysis below summarizes the likelihood of the Project to result in substantial soil erosion during temporary construction activities and long-term operation.

Construction-Related Impacts

Proposed grading and construction activities at the Project site would expose underlying soils and disturb surficial soils. Exposed soils would be subject to erosion during rainfall events or high winds due to the removal of stabilizing vegetation and exposure of these erodible materials to wind and water.

Pursuant to the requirements of the SWRCB, the Project Applicant is required to obtain a NPDES permit for construction activities, including proposed grading. The NPDES permit is required for all projects that include construction activities such as clearing, grading, and/or excavation that disturb at least one acre of total land area. The County's Municipal Separate Storm Sewer System (MS4) NPDES Permit requires the Project Applicant to prepare and submit to the County for approval a Project-specific Stormwater Pollution Prevention Plan (SWPPP). The SWPPP would identify a combination of erosion control and sediment control measure (i.e., Best Management Practices (BMPs)) to reduce or eliminate sediment discharge to surface water from stormwater and non-stormwater source discharges during construction.

In addition, proposed construction activities would be required to comply with South Coast Air Quality Management District (SCAQMD) Rule 403, which would reduce the amount of particulate matter in the air and minimize the potential for wind erosion. Rule 403 requires that certain construction practices be following that limit dust and dirt from leaving the construction site. For example, no dust is allowed to be tracked out of the site by more than 25 feet. In addition, proposed construction activities would be required to comply with

applicable County ordinances (i.e., Ordinance Nos. 457 and 460) to protect and enhance the water quality of the County, which requires the Project Applicant to prepare an erosion control plan to be used during the rainy season. With mandatory compliance to the requirements noted in the Project's SWPPP, as well as mandatory compliance to applicable regulatory requirements including but not limited to SCAQMD Rule 403 and Riverside County Ordinance Nos. 457 and 460, the potential for water and/or wind erosion impacts during Project construction would be reduced to less-than-significant levels.

Long-Term Operational Impacts

Following construction, wind and water erosion on the Project site would be minimized, as the disturbed areas would be landscaped or covered with impervious surfaces, and drainage would be controlled through a storm drain system.

With implementation of the proposed Project, runoff generated on site would be conveyed through the site via proposed ribbon gutters and curbs and gutters. Runoff would then be captured by a network of drainage inlets provided at lows points. Proposed private underground storm drains would convey captured flows towards an underground storage chamber before being pumped to a proposed biotreatment device for water quality treatment. Offsite flows from Decker Road, Cajalco Road, and Seaton Avenue would be collected via catch basins and would be conveyed to the onsite detention chamber for water quality treatment. All treated flows would then be conveyed offsite to the proposed 36-inch extension of the Perris Valley Master Drainage Plan (MDP) Lateral E-9.1.1 in Seaton Avenue and Cajalco Road connecting to Perris Valley MDP storm drain line E-9.1 at Cajalco Road Station 57+09.79, per Improvement Plan (IP) 200029. The Project site intercepts offsite flows along a small portion of the southern boundary. These offsite flows enter a 0.8-acre landscape area on the Project site. Larger storm events for this area will be conveyed through the Project site via a proposed 12-inch storm drain Line A that outlets to the proposed extension of Perris Valley MDP Line E-9.1.1. (WEBB, 2023, pp. 1-1 to 1-2) The proposed biotreatment device and onsite detention chamber would be effective in removing sediments from site runoff, and would preclude impacts due to soil erosion or the loss of topsoil. Impacts would be less than significant.

As discussed in detail in EIR Subsection 4.10, *Hydrology and Water Quality*, according to the Project's Preliminary Drainage Study (*Technical Appendix J1*), the proposed detention chambers onsite would be oversized to detain the 100-year, 24-hour storm flows of the Project site, plus the 100-year storm flows for the Decker Road and Seaton Avenue project frontages. While the Cajalco Road frontage water quality flows would be brought onsite for treatment, the 100-year flows would be bypassed through the catch basin at the southwest corner of Cajalco Road and Seaton Avenue and conveyed via proposed storm drain Line B to the extension of MDP Lateral E-9.1.1 in Cajalco Road. Due to the intensification of land uses on site as proposed by the Project Applicant, the onsite runoff volume would exceed the capacity of the existing Perris Valley MDP Line E-9.1; however, Line E-9.1 already was deficiently sized to handle pre-development flows. Flows from the Project would be discharged offsite at a rate that is appropriate for Line E-9.1 to accept, and would be finalized during final engineering. (WEBB, 2023, p. 1-2) Accordingly, implementation of the Project would not increase the risk of siltation or erosion in stormwater discharged from the Project site. In addition, a Water Quality Management Plan (WQMP) would be required in conjunction with future grading and building permits, which would identify post-construction measures to ensure on-going protection against erosion. Compliance with the

WQMP would be required as a condition of approval for future implementing developments, and long-term maintenance of on-site water quality features also would be required. Based on the foregoing, implementation of the Project would not significantly increase the risk of long-term wind or water erosion on- or off-site, and impacts would be less than significant.

Threshold k.: ***Would the Project be located on expansive soil, as defined in Section 1803.5.3 of the California Building Code (2022), creating substantial risks to life or property?***

Laboratory testing performed on representative samples of the near surface soils indicates that these materials possess a very low to low expansion potential (EI= 6 to 32) (SCG, 2022, p. 12). Accordingly, the Project would not be located on expansive soil, as defined in Section 1803.5.3 of the California Building Code (2022) (CBC, 2022), and would not create substantial risks to life or property; thus, no impact would occur.

Threshold l.: ***Would the Project have soils incapable of adequately supporting use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?***

Sewer service to the proposed Project would be provided by the EMWD, and no septic tanks or alternative wastewater disposal systems are proposed as part of the Project. Accordingly, no impact would occur.

4.7.5 Cumulative Impact Analysis

With the exception of erosion hazards, potential effects due to geology and soils are inherently restricted to the areas proposed for development and would not contribute to cumulative impacts associated with other existing, planned, or proposed development. That is, thresholds including fault rupture, seismic ground shaking, liquefaction, landslides, expansive soils, and other geologic hazards would involve effects to (and not from) the proposed development and are specific to on-site conditions. Accordingly, addressing these potential hazards for the proposed development would involve using measures to conform to existing requirements, and/or site-specific design and construction efforts that have no relationship to, or impact on, off-site areas. Because of the site-specific nature of these potential hazards and the measures to address them, there would be no connection to similar potential issues or cumulative effects to or from other properties. Cumulatively-considerable impacts would be less than significant.

As discussed under Thresholds j. and m., during both near-term construction and long-term operation, measures would be incorporated into the Project's design to ensure that significant erosion hazards do not occur. Other developments within the cumulative study area would be required to comply with similar requirements, such as the need to obtain an NPDES permit and mandatory compliance with the resulting SWPPPs. All projects in the cumulative study area also would be required to demonstrate that measures have been incorporated to ensure that development does not result in substantial increases in the amount or rate of runoff under long-term operating conditions, which could in turn increase soil erosion. Further, all projects in the cumulative study area also would be required to comply with Riverside County Ordinance Nos. 457 and 460, as well as SCAQMD Rule 403, which would preclude water- and wind-related erosion hazards during construction. Therefore, because the Project would result in less-than-significant erosion impacts, and because other projects within the cumulative study area would be subject to similar requirements to control erosion

hazards during construction and long-term operation, cumulatively-considerable impacts associated with wind and water erosion hazards are evaluated as less than significant.

4.7.6 Significance of Impacts Before Mitigation

Thresholds a. and c.: Significant Direct Impact. The potential for surface fault rupture to occur at the site is considered low. Impacts due to rupture of a known earthquake would therefore be less than significant. However, the Project site is located in a seismically active area of southern California and is expected to experience moderate to severe ground shaking during the lifetime of the Project. Thus, a significant impact could occur if the Project did not comply with the site-specific recommendations of the Project's Geotechnical Investigation (*Technical Appendix G*).

Threshold b.: No Impact. The Project site is located within a zone of "low to moderate" liquefaction susceptibility. The subsurface exploration performed at the site identified conditions that are considered to be non-conducive to liquefaction. Accordingly, the Project would not be subject to seismic-related ground failure, including liquefaction, and no impact would occur.

Threshold d.: Significant Direct Impact. Although hillsides occur to the west, south, and east of the Project site, these existing hill forms exhibit an extensive amount of rock outcroppings, indicating a low hazard due to landslides; thus, impacts due to landslide hazards would be less than significant. Due to the low probability of liquefaction to occur on site, the potential for lateral spreading is also considered low. Nonetheless, impacts could occur if proposed grading activities are not conducted in accordance with the site-specific recommendations of the future-required geotechnical studies. This is evaluated as a potentially significant direct impact of the proposed Project for which mitigation would be required. Additionally, impacts due to collapse hazards could occur if proposed grading activities are not conducted in accordance with the site-specific recommendations of the future geotechnical studies that would be required in association with Project grading and building permits. This is evaluated as a potentially significant direct impact of the proposed Project for which mitigation would be required. Although there are hill forms west of the northern portions of the Project site that contain rock outcroppings, these hill forms only occur at an elevation that is approximately 40 feet higher than the northern portions of the Project site. Additionally, the Project would be separated from these hills by undeveloped lands and the future extension of Decker Road. Moreover, there is no evidence that rockfall hazards occur in lands to the west of the Project site. Accordingly, impacts from rockfall hazards affecting the northern portions of the Project site would be less than significant. In addition, although the southern portions of the Project site contains rock outcroppings, the portions of the rock outcroppings within areas planned for grading as part of development of the park site would be removed, while the remaining rock outcroppings in the southeastern portion of the park site that would be preserved as open space occurs at a lower elevation than the portions proposed for improvement with park amenities. Although additional areas of rock outcroppings occur off-site to the west, south, and east of the park site, the Project site either is buffered from these rock outcroppings by existing open space areas, or the rock outcroppings are located within the drainage with slopes oriented away from the Project site. Accordingly, potential impacts to the Project site due to rockfall hazards would be less than significant, and the Project would have no potential to induce rockfall conditions. Additionally, with compliance to applicable regulatory requirements, potential geotechnical-related impacts due to blasting would be less than significant.

Threshold e.: Significant Direct Impact. Subsidence at the Project site following development is estimated to be approximately 0.1 feet. Accordingly, a significant impact could occur if proposed grading activities are not conducted in accordance with the site-specific recommendations of the future geotechnical studies that would be required in association with Project grading and building permits. This is evaluated as a potentially significant direct impact of the proposed Project for which mitigation would be required.

Threshold f.: Less-than-Significant Impact. There are no volcanoes in the Project region; thus, no impacts due to volcanic hazards would occur. Due to the lack of an on-site body of water or other bodies of water within close proximity to the site that have the potential to result in site inundation, the potential for the Project site to be impacted by seiches is considered low. As such, impacts due to seiches would be less than significant. Additionally, although several existing hill forms occur to the southeast and southwest of the Project site, these hill forms exhibit substantial amounts of rock outcroppings, thereby indicating that the chance of mudflow hazards is low. Accordingly, impacts due to mudflow hazards would be less than significant.

Threshold g.: Less-than-Significant Impact. The Project site would be graded in a manner that generally approximates the site's existing topographic conditions. Although the Project would require a substantial amount of grading, the proposed grading still would maintain the overall topographic character of the Project site, and there would be no major changes to drainage patterns on either portion of the Project site. Grading proposed as part of the Project has been designed to provide for proper site drainage and sewer flows, and would not substantially change the topography of the Project site as compared to existing conditions. Accordingly, the Project would not substantially change the site's topography or ground surface relief features, and impacts would be less than significant.

Threshold h.: Significant Direct Impact. Although the Project does not include any slopes steeper than 2:1 (horizontal:vertical), several proposed slopes within the northern portions of the Project site would exceed a height of 10 feet. A potentially significant impact would occur due to the proposed slopes higher than 10 feet if future implementing projects were to fail to incorporate the recommendations of the Project's geotechnical study (*Technical Appendix G*) or the future geotechnical evaluations required in association with grading permits.

Threshold i.: Less-than-Significant Impact. Based upon the Project's Phase I ESA, septic systems may have existed on the Project site historically due to the date of the existing residential structures present on site (circa 1963). As part of the Project, the existing residential units would be demolished, and septic systems, if present, would be removed from the Project site, and local regulatory guidelines would apply. With development of the Project site as proposed, all wastewater generated on site would be conveyed by a proposed sanitary sewer system, which would discharge into an existing sewer main located within Cajalco Road. Impacts associated with the Project's proposed sewer improvements are inherent to the Project's construction phase and have been evaluated throughout this EIR accordingly. There are no impacts associated with the Project's proposed sewer improvements that have not already been evaluated, and where necessary, mitigated to the maximum feasible extent by this EIR. Accordingly, the Project would not result in grading that affects or negates subsurface sewage disposal systems, and impacts would be less than significant.

Thresholds j. and m.: Less-than-Significant Impacts. The Project would not result in substantial soil erosion or loss of topsoil. The Project Applicant would be required to obtain an NPDES permit for construction activities and adhere to a Stormwater Pollution Prevention Plan (SWPPP) as well as SCAQMD Rule 403 and Riverside County Ordinance Nos. 457 and 460. With mandatory compliance to these regulatory requirements, the potential for water and wind erosion impacts during construction would be less than significant. Following development, wind and water erosion on the Project site would be minimized, as the areas disturbed during construction would be landscaped or covered with impervious surfaces and drainage would be controlled through a storm drain system. Furthermore, the Project is required by law to implement a WQMP during operation, which would preclude substantial erosion impacts in the long-term. Impacts would be less than significant.

Threshold k.: No Impact. Laboratory testing performed on representative samples of the near surface soils indicates that these materials possess a very low to low expansion potential (EI = 6 to 32). Accordingly, the Project would not be located on expansive soil, as defined in Section 1803.5.3 of the California Building Code (2022), and would not create substantial risks to life or property; thus, no impact would occur.

Threshold l.: No Impact. Sewer service to the proposed Project would be provided by the EMWD, and no septic tanks or alternative wastewater disposal systems are proposed as part of the Project. Accordingly, no impact would occur.

4.7.7 County Regulations, Design Requirements, and Mitigation

Applicable County Regulations and Design Requirements

The following are applicable regulations and design requirements that apply to the proposed Project and that reduce or preclude geology and soils impacts. Although compliance with mandatory regulatory requirements does not technically meet CEQA's definition for mitigation, they are specified herein as requirements for the Project.

- The Project is required to comply with the provisions of County Ordinance Nos. 457, 460, and 547. Ordinance No. 457 requires that all projects comply with California Building Codes and the International Building Codes. These codes establish site-specific investigation requirements, construction standards, and inspection procedures to ensure that development does not pose a threat to the health, safety, and welfare of the public, and includes requirements related to erosion. Ordinance No. 460 sets forth soil erosion control requirements and requires preparation and implementation of a wind erosion control plan. In addition, Ordinance No. 547 requires that cases where a proposed project falls within an earthquake fault zone as shown on the maps prepared by the State Geologist, this ordinance requires compliance with all of the provisions of the Alquist-Priolo Act and the adopted policies and criteria of Ordinance No. 547.

- The Project is required to comply with the provisions of SCAQMD Rule 403 by addressing blowing dust from the Project's construction activities in accordance with the requirements of Rule 403.

- The Project is required to comply with the provisions of the Project's National Pollution Discharge Elimination System (NPDES) permit, and the Project's Storm Water Pollution Prevention Plan (SWPPP). Compliance with the NPDES permit and the SWPPP would identify and implement an effective combination of erosion control and sediment control measures (i.e., Best Management Practices) to reduce or eliminate discharge to surface water from stormwater and non-stormwater discharges.

Mitigation

MM 4.7-1 Prior to issuance of grading or building permits, the Project Applicant shall have prepared an updated Geotechnical Investigation that addresses the site-specific design included as part of the grading and building permits. The Riverside County Building and Safety Department shall verify that all of the recommendations provided in the future-required Geotechnical Investigation are incorporated into the Project's grading and building plans and implemented by the construction contractors in order to reduce the Project's potential impacts due to strong seismic ground shaking, lateral spreading, collapse hazards, subsidence hazards, and slopes taller than 10 feet in height. Recommendations related to grading and building construction typically include but are not limited to: a) Seismic Design Considerations; b) Geotechnical Design Considerations; c) Site Grading Recommendations; d) Construction Considerations; e) Foundation Design and Construction; f) Floor Slab Design and Construction; g) Retaining Wall Design and Construction; and h) Pavement Design Parameters.

4.7.8 Significance of Impacts After Mitigation

Thresholds a., c., and e.: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.7-1 would ensure that the Project's design professionals and construction contractors implement the recommendations of the geotechnical investigation(s) required as part of future grading and building permits, which in turn would ensure measures are implemented to address potential impacts due to the exposure of people or structures to adverse effects, including loss, injury, or death as a result of strong seismic ground shaking. Implementation of the required mitigation would ensure that impacts are reduced to less-than-significant levels.

Threshold d.: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.7-1 would ensure that the Project's design professionals and construction contractors implement the recommendations of the geotechnical investigation(s) required as part of future grading and building permits, which in turn would ensure measures are implemented to address potential impacts due to lateral spreading and collapse hazards. Implementation of the required mitigation would ensure that impacts are reduced to less-than-significant levels.

Threshold e.: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.7-1 would ensure that the Project's design professionals and construction contractors implement the recommendations of the geotechnical investigations required as part of future grading and building permits, which in turn would ensure measures are implemented to address potential impacts due to

subsidence hazards. Implementation of the required mitigation would ensure that impacts are reduced to less-than-significant levels.

Threshold h.: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.7-1 would ensure that the Project's design professionals and construction contractors implement the recommendations of the geotechnical investigations required as part of future grading and building permits. Implementation of the required mitigation would ensure that impacts due to slopes that exceed 10 feet in height are reduced to less-than-significant levels.

4.8 GREENHOUSE GAS EMISSIONS

The analysis in this Subsection is based in part on a technical report prepared by Urban Crossroads, Inc. (herein, "Urban Crossroads"), titled "Mead Valley Commerce Center (PPT220050) Greenhouse Gas Analysis" (herein, "GHGA"), dated November 8, 2023, and included as *Technical Appendix H* to this EIR. (Urban Crossroads, 2023d). Refer to Section 7.0, *References*, for a complete list of reference sources.

4.8.1 EXISTING CONDITIONS

A. *Introduction to Global Climate Change*

Global Climate Change (GCC) is defined as the change in average meteorological conditions on Earth with respect to temperature, precipitation, and storms. The majority of scientists believe that the climate shift taking place since the Industrial Revolution is occurring at a quicker rate and magnitude than in the past. Scientific evidence suggests that GCC is the result of increased concentrations of GHGs in the earth's atmosphere, including carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), fluorinated gases. The majority of scientists believe that this increased rate of climate change is the result of GHGs resulting from human activity and industrialization over the past 200 years. (Urban Crossroads, 2023d, p. 8)

An individual project like the proposed Project cannot generate enough GHG emissions to affect a discernible change in global climate. However, the proposed Project may participate in the potential for GCC by its incremental contribution of GHGs combined with the cumulative increase of all other sources of GHGs, which when taken together constitute potential influences on GCC. (Urban Crossroads, 2023d, p. 8)

GCC refers to the change in average meteorological conditions on the earth with respect to temperature, wind patterns, precipitation, and storms. Global temperatures are regulated by naturally occurring atmospheric gases such as water vapor, CO_2, N_2O, CH_4, hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). These particular gases are important due to their residence time (duration they stay) in the atmosphere, which ranges from 10 years to more than 100 years. These gases allow solar radiation into the Earth's atmosphere, but prevent radiant heat from escaping, thus warming Earth's atmosphere. GCC can occur naturally as it has in the past with the previous ice ages. (Urban Crossroads, 2023d, p. 8)

Gases that trap heat in the atmosphere are often referred to as GHGs. GHGs are released into the atmosphere by both natural and anthropogenic activity. Without the natural GHG effect, Earth's average temperature would be approximately 61 degrees Fahrenheit (°F) cooler than it is currently. The cumulative accumulation of these gases in Earth's atmosphere is considered to be the cause for the observed increase in Earth's temperature. (Urban Crossroads, 2023d, p. 8)

B. *Greenhouse Gases*

1. *Greenhouse Gases and Health Effects*

GHGs trap heat in the atmosphere, creating a GHG effect that results in global warming and climate change. Many gases demonstrate these properties and are discussed below. For the purposes of analysis, emissions of CO_2, CH_4, and N_2O were evaluated because these gases are the primary contributors to GCC from development

projects. Although there are other substances such as fluorinated gases that also contribute to GCC, fluorinated gases were not evaluated as their sources are not well-defined and do not contain accepted emissions factors or methodology to accurately calculate these gases. (Urban Crossroads, 2023d, pp. 8-9)

❑ Water

Water is the most abundant, important, and variable GHG in the atmosphere. Water vapor is not considered a pollutant; in the atmosphere it maintains a climate necessary for life. Changes in its concentration primarily are considered to be a result of climate feedbacks related to the warming of the atmosphere rather than a direct result of industrialization. Climate feedback is an indirect, or secondary, change, either positive or negative, that occurs within the climate system in response to a forcing mechanism. The feedback loop in which water is involved is critically important to projecting future climate change. (Urban Crossroads, 2023d, Table 2-1)

As the temperature of the atmosphere rises, more water is evaporated from ground storage (rivers, oceans, reservoirs, soil). Because the air is warmer, the relative humidity can be higher (in essence, the air is able to 'hold' more water when it is warmer), leading to more water vapor in the atmosphere. As a GHG, the higher concentration of water vapor is then able to absorb more thermal indirect energy radiated from the Earth, thus further warming the atmosphere. The warmer atmosphere can then hold more water vapor and so on and so on. This is referred to as a "positive feedback loop." The extent to which this positive feedback loop will continue is unknown as there are also dynamics that hold the positive feedback loop in check. As an example, when water vapor increases in the atmosphere, more of it would eventually condense into clouds, which are more able to reflect incoming solar radiation (thus allowing less energy to reach the earth's surface and heat it up). (Urban Crossroads, 2023d, Table 2-1)

The main source of water vapor is evaporation from the ocean (approximately 85%). Other sources include evaporation from other water bodies, sublimation (change from solid to gas) from sea ice and snow, and transpiration from plant leaves. (Urban Crossroads, 2023d, Table 2-1)

There are no known direct health effects related to water vapor at this time. It should be noted however that when some pollutants react with water vapor, the reaction forms a transport mechanism for some of these pollutants to enter the human body through water vapor. (Urban Crossroads, 2023d, Table 2-1)

❑ Carbon Dioxide (CO_2)

Carbon Dioxide (CO_2) is an odorless and colorless GHG. Since the industrial revolution began in the mid-1700s, the sort of human activity that increases GHG emissions has increased dramatically in scale and distribution. Data from the past 50 years suggests a corollary increase in levels and concentrations. As an example, prior to the industrial revolution, CO_2 concentrations were fairly stable at 280 parts per million (ppm). Today, they are around 370 ppm, an increase of more than 30%. Left unchecked, the concentration of CO_2 in the atmosphere is projected to increase to a minimum of 540 ppm by 2100 as a direct result of anthropogenic sources. (Urban Crossroads, 2023d, Table 2-1)

CO_2 is emitted from natural and manmade sources. Natural sources include: the decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic sources include: the burning of coal, oil, natural gas, and wood. CO_2 is naturally removed from the air by photosynthesis, dissolution into ocean water, transfer to soils and ice caps, and chemical weathering of carbonate rocks. (Urban Crossroads, 2023d, Table 2-1)

Outdoor levels of CO_2 are not high enough to result in negative health effects. According to the National Institute for Occupational Safety and Health (NIOSH) high concentrations of CO_2 can result in health effects such as: headaches, dizziness, restlessness, difficulty breathing, sweating, increased heart rate, increased cardiac output, increased blood pressure, coma, asphyxia, and/or convulsions. It should be noted that current concentrations of CO_2 in the Earth's atmosphere are estimated to be approximately 370 ppm, the actual reference exposure level (level at which adverse health effects typically occur) is at exposure levels of 5,000 ppm averaged over 10 hours in a 40-hour workweek and short-term reference exposure levels of 30,000 ppm averaged over a 15-minute period. (Urban Crossroads, 2023d, Table 2-1)

❑ Methane (CH_4)

Methane (CH_4) is an extremely effective absorber of radiation, although its atmospheric concentration is less than CO_2 and its lifetime in the atmosphere is brief (10-12 years) compared to other GHGs. CH_4 in the atmosphere is generated by many different sources, such as fossil fuel production, transport and use, from the decay of organic matter in wetlands, and as a byproduct of digestion by ruminant animals such as cows. Determining which specific sources are responsible for variations in annual increases of CH_4 is complex, but scientists estimate that fossil fuel production and use contributes roughly 30% of the total CH_4 emissions. These industrial sources of CH_4 are relatively simple to pinpoint and control using current technology. (Urban Crossroads, 2023d, Table 2-1)

CH_4 is extremely reactive with oxidizers, halogens, and other halogen-containing compounds. Exposure to high levels of CH_4 can cause asphyxiation, loss of consciousness, headache, dizziness, nausea, vomiting, weakness, loss of coordination, and an increased breathing rate. (Urban Crossroads, 2023d, Table 2-1)

❑ Nitrous Oxide (N_2O)

Nitrous oxide (N_2O), also known as laughing gas, is a colorless GHG. Concentrations of N_2O also began to rise at the beginning of the industrial revolution. In 1998, the global concentration was 314 parts per billion (ppb). N_2O is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. It is used as an aerosol spray propellant (i.e., in whipped cream bottles), in potato chip bags to keep chips fresh, and in rocket engines and race cars. N_2O can be transported into the stratosphere, be deposited on Earth's surface, or be converted to other compounds by chemical reaction. (Urban Crossroads, 2023d, Table 2-1)

N_2O can cause dizziness, euphoria, and sometimes slight hallucinations. In small doses, it is considered harmless. However, in some cases, heavy and extended use can cause Olney's Lesions (brain damage). (Urban Crossroads, 2023d, Table 2-1)

❑ Chlorofluorocarbons (CFCs)

Chlorofluorocarbons (CFCs) are gases formed synthetically by replacing all hydrogen atoms in CH_4 or ethane (C_2H_6) with chlorine and/or fluorine atoms. CFCs are nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (the level of air at Earth's surface). CFCs have no natural sources but were first synthesized in 1928. They were used for refrigerants, aerosol propellants, and cleaning solvents. Due to the discovery that they are able to destroy stratospheric ozone, a global effort to halt their production was undertaken and was extremely successful, so much so that levels of the major CFCs are now remaining steady or declining. However, their long atmospheric lifetimes mean that some of CFCs will remain in the atmosphere for over 100 years. (Urban Crossroads, 2023d, Table 2-1)

In confined indoor locations, working with CFC-113 or other CFCs is thought to result in death by cardiac arrhythmia (heart frequency too high or too low) or asphyxiation. (Urban Crossroads, 2023d, Table 2-1)

❑ Hydrofluorocarbons (HFCs)

Hydrofluorocarbons (HFCs) are synthetic, man-made chemicals that are used as a substitute for CFCs. Out of all the GHGs, they are one of three groups with the highest global warming potential ("GWP," described below). The HFCs with the largest measured atmospheric abundances are (in order), fluoroform (CHF_3), 1,1,1,2-tetrafluoroethane (CH_2FCF), and 1,1-difluoroethane (CH_3CF_2). Prior to 1990, the only significant emissions were of CHF_3. CH_2FCF emissions are increasing due to its use as a refrigerant. HFCs are man-made for applications such as automobile air conditioners and refrigerants. No health effects are known to result from exposure to HFCs. (Urban Crossroads, 2023d, Table 2-1)

❑ Perfluorocarbons (PFCs)

Perfluorocarbons (PFCs) have stable molecular structures and do not break down through chemical processes in the lower atmosphere. High-energy ultraviolet rays, which occur about 60 kilometers above Earth's surface, are able to destroy the compounds. Because of this, PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane (CF_4) and hexafluoroethane (C_2F_6). The United States Environmental Protection Agency (EPA) estimates that concentrations of CF_4 in the atmosphere are over 70 parts per trillion (ppt). The two main sources of PFCs are primary aluminum production and semiconductor manufacture. No health effects are known to result from exposure to PFCs. (Urban Crossroads, 2023d, Table 2-1)

❑ Sulfur Hexafluoride (SF_6)

Sulfur Hexafluoride (SF_6) is an inorganic, odorless, colorless, nontoxic, nonflammable gas. It also has the highest GWP of any gas evaluated (23,900). The EPA indicates that concentrations in the 1990s were about 4 ppt. SF_6 is used for insulation in electric power transmission and distribution equipment, in the magnesium

industry, in semiconductor manufacturing, and as a tracer gas for leak detection. In high concentrations in confined areas, the gas presents the hazard of suffocation because it displaces the oxygen needed for breathing. (Urban Crossroads, 2023d, Table 2-1)

❑ **Nitrogen Trifluoride (NF_3)**

Nitrogen Trifluoride (NF_3) is a colorless gas with a distinctly moldy odor. The World Resources Institute (WRI) indicates that NF_3 has a 100-year GWP of 17,200. NF_3 is used in industrial processes and is produced in the manufacturing of semiconductors, Liquid Crystal Display (LCD) panels, types of solar panels, and chemical lasers. Long-term or repeated exposure may affect the liver and kidneys and may cause fluorosis. (Urban Crossroads, 2023d, Table 2-1)

2. Potential Global Warming Effects

The potential health effects related directly to the emissions of CO_2, CH_4, and N_2O as they relate to development projects are still being debated in the scientific community. Their cumulative effects to GCC have the potential to cause adverse effects to human health. Increases in Earth's ambient temperatures would result in more intense heat waves, causing more heat-related deaths. Scientists also purport that higher ambient temperatures would increase disease survival rates and result in more widespread disease. Climate change will likely cause shifts in weather patterns, potentially resulting in devastating droughts and food shortages in some areas. Figure 4.8-1, *Summary of Projected Global Warming Impact, 2070-2099*, presents the potential impacts of global warming. (Urban Crossroads, 2023d, p. 13)

3. Global Warming Potential (GWP)

GHGs have varying GWP values. GWP of a GHG indicates the amount of warming a gas causes over a given period of time and represents the potential of a gas to trap heat in the atmosphere. CO_2 is utilized as the reference gas for GWP, and thus has a GWP value of 1. CO_2 equivalent (CO_2e) is a term used for describing the difference between GHGs in a common unit. CO_2e signifies the amount of CO_2 which would have the equivalent GWP. (Urban Crossroads, 2023d, p. 15)

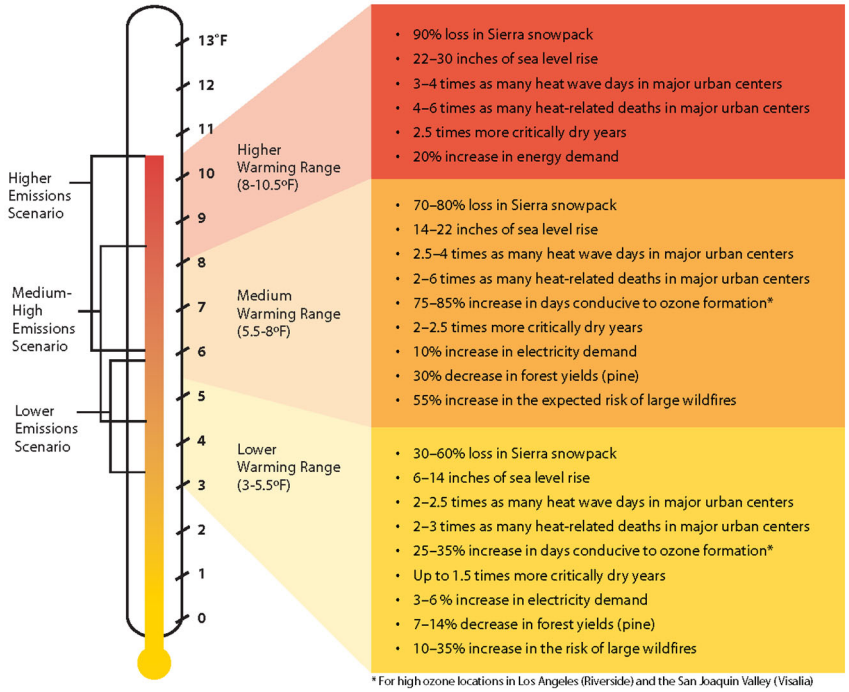
The atmospheric lifetime and GWP of selected GHGs are summarized at Table 4.8-1, *Global Warming Potential and Atmospheric Lifetime of Select GHGs*. As shown in Table 4.8-1, GWP for the Sixth Assessment report, the Intergovernmental Panel on Climate Change (IPCC)'s scientific and socio-economic assessment on climate change, range from 1 for CO_2 to 25,200 for SF_6. (Urban Crossroads, 2023d, p. 15)

C. GHG Emission Inventories

1. Global

Worldwide anthropogenic GHG emissions are tracked by the IPCC for industrialized nations (referred to as Annex I) and developing nations (referred to as Non-Annex I). Human GHG emissions data for Annex I nations

Figure 4.8-1 ~~Global Warming Potential and Atmospheric Lifetime of Select GHGs~~Summary of Projected Global Warming Impact, 2070-2099



(Urban Crossroads, 2023d, Exhibit 2-A)

Table 4.8-1 Global Warming Potential and Atmospheric Lifetime of Select GHGs

Gas	Atmospheric Lifetime (years)	GWP (100-year time horizon)
		6th Assessment Report
CO_2	Multiple	1
CH_4	12 .4	28
N_2O	121	273
HFC-23	222	14,600
HFC-134a	13.4	1,526
HFC-152a	1.5	164
SF_6	3,200	25,200

(Urban Crossroads, 2023d, Table 2-2)

are available through 2020. Based on the latest available data, the sum of these emissions totaled 28,026,643 gigagram (Gg) CO_2e[1] as summarized in Table 4.8-2, *Top GHG Producing Countries and the European Union*. (Urban Crossroads, 2023d, p. 15)

Table 4.8-2 Top GHG Producing Countries and the European Union

Emitting Countries	GHG Emissions (Gg CO_2e)
China	12,300,200
United States	5,981,354
European Union (27-member countries)	3,706,110
India	2,839,420
Russian Federation	2,051,437
Japan	1,148,122
Total	**28,026,643**

(Urban Crossroads, 2023d, Table 2-3)

2. United States

As noted in Table 4.8-2, the United States, as a single country, was the number two producer of GHG emissions in 2020. (Urban Crossroads, 2023d, p. 15)

3. State of California

California has significantly slowed the rate of growth of GHG emissions due to the implementation of energy efficiency programs as well as adoption of strict emission controls but is still a substantial contributor to the United States emissions inventory total. The California Air Resource Board (CARB) compiles GHG inventories for the State of California. Based upon the 2022 GHG inventory data (i.e., the latest year for which data are available) for the 2000-2020 GHG emissions period, California emitted an average 369.2 million metric tons of CO_2e per year ($MMTCO_2e/yr$) or 369,200 Gg CO_2e (6.17% of the total United States GHG emissions) (Urban Crossroads, 2023d, p. 16)

D. Effects of Climate Change in California

1. Public Heath

Higher temperatures may increase the frequency, duration, and intensity of conditions conducive to air pollution formation. For example, days with weather conducive to ozone formation could increase from 25 to 35% under the lower warming range to 75 to 85% under the medium warming range. In addition, if global

[1] The global emissions are the sum of Annex I and non-Annex I countries, without counting Land-Use, Land-Use Change and Forestry (LULUCF). For countries without 2020 data, the United Nations' Framework Convention on Climate Change (UNFCCC) data for the most recent year were used. The most recent GHG emissions for China and India are from 2014 and 2016, respectively.

background ozone levels increase as predicted in some scenarios, it may become impossible to meet local air quality standards. Air quality could be further compromised by increases in wildfires, which emit fine particulate matter that can travel long distances, depending on wind conditions. The Climate Scenarios report indicates that large wildfires could become up to 55% more frequent if GHG emissions are not significantly reduced. (Urban Crossroads, 2023d, p. 16)

In addition, under the higher warming range scenario, there could be up to 100 more days per year with temperatures above 90°F in Los Angeles and 95°F in Sacramento by 2100. This is a significant increase over historical patterns and approximately twice the increase projected if temperatures remain within or below the lower warming range. Rising temperatures could increase the risk of death from dehydration, heat stroke/exhaustion, heart attack, stroke, and respiratory distress caused by extreme heat. (Urban Crossroads, 2023d, p. 16)

2. Water Resources

A vast network of man-made reservoirs and aqueducts captures and transports water throughout the state from northern California rivers and the Colorado River. The current distribution system relies on Sierra Nevada snowpack to supply water during the dry spring and summer months. Rising temperatures, potentially compounded by decreases in precipitation, could severely reduce spring snowpack, increasing the risk of summer water shortages. (Urban Crossroads, 2023d, p. 17)

If temperatures continue to increase, more precipitation could fall as rain instead of snow, and the snow that does fall could melt earlier, reducing the Sierra Nevada spring snowpack by as much as 70 to 90%. Under the lower warming range scenario, snowpack losses could be only half as large as those possible if temperatures were to rise to the higher warming range. How much snowpack could be lost depends in part on future precipitation patterns, the projections for which remain uncertain. However, even under the wetter climate projections, the loss of snowpack could pose challenges to water managers and hamper hydropower generation. It could also adversely affect winter tourism. Under the lower warming range, the ski season at lower elevations could be reduced by as much as a month. If temperatures reach the higher warming range and precipitation declines, there might be many years with insufficient snow for skiing and snowboarding. (Urban Crossroads, 2023d, p. 17)

The State's water supplies are also at risk from rising sea levels. An influx of saltwater could degrade California's estuaries, wetlands, and groundwater aquifers. Saltwater intrusion caused by rising sea levels is a major threat to the quality and reliability of water within the southern edge of the Sacramento/San Joaquin River Delta – a major fresh water supply. (Urban Crossroads, 2023d, p. 17)

3. Agriculture

Increased temperatures could cause widespread changes to the agriculture industry reducing the quantity and quality of agricultural products statewide. First, California farmers could possibly lose as much as 25% of the water supply needed. Although higher CO2 levels can stimulate plant production and increase plant water-use efficiency, California's farmers could face greater water demand for crops and a less reliable water supply as

temperatures rise. Crop growth and development could change, as could the intensity and frequency of pest and disease outbreaks. Rising temperatures could aggravate ozone pollution, which makes plants more susceptible to disease and pests and interferes with plant growth. (Urban Crossroads, 2023d, p. 17)

Plant growth tends to be slow at low temperatures, increasing with rising temperatures up to a threshold. However, faster growth can result in less-than-optimal development for many crops, so rising temperatures could worsen the quantity and quality of yield for a number of California's agricultural products. Products likely to be most affected include wine grapes, fruits, and nuts. (Urban Crossroads, 2023d, p. 17)

In addition, continued GCC could shift the ranges of existing invasive plants and weeds and alter competition patterns with native plants. Range expansion could occur in many species while range contractions may be less likely in rapidly evolving species with significant populations already established. Should range contractions occur, new or different weed species could fill the emerging gaps. Continued GCC could alter the abundance and types of many pests, lengthen pests' breeding season, and increase pathogen growth rates. (Urban Crossroads, 2023d, p. 17)

4. Forests and Landscapes

GCC has the potential to intensify the current threat to forests and landscapes by increasing the risk of wildfire and altering the distribution and character of natural vegetation. If temperatures rise into the medium warming range, the risk of large wildfires in California could increase by as much as 55%, which is almost twice the increase expected if temperatures stay in the lower warming range. However, since wildfire risk is determined by a combination of factors, including precipitation, winds, temperature, and landscape and vegetation conditions, future risks would not be uniform throughout the state. In contrast, wildfires in northern California could increase by up to 90% due to decreased precipitation. (Urban Crossroads, 2023d, p. 18)

Moreover, continued GCC has the potential to alter natural ecosystems and biological diversity within the state. For example, alpine and subalpine ecosystems could decline by as much as 60 to 80% by the end of the century as a result of increasing temperatures. The productivity of the state's forests has the potential to decrease as a result of GCC. (Urban Crossroads, 2023d, p. 18)

5. Rising Sea Levels

Rising sea levels, more intense coastal storms, and warmer water temperatures could increasingly threaten the state's coastal regions. Under the higher warming range scenario, sea level is anticipated to rise 22 to 35 inches by 2100. Elevations of this magnitude would inundate low-lying coastal areas with saltwater, accelerate coastal erosion, threaten vital levees and inland water systems, and disrupt wetlands and natural habitats. Under the lower warming range scenario, sea level could rise 12-14 inches. (Urban Crossroads, 2023d, p. 18)

4.8.2 Applicable Regulatory Requirements

The following is a brief description of the international, federal, State, and local environmental laws and related regulations related to GHG emissions.

A. *International Regulations*

1. *Kyoto Protocol*

The Kyoto Protocol is an international agreement linked to the United Nations Framework Convention on Climate Change, which commits its Parties by setting internationally binding emission reduction targets. Recognizing that developed countries are principally responsible for the current high levels of GHG emissions in the atmosphere as a result of more than 150 years of industrial activity, the Kyoto Protocol places a heavier burden on developed nations under the principle of "common but differentiated responsibilities." (UNFCCC, n.d.1)

The Kyoto Protocol was adopted in Kyoto, Japan, on December 11, 1997, and entered into force on February 16, 2005. The detailed rules for the implementation of the Protocol were adopted at Conference of the Parties (COP) 7 in Marrakesh, Morocco, in 2001, and are referred to as the "Marrakesh Accords." Its first commitment period started in 2008 and ended in 2012. (UNFCCC, n.d.1)

On December 8, 2012, in Doha, Qatar, the "Doha Amendment to the Kyoto Protocol" was adopted. The amendment includes:

- New commitments for Annex I Parties to the Kyoto Protocol who agreed to take on commitments in a second commitment period from January 1, 2013 to December 31, 2020;
- A revised list of GHGs to be reported on by Parties in the second commitment period; and
- Amendments to several articles of the Kyoto Protocol which specifically referenced issues pertaining to the first commitment period and which needed to be updated for the second commitment period. (UNFCCC, n.d.1)

On December 21, 2012, the amendment was circulated by the Secretary-General of the United Nations, acting in his capacity as Depositary, to all Parties to the Kyoto Protocol in accordance with Articles 20 and 21 of the Protocol. (UNFCCC, n.d.1)

During the first commitment period, 37 industrialized countries and the European Community committed to reduce GHG emissions to an average of five percent against 1990 levels. During the second commitment period, Parties committed to reduce GHG emissions by at least 18 percent below 1990 levels in the eight-year period from 2013 to 2020; however, the composition of Parties in the second commitment period is different from the first. (UNFCCC, n.d.1)

2. *The Paris Agreement*

The Paris Agreement builds upon the Convention and – for the first time – brings all nations into a common cause to undertake ambitious efforts to combat climate change and adapt to its effects, with enhanced support to assist developing countries to do so. The Paris Agreement's central aim is to strengthen the global response to the threat of climate change by keeping a global temperature rise this century well below 2 degrees Celsius above pre-industrial levels and to pursue efforts to limit the temperature increase even further to 1.5 degrees Celsius. Additionally, the agreement aims to strengthen the ability of countries to deal with the impacts of

climate change. The Paris Agreement requires all Parties to put forward their best efforts through "nationally determined contributions" (NDCs) and to strengthen these efforts in the years ahead. This includes requirements that all Parties report regularly on their emissions and on their implementation efforts. The Paris Agreement entered into force on November 4, 2016, thirty days after the date on which at least 55 Parties to the Convention accounting in total for at least an estimated 55% of the total global greenhouse gas emissions have deposited their instruments of ratification, acceptance, approval, or accession with the Depositary. (UNFCCC, n.d.2)

On June 1, 2017, President Donald Trump announced he would begin the process of withdrawing the United States from the Paris Agreement. In accordance with articles within the Paris Agreement, the earliest effective date for the United States' withdrawal from the Agreement was November 4, 2020, at which time the withdraw became official. On January 20, 2021, President Biden signed the executive order for the United States to rejoin the Paris Agreement, which became official on February 19, 2021.

B. Federal Regulations

1. Clean Air Act

Coinciding with the 2009 meeting of international leaders in Copenhagen, on December 7, 2009, the EPA issued an Endangerment Finding under § 202(a) of the Clean Air Act (CAA), introducing federal regulation of GHGs. The Endangerment Finding notes that GHGs threaten public health and welfare and are subject to regulation under the CAA. To date, the EPA has not promulgated regulations on GHG emissions, but it has begun to develop them. Previously the EPA had not regulated GHGs under the CAA because it asserted that the Act did not authorize it to issue mandatory regulations to address GCC and that such regulation would be unwise without an unequivocally established causal link between GHGs and the increase in global surface air temperatures. In Massachusetts v. Environmental Protection Agency et al. (127 S. Ct. 1438 [2007]); however, the US Supreme Court held that GHGs are pollutants under the CAA and directed the EPA to decide whether the gases endangered public health or welfare. The EPA had also not moved aggressively to regulate GHGs because it expected Congress to make progress on GHG legislation, primarily from the standpoint of a cap-and-trade system. (EPA, 2023a; EPA, 2023b)

C. State Regulations

1. Title 24 Building Energy Standards

The California Energy Commission (CEC) first adopted Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) in 1978 in response to a legislative mandate to reduce energy consumption in the State. The standards are updated periodically to allow for the consideration and inclusion of new energy efficiency technologies and methods. The 2022 version of Title 24 was adopted by the CEC became effective on January 1, 2023. The 2022 Building Energy Efficiency Standards focuses on four key areas in newly constructed homes and businesses: 1) encouraging electric heat pump technology for space and water heating, which consumes less energy and produces fewer emissions than gas-powered units; 2) establishing electric-ready requirements for single-family homes to position owners to use cleaner electric heating, cooking and electric vehicle (EV) charging options whenever they choose to adopt

those technologies; 3) expanding solar photovoltaic (PV) system and battery storage standards to make clean energy available onsite and complement the State's progress toward a 100 percent clean electricity grid; and strengthening ventilation standards to improve indoor air quality. (CEC, n.d.3)

Part 11 of Title 24 is referred to as the California Green Building Standards Code (CALGreen Code). The purpose of the CALGreen Code is to "improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices in the following categories: 1) Planning and design; 2) Energy efficiency; 3) Water efficiency and conservation; 4) Material conservation and resource efficiency; and 5) Environmental air quality." The CALGreen Code is not intended to substitute or be identified as meeting the certification requirements of any green building program that is not established and adopted by the CBSC. Unless otherwise noted in the regulation, all newly constructed buildings in California are subject to the requirements of the CALGreen Code.

2. Assembly Bill 1493 (AB 1493)

Assembly Bill 1493 (AB 1493) required the CARB to adopt the nation's first GHG emission standards for automobiles. On September 24, 2009, the CARB adopted amendments to the "Pavley" regulations that reduce GHG emissions in new passenger vehicles from model year 2009 through 2016. These amendments were part of California's commitment toward a nationwide program to reduce new passenger vehicle GHGs from 2012 through 2016. The CARB's September amendments cement California's enforcement of the Pavley rule starting in 2009 while providing vehicle manufacturers with new compliance flexibility. The amendments also prepare California to harmonize its rules with the federal rules for passenger vehicles. (CARB, n.d.5)

The United States EPA granted California the authority to implement GHG emission reduction standards for new passenger cars, pickup trucks, and sport utility vehicles on June 30, 2009. The first California request to implement GHG standards for passenger vehicles, known as a waiver request, was made in December 2005, and was denied by the EPA in March 2008. That decision was based on a finding that California's request to reduce GHG emissions from passenger vehicles did not meet the CAA requirement of showing that the waiver was needed to meet "compelling and extraordinary conditions." (CARB, n.d.5)

CARB originally approved regulations to reduce GHGs from passenger vehicles in September 2004, with the regulations to take effect in 2009. These regulations were authorized by the 2002 legislation AB 1493 (Pavley). (CARB, n.d.5)

The regulations had been threatened by automaker lawsuits and were stalled by the EPA's delay in reviewing and then initially denying California's waiver request. The parties involved entered a May 19, 2009 agreement to resolve these issues. With the granting of the waiver on June 30, 2009, it is expected that the Pavley regulations reduced GHG emissions from California passenger vehicles by about 22% in 2012 and about 30% in 2016, all while improving fuel efficiency and reducing motorists' costs. (CARB, n.d.5)

The CARB has adopted a new approach to passenger vehicles – cars and light trucks – by combining the control of smog-causing pollutants and GHGs into a single coordinated package of standards. The new

approach also includes efforts to support and accelerate the numbers of plug-in hybrids and zero-emission vehicles in California. (CARB, n.d.5)

3. Executive Order S-3-05

Executive Order S-3-05 documents GHG emission reduction goals, creates the Climate Action Team and directs the Secretary of the California Environmental Protection Agency (CalEPA) to coordinate efforts with meeting the GHG reduction targets with the heads of other State agencies. The executive order requires the Secretary to report back to the Governor and Legislature biannually: progress toward meeting the GHG goals; GHG impacts to California; and applicable Mitigation and Adaptation Plans. Executive Order S-3-05 goals for GHG emissions reductions include: reducing GHG emissions to 2000 levels by the year 2010; reducing GHG emissions to 1990 levels by the year 2020; and reducing GHG emissions to 80% below 1990 levels by 2050. (CA State Library, 2005)

4. Assembly Bill 32 (AB 32) – Global Warming Solutions Act of 2006

In September 2006, Governor Schwarzenegger signed Assembly Bill 32 (AB 32), the California Climate Solutions Act of 2006. AB 32 required California to reduce its GHG emissions to 1990 levels by 2020, which represented a reduction of approximately 15% below emissions expected under a "business as usual" (BAU) scenario. Pursuant to AB 32, the CARB must adopt regulations to achieve the maximum technologically feasible and cost-effective GHG emission reductions. The full implementation of AB 32 was estimated to help mitigate risks associated with climate change, while improving energy efficiency, expanding the use of renewable energy resources, cleaner transportation, and reducing waste. (CARB, 2018)

AB 32 specifically required that the CARB do the following: (CARB, 2018)

- Prepare and approve a Scoping Plan for achieving the maximum technologically feasible and cost-effective reductions in GHG emissions from sources or categories of sources of GHGs by 2020, and update the Scoping Plan every five years.
- Maintain and continue reductions in emissions of GHG beyond 2020.
- Identify the Statewide level of GHG emissions in 1990 to serve as the emissions limit to be achieved by 2020.
- Identify and adopt regulations for discrete early actions that could be enforceable on or before January 1, 2010.
- Adopt a regulation that establishes a system of market-based declining annual aggregate emission limits for sources or categories of sources that emit GHG emissions.
- Convene an Environmental Justice Advisory Committee to advise the Board in developing and updating the Scoping Plan and any other pertinent matter in implementing AB 32.
- Appoint an Economic and Technology Advancement Advisory Committee to provide recommendations for technologies, research, and GHG emission reduction measures.

In November 2007, the CARB completed its estimated calculations of Statewide 1990 GHG levels. Net emission 1990 levels were estimated at 427 million metric tons (MMTs) (emission sources by sector were:

transportation – 35%; electricity generation – 26%; industrial – 24%; residential – 7%; agriculture – 5%; and commercial – 3%). Accordingly, 427 $MMTCO_2e$ was established as the emissions limit for 2020. For comparison, the CARB's estimate for baseline GHG emissions was 473 $MMTCO_2e$ for 2000 and without emissions reduction measures 2010 emissions were projected to be 532 $MMTCO_2e$. BAU conditions (without the reductions to be implemented by CARB regulations) for 2020 were projected to be 596 $MMTCO_2e$. (CARB, 2007)

5. Senate Bill 1368 (SB 1368)

In 2006, the State Legislature adopted Senate Bill 1368 (SB 1368) (Perata, Chapter 598, Statutes of 2006), which directs the California Public Utilities Commission (CPUC) to adopt a GHG emission performance standard (EPS) for the future power purchases of California utilities. SB 1368 seeks to limit carbon emissions associated with electrical energy consumed in California by forbidding procurement arrangements for energy longer than five years from resources that exceed specified emissions criteria. Accordingly, SB 1368 effectively prevents California's utilities from investing in, otherwise financially supporting, or purchasing power from new coal plants located in or out of the State. SB 1368 will lead to dramatically lower GHG emissions associated with California energy demand. (CEC, n.d.4)

6. Executive Order S-01-07, Low Carbon Fuel Standard (LCFS)

Executive Order S-01-07 is effectively known as the LCFS. The Executive Order seeks to reduce the carbon intensity of California's passenger vehicle fuels by at least 10 percent by 2020. The LCFS requires fuel providers in California to ensure that the mix of fuel they sell into the California market meet, on average, a declining standard for GHG emissions measured in CO_2e grams per unit of fuel energy sold. (CA State Library, 2007)

7. Senate Bill 1078 (SB 1078)

Senate Bill 1078 (SB 1078) establishes the California Renewables Portfolio Standard Program, which requires electric utilities and other entities under the jurisdiction of the California Public Utilities Commission to meet 20% of their renewable power by December 31, 2017 for the purposes of increasing the diversity, reliability, public health, and environmental benefits of the energy mix. (CA Legislative Info, n.d.22)

8. Senate Bill 107 (SB 107)

Senate Bill 107 (SB 107) directed California Public Utilities Commission's Renewable Energy Resources Program to increase the amount of renewable electricity (Renewable Portfolio Standard) generated per year, from 17% to an amount that equals at least 20% of the total electricity sold to retail customers in California per year by December 31, 2010. (CA Legislative Info, n.d.23)

9. Executive Order S-14-08

On November 17, 2008, Governor Schwarzenegger signed Executive Order S-14-08, revising California's existing Renewable Portfolio Standard upward to require all retail sellers of electricity to serve 33% of their load from renewable energy sources by 2020. In order to meet this new goal, a substantial increase in the

development of wind, solar, geothermal, and other "Renewable Portfolio Standard eligible" energy projects will be needed. Executive Order S-14-08 seeks to accelerate such development by streamlining the siting, permitting, and procurement processes for renewable energy generation facilities. To this end, S-14-08 issues two directives: (1) the existing Renewable Energy Transmission Initiative will identify renewable energy zones that can be developed as such with little environmental impact, and (2) the CEC and the California Department of Fish and Wildlife (CDFW) will collaborate to expedite the review, permitting, and licensing process for proposed Renewable Portfolio Standard eligible renewable energy projects. (CA State Library, 2008)

10. Senate Bill 97 (SB 97)

By enacting Senate Bill 97 (SB 97) in 2007, California's lawmakers expressly recognized the need to analyze GHGs as a part of the California Environmental Quality Act (CEQA) process. SB 97 required the Governor's Office of Planning and Research (OPR) to develop, and the Natural Resources Agency to adopt, amendments to the CEQA Guidelines addressing the analysis and mitigation of GHG emissions. Those CEQA Guidelines amendments clarified several points, including the following (CA Legislative Info, n.d.24):

- Lead agencies must analyze the GHG emissions of proposed projects, and must reach a conclusion regarding the significance of those emissions. (See CEQA Guidelines § 15064.4.)
- When a project's GHG emissions may be significant, lead agencies must consider a range of potential mitigation measures to reduce those emissions. (See CEQA Guidelines § 15126.4(c).)
- Lead agencies must analyze potentially significant impacts associated with placing projects in hazardous locations, including locations potentially affected by climate change. (See CEQA Guidelines § 15126.2(a).)
- Lead agencies may significantly streamline the analysis of GHGs on a project level by using a programmatic GHG emissions reduction plan meeting certain criteria. (See CEQA Guidelines § 15183.5(b).)
- CEQA mandates analysis of a proposed project's potential energy use (including transportation-related energy), sources of energy supply, and ways to reduce energy demand, including through the use of efficient transportation alternatives. (See CEQA Guidelines, Appendix F.)

As part of the administrative rulemaking process, the Natural Resources Agency developed a Final Statement of Reasons explaining the legal and factual bases, intent, and purpose of the CEQA Guidelines amendments. The amendments to the CEQA Guidelines implementing SB 97 became effective on March 18, 2010. (CA Legislative Info, n.d.24)

Of note, the new guidelines state that a lead agency shall have discretion to determine whether to use a quantitative model or methodology, or in the alternative, rely on a qualitative analysis or performance-based standards. Pursuant to CEQA Guidelines § 15064.4(a), "A lead agency shall have discretion to determine, in the context of a particular project, whether to: (1) Use a model or methodology to quantify GHGs resulting from a project, and which model or methodology to use; or (2) Rely on a qualitative analysis or performance-based standards." (CA Legislative Info, n.d.24)

CEQA emphasizes that the effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impacts analysis. (See CEQA Guidelines § 15130(f)).

CEQA Guidelines § 15064.4(b) provides direction to lead agencies for assessing the significance of impacts of GHG emissions:

1. The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting;
2. Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; or
3. The extent to which the project complies with regulations or requirements adopted to implement a Statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. Such regulations or requirements must be adopted by the relevant public agency through a public review process and must include specific requirements that reduce or mitigate the project's incremental contribution of greenhouse gas emissions. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, an EIR must be prepared for the project.

The CEQA Guideline amendments do not identify a threshold of significance for GHG emissions, nor do they prescribe assessment methodologies or specific mitigation measures. Instead, they call for a "good-faith effort, based on available information, to describe, calculate, or estimate the amount of GHG emissions resulting from a project." The amendments encourage lead agencies to consider many factors in performing a CEQA analysis and preserve lead agencies' discretion to make their own determinations based on substantial evidence. The amendments also encourage public agencies to make use of programmatic mitigation plans and programs from which to tier when they perform individual project analyses.

11. Senate Bill 375 (SB 375)

The Sustainable Communities and Climate Protection Act of 2008 (Sustainable Communities Act, Senate Bill 375 (SB 375), Chapter 728, Statutes of 2008) supports the State's climate action goals to reduce GHG emissions through coordinated transportation and land use planning with the goal of more sustainable communities. (CARB, n.d.7)

Under the Sustainable Communities Act, the CARB sets regional targets for GHG emissions reductions from passenger vehicle use. In 2010, the CARB established these targets for 2020 and 2035 for each region covered by one of the State's metropolitan planning organizations (MPO). The CARB will periodically review and update the targets, as needed. (CARB, n.d.7)

Each of California's MPOs must prepare a "sustainable communities strategy" (SCS) as an integral part of its regional transportation plan (RTP). The SCS contains land use, housing, and transportation strategies that, if implemented, would allow the region to meet its GHG emission reduction targets. Once adopted by the MPO, the RTP/SCS guides the transportation policies and investments for the region. CARB must review the adopted

SCS to confirm and accept the MPO's determination that the SCS, if implemented, would meet the regional GHG targets. If the combination of measures in the SCS would not meet the regional targets, the MPO must prepare a separate "alternative planning strategy" (APS) to meet the targets. The APS is not a part of the RTP. (CARB, n.d.7)

The Sustainable Communities Act also establishes incentives to encourage local governments and developers to implement the SCS or the APS. Developers can get relief from certain environmental review requirements under CEQA if their new residential and mixed-use projects are consistent with a region's SCS (or APS) that meets the targets (see Public Resources Code §§ 21155, 21155.1, 21155.2, and 21159.28.). (CARB, n.d.7)

12. Executive Order B-30-15

On April 29, 2015, Governor Brown issued Executive Order B-30-15, which sets a goal to reduce GHG emissions in California to 40 percent below 1990 levels by 2030. The 2030 target serves as a benchmark goal on the way to achieving the GHG reductions goal set by former Governor Schwarzenegger via Executive Order S-3-05 (i.e., 80 percent below 1990 greenhouse gas emissions levels by 2050). (CA State Library, 2015)

13. Senate Bill 32 (SB 32)

On September 8, 2016, Governor Jerry Brown signed Senate Bill 32 (SB 32) and its companion bill, Assembly Bill 197 (AB 197). SB 32 requires the State to reduce Statewide GHG emissions to 40% below 1990 levels by 2030, a reduction target that was first introduced in Executive Order B-30-15. The new legislation builds upon the AB 32 goal of 1990 levels by 2020 and provides an intermediate goal to achieving S-3-05, which sets a Statewide greenhouse gas reduction target of 80% below 1990 levels by 2050. (CA Legislative Info, n.d.25)

14. CARB Scoping Plan

AB 32 required CARB to develop a Scoping Plan which identified California's strategy for meeting the AB 32 reduction goals for 2020. The Scoping Plan must be updated every five years. In December 2008, CARB approved the initial Scoping Plan, which included a suite of measures to sharply cut GHG emissions to achieve the AB 32 GHG reduction target. (CARB, 2018)

In May 2014, CARB approved the First Update to the Climate Change Scoping Plan (Update), which builds upon the initial Scoping Plan with new strategies and recommendations. The Update highlighted California's progress toward meeting the near-term 2020 GHG emission reduction goals, highlights the latest climate change science and provides direction on how to achieve long-term emission reduction goal described in Executive Order S-3-05. The Update recalculated 1990 GHG emissions using new global warming potentials identified in the IPCC Fourth Assessment Report released in 2007. Using those GWPs, the 427 $MTCO_2e$ 1990 emissions level and 2020 GHG emissions limit identified in the 2008 Scoping Plan would be slightly higher, at 431 $MTCO_2e$. Based on the revised 2020 emissions level projection identified in the 2011 Final Supplement and the updated 1990 emissions levels identified in the discussion draft of the First Update, achieving the 1990 emissions level in 2020 would require a reduction of 78 $MTCO_2e$ (down from 509 $MTCO_2e$), or approximately 15.3 percent (down from 28.5 percent), from the BAU condition. (CARB, 2018; CARB, 2017)

In November 2017, CARB released the Final 2017 Scoping Plan Update, which identifies the State's post-2020 reduction strategy. The Final 2017 Scoping Plan Update reflects the 2030 target of a 40% reduction below 1990 levels, set by Executive Order B-30-15 and codified by SB 32. Key programs that the proposed Second Update builds upon include the Cap-and-Trade Regulation, the LCFS, and much cleaner cars, trucks, and freight movement, utilizing cleaner, renewable energy, and strategies to reduce CH_4 emissions from agricultural and other wastes.

The Final 2017 Scoping Plan Update establishes a new emissions limit of 260 $MMTCO_2e$ for the year 2030, which corresponds to a 40% decrease in 1990 levels by 2030.

California's climate strategy will require contributions from all sectors of the economy, including the land base, and will include enhanced focus on zero- and near-zero-emission (ZE/NZE) vehicle technologies; continued investment in renewables, including solar roofs, wind, and other distributed generation; greater use of low carbon fuels; integrated land conservation and development strategies; coordinated efforts to reduce emissions of short-lived climate pollutants (CH_4, black carbon, and fluorinated gases); and an increased focus on integrated land use planning to support livable, transit-connected communities and conservation of agricultural and other lands. Requirements for direct GHG reductions at refineries will further support air quality co-benefits in neighborhoods, including in disadvantaged communities historically located adjacent to these large stationary sources, as well as efforts with California's local air pollution control and air quality management districts (air districts) to tighten emission limits on a broad spectrum of industrial sources. Major elements of the Final 2017 Scoping Plan Update framework include:

- Implementing and/or increasing the standards of the Mobile Source Strategy, which include increasing ZEV buses and trucks.
- LCFS, with an increased stringency (18% by 2030).
- Implementing SB 350, which expands the RPS to 50% RPS and doubles energy efficiency savings by 2030.
- California Sustainable Freight Action Plan, which improves freight system efficiency, utilizes near-zero emissions technology, and deployment of zero-emission vehicles (ZEV) trucks.
- Implementing the proposed Short-Lived Climate Pollutant Strategy (SLPS), which focuses on reducing CH4 and hydrofluorocarbon emissions by 40% and anthropogenic black carbon emissions by 50% by year 2030.
- Continued implementation of SB 375.
- Post-2020 Cap-and-Trade Program that includes declining caps.
- 20% reduction in GHG emissions from refineries by 2030.
- Development of a Natural and Working Lands Action Plan to secure California's land base as a net carbon sink.

Note, however, that the Final 2017 Scoping Plan Update acknowledges that:

> *"[a]chieving net zero increases in GHG emissions, resulting in no contribution to GHG impacts, may not be feasible or appropriate for every project, however, and the inability of a project to mitigate its*

GHG emissions to net zero does not imply the project results in a substantial contribution to the cumulatively significant environmental impact of climate change under CEQA."

In addition to the statewide strategies listed above, the Final 2017 Scoping Plan Update also identifies local governments as essential partners in achieving the State's long-term GHG reduction goals and identifies local actions to reduce GHG emissions. As part of the recommended actions, CARB recommends that local governments achieve a community-wide goal to achieve emissions of no more than 6 metric tons of CO_2e ($MTCO_2e$) or less per capita by 2030 and 2 $MTCO_2e$ or less per capita by 2050. For CEQA projects, CARB states that lead agencies may develop evidenced-based bright-line numeric thresholds – consistent with the Scoping Plan and the State's long-term GHG goals – and projects with emissions over that amount may be required to incorporate on-site design features and mitigation measures that avoid or minimize project emissions to the degree feasible; or, a performance-based metric using a CAP or other plan to reduce GHG emissions is appropriate.

According to research conducted by the Lawrence Berkeley National Laboratory (LBNL) and supported by CARB, California, under its existing and proposed GHG reduction policies, could achieve the 2030 goals under SB 32. The research utilized a new, validated model known as the California LBNL GHG Analysis of Policies Spreadsheet (CALGAPS), which simulates GHG and criteria pollutant emissions in California from 2010 to 2050 in accordance to existing and future GHG-reducing policies. The CALGAPS model showed that by 2030, emissions could range from 211 to 428 $MTCO_2e$ per year, indicating that "even if all modeled policies are not implemented, reductions could be sufficient to reduce emissions 40% below the 1990 level [of SB 32]." CALGAPS analyzed emissions through 2050 even though it did not generally account for policies that might be put in place after 2030. Although the research indicated that the emissions would not meet the State's 80% reduction goal by 2050, various combinations of policies could allow California's cumulative emissions to remain very low through 2050.

On December 15, 2022, CARB adopted the 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan). The 2022 Scoping Plan builds on the 2017 Scoping Plan as well as the requirements set forth by AB 1279, which directs the state to become carbon neutral no later than 2045. To achieve this statutory objective, the 2022 Scoping Plan lays out how California can reduce GHG emissions by 85% below 1990 levels and achieve carbon neutrality by 2045. The Scoping Plan scenario to do this is to "deploy a broad portfolio of existing and emerging fossil fuel alternatives and clean technologies, and align with statutes, Executive Orders, Board direction, and direction from the governor." The 2022 Scoping Plan sets one of the most aggressive approaches to reach carbon neutrality in the world. Unlike the 2017 Scoping Plan, CARB no longer includes a numeric per capita threshold and instead advocates for compliance with a local GHG reduction strategy (CAP) consistent with CEQA Guidelines section 15183.5. (Urban Crossroads, 2023d, p. 29)

Included in the 2022 Scoping Plan is a set of Local Actions (Appendix D to the 2022 Scoping Plan) aimed at providing local jurisdictions with tools to reduce GHGs and assist the state in meeting the ambitious targets set forth in the 2022 Scoping Plan. Appendix D to the 2022 Scoping Plan includes a section on evaluating plan-level and project-level alignment with the State's Climate Goals in CEQA GHG analyses. In this section, CARB identifies several recommendations and strategies that should be considered for new development in

order to determine consistency with the 2022 Scoping Plan. Notably, this section is focused on Residential and Mixed-Use Projects, in fact CARB states in Appendix D (page 4): "…focuses primarily on climate action plans (CAPs) and local authority over new residential development. It does not address other land use types (e.g., industrial) or air permitting." (Urban Crossroads, 2023d, p. 31)

Additionally on Page 21 in Appendix D, CARB states: "The recommendations outlined in this section apply only to residential and mixed-use development project types. California currently faces both a housing crisis and a climate crisis, which necessitates prioritizing recommendations for residential projects to address the housing crisis in a manner that simultaneously supports the State's GHG and regional air quality goals. CARB plans to continue to explore new approaches for other land use types in the future." As such, it would be inappropriate to apply the requirements contained in Appendix D of the 2022 Scoping Plan to any land use types other than residential or mixed-use residential development. (Urban Crossroads, 2023d, p. 31)

15. California Climate Crisis Act (AB 1279)

AB 1279, also known as the California Climate Crisis Act, declares that it is the policy of the State to achieve net zero greenhouse gas emissions as soon as possible, but no later than 2045; to achieve and maintain net negative greenhouse gas emissions thereafter; and to ensure that by 2045, Statewide anthropogenic greenhouse gas emissions are reduced to at least 85% below the 1990 levels. The bill requires the California Air Resources Board (CARB) to work with relevant State agencies to ensure that updates to the CARB Scoping Plan identify and recommend measures to achieve these policy goals and to identify and implement a variety of policies and strategies that enable carbon dioxide removal solutions and carbon capture, utilization, and storage technologies in California. AB 1279 also requires CARB to submit an annual report evaluating progress towards these policies. (CA Legislative Info, n.d.26)

16. Clean Energy, Jobs, and Affordability Act of 2022 (Senate Bill 1020)

SB 1020, also known as the Clean Energy, Jobs, and Affordability Act of 2022, revised State policy to include interim targets requiring that eligible renewable energy resources and zero-carbon resources supply 90 percent of all retail sales of electricity to California end-use customers by December 31, 2035, 95 percent of all retail sales of electricity to California end-use customers by December 31, 2040, 100 percent of all retail sales of electricity to California end-use customers by December 31, 2045, and 100 percent of electricity procured to serve all state agencies by December 31, 2035. SB 1020 also requires each State agency to ensure that zero-carbon resources and eligible renewable energy resources supply 100 percent of electricity procured to serve their agency by December 31, 2035. In addition, SB 1020 requires the State Water Project (SWP) to procure eligible renewable energy and zero-carbon resources as necessary to meet the clean energy requirements specified for all State agencies. Finally, SB 1020 requires the CPUC to develop utility affordability metrics for both electricity and gas service. (CA Legislative Info, n.d.27)

17. Carbon sequestration: Carbon Capture, Removal, Utilization, and Storage Program (Senate Bill 905)

SB 905 requires CARB to establish a Carbon Capture, Removal, Utilization, and Storage (CCRUS) Program and adopt regulations for a model unified permit program for the construction and operation of CCRUS

projects. SB 905 is intended to accelerate the deployment of carbon management technologies and ensuring they are deployed in a safe and equitable way. SB 905 requires the CCRUS Program to ensure that carbon dioxide capture, removal, and sequestration projects include specified components including, among others, certain monitoring activities. In addition, SB 905 requires that by January 1, 2025, CARB shall adopt regulations for a unified permit application for the construction and operation of carbon dioxide capture, removal, or sequestration projects to expedite the issuance of permits or other authorizations for the construction and operation of those projects. SB 905 also requires the establishment of a centralized public database to track the deployment of carbon capture, utilization, or storage (CCUS) technologies and carbon dioxide removal (CDR) technologies. (CA Legislative Info, n.d.29)

18. Assembly Bill 1757

AB 1757 directs the California Natural Resources Agency (CNRA) to determine an ambitious range of targets for natural carbon sequestration, and for nature-based climate solutions, that reduce GHG emissions for 2030, 2038, and 2045 to support State goals to achieve carbon neutrality and foster climate adaptation and resilience. Additionally, AB 1757 requires these targets to be integrated into the CARB Scoping Plan and other State policies. It also includes provisions to avoid double counting emission reductions, updates the Natural and Working Lands Climate Smart Strategy, develops GHG tracking protocols, and biennially post progress made in achieving the targets on CNRA's internet website. In addition, AB 1757 requires CARB to develop standard methods for State agencies to consistently track greenhouse gas emissions and reductions, carbon sequestration, and, where feasible, additional benefits from natural and working lands over time. (CA Legislative Info, n.d.30)

D. Regional Regulations

1. Connect SoCal 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

The Southern California Association of Governments (SCAG) is a regional agency established pursuant to California Government Code § 6500, also referred to as the Joint Powers Authority law. SCAG is designated as a Council of Governments (COG), a Regional Transportation Planning Agency (RTPA), and a Metropolitan Planning Organization (MPO). The Project site is within SCAG's regional authority. In April 2024, SCAG adopted the *2024-2050 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS)* ("RTP/SCS"); also referred to herein as "Connect SoCal" with goals to: 1) build and maintain an integrated multimodal transportation network; 2) develop, connect and sustain communities that are livable and thriving; 3) create a healthy region for the people of today and tomorrow; and 4) support a sustainable, efficient and productive regional economic environment that provides opportunities for all residents. Performance measures and funding strategies also are included to ensure that the adopted goals are achieved through implementation of the RTP.

Connect SoCal includes long-range regional transportation plans, regional transportation improvement programs, regional housing needs allocations, and other plans for the region. Connect SoCal also provides objectives for meeting emissions reduction targets set forth by the California Air Resources Board (CARB); these objectives were provided in a direct response to Senate Bill 375 (SB 375) which was enacted to reduce

greenhouse gas emissions from automobiles and light trucks through integrated transportation, land use, housing, and environmental planning. Connect SoCal is updated periodically to allow for the consideration and inclusion of new transportation strategies and methods.

2. South Coast Air Quality Management District (SCAQMD)

To provide guidance to local lead agencies on determining significance for GHG emissions in CEQA documents, South Coast Air Quality Management District (SCAQMD) staff is convening an ongoing GHG CEQA Significance Threshold Working Group. Members of the working group include government agencies implementing CEQA and representatives from various stakeholder groups that provide input to SCAQMD staff on developing the significance thresholds. On October 8, 2008, the SCAQMD released the Draft AQMD Staff CEQA GHG Significance Thresholds. These thresholds have not been finalized and continue to be developed through the working group.

The Draft AQMD Staff CEQA GHG Significance Thresholds guidance document, which builds on the previous guidance prepared by the California Air Pollution Control Officers Association (CAPCOA), explored various approaches for establishing a significance threshold for GHG emissions and was described as a "work in progress" of efforts to date. However, the draft interim CEQA thresholds guidance document was not adopted or approved by the Governing Board. In December 2008, the SCAQMD adopted an interim 10,000 metric tons of CO_2e per year ($MTCO_2e/yr$) screening level threshold for stationary source/industrial projects for which the SCAQMD is the lead agency. From December 2008 to September 2010, SCAQMD hosted working group meetings and revised the draft threshold proposal several times, although it did not officially provide these proposals in a subsequent document. SCAQMD has continued to consider adoption of significance thresholds for residential and general land use development projects. The most recent proposal, issued in September 2010, used the following tiered approach to evaluate potential GHG impacts from various uses:

- Tier 1: Determine if CEQA categorical exemptions are applicable. If not, move to Tier 2.

- Tier 2: Consider whether or not the proposed project is consistent with a locally-adopted GHG reduction plan that has gone through public hearing and CEQA review, that has an approved inventory, includes monitoring, etc. If not, move to Tier 3.

- Tier 3: Consider whether the project generates GHG emissions in excess of screening thresholds for individual land uses. The 10,000 $MTCO_2e/yr$ threshold for industrial uses would be recommended for use by all lead agencies. Under option 1, separate screening thresholds are proposed for residential projects (3,500 $MTCO_2e/yr$), commercial projects (1,400 $MTCO_2e/yr$), and mixed-use projects (3,000 $MTCO_2e/yr$). Under option 2, a single numerical screening threshold of 3,000 $MTCO_2e/yr$ would be used for all non-industrial projects. If the project generates emissions in excess of the applicable screening threshold, move to Tier 4.

- Tier 4: Consider whether the project generates GHG emissions in excess of applicable performance standards for the project service population (population plus employment). The efficiency targets were established based on the goal of AB 32 to reduce Statewide GHG emissions to 1990 levels by 2020. The 2020 efficiency targets are 4.8 $MTCO_2e$/yr per service population for project level analyses and 6.6 $MTCO_2e$/yr per service population for plan level analyses. If the project generates emissions in excess of the applicable efficiency targets, move to Tier 5.

- Tier 5: Consider the implementation of CEQA mitigation (including the purchase of GHG offsets) to reduce the project efficiency target to Tier 4 levels.

The SCAQMD has not announced when staff is expecting to present a finalized version of its GHG thresholds to the governing board. These thresholds were developed as part of the SCAQMD GHG CEQA Significance Threshold Working Group. This working group was formed to assist SCAQMD's efforts to develop a GHG significance threshold and is composed of a wide variety of stakeholders including the State OPR, CARB, the Attorney General's Office, a variety of city and county planning departments in the SCAB, various utilities such as sanitation and power companies throughout the SCAB, industry groups, and environmental and professional organizations. These thresholds were developed to be consistent with CEQA requirements for developing significance thresholds, are supported by substantial evidence, and provides guidance to CEQA practitioners with regard to determining whether GHG emissions from a proposed land use project are significant.

E. Local Regulations

1. Riverside County Climate Action Plan (CAP)

The Riverside County CAP, which was adopted in December 2015 and most recently updated in November 2019 ("CAP Update"), was designed under the premise that Riverside County, and the community it represents, is uniquely capable of addressing emissions associated with sources under Riverside County's jurisdiction, and that Riverside County's emission reduction efforts should coordinate with the State strategies of reducing emissions in order to accomplish these reductions in an efficient and cost-effective manner. (Urban Crossroads, 2023d, p. 41)

The 2019 CAP Update establishes GHG emission reduction programs and regulations that correlate with and support evolving State GHG emissions reduction goals and strategies. The CAP Update includes reduction targets for year 2030 and year 2050. These reduction targets require the County to reduce emissions by at least 525,511 $MTCO_2e$/yr below the Adjusted Business As Usual (ABAU) scenario by 2030 and at least 2,982,948 $MTCO_2e$/yr below the ABAU scenario by 2050. (Urban Crossroads, 2023d, p. 41)

To evaluate consistency with the CAP Update, the County has implemented CAP Update Screening Tables (Screening Tables) to aid in measuring the reduction of GHG emissions attributable to certain design and construction measures incorporated in development projects. To this end, the Screening Tables establish categories of GHG Implementation Measures. Under each Implementation Measure category, mitigation or project design features (collectively "features") are assigned point values that correspond to the minimum

GHG emissions reduction that would result from each feature. Projects that yield at least 100 points are considered to be consistent with the GHG emissions reduction quantities anticipated in the County's GHG Technical Report and support the GHG emissions reduction targets established under the CAP Update. The potential for such projects to generate direct or indirect GHG emissions that would result in a significant impact on the environment; or conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG would be considered less than significant. (Urban Crossroads, 2023d, p. 41)

2. Riverside County Board of Supervisors Policy F-3

The logistics industry is a well-established sector of the Riverside County economy that has contributed to local job growth, fueled by societal growth trends in e-commerce and coupled with the County's strategic location along a major trade corridor that connects to the Ports of Los Angeles and Long Beach. It is expected that Riverside County will continue to see strong demand for growth in the logistics industry. However, it is also recognized that the construction and operations of logistics and warehouse projects in close proximity to residences or other sensitive land uses may negatively affect the quality of life of those existing communities. The County of Riverside Board of Supervisors Policy F-3, *Good Neighbor Policy for Logistics and Warehouse/Distribution Uses*, provides a framework through which large-scale logistics and warehouse projects, such as that proposed by the Project, can be designed and operated in a way that lessens their impact on surrounding communities and the environment. It is meant to apply Best Management Practices to help minimize potential impacts to sensitive receptors and is intended to be used in conjunction with the County's Land Use Ordinance, which provides development requirements for said projects, and CEQA. This policy provides a series of development and operational criteria applicable to logistics and warehouse projects that include any building larger than 250,000 square feet in size that are implemented to supplement project-level mitigation measures in order to further reduce impacts related to logistics and warehousing development and operations. Pursuant to Mitigation Measures MM 4.3-6 and MM 4.3-7 in EIR Subsection 4.3, *Air Quality*, the Project's proposed warehouse building would be subject to applicable provisions of Policy F-3. The specific policy provisions germane to Project GHG emissions include the following:

2.1 During construction of the warehouse/distribution facility, all heavy-duty haul trucks accessing the site shall have CARB-approved 2010 engines or newer approved CARB engine standards.

2.4 Construction contractors shall utilize construction equipment, with properly operating and maintained mufflers, consistent with manufacturers' standards.

2.9 Construction Contractors shall prohibit truck drivers from idling more than five (5) minutes and require operators to turn off engines when not in use, in compliance with the California Air Resources Board regulations.

4.1 Facility operators shall maintain records of their fleet equipment and ensure that all diesel-fueled Medium-Heavy Duty Trucks ("MHDT") and Heavy-Heavy Duty Trucks ("HHD") accessing the site use year CARB 2010 or newer engines. The records should be maintained on-site and be made available for inspection by the County.

4.2 Facility operators shall prohibit truck drivers from idling more than five (5) minutes and require operators to turn off engines when not in use, in compliance with the California Air Resources Board regulations.

4.3 Facility operators shall train their managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.

4.4 Facility operators shall coordinate with CARB and SCAQMD to obtain the latest information about regional air quality concentrations, health risks, and trucking regulations.

4.7 Facility operators for sites that exceed 250 employees shall establish a rideshare program, in accordance with AQMD rule 2202, with the intent of discouraging single-occupancy vehicle trips and promote alternate modes of transportation, such as carpooling and transit where feasible.

4.8 A minimum of 5 percent of employee parking spaces shall be designated for electric or other alternative fueled vehicles.

5.5 Each Facility shall designate a Compliance Officer responsible for implementing the measures described herein and/or in the project conditions of approval and mitigation measures. Contact information should be provided to the County and updated annually, and signs should be posted in visible locations providing the contact information for the Compliance Officer to the surrounding community.

4.8.3 Basis for Determining Significance

A. Thresholds of Significance

While estimated Project-related GHG emissions can be quantified, the direct impacts of such emissions on GCC and global warming cannot be determined on the basis of available science. There is no evidence at this time that would indicate that the emissions from a project the size of the proposed Project would directly or indirectly affect the global climate.

AB 32 states, in part, that "[g]lobal warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California." Because global warming is the result of GHG emissions, and GHGs are emitted by innumerable sources worldwide, the proposed Project would have no potential to result in a direct impact to global warming; rather, Project-related contributions to GCC, if any, only have potential significance on a cumulative basis. Therefore, the analysis below focuses on the Project's potential to contribute to GCC in a cumulatively-considerable way.

Section VIII of Appendix G to the State CEQA Guidelines addresses typical adverse effects due to greenhouse gas emissions, and includes the following threshold questions. The proposed Project would result in a significant impact due to greenhouse gas emissions if the Project or any Project-related component would:

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

- Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

The above-listed thresholds are derived directly from Section VII of Appendix G to the State CEQA Guidelines and the County's Environmental Assessment form, and address typical adverse effects associated with greenhouse gas emissions.

The above-listed thresholds for GHG's do not prescribe specific methodologies for performing an assessment, do not establish specific thresholds of significance, and do not mandate specific mitigation measures. Rather, the State CEQA Guidelines emphasize the lead agency's discretion to determine the appropriate methodologies and thresholds of significance consistent with the manner in which other impact areas are handled in CEQA. With respect to GHG emissions, State CEQA Guidelines Section 15064.4(a) states that lead agencies "shall make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate" GHG emissions resulting from a project. The State CEQA Guidelines note that an agency has the discretion to either quantify a project's GHG emissions or rely on a "qualitative analysis or other performance-based standards." A lead agency may use a "model or methodology" to estimate GHG emissions and has the discretion to select the model or methodology it considers "most appropriate to enable decision makers to intelligently take into account the project's incremental contribution to climate change." Section 15064.4(b) provides that the lead agency should consider the following when determining the significance of impacts from GHG emissions on the environment:

1. The extent a project may increase or reduce GHG emissions as compared to the existing environmental setting.
2. Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
3. The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions (14 CCR 15064.4(b)).

In addition, Section 15064.7(c) of the State CEQA Guidelines specifies that "[w]hen adopting or using thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence." The State CEQA Guidelines also clarify that the effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis. As a note, the State CEQA Guidelines were amended in response to SB 97. In particular, the State CEQA Guidelines were amended to specify that compliance with a GHG emissions reduction plan renders a cumulative impact insignificant.

Per State CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that would avoid or substantially lessen the cumulative problem

within the geographic area of the project. To qualify, such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. Examples of such programs include a "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plans, [and] plans or regulations for the reduction of greenhouse gas emissions." Put another way, State CEQA Guidelines Section 15064(h)(3) allows a lead agency to make a finding of less than significant for GHG emissions if a project complies with adopted programs, plans, policies, and/or other regulatory strategies to reduce GHG emissions.

The significance of the Project's GHG emissions is evaluated consistent with State CEQA Guidelines Section 15064.4(b)(2) by considering whether the Project complies with applicable plans, policies, regulations, and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

The Riverside County 2019 CAP Update aims to reduce GHG emissions from development projects under County jurisdiction. The CAP Update builds on State and regional policies aimed at reducing GHG emissions consistent with the SB 32 2030 GHG reduction target and Statewide post-2030 reduction goals. The CAP Update identifies a two-step approach in evaluating GHG emissions. First, a screening threshold of 3,000 $MTCO_2e$/yr is used to determine if additional analysis is required. Projects that exceed 3,000 $MTCO_2e$/yr will be required to quantify and disclose the anticipated GHG emissions then either 1) demonstrate GHG emissions at project buildout year levels of efficiency and include project design features and/or mitigation measures to reduce GHG emissions or 2) garner 100 points through the CAP Update Screening Tables. Projects that garner at least 100 points (equivalent to an approximate 49% reduction in GHG emissions) may be determined to be consistent with the reduction quantities anticipated in the County's GHG Technical Report, and consequently may be considered consistent with the CAP Update. As such, projects that achieve a total of 100 points or more normally are considered to have a less-than-significant individual and cumulative impact on GHG emissions. (Urban Crossroads, 2023d, p. 44)

B. Methodology

1. Greenhouse Gas Emissions Modeling

In May 2023, the CAPCOA in conjunction with other California air districts, including SCAQMD, released the latest version of CalEEMod Version 2022.1.1.12.. The purpose of this model is to calculate construction-source and operational-source criteria pollutants and GHG emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved from mitigation measures. Accordingly, the latest version of CalEEMod has been used for this Project to determine GHG emissions. Output from the model runs for construction and operational activity are provided in Appendices 3.1 through 3.3 of the Project's GHGA (*Technical Appendix H*). CalEEMod includes GHG emissions from the following source categories: construction, area, energy, mobile, waste, water refrigerants, stationary, on-site cargo equipment and TRUs. (Urban Crossroads, 2023d, p. 44)

2. Construction and Operational Life-Cycle Analysis Not Required

A full life-cycle analysis (LCA) for construction and operational activity is not included in this analysis due to the lack of consensus guidance on LCA methodology at this time. Life-cycle analysis (i.e., assessing economy-wide GHG emissions from the processes in manufacturing and transporting all raw materials used in the Project development, infrastructure, and on-going operations) depends on emission factors or econometric factors that are not well established for all processes. At this time, an LCA would be extremely speculative and thus has not been prepared. (Urban Crossroads, 2023d, p. 44)

Additionally, the SCAQMD recommends analyzing direct and indirect project GHG emissions generated within California and not life-cycle emissions because the life-cycle effects from a project could occur outside of California, might not be very well understood, or documented, and would be challenging to mitigate. Additionally, the science to calculate life cycle emissions is not yet established or well defined; therefore, SCAQMD has not recommended, and is not requiring, life-cycle emissions analysis. (Urban Crossroads, 2023d, p. 44)

4.8.4 Impact Analysis

Threshold a.: ***Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?***

As discussed below, the Project's GHG emissions were estimated for both construction and long-term operation.

❑ Construction Emissions

Project construction activities would generate CO_2 and CH_4 emissions. The Project's Air Quality Impact Analysis ("AQIA"; *Technical Appendix C1*) contains detailed information regarding Project construction activities. As discussed in the Project's AQIA, construction-related emissions are expected from the following construction activities: demolition; site preparation; grading; crushing/blasting; building construction/park development; paving; and architectural coating. (Urban Crossroads, 2023d, p. 45.)

The anticipated construction duration and anticipated construction equipment were previously summarized in EIR Tables 3-1 and 3-2. The construction schedule utilized in the analysis represents a "worst-case" analysis scenario should construction occur any time after the respective dates since emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent. The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet and durations. (Urban Crossroads, 2023d, p. 45)

For construction phase Project emissions, GHGs are quantified and amortized over the life of the Project. To amortize the emissions over the life of the Project, the SCAQMD recommends calculating the total GHG emissions for the construction activities, dividing it by a 30-year Project life then adding that number to the annual operational phase GHG emissions. As such, construction emissions were amortized over a 30-year

period and added to the annual operational phase GHG emissions. The amortized construction emissions are presented in Table 4.8-3, *Project Amortized Annual Construction Emissions*. (Urban Crossroads, 2023d, p. 46)

Table 4.8-3 Project Amortized Annual Construction Emissions

Year	Emissions (MT/yr)				
	CO_2	CH_4	N_2O	Refrigerants	Total CO_2e[5]
2024	326.12	0.01	0.02	0.13	332.24
2025	1,843.47	0.07	0.12	1.58	1,882.49
Total GHG Emissions	**2,169.59**	**0.08**	**0.14**	**1.70**	**2,214.72**
Amortized Construction Emissions	72.32	0.00	0.00	0.06	73.82

Source: CalEEMod annual construction-source emissions are presented in Appendix 3.1 to the Project's GHGA (*Technical Appendix H*).
(Urban Crossroads, 2023d, Table 3-3)

❑ Operational Emissions

Operational activities associated with the proposed Project would result in emissions of CO_2, CH_4, and N_2O from the following primary sources: area source emissions; energy source emissions; mobile source emissions; on-site cargo handling equipment emissions; transportation refrigeration units (TRU) emissions; water supply, treatment, and distribution; solid waste; refrigerants; and stationary emissions. Each is discussed below. (Urban Crossroads, 2023d, p. 47)

Area Source Emissions

Landscape Maintenance Equipment

Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shedders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the Project. It should be noted that as of October 9, 2021, Governor Gavin Newsom signed AB 1346. The bill aims to ban the sale of new gasoline-powered equipment under 25 gross horsepower (known as small off-road engines [SOREs]) by 2024. For purposes of analysis, the emissions associated with landscape maintenance equipment were calculated based on assumptions provided in CalEEMod. (Urban Crossroads, 2023d, p. 47)

Energy Source Emissions

Combustion Emissions Associated with Natural Gas and Electricity

GHGs are emitted from buildings as result of activities for which electricity and natural gas are typically used as energy sources. Combustion of any type of fuel emits CO_2 and other GHGs directly into the atmosphere; these emissions are considered direct emissions associated with a building. The building energy use emissions

do not include street lighting[2]. Based on information provided by the Project applicant, the Project also is not expected to utilize natural gas for the building envelope, and therefore would not generate any emissions from direct energy consumption. GHGs also are emitted during the generation of electricity from fossil fuels; these emissions are considered to be indirect emissions. Electricity usage associated with the Project was calculated based on data provided by the Project Applicant and includes 20% of the building user's electric power from on-site renewable sources. (Urban Crossroads, 2023d, p. 48)

Mobile Source Emissions

The Project-related GHG emissions derive primarily from vehicle trips generated by the Project, including employee trips to and from the site and truck trips associated with the proposed warehouse use. Trip characteristics available from the Project's Traffic Analysis ("TA"; EIR *Technical Appendix N2*) were utilized in the analysis. (Urban Crossroads, 2023d, p. 48)

Approach for Estimating Mobile Source Emissions

In order to determine emissions from passenger car vehicles, CalEEMod defaults for trip length and trip purpose were utilized. Default vehicle trip lengths for primary trips will be populated using data from the local metropolitan planning organizations/Regional Transportation Planning Agencies (MPO/RTPA). Trip type percentages and trip lengths provided by MPO/RTPAs truncate data at their demonstrative borders. For the proposed industrial uses, it is important to note that although the Project's TA does not breakdown passenger cars by type, this analysis assumes that passenger cars include Light-Duty-Auto vehicles (LDA), Light-Duty-Trucks (LDT1[3] & LDT2[4]), Medium-Duty-Vehicles (MDV), and Motorcycles (MCY) vehicle types. In order to account for emissions generated by passenger cars, the fleet mix presented in Table 3-4 of the Project's GHGA (*Technical Appendix H*) was utilized in the analysis. (Urban Crossroads, 2023d, p. 48)

To determine emissions from trucks for the proposed industrial uses, the analysis incorporated SCAQMD recommended truck trip length of 15.3 miles for 2-axle (LHDT1, LHDT2) trucks, 14.2 miles 3-axle (MHDT) trucks and 39.9 miles for 4+-axle (HHDT) trucks and weighting the average trip lengths using traffic trip percentages taken from the Project's TA. The trip length function for the proposed industrial building use has been calculated to 35.88 miles a for high-cube fulfillment center and 28.56 miles for high-cube cold storage and an assumption of 100% primary trips. This trip length assumption is higher than the CalEEMod defaults for trucks. In order to be consistent with the Project's TA (EIR *Technical Appendix N2*), trucks are broken down by truck type. The truck fleet mix is estimated by rationing the trip rates for each truck type based on information provided SCAQMD recommended truck mix, by axle type. Heavy trucks are broken down by

[2] The CalEEMod emissions inventory model does not include indirect emission related to street lighting. Indirect emissions related to street lighting are expected to be negligible and cannot be accurately quantified at this time as there is insufficient information as to the number and type of street lighting that would be installed.
[3] Vehicles under the LDT1 category have a gross vehicle weight rating (GVWR) of less than 6,000 lbs. and equivalent test weight (ETW) of less than or equal to 3,750 lbs.
[4] Vehicles under the LDT2 category have a GVWR of less than 6,000 lbs. and ETW between 3,751 lbs. and 5,750 lbs.

truck type (or axle type) and are categorized as either Light-Heavy-Duty Trucks (LHDT1[5] & LHDT2[6])/2-axle, Medium-Heavy-Duty Trucks (MHDT)/3-axle, and Heavy-Heavy-Duty Trucks (HHDT)/4+-axle. To account for emissions generated by trucks, the fleet mix presented in Table 3-5 of the Project's GHGA (*Technical Appendix H*) was utilized in the analysis. (Urban Crossroads, 2023d, pp. 48-49)

On-Site Cargo Handling Equipment Emissions

It is common for industrial buildings to require the operation of exterior cargo handling equipment in the building's truck court areas. For the Project, on-site modeled operational equipment includes up to five 175 horsepower (hp), natural gas-powered cargo handling equipment – port tractor operating at 4 hours a day for 365 days of the year. (Urban Crossroads, 2023d, p. 49)

TRU Emissions

In order to account for the possibility of refrigerated uses, trucks associated with the cold-storage land use are assumed to also have TRUs. For modeling purposes, 57 two-way truck trips have been estimated to include TRUs (e.g., all truck trips that would be associated with up to 150,526 s.f. of high-cube cold storage use, as summarized in the Project's TA [*Technical Appendix N_2*]*)*. TRUs are accounted for during on-site and off-site travel. The TRU calculations are based on EMissions FACtor Model version 2021 (EMFAC2021), developed by the CARB. EMFAC2021 does not provide emission rates per hour or mile as with the on-road emission model and only provides emission inventories. Emission results are produced in tons per day, while all activity, fuel consumption, and horsepower hours were reported at annual levels. The emission inventory is based on specific assumptions including the average horsepower rating of specific types of equipment and the hours of operation annually. These assumptions are not always consistent with assumptions used in the modeling of project-level emissions. Therefore, the emissions inventory was converted into emission rates to accurately calculate emissions from TRU operation associated with project level details. This was accomplished by converting the annual horsepower hours to daily operational characteristics and converting the daily emission levels into hourly emission rates based on the total emission of each criteria pollutant by equipment type and the average daily hours of operations. (Urban Crossroads, 2023d, pp. 49-50)

Water Supply, Treatment, and Distribution

Indirect GHG emissions result from the production of electricity used to convey, treat, and distribute water and wastewater. The amount of electricity required to convey, treat, and distribute water depends on the volume of water as well as the sources of the water. Unless otherwise noted, CalEEMod default parameters were used. (Urban Crossroads, 2023d, p. 50)

Solid Waste

Industrial land uses would result in the generation and disposal of solid waste. A percentage of this waste would be diverted from landfills by a variety of means, such as reducing the amount of waste generated, recycling, and/or composting. The remainder of the waste not diverted would be disposed of at a landfill. GHG

[5] Vehicles under the LHDT1 category have a GVWR of 8,501 to 10,000 lbs.
[6] Vehicles under the LHDT2 category have a GVWR of 10,001 to 14,000 lbs.

emissions from landfills are associated with the anaerobic breakdown of material. GHG emissions associated with the disposal of solid waste associated with the proposed Project were calculated by CalEEMod using default parameters. (Urban Crossroads, 2023d, p. 50)

Refrigerants

Air conditioning (A/C) and refrigeration equipment associated with the building is anticipated to generate GHG emissions. CalEEMod automatically generates a default A/C and refrigeration equipment inventory for each project land use subtype based on industry data from the US EPA. CalEEMod quantifies refrigerant emissions from leaks during regular operation and routine servicing over the equipment lifetime and then derives average annual emissions from the lifetime estimate. It should be noted that CalEEMod does not quantify emissions from the disposal of refrigeration and A/C equipment at the end of its lifetime. Per 17 CCR 95371, new facilities with refrigeration equipment containing more than 50 pounds of refrigerant are prohibited from utilizing refrigerants with a GWP of 150 or greater as of January 1, 2022. GHG emissions associated with refrigerants were calculated by CalEEMod using default parameters. (Urban Crossroads, 2023d, p. 50)

❑ Emissions Summary

The annual GHG emissions associated with the operation of the proposed Project are estimated to be approximately 12,477.48 $MTCO_2e$/yr as summarized in Table 4.8-4, *Project GHG Emissions*. Detailed operation model outputs for the Project are presented in Appendix 3.2 of the Project's GHGA (*Technical Appendix H*). (Urban Crossroads, 2023d, pp. 50-51)

Table 4.8-4 Project GHG Emissions

Emission Source	Emissions (MT/yr)				
	CO_2	CH_4	N_2O	Refrigerants	Total CO_2e
Annual construction-related emissions amortized over 30 years	72.32	2.55E-03	4.64E-03	5.67E-02	73.82
Mobile Source	9,619.60	0.24	0.98	12.48	9,931.42
Area Source	20.35	0.00	0.00	0.00	20.43
Energy Source	506.46	0.05	0.01	0.00	509.42
Water Usage	325.53	7.57	0.18	0.00	569.18
Waste	84.27	8.42	0.00	0.00	294.83
Refrigerants	0.00	0.00	0.00	25.40	25.40
Stationary Source	4.53	0.00	0.00	0.00	4.55
On-Site Equipment Source					811.90
TRUs Source					236.83
Total CO_2e (All Sources)	**12,477.78**				

Source: CalEEMod output, See Appendix 3.1 to the Project's GHGA (*Technical Appendix H*) for detailed model outputs.
(Urban Crossroads, 2023d, Table 3-6)

❑ Evaluation of Project Impacts due to GHGs

As previously indicated, Riverside County adopted a CAP in December 2015, which was most recently updated in November 2019 ("CAP Update"). The purpose of the CAP Update is to provide guidance on how to analyze GHG emissions and determine significance during the CEQA review of proposed development projects within the County. To address the State's requirement to reduce GHG emissions, the County prepared its CAP Update with the goal of reducing GHG emissions within the County by 49% below "existing" 2008 levels by the year 2030. The County's target is consistent with the SB 32 target and ensures that the County will be providing GHG reductions locally that will complement state efforts to reduce GHG emissions. The County's target is also consistent with the SB 32 target that expands on AB 32 to reduce GHG emissions to 40% below the 1990 levels by 2030. Because the County's CAP Update addresses GHG emissions reductions and is consistent with the requirements of AB 32, SB 32, and international efforts to reduce GHG emissions, compliance with the CAP Update fulfills the description of mitigation found in the State CEQA Guidelines. (Urban Crossroads, 2023d, p. 51)

The CAP Update identifies a two-step approach in evaluating GHG emissions. First, a screening threshold of 3,000 $MTCO_2e$/yr is used to determine if additional analysis is required. Projects that exceed the 3,000 $MTCO_2e$/yr will be required to demonstrate and achieve a 25% reduction minimum of GHG emissions from a 2011-year level of efficiency compared to the mitigated Project buildout year or demonstrate at least 100 points (equivalent to an approximate 15% reduction in GHG emissions) through the CAP Screening Tables. (Urban Crossroads, 2023d, p. 51)

As shown on Table 4.8-4, the Project would result in approximately 12,477.48 $MTCO_2e$/yr of GHG emissions and thus would exceed the County's screening threshold of 3,000 $MTCO_2e$/yr. Thus, the Project's cumulatively-considerable impacts due to GHG emissions would be potentially significant prior to mitigation. (Urban Crossroads, 2023d, p. 52)

Threshold b.: ***Would the Project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?***

As previously stated, pursuant to Section 15604.4 of the CEQA Guidelines, a lead agency may rely on qualitative analysis or performance-based standards to determine the significance of impacts from GHG emissions. As such, the Project's consistency with the 2022 Scoping Plan is discussed below. It should be noted that the Project's consistency with the 2022 Scoping Plan also satisfies consistency with AB 32 since the 2022 Scoping Plan is based on the overall targets established by AB 32 and SB 32. Consistency with the 2008 and 2017 Scoping Plan is not necessary, since both of these plans have been superseded by the 2022 Scoping Plan. Project consistency with the 2022 Scoping Plan and County's CAP is evaluated in the following discussion. (Urban Crossroads, 2023d, p. 52)

❑ Project Consistency with Riverside County CAP Update

The purpose of the Riverside County CAP Update is to provide guidance on how to analyze GHG emissions and determine significance during the CEQA review of proposed development projects within the County.

Because the County of Riverside CAP Update addresses GHG emissions reductions and is consistent with the requirements of AB 32, SB 32, and international efforts to reduce GHG emissions, compliance with the CAP Update fulfills the description of mitigation found in the State CEQA Guidelines. (Urban Crossroads, 2023d, p. 53)

As previously shown on Table 4.8-4, the Project would result in approximately 12,477.48 $MTCO_2e$/yr of GHG emissions. Thus, the Project would exceed the CAP screening threshold of 3,000 $MTCO_2e$/yr. In order to evaluate consistency with the CAP Update, the County provided Screening Tables to aid in measuring the reduction of GHG emissions attributable to certain design and construction measures incorporated into development projects. Projects that garner at least 100 points (equivalent to an approximate 49% reduction in GHG emissions) are determined to be consistent with the reduction quantities anticipated in the County's GHG Technical Report, and consequently would be consistent with the CAP Update. Absent implementation of Screening Table Measures, the Project could be considered inconsistent with the County CAP. This is a potentially significant impact for which mitigation is required.

The CAP Update also includes measure R2-CE1, which requires on-site renewable energy production. This measure is required for any tentative tract map, plot plan, or conditional use permit that proposes to add more than 100,000 gross square feet of commercial, office, industrial, or manufacturing development. Renewable energy production shall be onsite generation of at least 20% of energy demand for commercial, office, industrial or manufacturing development. Future implementing developments within the Project site would be subject to compliance with measure R2-CE1 as a standard condition of approval, and thus the Project would not conflict with CAP Update measure R2-CE1.

❑ Project Consistency with 2022 Scoping Plan

The Project would not impede the State's progress towards carbon neutrality by 2045 under the 2022 Scoping Plan. The Project would be required to comply with applicable current and future regulatory requirements promulgated through the 2022 Scoping Plan. Some of the current transportation sector policies the Project would comply with (through vehicle manufacturer compliance) include: Advanced Clean Cars II, Advanced Clean Trucks, Advanced Clean Fleets, Zero Emission Forklifts, the Off-Road Zero-Emission Targeted Manufacturer rule, Clean Off-Road Fleet Recognition Program, In-use Off-Road Diesel-Fueled Fleets Regulation, Off-Road Zero-Emission Targeted Manufacturer rule, Clean Off-Road Fleet Recognition Program, Amendments to the In-use Off-Road Diesel-Fueled Fleets Regulation, carbon pricing through the Cap-and-Trade Program, and the Low Carbon Fuel Standard. (Urban Crossroads, 2023d, pp. 52-53) Notwithstanding, and as indicated above, the Project's level of GHG emissions would exceed the CAP Update screening threshold of 3,000 $MTCO_2e$/yr. As such, and in the absence of mitigation, the Project would result in a conflict with the CAP Update, and therefore would not be consistent with the GHG reduction mandates established by SB 32 and the 2022 Scoping Plan. Prior to mitigation, the Project's potential conflict with the County's CAP Update also represents a potential conflict with the 2022 Scoping Plan. This is evaluated as a potentially significant impact for which mitigation would be required.

4.8.5 Cumulative Impact Analysis

As discussed in Subsection 4.8.3.A, there is no evidence at this time that would indicate that the emissions from a project the size of the proposed Project would directly or indirectly affect the global climate. As such, Project impacts due to GHG emissions are inherently cumulative in nature.

As discussed under the analysis of Threshold a., the Project would result in approximately 12,477.48 $MTCO_2e$/yr of GHG emissions. Thus, the proposed Project would exceed the CAP Update screening threshold of 3,000 $MTCO_2e$ per year. As other cumulative developments similarly have the potential to exceed the CAP Update screening threshold of 3,000 $MTCO_2e$/yr, the Project's impacts due to GHG emissions would be cumulatively considerable.

As discussed under the analysis of Threshold b., the Project has the potential (prior to mitigation) to conflict with the Riverside County CAP Update and the CARB 2022 Scoping Plan. As other cumulative developments also have the potential to conflict with the CAP Update and/or 2022 Scoping Plan, the Project's impacts due to a conflict with the CAP Update and 2022 Scoping Plan would be cumulatively considerable prior to mitigation.

4.8.6 Significance of Impacts Before Mitigation

Threshold a.: Significant Cumulatively-Considerable Impact. The Project would emit approximately 12,477.48 $MTCO_2e$ per year; thus, the proposed Project would exceed the County's CAP Update screening threshold of 3,000 $MTCO_2e$ per year. Accordingly, prior to mitigation, Project-related GHG emissions would have the potential to result in a significant cumulatively-considerable impact on the environment.

Threshold b.: Significant Direct and Cumulatively-Considerable Impact. The Project has the potential (prior to mitigation) to conflict with the Riverside County CAP Update, which also represents a potential conflict with the CARB 2022 Scoping Plan. This is considered a significant direct and cumulatively-considerable impact of the proposed Project.

4.8.7 County Regulations, Design Requirements, and Mitigation

Applicable County Regulations and Design Requirements

~~The following are regulations and design requirements that apply to the proposed Project and that reduce or preclude GHG emissions. Although compliance with mandatory regulatory requirements does not technically meet CEQA's definition for mitigation, they are specified herein as requirements for the Project.~~

- ~~Pursuant to Riverside County Climate Action Plan Update Measure R2-CE1, prior to issuance of building permits, future implementing building permits that involve more than 100,000 gross square feet of commercial, office, industrial, or manufacturing development shall be required to offset the energy demand through renewable energy production. Renewable energy production shall be onsite generation of at least 20% of energy demand for commercial, office, industrial or manufacturing development.~~

~~In addition, t~~The Project would be required to comply with all mandates imposed by the State of California and SCAQMD aimed at the reduction of GHG emissions. Those that are applicable to the Project and that would assist in the reduction of greenhouse gas emissions are listed below:

- Global Warming Solutions Act of 2006 (AB 32).
- Regional GHG Emissions Reduction Targets/Sustainable Communities Strategies (SB 375).
- Pavley Fuel Efficiency Standards (AB 1493). Establishes fuel efficiency ratings for new vehicles.
- California Green Building Standards Code (CALGreen – also referred to as Title 24, Part 11 of the California Code of Regulations (CCR)). Establishes energy efficiency requirements for new construction.
- Appliance Energy Efficiency Standards (Title 20 CCR). Establishes energy efficiency requirements for appliances.
- Low Carbon Fuel Standard (LCFS). Requires carbon content of fuel sold in California to be 10% less by 2020.
- California Water Conservation in Landscaping Act of 2006 (AB 1881). Requires local agencies to adopt the Department of Water Resources updated Water Efficient Landscape Ordinance or equivalent by January 1, 2010 to ensure efficient landscapes in new development and reduced water waste in existing landscapes.
- Statewide Retail Provider Emissions Performance Standards (SB 1368). Requires energy generators to achieve performance standards for GHG emissions.
- Renewable Portfolio Standards (SB 1078). Requires electric corporations to increase the amount of energy obtained from eligible renewable energy resources to 20 percent by 2010 and 33 percent by 2020.
- California Global Warming Solutions Act of 2006 (SB 32). Requires the state to reduce Statewide GHG emissions to 40% below 1990 levels by 2030, a reduction target that was first introduced in Executive Order B-30-15.
- SCAQMD Rule 2305. The SCAQMD adopted Rule 2305, the Warehouse Indirect Source Rule, on May 7, 2021. Owners and operators associated with warehouses 100,000 s.f. or larger are required to directly reduce nitrogen oxides (NO_X) and particulate matter emissions, or to otherwise facilitate emission and exposure reductions of these pollutants in nearby communities.

Mitigation

MM 4.8-1 Prior to issuance of building permits, the Project Applicant shall demonstrate that appropriate building construction measures shall apply to achieve a minimum of 100 points per Appendix D to the Riverside County 2019 Climate Action Plan (CAP) Update. The conceptual measures anticipated for the Project are listed in Appendix 3.3 of the Project's Greenhouse Gas

Assessment (GHGA), which is appended to this EIR as *Technical Appendix H*. The conceptual measures may be replaced with other measures as listed in the CAP Screening Tables (Appendix D to the CAP Update), as long as they are replaced at the same time with other measures that in total achieve a minimum of 100 points per Appendix D to the Riverside County CAP Update.

MM 4.8-2 ~~Pursuant to~~ In order to demonstrate compliance with Riverside County Climate Action Plan Update Measure R2-CE1, prior to issuance of building permits for the proposed warehouse building, the Riverside County Building & Safety Department shall review the building permit application materials to ensure that the plans require the provision of the minimum number of solar panels on the roof of the proposed warehouse building as necessary to generate at least 0.5 Megawatts of power. The plans shall be accompanied by calculations demonstrating that the number of solar panels depicted on the plans are sufficient to generate the required 0.5 Megawatts. In addition, prior to issuance of building permits for the proposed recreational building within the park site, the Riverside County Building & Safety Department shall review the building permit application materials to ensure that the maximum number of solar panels have been accommodated on the roof of the proposed recreational building, given applicable Building Code requirements, clearance requirements around skylights and roof-mounted equipment, SCE interconnection regulations, transformer capacity, and other applicable code compliance constraints. Prior to final building inspection for the warehouse building and recreational building, the Riverside County Building & Safety Department shall ensure that the required solar panels have been installed and are operational.~~future implementing building permits that involve more than 100,000 gross square feet of commercial, office, industrial, or manufacturing development shall be required to offset the energy demand through renewable energy production. Renewable energy production shall be onsite generation of at least 20% of energy demand for commercial, office, industrial or manufacturing development.~~

4.8.8 Significance of Impacts After Mitigation

Threshold a.: Less-than-Significant Impact with Mitigation Incorporated. The Riverside County CAP Update (November 2019) qualifies as a "Plan for the Reduction of Greenhouse Gas Emissions," pursuant to State CEQA Guidelines § 15183.5(b). Pursuant to State CEQA Guidelines §§ 15064(h)(3) and 15130(d), a lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if a project complies with the requirements in a previously adopted plan or mitigation program. Additionally, and as discussed above in subsection 4.8.2, Tier 2 of the SCAQMD interim thresholds for GHG emissions indicates that if a project is consistent with a qualifying local GHG reduction plan, it does not have significant GHG emissions. Although the Project would exceed CAP Update Screening Threshold of 3,000 $MTCO_2e$, implementation of Mitigation Measures MM 4.8-1 and MM 4.8-2 would ensure that the proposed Project is fully consistent with the Riverside County CAP Update (November 2019) by requiring the Project Applicant to demonstrate that implementing building permit applications have incorporated measures to achieve a minimum of 100 points pursuant to the CAP Update Screening Tables, and by requiring the Project to offset energy demands through renewable energy production. Accordingly, with implementation of

Mitigation Measure MM 4.8-1, the Project would be fully consistent with the CAP Update and the Project's cumulatively-considerable impacts due to GHG emissions would be reduced to less-than-significant levels.

Threshold b.: Less-than-Significant Impact with Mitigation Incorporated. Projects that garner at least 100 points through application of the CAP Update Screening Table measures are determined to be consistent with the reduction quantities anticipated in the County's GHG Technical Report, and consequently would be consistent with the CAP Update and the CARB 2022 Scoping Plan. With implementation of Mitigation Measures MM 4.8-1 and MM 4.8-2, the Project would be fully consistent with the 2019 CAP Update, which in turn also would ensure Project consistency with the CARB 2022 Scoping Plan. The Project would not conflict with any other applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. As such, with implementation of the required mitigation, Project impacts due to a conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs would be reduced to less-than-significant levels.

4.9 HAZARDS AND HAZARDOUS MATERIALS

The information and analysis presented in this Subsection is based in part on a technical study that was prepared to determine the presence or absence of hazardous materials on the Project site under existing conditions. This report, entitled, "Phase I Environmental Site Assessment Update" (herein, "Phase I ESA"), was prepared by Group Delta, is dated December 23, 2022, and is included as EIR *Technical Appendix I* (Group Delta, 2022). Refer to Section 7.0, *References*, for a complete list of reference sources.

4.9.1 EXISTING CONDITIONS

A. Definition of Toxic Substances and Hazardous Waste

For purposes of this EIR, the term "toxic substance" is defined as a substance which, because of its quantity, concentration, or physical, chemical, or infectious characteristics, may present an unreasonable risk of injury to human health or the environment. Toxic substances include: chemical, biological, flammable, explosive, and radioactive substances.

"Hazardous material" is defined as a substance which, because of its quantity, concentration, or physical, chemical, or infectious characteristics, may: 1) pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, disposed of, or otherwise mismanaged; or 2) cause or contribute to an increase in mortality or an increase in irreversible or incapacitating illness.

Hazardous waste is defined in the California Code of Regulations, Title 22, § 66261.3. The defining characteristics of hazardous waste are: ignitability (oxidizers, compressed gases, and extremely flammable liquids and solids), corrosivity (strong acids and bases), reactivity (explosives or generates toxic fumes when exposed to air or water), and toxicity (materials listed by the United States Environmental Protection Agency [USEPA] as capable of inducing systemic damage to humans or animals).

Certain wastes are called "Listed Wastes" and are found in the California Code of Regulations, Title 22, §§ 66261.30 through 66261.35. Wastes appear on the lists because of their known hazardous nature or because the processes that generate them are known to produce hazardous wastes (which are often complex mixtures).

"Recognized Environmental Condition (REC)" is defined as the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment.

"Historical Recognized Environmental Condition (HREC)" is defined as a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls (e.g., property use restrictions, AULs, institutional controls, or engineering controls).

A Controlled Recognized Environmental Condition (CREC) is defined as a REC resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (e.g., as evidenced by the issuance of a NFA letter or equivalent, or meeting risk-based criteria established by regulatory authority), with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (e.g., property use restrictions, Authorized Use Lists [AULs], institutional controls, or engineering controls).

B. Historical Review, Regulatory Review, and Field Reconnaissance

Group Delta performed a search of readily available environmental record sources. The search results are summarized below. As part of the Project's Phase I ESA, Environmental Data Resources, Inc. (EDR) conducted a search for sites listed on various federal and State databases within one mile of the Project site. A detailed description of the results of the regulatory and historical records review is provided in the Project's Phase I ESA (*Technical Appendix I*), and is summarized below.

1. Historical Review

Group Delta reviewed available historical information to ascertain the historical uses of the Project site and the adjoining properties. As part of this research, Group Delta reviewed information included Sanborn insurance maps, historic aerial photographs, historic topographic maps, and city directories. (Group Delta, 2022, p. 10)

Aerial photographs and historical topographic maps of the Project site and adjoining properties were provided by EDR and reviewed to identify historical land development. Aerial photographs and historical topographic maps dating between 1901 and 2018 were reviewed. Tables 3 and 4 of the Project's Phase I ESA (*Technical Appendix I*) summarize the results of the aerial photograph and topographic map reviews, and copies of the aerial photographs and topographic maps provided by EDR are included as Appendix B to the Project's Phase I ESA. Provided below is a summary of the results of Group Delta's historical review.

- **Northern 50.04 Acres**. According to aerial photographs reviewed by Group Delta, aerial photographs from between 1938 and 1959 show that the northern 50.04 acres of the Project site were used for agricultural uses (row crops) and were developed with several rural residential structures in the northwestern and eastern portions of this area. Several additional rural residential structures appear to have been constructed in the north-central portion of this area in the aerial photographs taken between 1967 and 1985. In the 1990 and 2006 aerial photographs, agricultural activities on site had ceased, the rural residential uses shown in earlier aerial photographs still remained on site, and several additional rural residential structures were constructed in the southeastern portion of this area. The 2009 through 2016 aerial photographs reviewed by Group Delta show that the site conditions were similar to the 1990 and 2006 aerial photographs, except that the rural residential structures in the eastern portion were converted to commercial uses with an accompanying exterior equipment yard. (Group Delta, 2022, Table 3)

- **Southern 14.93 Acres**. Based on aerial photographs reviewed by Group Delta, the southern 14.93 acres of the Project site were vacant and undeveloped at least through 1985. The 1990 and 2006 aerial

photographs show the majority of this portion of the Project site as vacant and undeveloped, with exception of several rural residential structures that were constructed in the northwest portions of this site. Aerial photographs from between 2009 and 2016 show conditions similar to the 1990 and 2006 aerial photographs, except that several additional rural residential uses were constructed in the southwest portions of this site. (Group Delta, 2022, Table 3)

In summary, the Project site was occupied by residential tenants in 1976, 1980, 1985, 1990, 1992, 1995, 2000, 2005, 2010, 2014, and 2017, and the Project vicinity largely has been occupied by residential tenants from 1976 to 2017. (Group Delta, 2022, p. 12)

2. Regulatory Records Review

Group Delta also conducted a review of available regulatory agency records. Research was conducted with the Department of Toxic Substances Control (DTSC), State Water Resources Control Board (SWRCB), California Geologic Energy Management Division (CalGEM), Office of California State Fire Marshall National Pipeline Mapping System (NPMS), County of Riverside Building and Safety Department, and the Riverside County Department of Environmental Health (RCDEH). The Project site was not identified in any of the agency records reviewed by Group Delta, and no evidence of any RECs affecting the Project site was uncovered as a result of the regulatory records review. (Group Delta, 2022, pp. 14-15)

3. Site Reconnaissance

Group Delta conducted a site reconnaissance of the Project site on December 2, 2022. The purpose of the site reconnaissance was to observe the present uses and conditions at the Project site as they relate to the possible presence of potentially hazardous substances and petroleum products. In addition, adjoining properties and roads were visually observed from the Project site to identify land uses and the potential presence of structures, operations, activities, or environmental conditions that may involve the use, treatment, storage, disposal, or generation of hazardous wastes and/or petroleum products that may pose an environmental concern to the Project site. (Group Delta, 2022, p. 16)

During the reconnaissance, Group Delta determined the Project site currently is occupied by approximately twenty-six (26) single-family residential structures and one commercial structure, with vacant land in the remainder. No evidence of distressed vegetation or odors was observed during the site reconnaissance. (Group Delta, 2022, p. 16)

Approximately three propane aboveground storage tanks (ASTs), ranging from 500 to 1,000 gallons in size, were observed near the residential structures on site. The propane ASTs appeared to be in good condition. Based on this information, the propane ASTs do not represent a significant environmental concern. (Group Delta, 2022, p. 16)

Several pole-mounted transformers were observed at the northern perimeter of the Project site along Cajalco Road and in the southern portion of the Project site along Camino Del Sol (which traverses the central portions of the Project site in a north-south orientation). The transformers appeared to be in good condition, with no

leaking or staining observed. Based on this information, the pole-mounted transformers do not represent a significant environmental concern. (Group Delta, 2022, p. 16)

Exterior storage of construction equipment, including cranes and earthmovers, was observed at the Craneology, Inc. facility located at 19641 Seaton Avenue. The storage yard was unpaved; however, minor to no staining was observed beneath the equipment. The equipment appeared to be new and in good condition. Approximately 20 lead-acid car batteries were observed on a wooden pallet and appeared to be in good condition, with no leaking or staining observed. Based on this information, the exterior equipment storage facility at 19641 Seaton Avenue does not represent a REC to the Project site at this time. (Group Delta, 2022, p. 16)

The properties adjacent to the site were observed to assess if they had potential to present RECs for the Project site. The Project site is bordered on the north by Cajalco Road, followed by J & D Multiple Services legal services and vacant land; on the east by vacant land; on the south by Hương Sen Buddhist Temple, single-family residential structures, and vacant land; and on the west by Seaton Avenue, followed by commercial retail and equipment rental companies and vacant land. No evidence of RECs was identified at the adjacent and adjoining properties to the Project site. (Group Delta, 2022, p. 17)

As a result of the site reconnaissance, Group Delta did not identify any evidence of RECs either on site or that could affect the site (Group Delta, 2022, p. 17).

C. Airport Hazards

The Project site is located approximately 1.9 miles southwest of the MARB. According to the Land Use Compatibility Plan prepared by the Riverside County Airport Land Use Commission (ALUC), the 64.97-acre Project site is located within Compatibility Zone C2, which allows for development of uses with an average of 200 people per acre and a maximum of 500 people on any single acre, and has no open land requirements. Highly noise-sensitive outdoor nonresidential uses and hazards to flight are prohibited within Zone C2. (ALUC, 2014, p. 9 and Map MA-1)

4.9.2 Applicable Environmental Regulations

The following is a brief description of the federal, State, and local environmental laws and related regulations related to hazards and hazardous materials.

A. Hazardous Materials Regulations and Plans

1. Federal Regulations

- ❑ Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and Superfund Amendments and Reauthorization Act (SARA)

The Comprehensive Environmental Response, Compensation, and Liability Act, also known as CERCLA or Superfund, provides a Federal "Superfund" to clean up uncontrolled or abandoned hazardous-waste sites as well as accidents, spills, and other emergency releases of pollutants and contaminants into the environment.

Through CERCLA, the Environmental Protection Agency (EPA) was given power to seek out those parties responsible for any release and assure their cooperation in the cleanup. EPA cleans up orphan sites when potentially responsible parties cannot be identified or located, or when they fail to act. Through various enforcement tools, EPA obtains private party cleanup through orders, consent decrees, and other small party settlements. EPA also recovers costs from financially viable individuals and companies once a response action has been completed. (EPA, 2023f)

EPA is authorized to implement the Act in all 50 states and U.S. territories. Superfund site identification, monitoring, and response activities in states are coordinated through the state environmental protection or waste management agencies. (EPA, 2023f)

The Superfund Amendments and Reauthorization Act (SARA) of 1986 reauthorized CERCLA to continue cleanup activities around the country. Several site-specific amendments, definitions clarifications, and technical requirements were added to the legislation, including additional enforcement authorities. Also, Title III of SARA authorized the Emergency Planning and Community Right-to-Know Act (EPCRA). (EPA, 2023f)

❑ Resource Conservation and Recovery Act (RCRA)

The Resource Conservation and Recovery Act (RCRA) gives EPA the authority to control hazardous waste from the "cradle-to-grave." This includes the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA also set forth a framework for the management of non-hazardous solid wastes. The 1986 amendments to RCRA enabled EPA to address environmental problems that could result from underground tanks storing petroleum and other hazardous substances. (EPA, 2023g)

The Federal Hazardous and Solid Waste Amendments (HSWA) are the 1984 amendments to RCRA that focused on waste minimization and phasing out land disposal of hazardous waste as well as corrective action for releases. Some of the other mandates of this law include increased enforcement authority for EPA, more stringent hazardous waste management standards, and a comprehensive underground storage tank program. (EPA, 2023g)

❑ Hazardous Materials Transportation Act (HMTA)

The Hazardous Materials Transportation Act of 1975 (HMTA) empowered the Secretary of Transportation to designate as hazardous material any "particular quantity or form" of a material that "may pose an unreasonable risk to health and safety or property." (OSHA, n.d.1)

Hazardous materials regulations are subdivided by function into four basic areas:

- Procedures and/or Policies 49 CFR Parts 101, 106, and 107
- Material Designations 49 CFR Part 172
- Packaging Requirements 49 CFR Parts 173, 178, 179, and 180
- Operational Rules 49 CFR Parts 171, 173, 174, 175, 176, and 177 (OSHA, n.d.1)

The HMTA is enforced by use of compliance orders [49 U.S.C. 1808(a)], civil penalties [49 U.S.C. 1809(b)], and injunctive relief (49 U.S.C. 1810). The HMTA (Section 112, 40 U.S.C. 1811) preempts state and local governmental requirements that are inconsistent with the statute, unless that requirement affords an equal or greater level of protection to the public than the HMTA requirement. (OSHA, n.d.1)

❑ Hazardous Materials Transportation Uniform Safety Act of 1990

In 1990, Congress enacted the Hazardous Materials Transportation Uniform Safety Act (HMTUSA) to clarify the maze of conflicting state, local, and federal regulations. Like the HMTA, the HMTUSA requires the Secretary of Transportation to promulgate regulations for the safe transport of hazardous material in intrastate, interstate, and foreign commerce. The Secretary also retains authority to designate materials as hazardous when they pose unreasonable risks to health, safety, or property. (OSHA, n.d.1)

The statute includes provisions to encourage uniformity among different state and local highway routing regulations, to develop criteria for the issuance of federal permits to motor carriers of hazardous materials, and to regulate the transport of radioactive materials. (OSHA, n.d.1)

❑ Occupational Safety and Health Act (OSHA)

Congress passed the Occupational and Safety Health Act (OSHA) to ensure worker and workplace safety. Their goal was to make sure employers provide their workers a place of employment free from recognized hazards to safety and health, such as exposure to toxic chemicals, excessive noise levels, mechanical dangers, heat or cold stress, or unsanitary conditions. (EPA, 2022a)

In order to establish standards for workplace health and safety, the Act also created the National Institute for Occupational Safety and Health (NIOSH) as the research institution for OSHA. OSHA is a division of the U.S. Department of Labor that oversees the administration of the Act and enforces standards in all 50 states. (EPA, 2022a)

❑ Toxic Substances Control Act

The Toxic Substances Control Act (TSCA) of 1976 provides EPA with authority to require reporting, record-keeping and testing requirements, and restrictions relating to chemical substances and/or mixtures. Certain substances are generally excluded from TSCA, including, among others, food, drugs, cosmetics, and pesticides. TSCA addresses the production, importation, use, and disposal of specific chemicals including polychlorinated biphenyls (PCBs), asbestos, radon, and lead-based paint. (EPA, 2022d)

Various sections of TSCA provide authority to:

- Require, under Section 5, pre-manufacture notification for "new chemical substances" before manufacture
- Require, under Section 4, testing of chemicals by manufacturers, importers, and processors where risks or exposures of concern are found

- Issue Significant New Use Rules (SNURs), under Section 5, when it identifies a "significant new use" that could result in exposures to, or releases of, a substance of concern.
- Maintain the TSCA Inventory, under Section 8, which contains more than 83,000 chemicals. As new chemicals are commercially manufactured or imported, they are placed on the list.
- Require those importing or exporting chemicals, under Sections 12(b) and 13, to comply with certification reporting and/or other requirements.
- Require, under Section 8, reporting and record-keeping by persons who manufacture, import, process, and/or distribute chemical substances in commerce.
- Require, under Section 8(e), that any person who manufactures (including imports), processes, or distributes in commerce a chemical substance or mixture and who obtains information which reasonably supports the conclusion that such substance or mixture presents a substantial risk of injury to health or the environment to immediately inform EPA, except where EPA has been adequately informed of such information. EPA screens all TSCA b§8(e) submissions as well as voluntary "For Your Information" (FYI) submissions. The latter are not required by law, but are submitted by industry and public interest groups for a variety of reasons. (EPA, 2022d)

2. State Regulations

❑ Cal/OSHA and the California State Plan

Under an agreement with OSHA, since 1973 California has operated an occupational safety and health program in accordance with Section 18 of the federal OSHA. The State of California's Department of Industrial Relations administers the California Occupational Safety and Health Program, commonly referred to as Cal/OSHA. The State of California's Division of Occupational Safety and Health (DOSH) is the principal agency that oversees plan enforcement and consultation. In addition, the California State program has an independent Standards Board responsible for promulgating State safety and health standards, and reviewing variances. It also has an Appeals Board to adjudicate contested citations and the Division of Labor Standards Enforcement to investigate complaints of discriminatory retaliation in the workplace. (OSHA, n.d.2)

Pursuant to 29 CFR 1952.172, the California State Plan applies to all public and private sector places of employment in the state, with the exception of federal employees, the United States Postal Service, private sector employers on Native American lands, maritime activities on the navigable waterways of the United States, private contractors working on land designated as exclusively under federal jurisdiction and employers that require federal security clearances. Cal/OSHA is the only agency in the state authorized to adopt, amend, or repeal occupational safety and health standards or orders. In addition, the Standards Board maintains standards for certain things not covered by federal standards or enforcement, including: elevators, aerial passenger tramways, amusement rides, pressure vessels and mine safety training. The Cal/OSHA enforcement unit conducts inspections of California workplaces in response to a report of an industrial accident, a complaint about an occupational safety and health hazard, or as part of an inspection program targeting industries with high rates of occupational hazards, fatalities, injuries or illnesses. (OSHA, n.d.2)

❑ California Hazardous Waste Control Law

The Hazardous Waste Control Law (HWCL) (Health and Safety Code [HSC], Division 20, Chapter 6.5, Section 25100, et seq.) is the primary hazardous waste statute in California. The HWCL implements RCRA as a "cradle-to-grave" waste management system in the state. It specifies that generators have the primary duty to determine whether their wastes are hazardous and to ensure its proper management. The HWCL also establishes criteria for the reuse and recycling of hazardous wastes used or reuse as raw materials. The HWCL exceeds federal requirements by mandating source reduction planning and broadening requirements for permitting facilities that treat hazardous waste. It also regulates a number of waste types and waste management activities not covered by federal law (RCRA). (CA Legislative Info, n.d.34)

❑ California Code of Regulations (CCR), Titles 22 and 26

A variety of California Code of Regulation (CCR) titles address regulations and requirements for generators of hazardous waste. Title 22 contains detailed compliance requirements for hazardous waste generators, transporters, and facilities for treatment, storage, and disposal. Because California is a fully-authorized state according to RCRA, most regulations (i.e., 40 CFR 260, et seq.) have been duplicated and integrated into Title 22. However, because the Department of Toxic Substances Control (DTSC) regulates hazardous waste more stringently than the EPA, the integration of state and federal hazardous waste regulations that make up Title 22 does not contain as many exemptions or exclusions as does 40 CFR 260. As with the HSC, Title 22 also regulates a wider range of waste types and waste management activities than does RCRA. To aid the regulated community, California has compiled hazardous materials, waste, and toxics-related regulations from CCR, Titles 3, 8, 13, 17, 19, 22, 23, 24 and 27 into one consolidated listing: CCR Title 26 (Toxics). However, the hazardous waste regulations are still commonly referred to collectively as "Title 22." (DTSC, n.d.; DTSC, 2019)

❑ Safe Drinking Water and Toxic Enforcement Act

Proposition 65, officially known as the Safe Drinking Water and Toxic Enforcement Act of 1986 (Health and Safety Code, Division 20, Chapter 6.6, Section 25249.5, et seq), protects the state's drinking water sources from being contaminated with chemicals known to cause cancer, birth defects, or other reproductive harm, and requires businesses to inform Californians about exposures to such chemicals. Proposition 65 requires the state to maintain and update a list of chemicals known to the state to cause cancer or reproductive toxicity. (CA Legislative Info, n.d.33)

❑ California Water Code

The California Water Code is the principal state law regulating water quality in California. Water quality provisions must be complied with as contained in numerous code sections including: 1) the Health and Safety Code for the protection of ground and surface waters from hazardous waste and other toxic substances; 2) the Fish and Game Code for the prevention of unauthorized diversions of any surface water and discharge of any substance that may be deleterious to fish, plant, animal, or bird life; 3) the Harbors and Navigation Code for the prevention of the unauthorized discharge of waste from vessels into surface waters; and 4) the Food and Agriculture Code for the protection of groundwater which may be used for drinking water supplies. The California Department of Fish and Wildlife (CDFW), through provisions of the Fish & Game Code (§§ 1601

- 1603) is empowered to issue agreements for any alteration of a river, stream, or lake where fish or wildlife resources may be adversely affected. CDFW regulates wetland areas only to the extent that those wetlands are part of a river, stream, or lake as defined by CDFW. (CA Legislative Info, n.d.32)

Surface water quality is the responsibility of the Regional Water Quality Control Board (RWQCB), water supply and wastewater treatment agencies, and city and county governments. The principal means of enforcement by the RWQCB is through the development, adoption, and issuance of water discharge permits. RWQCB basin plans establish water quality objectives that are defined as the limits or levels of water quality constituents or characteristics for the reasonable protection of beneficial uses of water. (CA Legislative Info, n.d.32)

❑ Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

California's Unified Program, overseen but the California Environmental Protection Agency (CalEPA), protect Californians from hazardous waste and hazardous materials by ensuring local regulatory agencies consistently apply statewide standards when they issue permits, conduct inspections, and engage in enforcement activities. The Unified Program is a consolidation of multiple environmental and emergency management programs, including the following:

- Aboveground Petroleum Storage Act (APSA) Program;
- Area Plans for Hazardous Materials Emergencies;
- California Accidental Release Prevention (CalARP) Program;
- Hazardous Materials Release Response Plans and Inventories (Business Plans);
- Hazardous Materials Management Plan (HMMP) and Hazardous Materials Inventory Statements (HMIS) (California Code)
- Hazardous Waste Generator and Onsite Hazardous Waste Treatment (tiered permitting) Programs; and
- Underground Storage Tank Program.

State agency partners involved in the implementation of the Unified Program are responsible for setting program element standards, working with CalEPA to ensure program consistency, and providing technical assistance to the California Unified Program Agencies (CUPAs) and Program Agencies (PAs). The state agencies involved with the Unified Program include CalEPA, Department of Toxic Substances Control (DTSC), the Governor's Office of Emergency Services (Cal OES), CAL FIRE – Office of the State Fire Marshall (CAL FIRE-OSFM), and the State Water Resources Control Board (State Water Board). (CalEPA, 2021)

❑ Uniform Fire Code

The Uniform Fire Code, Article 80 (Section 80.103 of the Uniform Fire Code as adopted by the State Fire Marshal pursuant to HSC Section 13143.9), includes specific requirements for the safe storage and handling of hazardous materials. These requirements are intended to reduce the potential for a release of hazardous materials and for mixing of incompatible chemicals, and specify the following specific design features to reduce the potential for a release of hazardous materials that could affect public health or the environment:

- Separation of incompatible materials with a noncombustible partition;
- Spill control in all storage, handling, and dispensing areas; and
- Separate secondary containment for each chemical storage system. The secondary containment must hold the entire contents of the tank, plus the volume of water needed to supply the fire suppression system for a period of 20 minutes in the event of catastrophic spill. (FindLaw, 2019a)

❑ License to Transport Hazardous Materials

Caltrans regulates hazardous materials transportation on all interstate roads (California Vehicle Code, Section 32000.5, et seq). Within California, the State agencies with primary responsibility for enforcing federal and State regulations and for responding to transportation emergencies are the California Highway Patrol and Caltrans. Together, federal and State agencies determine driver-training requirements, load labeling procedures, and container specifications for vehicles transporting hazardous materials. (FindLaw, 2019b)

❑ California Hazardous Materials Release Response Plan and Inventory Law of 1985

The Business Plan Act requires preparation of Hazardous Materials Business Plans and disclosure of hazardous materials inventories, including an inventory of hazardous materials handled, plans showing where hazardous materials are stored, an emergency response plan, and provisions for employee training in safety and emergency response procedures for businesses that handle, store, or transport hazardous materials in amounts exceeding specified minimums (California Health and Safety Code, Division 20, Chapter 6.95, Article 1). Statewide, DTSC has primary regulatory responsibility for management of hazardous materials, with delegation of authority to local jurisdictions that enter into agreements with the State. Local agencies are responsible for administering these regulations.

Several state agencies regulate the transportation and use of hazardous materials to minimize potential risks to public health and safety, including CalEPA and the California Emergency Management Agency. The California Highway Patrol and California Department of Transportation (Caltrans) enforce regulations specifically related to the transport of hazardous materials. Together, these agencies determine container types used and license hazardous waste haulers for hazardous waste transportation on public roadways. (CA Legislative Info, n.d.37)

B. Airport and Aircraft Hazards Regulations and Plans

1. State Regulations

❑ State Aeronautics Act

The State Aeronautics Commission Act of 1947 created the Division of Aeronautics ("Division"), and was later amended by statute to read the State Aeronautics Act (Aeronautics Act) in 1961. As a result of this legislation, the Division's first priorities are those mandated by the Aeronautics Act, then Caltrans guidance, then Division guidance as expressed through its Policy Element. As directed by the Aeronautics Act, the Division is a steward and advocate of aviation in California. To that end, its efforts are focused on activities

that "protect the public interest in aeronautics and aeronautical progress." (§ 21002) (CA Legislative Info, n.d.41)

The Aeronautics Act itself is divided into six chapters, the first five of which have not received significant cleanup legislation since its enabling in 1947. The first chapter begins with general provisions and definitions and explains the Legislature's intent for a State aviation program. Chapter two explains Caltrans' role in administering the Division, and explains the role of the California Transportation Commission (CTC). Chapter three includes many of the safety considerations from Federal Aviation Administration (FAA) regulations that help keep airports and the surrounding communities safe and compatible with flight operations. Chapter four deals with airport and heliport permitting, air navigation facilities, noise guidelines, funding, and importantly, the formation and authority of Airport Land Use Commissions (ALUC). Chapter five covers the investigations and hearings on matters covered in the Aeronautics Act. Finally, Chapter six introduces airport planning and specifically introduces the intent of the CASP and how it can be used to support California aviation. (CA Legislative Info, n.d.41)

❑ California Environmental Quality Act

The operation of airports and aircraft is the responsibility of the Federal Aviation Administration (FAA), but the requirement to document potential hazards related to airports and air activities when a new project is proposed is contained in CEQA, specifically PRC Section 21096, which states: (CA Legislative Info, n.d.42)

> *"(a) If a lead agency prepares an environmental impact report for a project situated within airport land use compatibility plan boundaries, or, if an airport land use compatibility plan has not been adopted, for a project within two nautical miles of a public airport or public use airport, the Airport Land Use Planning Handbook published by the Division of Aeronautics of the Department of Transportation, in compliance with section 21674.5 of the Public Utilities Code and other documents, shall be utilized as technical resources to assist in the preparation of the environmental impact report as the report relates to airport-related safety hazards and noise problems.*
>
> *(b) A lead agency shall not adopt a negative declaration for a project described in subdivision (a) unless the lead agency considers whether the project will result in a safety hazard or noise problem for persons using the airport or for persons residing or working in the project area."*

C. *Local Regulations*

❑ Riverside County Operational Area Multi-Jurisdictional Local Hazard Mitigation Plan

In April 2023 the County of Riverside Emergency Management Department (EMD) published a Multi-Jurisdictional LHMP for the purposes of identifying the County's hazards, reviewing and assessing past disaster occurrences, estimating the probability of future occurrences, and setting goals to reduce or eliminate potential risks to people and property from natural and human-caused hazards. The LHMP addresses a variety of hazard types including but not limited to wildland fire, electrical outages, extreme weather, pipeline disruptions, and hazardous materials incidents. (Riverside EMD, 2023)

❑ Riverside County Ordinance No. 457

Every three years, Riverside County's Building and Fire Codes are adapted from the California Building Standards Code (CCR Title 24), which includes both building and fire codes. These codes establish site-specific investigation requirements, construction standards and inspection procedures to ensure that development authorized by the County of Riverside does not pose a threat to the health, safety or welfare of the public. The California Building Standards Code contains minimum baseline standards to guard against unsafe development. This ordinance also adopts, in some cases with modification to a stricter standard, a number of California State's Title 24 codes (fire, building, plumbing, electrical, etc.). The Riverside County Department of Building and Safety provides technical expertise in reviewing and enforcing these codes. Riverside County Ordinance No. 457 (Building Codes and Fees Ordinance) regulates grading, buildings and structures within Riverside County. (Riverside County, 2015a, p. 4.12-35)

❑ Riverside County Ordinance No. 615

Riverside County Ordinance No. 615 (Hazardous Waste Generation, Storage, Handling and Disposal) was promulgated for the purpose of monitoring establishments where hazardous waste is generated, stored, handled, disposed, treated or recycled and to regulate the issuance of permits and the activities of establishments where hazardous waste is generated. This ordinance designates RCDEH to enforce the provisions of HSC Division 20, Chapter 6.5, § 25100, et seq., and the "Environmental Health Standards for the Management of Hazardous Waste," as specified in CCR Title 22, Division 4.5, pertaining to the generation, storage, handling, disposal, treatment and recycling of hazardous waste. (Riverside County, 2015a, p. 4.13-57)

❑ Riverside County Ordinance No. 617

Riverside County Ordinance No. 617 (Underground Storage Tanks Containing Hazardous Substances) implements § 25280 et seq. of the California HSC to ensure that hazardous substances stored in underground tanks are done so safely and in a manner that prevents contamination. It does so by establishing appropriate construction standards for new underground storage tanks and requiring maintenance, monitoring and inspection of existing tanks. The ordinance also establishes a Local Oversight Program for "unauthorized releases of petroleum and petroleum-related materials from leaking underground tanks systems which require remedial action...to prevent long-term threats to the public health, water quality and environment." The RCDEH manages these programs. (Riverside County, 2015a, p. 4.13-57)

❑ Riverside County Ordinance No. 651

Riverside County Ordinance No. 651 (Disclosure of Hazardous Materials and Business Emergency Plans) implements the State of California's "Hazardous Materials Release Response Plans and Inventory Law" (HSC, Chapter 6.95), to establish a system for permitting businesses handling hazardous materials. It serves to enforce minimum material standards and designates the Riverside County Community Health Agency as the agency responsible for administering and enforcing HSC Chapter 6.95. The RCDEH may require compliance with the applicable articles of the most-current Fire Codes. Pursuant to HSC § 25500, the Riverside County Board of Supervisors may also impose additional, more stringent requirements on businesses that handle hazardous materials. (Riverside County, 2015a, p. 4.13-57)

4.9.3 Basis for Determining Significance

Section IX of Appendix G to the CEQA Guidelines addresses typical adverse effects due to hazards and hazardous materials, and includes the following threshold questions to evaluate a project's impacts due to hazards and hazardous materials:

- Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

- Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

- Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

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

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

- Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

- Would the project expose people or structures, either directly or indirectly, 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?

Significance thresholds are set forth in Riverside County's Environmental Assessment Checklist, are derived from Section IX of Appendix G to the CEQA Guidelines, and state that the proposed Project would have a significant impact from hazards and hazardous materials if construction and/or operation of the Project would:

a. *Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;*

b. *Create a significant hazard to the public, or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;*

c. *Impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan;*

d. *Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;*

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

f. *Result in an inconsistency with an Airport Master Plan;*

g. *Require review by the Airport Land Use Commission;*

h. *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; or*

i. *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.*

The significance thresholds set forth in Riverside County's Environmental Assessment Checklist, which were revised to incorporate the 2018 updates to the CEQA Guidelines, were used to evaluate the significance of the proposed Project's impacts due to hazards and hazardous materials. The issue of loss, injury, or death involving wildland fires is addressed separately in EIR Subsection 4.21, *Wildfire*.

4.9.4 Impact Analysis

Threshold a:	***Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?***
Threshold b:	***Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?***

Implementation of the Project would result in the construction and long-term operation of a 1,003,510 square-foot (s.f.) warehouse building on 44.66 net acres and a public park on approximately 13.33 net acres. The analysis below evaluates the potential for the Project to result in a substantial hazard to people or the environment due to existing site conditions, construction activities, and long-term operation.

Impact Analysis for Existing Conditions

As indicated above under subsection 4.9.1.B, and based on the results of the Project's Phase I ESA (EIR *Technical Appendix I*), there is no evidence that the Project site contains or is affected by any RECs (Group Delta, 2022). As such, there are no conditions associated with the Project site's existing condition or surroundings that would create a significant hazard to the public or the environment through the routine

transport, use, disposal, or accidental release of hazardous materials. Accordingly, no impact would occur associated with the Project site's existing conditions.

Impact Analysis for Temporary Construction-Related Activities

Heavy equipment (e.g., dozers, excavators, tractors) would be operated on the Project site during construction of the Project. This heavy equipment likely would be fueled and maintained by petroleum-based substances such as diesel fuel, gasoline, oil, and hydraulic fluid, which are considered hazardous if improperly stored or handled. In addition, materials such as paints, adhesives, solvents, and other substances typically used in building construction would be used on the Project site during construction. Improper use, storage, or transportation of hazardous materials can result in accidental releases or spills, potentially posing health risks to workers, the public, and the environment. This is a standard risk on all construction sites, and there would be no greater risk for improper handling, transportation, or spills associated with the Project than would occur on any other similar construction site. Construction contractors would be required to comply with all applicable federal, State, and local laws and regulations regarding the transport, use, and storage of hazardous construction-related materials, including but not limited to requirements imposed by the EPA, CalEPA, and DTSC, as well as the Santa Ana RWQCB pertaining to water quality as discussed in EIR Subsection 4.10, *Hydrology and Water Quality*. With mandatory compliance with applicable hazardous materials regulations, the Project would not create significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials during the construction phase. A less-than-significant impact would occur.

Impact Analysis for Long-Term Operation

Implementation of the Project would result in the construction and long-term operation of a 1,003,510 s.f. warehouse building on 44.66 net acres and a public park on approximately 13.33 net acres.

The public park conceptually is designed to include a recreation center, play fields, hard surfaces sport courts, a playground, walking paths, dog parks, and other amenities. There are no operational characteristics associated with the Project's park use that could create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, or that could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Accordingly, no hazards or hazardous material impacts would result from long-term operation of the Project's proposed park use.

The future occupants of the proposed warehouse building is not yet known. However, the future building occupant likely would include general warehousing and/or similar uses and it is possible that hazardous materials could be used during the course of a future building user's daily operations. State and federal Community-Right-to-Know laws allow public access to information about the amounts and types of chemicals in use at local businesses. Laws also are in place that require businesses to plan and prepare for possible chemical emergencies. Any business that occupies the proposed building on the Project site and that handles hazardous materials (as defined in Section 25500 of California Health and Safety Code, Division 20, Chapter 6.95) would require a permit from RCDEH in order to register the business as a hazardous materials handler. Such businesses also are required to comply with California's Hazardous Materials Release Response Plans and Inventory Law, which requires immediate reporting to Riverside County Fire Department and the State

Office of Emergency Services regarding any release or threatened release of a hazardous material, regardless of the amount handled by the business. In addition, any business handling at any one time, greater than 500 pounds of solid, 55 gallons of liquid, or 200 cubic feet of gaseous hazardous material, is required, under Assembly Bill 2185 (AB 2185), to file a Hazardous Materials Business Emergency Plan (HMBEP). A HMBEP is a written set of procedures and information created to help minimize the effects and extent of a release or threatened release of a hazardous material. The intent of the HMBEP is to satisfy federal and State Community Right-To-Know laws and to provide detailed information for use by emergency responders.

If businesses that use or store hazardous materials occupy any of the future buildings on the Project site, the business owners and operators would be required to comply with all applicable federal, State, and local regulations to ensure proper use, storage, use, emission, and disposal of hazardous substances (as described above). With mandatory regulatory compliance, the Project is not expected to pose a significant hazard to the public or the environment through the routine transport, use, storage, emission, or disposal of hazardous materials, nor would the Project increase the potential for accident conditions which could result in the release of hazardous materials into the environment. In addition, the Project would be required to comply with Riverside County Ordinance No. 651.5, which establishes specific requirements for the storage of hazardous materials and for reporting and permitting the use, handling, storage, and transportation of hazardous materials.

With mandatory regulatory compliance, along with mandatory compliance with Riverside County Ordinance No. 651, potential hazardous materials impacts associated with long-term operation of the Project are determined to be less than significant and mitigation is not required.

Threshold c: ***Would the Project impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan?***

The Project site does not contain any emergency facilities nor does it serve as an emergency evacuation route. In April 2023, the Riverside County Emergency Management Department (EMD) published a Multi-Jurisdictional Local Hazard Mitigation Plan (LHMP). The purpose of the LHMP is to identify the County's hazards, review and assess past disaster occurrences, estimate the probability of future occurrences, and set goals to mitigate potential risks to reduce or eliminate long-term risk to people and property from natural and human-caused hazards. The LHMP describes the County's plans for a variety of potential hazards, ranging from wildfires to tornados. However, the LHMP does not identify any emergency management facilities on the Project site, does not identify any specific evacuation routes within the Project area, and does not identify any policies or requirements specific to the Project site or surrounding areas. Rather, the LHMP provides a series of policies to be enacted by the various agencies and jurisdictions within the County in the event of emergency situations. As noted by the LHMP, "[t]here has been no development within Riverside County unincorporated areas that have increased hazard risk or vulnerability since the previous plan was adopted in 2018" (Riverside EMD, 2023, p. 49) Therefore, it can be concluded that developments within Riverside County that adhere to the applicable provisions of County ordinances, including design measures related to emergency access, would not result in a conflict with the LHMP. The proposed Project would be required to comply with all applicable provisions of County policies and ordinances related to public safety, including but not limited to Ordinance No. 457, which establishes the County's building and fire protection regulations and includes measures requiring the provision of adequate emergency access and other measures to address fire

hazard safety. During construction and long-term operation of the Project, adequate emergency access for emergency vehicles would be required to be maintained along public streets that abut the Project site. Furthermore, improvements planned as part of the Project are not anticipated to adversely affect traffic operations in the local area, including along nearby segments of Cajalco Road. As part of the County's discretionary review process, Riverside County reviewed the Project's application materials to ensure that appropriate emergency ingress and egress would be available to and from each portion of the Project site and that circulation on each portion of the Project site was adequate for emergency vehicles. There are no components of the proposed Project with the potential to conflict with the County's LHMP. Accordingly, implementation of the proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan, and no impact would occur.

Threshold d: ***Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?***

The nearest school to the Project site is the Val Verde Academy, which is located approximately 0.7-mile southeast of the Project site. However, a church that provides religious and educational services (Perris Spanish Seventh-Day Adventist) is located approximately 0.2-mile north of the Project site (Google Earth, 2024). Thus, for purposes of analysis, it is assumed that the Project site is located within one-quarter mile of an existing school.

As described above under the analysis for Thresholds a. and b., the use and transport of hazardous substances or materials to and from the Project site during construction and long-term operational activities would be required to comply with applicable federal, State, and local regulations that would preclude substantial public safety hazards. Accordingly, there would be no potential for existing or proposed schools to be exposed to substantial safety hazards associated with emission, handling, or the routine transport of hazardous substances or materials to-and-from the Project site and impacts would be less than significant.

Although impacts would be less than significant upon compliance with applicable federal, State, and local regulations, standard County conditions of approval are specified herein to ensure regulatory compliance, which requires the Project Applicant to prepare a HMBEP (if required by law) and otherwise comply with Riverside County Ordinance No. 651. Impacts would remain less than significant.

Refer to EIR Subsection 4.3, *Air Quality*, for analysis pertaining to human health risks associated with air pollutant emissions associated with the Project, including risks to the maximally exposed school child located within one-quarter mile from the Project site. As concluded in EIR Subsection 4.3, the Project's toxic air contaminant emissions (and their associated health risks) would be less than significant.

Accordingly, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, and impacts would be less than significant.

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

Based on the results of the Project's Phase I ESA (*Technical Appendix I*) and a review of Cortese List Data Resources available from CalEPA, which includes listings of hazardous materials sites as reported by the DTSC, the State Water Resources Control Board (SWRCB) GeoTracker database, the SWRCB list of solid waste disposal sites, and sites subject to Cease and Desist Orders (CDO) and Cleanup and Abatement Orders (CAO), the Project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Accordingly, no impact would occur. (CalEPA, n.d.; Group Delta, 2022, pp. 14-15)

Threshold f:	***Would the Project result in an inconsistency with an Airport Master Plan?***
Threshold g:	***Would the Project require review by the Airport Land Use Commission?***
Threshold h:	***For a project located within an airport land use plan or, where such a plan has not been adopted, within two 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?***

The Project site is not located within the boundaries of any Airport Master Plans, and no impact due to an inconsistency with an Airport Master Plan would occur. As previously indicated, the Project site is located within the Airport Influence Area (AIA) for the MARB and is located within Airport Land Use Compatibility Plan (ALUCP) Compatibility Zone C2 (RCIT, n.d.). Because the Project site is located within the AIA for the MARB, the Project required review by the Riverside County Airport Land Use Commission (RCALUC). In accordance with the MARB ALUCP, the Riverside County ALUC reviewed the Project for consistency with the ALUCP. Based on the result of the ALUC's review, on March 14, 2024, the ALUC determined that the Project is fully consistent with the March ARB ALUCP. A copy of the ALUC approval letter is included in EIR *Technical Appendix P*. As such, the Project would result in less-than-significant impacts due to a conflict with the MARB ALUCP.

Threshold i.:	***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?***

There are no private airport facilities or heliports within the Project vicinity. The nearest private airport is the Perris Valley Airport, located approximately 4.9 miles southeast of the Project site. However, according to the Riverside County ALUCP policy document, the Project site is not located within the AIA for the Perris Valley Airport, and the Project site also is not identified as being located within any of the Compatibility Zones for the Perris Valley Airport (ALUC, 2010). As such, the Project would not result in a safety hazard for people residing or working in the Project area associated with private airports or heliports, and no impact would occur.

4.9.5 Cumulative Impact Analysis

Because the issue of hazards and hazardous materials tends to be site-specific in nature, the cumulative study area includes existing and planned developments within a one-mile radius of the Project site. A one-mile radius is appropriate for most of the thresholds identified herein because that is the standard distance used in

regulatory database searches of properties that may generate or store toxic materials. With respect to cumulatively-considerable impacts to public airport facilities, the cumulative study area would include the Project site and surroundings, as well as other properties located within the AIA for the MARB.

As discussed under the analysis of Thresholds a. and b., the Project site does not contain any RECs under existing conditions. As such, the Project would not result in any cumulatively-considerable impacts due to existing site contamination. With respect to construction activities, the Project would be subject to compliance with all applicable federal, State, and local laws and regulations regarding the transport, use, and storage of hazardous construction-related materials, including but not limited to requirements imposed by the EPA and DTSC, as well as the Santa Ana RWQCB pertaining to water quality. Other cumulative developments similarly would be subject to applicable federal, State, and local laws and regulations regarding the transport, use, and storage of hazardous construction-related materials. As such, cumulatively-considerable impacts during construction would be less than significant. Similarly, under long-term operating conditions, future businesses on site that involve the storage or use of hazardous materials or substances would be subject to applicable federal, State, and local requirements related to hazardous materials. Other businesses within the Project's cumulative study area similarly would be required to comply with applicable federal, State, and local requirements related to hazardous materials. With mandatory regulatory compliance, along with mandatory compliance with Riverside County Ordinance No. 651 (or the applicable ordinances of other local agencies), potential hazardous materials impacts associated with long-term operation of the Project are determined to be less-than-cumulatively considerable.

As discussed under the analysis of Threshold c., the Project site does not contain any emergency facilities nor does it serve as an emergency evacuation route. Additionally, there are no emergency response plans or emergency evacuation plans in effect in the local area, and the Project construction activities are not anticipated to adversely affect operations of existing local roadways in the area, including Cajalco Road. Thus, there is no potential for the Project to contribute to any cumulatively-considerable impacts associated with an adopted emergency response plan or emergency evacuation plan.

As indicated under the discussion of Threshold d., the nearest school to the Project site is the Val Verde Academy, which is located approximately 0.7-mile southeast of the Project site. However, a church that provides religious and educational services (Perris Spanish Seventh-Day Adventist) is located approximately 0.2-mile north of the Project site (Google Earth, 2024). It is possible that other businesses could be proposed in the future within close proximity to the nearby church, and thereby could result in hazardous emissions or hazardous or acutely hazardous materials, substances, or waste. However, the Project and other cumulative developments would be required to comply with applicable federal, State, and local regulations that would preclude substantial public safety hazards. Although Project impacts would be less than significant upon compliance with applicable federal, State, and local regulations, the Project would be conditioned to comply with applicable regulatory requirements, including the requirement to comply with Riverside County Ordinance No. 651 and prepare a Hazardous Materials Business Emergency Plan (HMBEP) (if required by law). Other cumulative developments likewise would be required to comply with Riverside County Ordinance No. 651 and prepare a HMBEP (as required by law). With implementation of applicable regulations and requirements, hazardous materials impacts to the nearby schools would be less than significant.

The Project site is not located on the list of hazardous materials sites compiled pursuant to Government Code § 65962.5; therefore, the Project has no potential to contribute to substantial, cumulative effects related to the development of contaminated sites listed on regulatory databases.

As indicated under the analysis of Thresholds f., g., and h., the Project was reviewed by the RCALUC, which found that the Project would be fully consistent with the March ARB ALUCP. Other cumulative developments within the MARB ARB AIA similarly would require review by the RCALUC and would be subject to compliance with any conditions of approval or other requirements imposed by the RCALUC. Accordingly, cumulatively-considerable impacts would be less than significant.

As indicated under the analysis of Threshold i., there are no private airport facilities or heliports within the Project vicinity, and the nearest private airport is the Perris Valley Airport, located approximately 4.9 miles southeast of the Project site. The Project site is not located within the AIA for the Perris Valley Airport. Accordingly, the Project would not result in any cumulatively-considerable impacts associated with public or private airport-related hazards.

4.9.6 Significance of Impacts Before Mitigation

Thresholds a. and b.: Less-than-Significant Impact. Based on the Project's Phase I ESA (*Technical Appendix I*), the Project site does not contain any RECs. With respect to construction activities, the Project would be subject to compliance with all applicable federal, State, and local laws and regulations regarding the transport, use, and storage of hazardous construction-related materials, including but not limited to requirements imposed by the EPA and DTSC, as well as the Santa Ana RWQCB pertaining to water quality. With mandatory compliance with applicable hazardous materials regulations, the Project would result in less-than-significant impacts due to the creation of a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials during the construction phase. Additionally, with mandatory regulatory compliance, along with mandatory compliance with Riverside County Ordinance No. 651, potential hazardous materials impacts associated with long-term operation of the Project are determined to be less than significant and mitigation is not required.

Threshold c.: No Impact. The proposed Project would be required to comply with all applicable provisions of County policies and ordinances related to public safety, including but not limited to Ordinance No. 457, which establishes the County's building and fire protection regulations and includes measures requiring the provision of adequate emergency access and other measures to address fire hazard safety. The Project site does not contain any emergency facilities nor does it serve as an emergency evacuation route. There are no components of the proposed Project with the potential to conflict with the County's LHMP. Accordingly, implementation of the proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan, and no impact would occur.

Threshold d.: Less-than-Significant Impact. Although there are no public schools within 0.25-mile of the Project site, a church that provides religious and educational services (Perris Spanish Seventh-Day Adventist) is located approximately 0.2-mile north of the Project site. However, impacts would be less than significant with compliance with applicable federal, State, and local regulations. Although impacts would be less than

significant, the Project would be conditioned to prepare a Hazardous Materials Business Emergency Plan (HMBEP) for future implementing uses, if required by law.

Threshold e.: No Impact. Based on the results of the Project's Phase I ESA (*Technical Appendices I*) and a review of Cortese List Data Resources available from CalEPA, the Project site is not located on any list of hazardous materials sites complied pursuant to Government Code Section 65962.5. Accordingly, no impact would occur.

Thresholds f., g., and h.: Less-than-Significant Impact. As indicated under the analysis of Thresholds f., g., and h., the Project was reviewed by the RCALUC, which found that the Project would be fully consistent with the March ARB ALUCP. As such, the Project would result in less-than-significant impacts due to a conflict with the MARB ALUCP.

Threshold i.: No Impact. There are no private airstrips in the Project vicinity. The nearest private airport facility is Perris Valley Airport, located approximately 4.9 miles southeast of the Project site. However, according to the Riverside County ALUCP policy document, the Project site is not located within the AIA for the Perris Valley Airport, and also is not identified as being located within any of the Compatibility Zones for the Perris Valley Airport. As such, the Project would not result in a safety hazard for people residing or working in the Project area associated with private airports or heliports, and no impact would occur.

4.9.7 Applicable Regulations, Design Requirements, and Mitigation

Applicable Regulations and Design Requirements

The following are applicable regulations and design requirements within Riverside County. Although these requirements technically do not meet CEQA's definition for mitigation, they are imposed herein to ensure Project compliance with applicable County regulations and design requirements.

- All future businesses operating on the site would be subject to compliance with Riverside County Ordinance No. 651, which sets forth requirements for handling hazardous materials, requires a permit for handling certain types and quantities of hazardous materials, requires businesses to report their hazardous materials inventory, identifies different classifications of hazardous materials handlers, and requires reporting of spills or releases or threatened releases of a hazardous material to the Riverside County Department of Environmental Health (DEH) and to the Governor's Office of Emergency Services.

- All future contracts with construction contractors shall comply with all applicable regulations and requirements promulgated by the federal Occupational Safety and Health Administration (OSHA).

- The Project shall comply with Title 22, Division 4.5 of the California Code of Regulations, which requires residents and employees to dispose of household hazardous waste, including pesticides, batteries, old paint, solvents, used oil, antifreeze, and other chemicals, at a Household Hazardous Waste Collection Facility.

- The Project shall comply with Title 22, Division 4.5, Chapter 11 of the California Code of Regulations which requires fluorescent lamps, batteries, and mercury thermostats be recycled or taken to a Household Hazardous Waste Collection Facility.

Mitigation

Impacts would be less than significant; therefore, mitigation measures are not required.

4.10 HYDROLOGY AND WATER QUALITY

The following analysis is based on a study entitled, "Preliminary Drainage Study for Cajalco Commerce Center," prepared by Albert A. Webb Associates (herein, "Webb"), dated ~~May~~ September 2024, and included as *Technical Appendix J1* to this EIR (Webb, 2024a). Analysis in this subsection 4.10 also is based in part on a Preliminary Water Quality Management Plan (P-WQMP) titled, "Project Specific Water Quality Management Plan for Cajalco Commerce Center," prepared by Webb, dated May 2024, and included as *Technical Appendix J2* to this EIR (Webb, 2024b). Refer to Section 7.0, *References*, for a complete list of these and other reference sources.

4.10.1 EXISTING CONDITIONS

A. Regional Hydrology

The Project site is located within the Santa Ana River Watershed, which drains a 2,480 square-mile area and is the principal surface flow water body within the region. The Santa Ana River flows over 100 miles and drains the largest coastal stream system in Southern California. It discharges into the Pacific Ocean at the City of Huntington Beach. The total stream length of the Santa Ana River and its major tributaries is about 700 miles. (SAWPA, 2019, p. 4-1) The Project site's location within the Santa Ana River Watershed is depicted on Figure 4.10-1, *Santa Ana River Watershed Map.* As shown, the Project site is located within the Perris Valley Hydrologic Subarea of the Perris Hydrologic Area of the San Jacinto Valley Hydrologic Unit (RWQCB, 2019, p. 4-33).

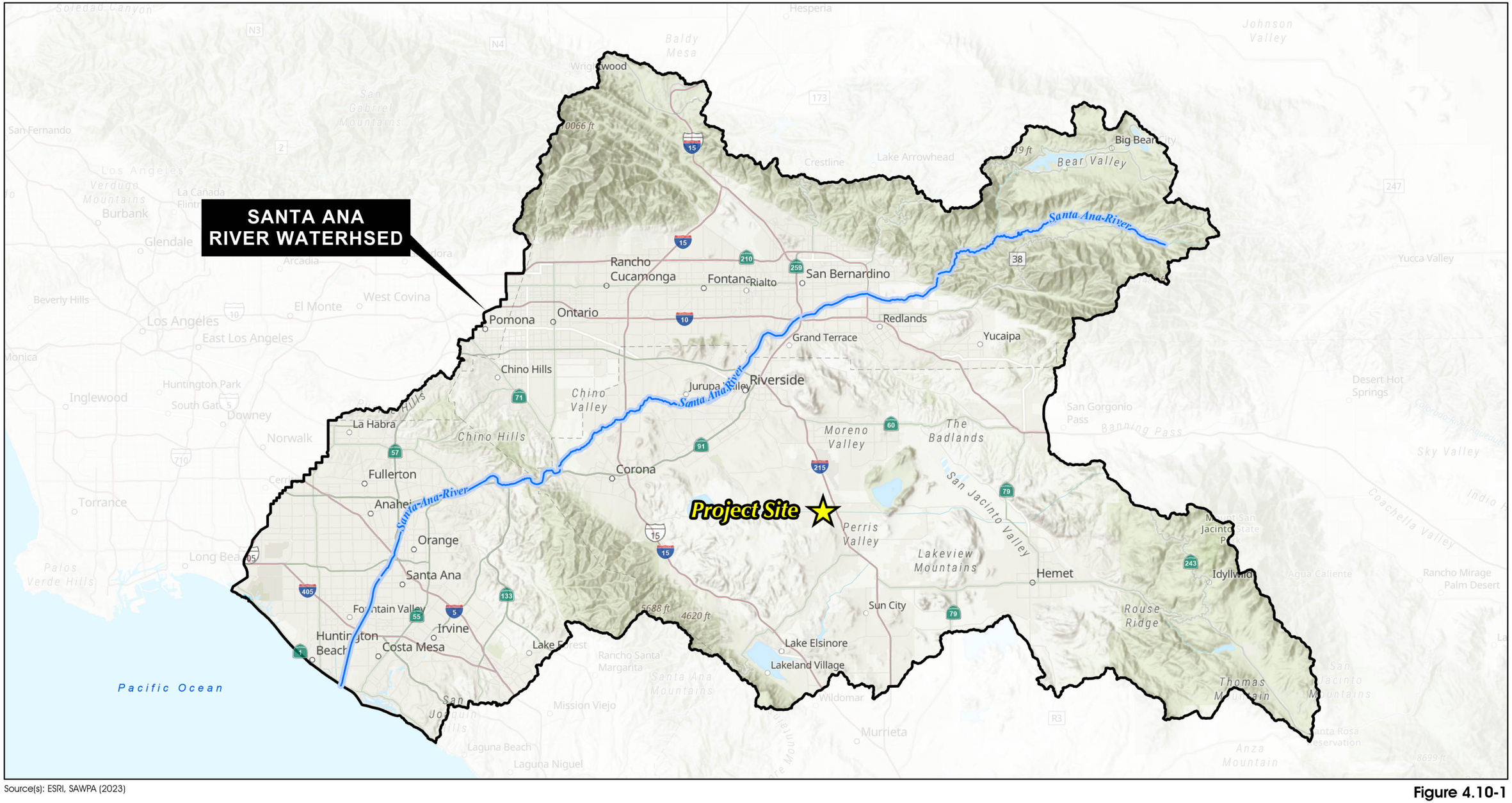
B. Site Hydrology

1. Northern 50.04 Gross Acres

Under existing conditions, the northern 50.04 gross acres of the Project site includes undeveloped land, multiple large-lot single-family residential homes with ancillary structures and outdoor storage, and a commercial structure (Craneology, Inc.). The existing drainage pattern for the northern 50.04 gross acres slopes down at approximately 1% to 8% grade from west to east, and as such the existing drainage pattern for the site and the general area is characterized by sheet flows that follow the slope to the east towards Seaton Avenue. Existing flows for the site sheet flow to existing drainage facilities within Seaton Avenue and Cajalco Road, eventually draining to Master Drainage Plan (MDP) storm drain Lateral E-9.1 and to the Seaton Basin of the Perris Valley MDP. The existing hydrologic conditions of the proposed warehouse Project site are depicted on Figure 4.10-2, *Existing Conditions Hydrology Map for Northern 50.04 Gross Acres*. As also shown on Figure 4.10-2, off-site areas that are tributary to the northern 50.04 gross acres of the Project site include existing flows within the southern portion of Cajalco Road and a small area associated with the off-site MWD-owned parcel to the south of the northern 50.04 gross acres of the Project site. (Webb, 2024a, pp 1-1 and 1-2)

2. Southern 14.93 Gross Acres

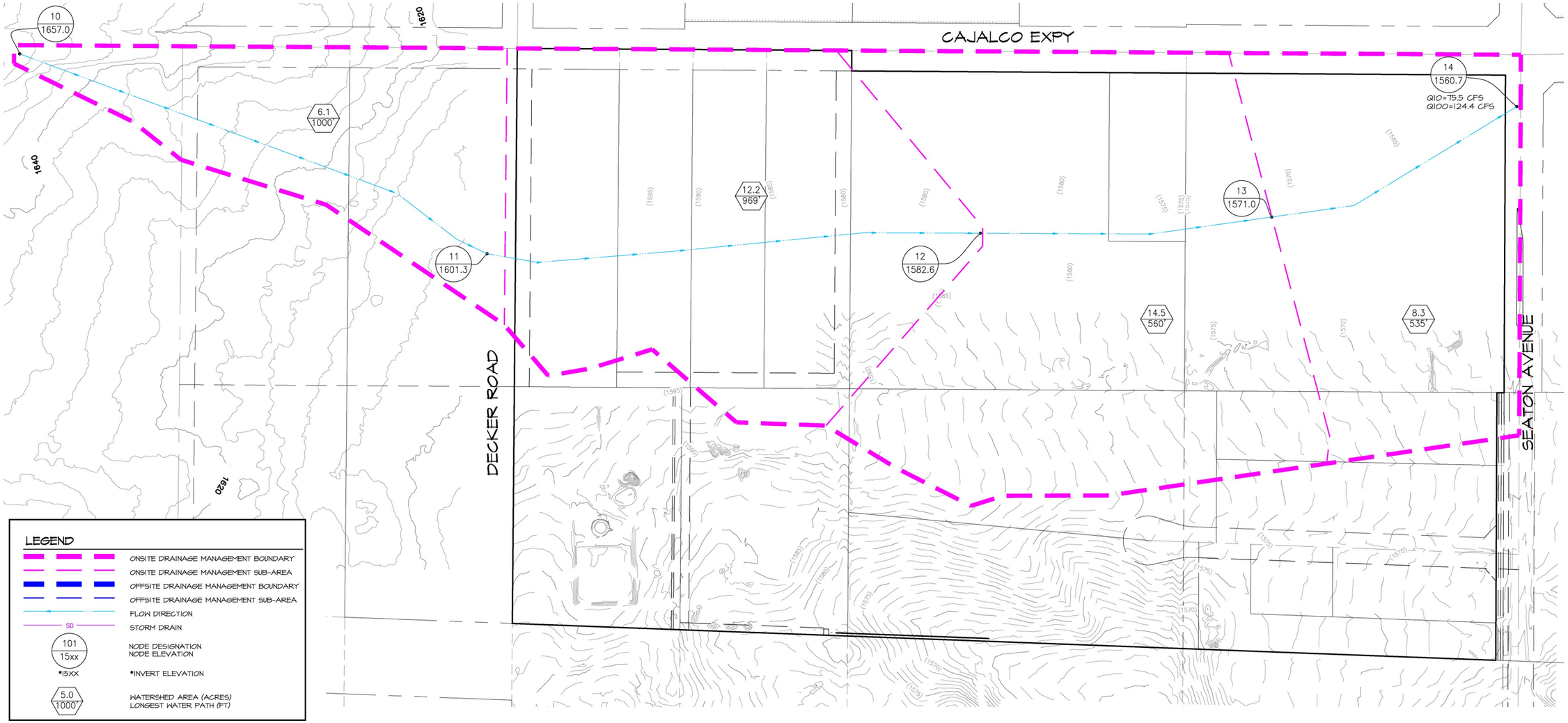
Under existing conditions, the southern 14.93 gross acres of the Project site includes a mixture of undeveloped land and multiple single-family homes with a variety of ancillary structures and outdoor storage. The existing drainage pattern for the southern 14.93 gross acres slopes down at approximately 1% to 8% grade from west



Source(s): ESRI, SAWPA (2023)

Figure 4.10-1

Santa Ana River Watershed Map



Source(s): Albert A. Webb Associates (03-19-2024)

Figure 4.10-2

Not to Scale

Existing Conditions Hydrology Map for Northern 50.04 Gross Acres

to east, and as such the existing drainage pattern for the site and the general area is characterized by sheet flows that follow the slope to the east towards an existing stream that flows easterly along the south end to the site. The existing hydrologic conditions of the proposed public park site are depicted on Figure 4.10-3, *Existing Conditions Hydrology Map for Southern 14.93 Gross Acres.* Areas that are tributary to the southern 14.93 gross acres proposed for public park uses include approximately 1,200 acres of off-site drainage areas primarily characterized as undeveloped lands. Figure 4.10-4, *Off-Site Hydrological Conditions for Southern 14.93 Gross Acres*, shows the areas that are tributary to the southern 14.93 gross acres of the Project site and/or to the proposed southerly extension of Decker Road. As shown, off-site run-on primarily occurs from existing drainage areas located to the west of the proposed public park site and west of the future southern extension of Decker Road. (Webb, 2024a, pp. 1-1 through 1-4)

C. Flood Hazards

According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) No. 06065C1410G, the Project site is located within "Zone X (unshaded)," which includes areas determined to be outside the 0.2% annual chance floodplain (FEMA, 2008). Accordingly, the Project site is not subject to flood hazards under existing conditions.

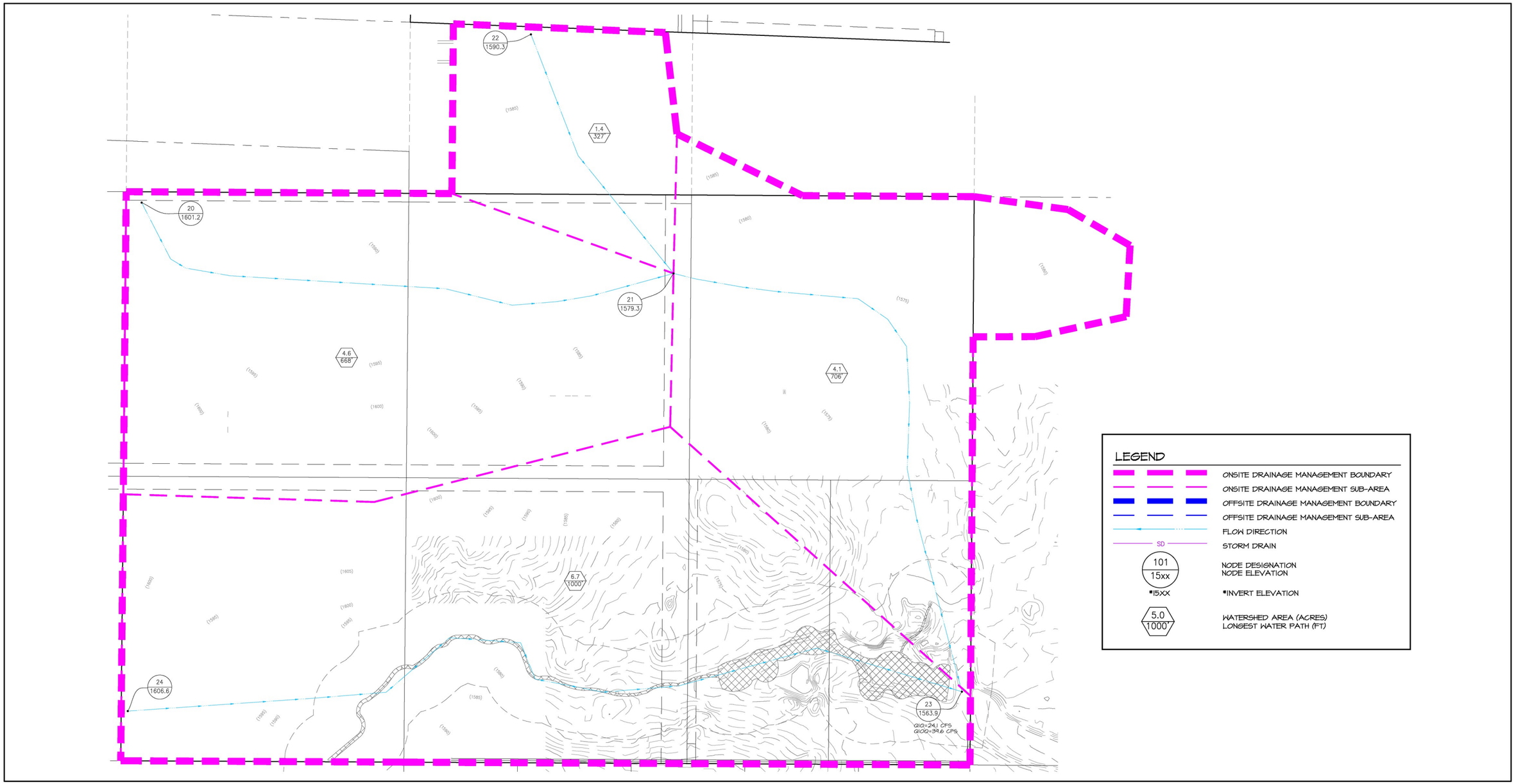
D. Water Quality

The Project site is located within the jurisdiction of the Santa Ana Basin Regional Quality Control Board (RWQCB). The receiving water of flows from the Project site include Perris Valley Storm Drain Channel; San Jacinto River, Reach 1; San Jacinto River, Reach 2; San Jacinto River, Reach 3; Canyon Lake; and Lake Elsinore. Table 4.10-1, *Receiving Waters, Section 303(d) Impairments, and Beneficial Uses, Section 303(d) Impairments, and Beneficial Uses,* provides a summary of the receiving waters for the Project site, their listed impairments pursuant to Clean Water Act (CWA) Section 303(d) list regulations, and their listed beneficial uses. (Webb, 2024b, Table A.1)

E. Groundwater

The Project site is located within the West San Jacinto Groundwater Management Area (Management Area). Developments within the Management Area are subject to the Eastern Municipal Water District's (EMWD) "Groundwater Management Plan – West San Jacinto Groundwater Basin" (herein, "GMP"). The GMP is intended to manage the San Jacinto Groundwater Basin (SJGB) in a manner that would supplement EMWD's water supplies, thereby increasing the amount of locally-available water and reducing the amount of water that needs to be imported through Metropolitan Water District (MWD). The GMP covers approximately 256-square miles (over 164,200 acres) and has been divided into six (6) groundwater management zones. The Project site is located at the western edge of the Perris North Groundwater Management Zone (GMZ). (EMWD, 1995; EMWD, 2021b, p. 8 and Figures 7-1 and 7-2)

EMWD adopted the GMP in June 1995 in accordance with Assembly Bill 3030 (AB 3030) enacted in 1992, which is now codified in the California Water Code Sections 10750 through 10755. The GMP is intended to protect the vested interests of existing groundwater producers while providing a planning framework for new water supply projects for the benefit of groundwater producers and the public. The Management Plan goals include (EMWD, 2021b, p. 13):

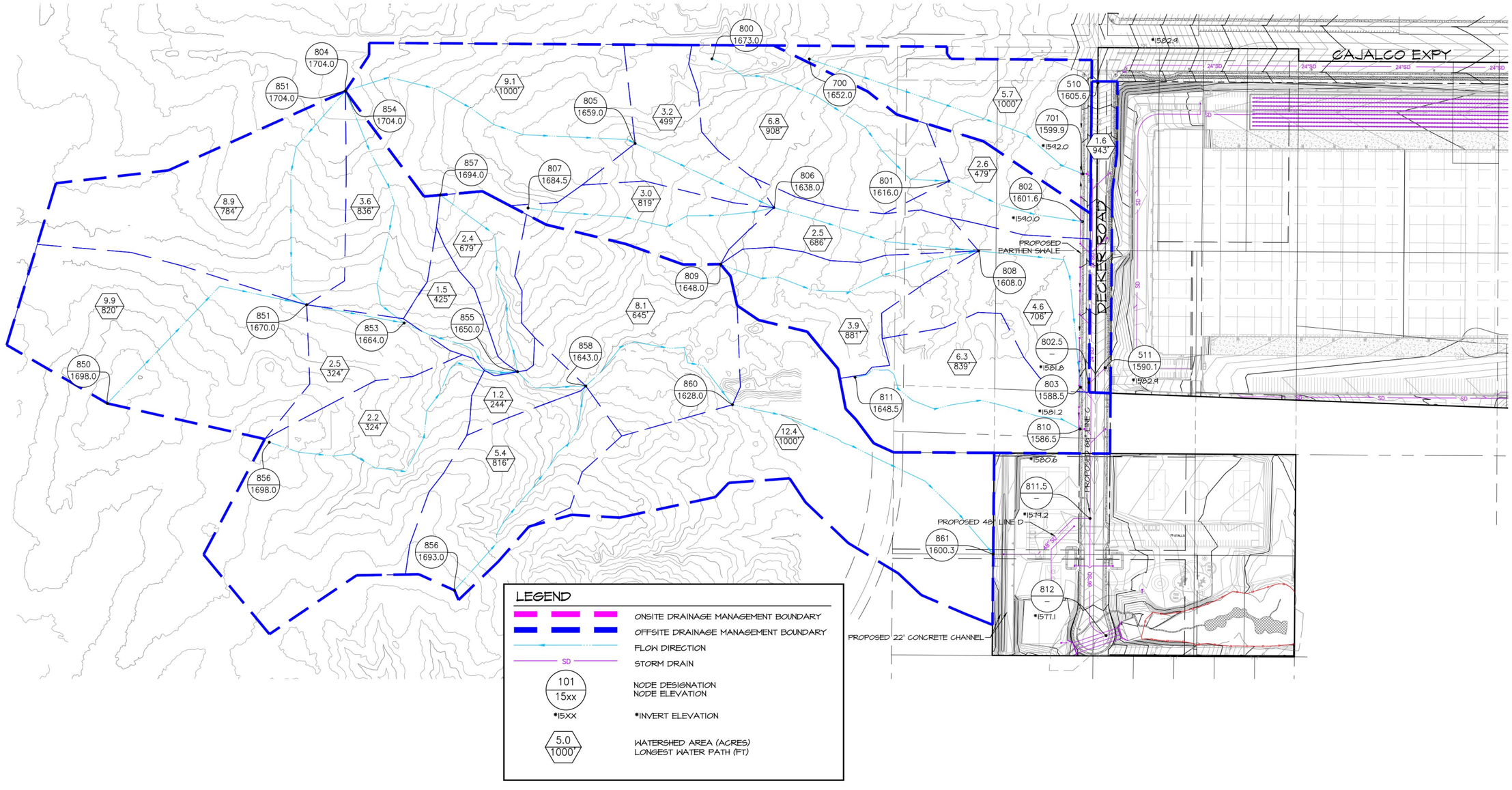


Source(s): Albert A. Webb Associates (03-19-2024)

Figure 4.10-3

Not to Scale

Existing Conditions Hydrology Map for Southern 14.93 Gross Acres



Source(s): Albert A. Webb Associates (03-19-2024)

Figure 4.10-4

Off-Site Hydrological Conditions for Southern 14.93 Gross Acres

Table 4.10-1 Receiving Waters, Section 303(d) Impairments, and Beneficial Uses

Receiving Waters	EPA Approved 303(d) List Impairments	Designated Beneficial Uses	Proximity to RARE Beneficial Use
Perris Valley Storm Drain Channel	None	None	Not a water body classified as RARE
San Jacinto River (Reach 3) (HU# 802.11)	None	Intermittent: MUN, AGR, GWR, REC1, REC2, WARM, WILD	Not a water body classified as RARE
San Jacinto River (Reach 2) (HU# 802.11)	None	Intermittent: MUN, AGR, GWR, REC1, REC2, WARM, WILD	Not a water body classified as RARE
Canyon Lake (HU# 802.11, 802.12)	Nutrients, Pathogens	MUN, AGR, GWR, REC1, REC2, WARM, WILD	Not a water body classified as RARE
San Jacinto River (Reach 1) (HU# 802.31, 802.32)	None	MUN, AGR, GWR, REC1, REC2, WARM, WILD	Not a water body classified as RARE
Lake Elsinore (HU# 802.31)	PCBs, (Organic Compound), Nutrients, Organic Enrichment (Low DO), Sediment Toxicity, Unknown Toxicity	REC1, REC2, WARM, WILD	Not a water body classified as RARE

(Webb, 2024b, p. 9)

- Establishment of a Groundwater Basin Manager
- Monitoring of Groundwater Production
- Monitoring of Groundwater Level and Quality
- Development of Well Construction Policies
- Development of a Well Abandonment and Destruction Program
- Monitoring of Well Construction, Abandonment, and Destruction
- Groundwater Quality Protection
- Exchange of Agricultural and Other Non-potable Groundwater Production to Municipal Use
- Maximize Yield Augmentation with Local Resources – Local Runoff and Reclaimed Water
- Maximize Conjunctive Use
- Groundwater Treatment

4.10.2 Applicable Environmental Regulations

The following is a brief description of the federal, State, and local environmental laws and related regulations related to hydrology and water quality.

A. Federal Regulations

1. Clean Water Act

The CWA establishes the basic structure for regulating discharges of pollutants into the waters of the United States and regulating quality standards for surface waters. The basis of the CWA was enacted in 1948 and was called the Federal Water Pollution Control Act, but the Act was substantially reorganized and expanded in 1972. "Clean Water Act" became the Act's common name with amendments in 1972. Under the CWA, the Environmental Protection Agency (EPA) has implemented pollution control programs such as setting

wastewater standards for industry, and also has set water quality standards for all contaminants in surface waters. The CWA made it unlawful to discharge any pollutant from a point source into navigable waters, unless a permit was obtained. EPA's National Pollutant Discharge Elimination System (NPDES) permit program controls discharges. Point sources are discrete conveyances such as pipes or man- made ditches. Individual homes that are connected to a municipal system, use a septic system, or do not have a surface discharge do not need an NPDES permit; however, industrial, municipal, and other facilities must obtain permits if their discharges go directly to surface waters. (EPA, 2023e)

2. Federal Flood Insurance Program

The U.S. Congress established the National Flood Insurance Program (NFIP) with the passage of the National Flood Insurance Act of 1968. The NFIP is a Federal program enabling property owners in participating communities to purchase insurance as a protection against flood losses in exchange for State and community floodplain management regulations that reduce future flood damages. Participation in the NFIP is based on an agreement between communities and the Federal Government. If a community adopts and enforces a floodplain management ordinance to reduce future flood risk to new construction in floodplains, the Federal Government will make flood insurance available within the community as a financial protection against flood losses. This insurance is designed to provide an insurance alternative to disaster assistance to reduce the escalating costs of repairing damage to buildings and their contents caused by floods. The Federal Insurance and Mitigation Administration (FIMA) within the FEMA is responsible for administering the NFIP and administering programs that provide assistance for mitigating future damages from natural hazards. (FEMA, 2023)

3. Executive Order 11988 – Floodplain Management

Executive Order 11988 requires federal agencies to avoid to the extent possible the long- and short-term adverse impacts associated with the occupancy and modification of flood plains and to avoid direct and indirect support of floodplain development wherever there is a practicable alternative. In accomplishing this objective, "each agency shall provide leadership and shall take action to reduce the risk of flood loss, to minimize the impact of floods on human safety, health, and welfare, and to restore and preserve the natural and beneficial values served by flood plains in carrying out its responsibilities" for the following actions: (FEMA, 2021)

- acquiring, managing, and disposing of federal lands and facilities;
- providing federally-undertaken, financed, or assisted construction and improvements; and
- conducting federal activities and programs affecting land use, including but not limited to water and related land resources planning, regulation, and licensing activities.

B. State Regulations

1. Porter-Cologne Water Control Act

The Porter-Cologne Act is the principal law governing water quality regulation in California. It establishes a comprehensive program to protect water quality and the beneficial uses of water. The Porter-Cologne Act applies to surface waters, wetlands, and ground water and to both point and nonpoint sources of pollution. Pursuant to the Porter-Cologne Act (California Water Code § 13000 et seq.), the policy of the State is as follows: (SWRCB, 2014)

- That the quality of all the waters of the State shall be protected;
- That all activities and factors affecting the quality of water shall be regulated to attain the highest water quality within reason; and
- That the State must be prepared to exercise its full power and jurisdiction to protect the quality of water in the State from degradation.

The Porter-Cologne Act established nine Regional Water Boards (based on hydrogeologic barriers) and the State Water Board, which are charged with implementing its provisions and which have primary responsibility for protecting water quality in California. The State Water Board provides program guidance and oversight, allocates funds, and reviews Regional Water Boards decisions. In addition, the State Water Board allocates rights to the use of surface water. The Regional Water Boards have primary responsibility for individual permitting, inspection, and enforcement actions within each of nine hydrologic regions. The State Water Board and Regional Water Boards have numerous non-point source (NPS) related responsibilities, including monitoring and assessment, planning, financial assistance, and management. (SWRCB, 2014)

The Regional Water Boards regulate discharges under the Porter-Cologne Act primarily through issuance of NPDES permits for point source discharges and waste discharge requirements (WDRs) for NPS discharges. Anyone discharging or proposing to discharge materials that could affect water quality (other than to a community sanitary sewer system regulated by an NPDES permit) must file a report of waste discharge. The State Water Resources Control Board (SWRCB) and the Regional Water Quality Control Boards (RWQCBs) can make their own investigations or may require dischargers to carry out water quality investigations and report on water quality issues. The Porter-Cologne Act provides several options for enforcing WDRs and other orders, including cease and desist orders, cleanup and abatement orders, administrative civil liability orders, civil court actions, and criminal prosecutions. (SWRCB, 2014)

The Porter-Cologne Act also implements many provisions of the Clean Water Act, such as the NPDES permitting program. The Porter-Cologne Act also requires adoption of water quality control plans that contain the guiding policies of water pollution management in California. In addition, regional water quality control plans (basin plans) have been adopted by each of the Regional Water Boards and get updated as necessary and practical. These plans identify the existing and potential beneficial uses of waters of the State and establish water quality objectives to protect these uses. The basin plans also contain implementation, surveillance, and monitoring plans. (SWRCB, 2014) The Project site is located in the Santa Ana River, which is within the purview of the Santa Ana RWQCB. The Santa Ana River Basin Plan is the governing water quality plan for the region.

2. California Water Code

The California Water Code is the principal state law regulating water quality in California. Water quality provisions must be complied with as contained in numerous code sections including: 1) the Health and Safety Code (HSC) for the protection of ground and surface waters from hazardous waste and other toxic substances; 2) the Fish and Game Code for the prevention of unauthorized diversions of any surface water and discharge of any substance that may be deleterious to fish, plant, animal, or bird life; 3) the Harbors and Navigation Code for the prevention of the unauthorized discharge of waste from vessels into surface waters; and 4) the Food

and Agriculture Code for the protection of groundwater which may be used for drinking water supplies. The California Department of Fish and Wildlife (CDFW), through provisions of the Fish & Game Code (§§ 1601 - 1603) is empowered to issue agreements for any alteration of a river, stream, or lake where fish or wildlife resources may be adversely affected. CDFW regulates wetland areas only to the extent that those wetlands are part of a river, stream, or lake as defined by CDFW. (CA Legislative Info, n.d.32)

Surface water quality is the responsibility of the RWQCB, water supply and wastewater treatment agencies, and city and county governments. The principal means of enforcement by the RWQCB is through the development, adoption, and issuance of water discharge permits. RWQCB basin plans establish water quality objectives that are defined as the limits or levels of water quality constituents or characteristics for the reasonable protection of beneficial uses of water. (CA Legislative Info, n.d.32)

3. California Toxics Rule (CTR)

The California Toxics Rule (CTR) fills gap in California's water quality standards necessary to protect human health and aquatic life beneficial uses. The CTR criteria are similar to those published in the National Recommended Water Quality Criteria. The CTR supplements, and does not change or supersede, the criteria that EPA promulgated for California waters in the National Toxics Rule (NTR). The human health NTR and CTR criteria that apply to drinking water sources (those water bodies designated in the Basin Plans as municipal and domestic supply) consider chemical exposure through consumption of both water and aquatic organisms (fish and shellfish) harvested from the water. For waters that are not drinking water sources (e.g., enclosed bays and estuaries), human health NTR and CTR criteria only consider the consumption of contaminated aquatic organisms. The CTR and NTR criteria, along with the beneficial use designations in the Basin Plans and the related implementation policies, are the directly applicable water quality standards for toxic priority pollutants in California waters. (SWRCB, 2016, pp. 14-15)

4. CDFG Code Section 1600 et seq. (Lake- or Streambed Alteration Agreement Program)

Fish and Game Code § 1602 requires an entity to notify CDFW prior to commencing any activity that may do one or more of the following: (CDFW, n.d.2)

- Substantially divert or obstruct the natural flow of any river, stream, or lake;
- Substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or
- Deposit debris, waste or other materials that could pass into any river, stream, or lake.

It should be noted that "any river, stream or lake" includes those that are episodic (they are dry for periods of time) as well as those that are perennial (they flow year-round). This includes ephemeral streams, desert washes, and watercourses with a subsurface flow. It may also apply to work undertaken within the flood plain of a body of water. (CDFW, n.d.2)

CDFW requires a Lake and Streambed Alteration (LSA) Agreement when it determines that the activity, as described in a complete LSA Notification, may substantially adversely affect existing fish or wildlife resources. An LSA Agreement includes measures necessary to protect existing fish and wildlife resources.

CDFW may suggest ways to modify a project that would eliminate or reduce harmful impacts to fish and wildlife resources. Before issuing an LSA Agreement, CDFW must comply with CEQA. (CDFW, n.d.2)

5. Watershed Management Initiative (WMI)

The State and Regional Water Boards are currently focused on looking at entire watersheds when addressing water pollution. The Water Boards adopted the Watershed Management Initiative (WMI) to further their goals. The WMI establishes a broad framework overlying the numerous federal and State mandated priorities. As such, the WMI helps the Water Boards achieve water resource protection, enhancement and restoration while balancing economic and environmental impacts. (SWRCB, 2017) The integrated approach of the WMI involves three main ideas:

- Use water quality to identify and prioritize water resource problems within individual watersheds. Involve stakeholders to develop solutions.
- Better coordinate point source and nonpoint source regulatory efforts. Establish working relationships between staff from different programs.
- Better coordinate local, state, and federal activities and programs, especially those relating to regulations and funding, to assist local watershed groups. (SWRCB, 2017)

6. Sustainable Groundwater Management Act (SGMA)

The 2014 Sustainable Groundwater Management Act (SGMA) requires governments and water agencies of high and medium priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under SGMA, these basins should reach sustainability within 20 years of implementing their sustainability plans. The DWR categorizes the priority of groundwater basins. For critically over-drafted basins, that will be 2040. For the remaining high and medium priority basins, 2042 is the deadline. The SGMA also requires local public agencies and Groundwater Sustainability Agencies (GSAs) in high- and medium-priority basins to develop and implement Groundwater Sustainability Plans (GSPs) or Alternatives to GSPs. GSPs are detailed road maps for how groundwater basins will reach long term sustainability. (DWR, n.d.; DWR, 2020)

C. Local Regulations

1. Water Quality Control Plan for the Santa Ana River Basin (Basin Plan)

The California Porter-Cologne Water Quality Control Act (§ 13000 ("Water Quality") et seq., of the California Water Code), and the Federal Water Pollution Control Act Amendment of 1972 (also referred to as the Clean Water Act (CWA)) require that comprehensive water quality control plans be developed for all waters within the State of California. The Project site is located within the jurisdiction of the Santa Ana RWQCB. Water quality information for the Santa Ana watershed is contained in the "Water Quality Control Plan for the Santa Ana River Basin" (Basin Plan), which was most recently updated in June 2019. This document is herein incorporated by reference and is available for public review at the Santa Ana RWQCB office located at 3737 Main Street, Suite 500, Riverside, CA 92501-3339. The purpose of the Basin Plan is to: (1) designate beneficial uses of the Region's surface and ground waters; (2) designate water quality objectives for the reasonable protection of those uses; and (3) establish an implementation plan to achieve the objectives. A summary of the

receiving waters for the Project site, their existing Section 303(d) impairments, and designated beneficial uses was previously shown in Table 4.10-1. (RWQCB, 2019)

4.10.3 Basis for Determining Significance

Section X of Appendix G to the CEQA Guidelines addresses typical adverse effects to hydrology and water quality, and includes the following threshold questions to evaluate the Project's impacts on hydrology and water quality:

- *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality;*
- *Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin;*
- *Would the project 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, in a manner which would:*
    - *Result in substantial erosion or siltation on or off site;*
    - *Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;*
    - *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; or*
    - *Impede or redirect flood flows;*
- *In flood hazard, tsunami, or seiche zones, would the project risk release of pullutants due to project inundation; or*
- *Would the project conflict with or otherwise obstruct implementation of a water quality control plan or sustainable groundwater management plan.*

Significance thresholds are set forth in Riverside County's Environmental Assessment Checklist, are derived from Section X of Appendix G to the CEQA Guidelines (listed above), and state that the proposed Project would have a significant impact to hydrology and water quality if construction and/or operation of the Project would:

a. *Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality;*

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

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;*

d. Result in substantial erosion or siltation on-site or off-site;

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

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;

g. Impede or redirect flood flows;

h. In flood hazard, tsunami, or seiche zones, risk the release of pollutants due to project inundation; or

i. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

The significance thresholds set forth in Riverside County's Environmental Assessment Checklist were used to evaluate the significance of the proposed Project's impacts on hydrology and water quality.

4.10.4 Impact Analysis

Threshold a.:	***Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?***
Threshold b.:	***Would the Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?***
Threshold i.:	***Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?***

Potable water service to the Project site would be provided by the EMWD, and the Project would not involve direct groundwater extraction via existing or proposed groundwater wells. Additionally, although the Project would result in a substantial increase in impervious surfaces on the northern 50.04 gross acres of the Project site, the total amount of runoff from the site would be similar to existing conditions, and all runoff would be conveyed to downstream facilities where groundwater infiltration would continue to occur (i.e., the San Jacinto River, Canyon Lake, and Lake Elsinore). Thus, the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. Impacts would be less than significant.

The Project site is located within the jurisdiction of the Santa Ana RWQCB. Water quality information for the Santa Ana River watershed is contained in the Santa Ana Region Basin Plan ("Basin Plan"), as most recently updated in June 2019 (RWQCB, 2019). In addition, the Project site is located at the western edge of the Perris North GMZ. Thus, the Project is subject to the EMWD's "Groundwater Management Plan – West San Jacinto Groundwater Basin" (EMWD, 1995). The Project's consistency with each is discussed below.

Santa Ana River Basin Plan

The California Porter-Cologne Water Quality Control Act (§ 13000 ("Water Quality") et seq., of the California Water Code), and the Federal Water Pollution Control Act Amendment of 1972 (also referred to as the CWA) require that comprehensive water quality control plans be developed for all waters within the State of California. The Project site is located within the jurisdiction of the Santa Ana RWQCB. Water quality information for the Santa Ana River watershed is contained in the Santa Ana Region Basin Plan (as most recently updated in June 2019). This document is herein incorporated by reference and is available for public review at the Santa Ana RWQCB office located at 3737 Main Street, Suite 500, Riverside, CA 92501-3348. (RWQCB, 2019)

The CWA requires all states to conduct water quality assessments of their water resources to identify water bodies that do not meet water quality standards. Water bodies that do not meet water quality standards are placed on a list of impaired waters pursuant to the requirements of Section 303(d) of the CWA. The Project site resides within the Santa Ana River Watershed and receiving waters for the property's drainage previously were summarized in Table 4.10-1, along with their listed Section 303(d) impairments.

Specific provision of the CWA applicable to the proposed Project is CWA Section 402, which authorizes the NPDES permit program that covers point sources of pollution discharging to a water body. The NPDES program also requires operators of construction sites one acre or larger to prepare a Stormwater Pollution Prevention Plan (SWPPP) and obtain authorization to discharge stormwater under an NPDES construction stormwater permit.

Provided below is a discussion of the Project's potential to conflict with the Santa Ana Region Basin Plan during both construction and long-term operation.

Construction-Related Water Quality

Construction of the proposed Project would involve demolition, clearing, grading, paving, utility installation, building construction, and landscaping activities, which would result in the generation of potential water quality pollutants such as silt, debris, chemicals, paints, and other solvents with the potential to adversely affect water quality. As such, short-term water quality impacts have the potential to occur during construction of the Project in the absence of any protective or avoidance measures.

Pursuant to the requirements of the Santa Ana RWQCB and the County of Riverside, the Project Applicant would be required to obtain an NPDES Municipal Stormwater Permit for construction activities. The NPDES permit is required for all projects that include construction activities, such as clearing, grading, and/or excavation, that disturb at least one acre of total land area. In addition, the Project would be required to comply with the RWQCB's Basin Plan. Compliance with the NPDES permit and the Basin Plan involves the preparation and implementation of a SWPPP for construction-related activities. The SWPPP is required to specify the Best Management Practices (BMPs) that the Project would be required to implement during construction activities to ensure that all potential pollutants of concern are prevented, minimized, and/or otherwise appropriately treated prior to being discharged from the subject property. Mandatory compliance with the SWPPP would ensure that the proposed Project does not violate any water quality standards or waste discharge requirements during construction activities. Therefore, with mandatory adherence to the future

required SWPPP, runoff associated with Project-related construction activities would not conflict with the Santa Ana Region Basin Plan requirements, and impacts would be less than significant.

Operational Water Quality Impacts

In general, runoff associated with the northern portions of the Project site would be collected and detained on site and subjected to treatment with LID BMPs, ultimately discharging flows to the north into the Perris Valley Master Drainage Plan (MDP) system. Flows within the proposed public park in the southern portion of the Project site would retain water quality storm flows for treatment through LID Principals, with larger storm events designed to surface flow towards the existing stream that travels through the southeast portion of the proposed park site. Frontage road improvements would be split between these two drainage outlets. Provided below is a description of the drainage and water quality measures proposed for the northern and southern portions of the Project site.

Water Quality Impacts – Northern 50.04 Acres (Proposed Warehouse Building Site)

For the northern 50.04 gross acres proposed for development with warehouse uses as part of the proposed Project, runoff generated on site would be conveyed throughout the site via proposed ribbon gutters and curbs and gutters. Onsite runoff would then be captured by a network of drainage inlets provided at low points. For water quality purposes, this is considered Drainage Management Area (DMA) A. Proposed private underground storm drains would convey captured flows towards an underground storage chamber before being pumped to a proposed modular wetlands system (MWS) for water quality treatment. Offsite flows from Cajalco Road and Seaton Avenue would be collected via catch basins and would be conveyed via 36-inch storm drain lines in Cajalco Road. These offsite road areas are considered DMA-C for water quality purposes. The onsite Project treatment would be oversized to compensate for the volume of stormwater requiring treatment (referred to as "V_{BMP}") of the offsite street frontages to the maximum extent practical. All onsite treated flows would then be conveyed offsite to the proposed 36-inch extension of Perris Valley MDP Lateral E-9.1.1 in Seaton Avenue and Cajalco Road connecting to Perris Valley MDP Line E-9.1 at Cajalco Road Station 57+09.79. Decker Road flows within the proposed warehouse site's frontage would be conveyed southerly to be outletted into the existing stream that runs through the southeastern portions of the proposed public park site. Similar to Cajalco Road and Seaton Avenue within the industrial project frontage, the Decker Road frontage area is accounted for in the V_{BMP} calculations of the industrial site onsite BMPs. (Webb, 2024b, p. 1-2)

The northern 50.04 gross acres proposed for development with warehouse uses intercepts offsite flows from a small portion of the adjacent MWD-owned parcel. These offsite flows would be conveyed to a 0.7-acre landscape area on the northern 50.04 acres of the Project site and that would consist of a self-retaining area. Larger storm event for this area would be conveyed through the northern portions of the Project site via a proposed 12-inch storm drain Line A that would outlet to the proposed extension of Perris Valley MDP Line E-9.1.1. (Webb, 2024a, p. 1-2)

Existing flows that travel east on Cajalco Road approaching Decker Road, outside of the Project site's frontage with these roadways, would be collected via proposed catch basins at the Cajalco Road and Decker Road intersection, and would then be conveyed via a proposed public 18-inch storm drain (Line B), which

would connect to the proposed extension of Perris Valley MDP Lateral E-9.1 at the intersection of Cajalco Road and Seaton Avenue. (Webb, 2024a, p. 1-2)

According to the approved Perris Valley MDP Lateral E-9.1.1 Stage 1 improvement plans (IP 200029), the existing available capacity is 45 cfs at the point of connection with MDP Line E-9.1. The detention chambers onsite would be oversized to detain the 100-year, 24-hour storm flows of the Project site as well as the BMP volume. As the water quality volume is being pumped from the chamber to the modular wetlands for treatment, when a larger volume storm hits, the larger volume would gravity out of the chamber system through an orifice plate that would control the discharge rate to not exceed the capacity of the downstream lateral. The elevation of this orifice plate would be just higher than the top of the V_{BMP} storage elevation. (Webb, 2024a, p. 1-2)

The onsite runoff volume have the potential to exceed the capacity of the existing Perris Valley MDP Line E-9.1 without detention, as existing peak flows from this portion of the Project site (120 cfs) already exceeds the capacity of MDP Line E-9.1. Flows from the northern portions of the Project site would be detained and discharged offsite at a rate that is appropriate for Line E-9.1 to accept such that the Project would not exceed the capacity of Line E-9.1. The remaining capacity of the downstream MDP Lateral E-9.1.1 is approximately 10.5 cfs. The preliminary routing analysis utilized a discharge of 10 cfs out of the detention chambers which would allow for the 100-year flows to leave the chambers in less than 72 hours. (Webb, 2024a, pp. 1-2 and 1-3)

As mentioned above, street flows in the Decker Road industrial site frontage, as well as the MWD frontage just south of the northern 50.04 gross acres of the Project site would be collected via proposed catch basins and conveyed through proposed Line C, which ranges in size from 24" RCP to 66" RCP. Line C would connect to three proposed 12'x12' RCB that would convey the existing stream underneath the Decker Road cul-de-sac. Decker Road flows in the park site frontage would be accepted via reverse under sidewalk drains and then would be treated by proposed bioretention basins on the public park proposed in the southern portions of the Project site. Larger storm flows in Decker Road would bypass the under-sidewalk drains and will be captured by proposed catch basins and directed to proposed Line C. (Webb, 2024ap. 1-2)

Water Quality Impacts – Southern 14.93 Acres (Proposed Public Park Site)

For the proposed park component of the Project, onsite runoff would be conveyed through surface flows, with flows eventually draining towards the existing stream that runs through the southeast portion of the proposed public park site. The park would be split into multiple DMAs, DMA-E1 through E5 and DMA-W1. (Webb, 2024b, p. 8)

DMAs E1, E3, and E4 would provide water quality treatment in areas that drain to depressed self-retaining areas. This would offer treatment of the proposed improvements through Low Impact Development (LID) Principles, allowing settlement of the flows in depressed low areas created by berms on the park site. The storm flows would be able to pond to a maximum depth of 3-inches before bypassing the retaining areas over the berms and flowing toward the existing stream on the site. DMA-E4, specifically, would consist of a stabilized, pervious access road that drains to a drainage swale that runs parallel to it on the south side. The swale would contain decomposed granite and would be utilized for water quality storage. While this

area would not meet the 2:1 ratio for self-retaining areas, due to limitations of the site this area has been designed to the maximum extent practicable. (Webb, 2024b, p. 8)

DMAs W1 and E2, which each would contain the half width of Decker Road in the park frontage, would drain to BMP-W1 and BMP-E2, respectively. The bioretention basins would have 2.5 feet of engineered media over 0.5-foot of choker gravel over 1.0 foot of gravel, and it would have a water quality ponding depth of 0.5-foot, per the Riverside County Santa Ana Region bioretention design sheet. The basins also would be sized to handle the Hydrologic Conditions of Concern (HCOC) mitigation volumes for these respective DMAs in addition to the Design Capture Volume (VBMP). Water quality flows would filter through the media and gravel before being picked up by perforated pipes in the gravel section, which would convey treated flows towards proposed 66-inch storm drain, Line C in Decker Road, which then would convey flows south towards the existing stream in the southern portions of the public park site. In the bioretention basins, flows from larger storm events would be intercepted by an overflow grate inlet in the proposed basins, which would outlet through proposed Line C. (Webb, 2024b, p. 8)

The portion of Decker Road along the frontage with the MWD-owned parcel that occurs between the northern and southern portions of the Project site would drain to proposed inlets that convey flows to proposed Line C in Decker Road. BMPs W1 and E2 would oversized to compensate for the treatment of west and east sides of Decker Road along the MWD frontage, respectively. For treatment of Decker Road within the park frontage, flows would be intercepted at the low spot in Decker Road and conveyed via reversed under sidewalk drains to bioretention basins. (Webb, 2024b, p. 8)

DMA-E5 on the park site would consist of a self-treating area. The area would consist of a natural stream that would drain to the east offsite. There are no existing impervious areas or proposed improvements or grading within this area. (Webb, 2024b, p. 8)

The park component of the Project is subject to Hydrologic Conditions of Concern (HCOC) measures and increased runoff mitigation due to the discharge of flows into the existing stream that runs through the park. Any increase from the pre and post 10-year and 100-year flowrates will be addressed through the onsite drainage system design and is expected to be minimal. For DMAs E-2 and W-1 there would be a significant increase for the 2-Year, 24-Hour storm event flows which triggered mitigation for the HCOC measures. The Project Applicant proposes to mitigate this volume by detaining it in proposed bio-retention basins in the DMAs. (Webb, 2024a, pp. 1-3 and 1-4)

There are approximately 1,200 acres of offsite area that are tributary to the southern portions of the Project site. The three primary areas collecting this offsite stormwater proposed with development of the Project are Decker Road, between Cajalco and the north side of the park site; a proposed channel located along the west side of the park site; and the south side of the park site where a box culvert is proposed to convey the existing stream. The offsite flows that are tributary to Decker Road would be intercepted by a shotcrete swale, proposed to parallel the parkway improvements. Multiple inlets are proposed within the swale and would be connected to Line C. Maintenance of various storm drain infrastructure would be provided by the Riverside County Transportation Department (RCTD), the Riverside County Flood Control and Water Conservation District (RCFCWCD), or other public agency equivalent. Maintenance activities frequency

would be regular with a minimum occurrence of once a year. Sediment and debris are expected from the offsite undeveloped tributary area that would convey flows to these collection channels and RCB culverts. (Webb, 2024a, p. 1-4)

Offsite flows that drain easterly to the western boundary of the southern portions of the Project site would be accepted by a proposed drainage channel that would parallel the property line. This 22-foot wide concrete channel would have a slope with rip-rap on the western side to slow down flows as they enter the channel. The channel would drain to proposed Line D, a 48-inch RCP storm drain that would convey flows through the park, connecting to Line C in Decker Road. The proposed concrete channel and inlet would require maintenance. The channel would be accessed via a 20-foot-wide access road that would separate the channel from the park, which also would include a retaining wall and fencing. (Webb, 2024a, p. 1-4)

Offsite flows that drain northerly to the southern portions of the Project site generally would follow the existing stream. These flows would be accepted into the three proposed 12'x12' RCB that would continue the stream underneath the Decker Road cul-de-sac. As these flows exit the box, they would dissipate over a design rock rip rap outlet structure to address any increase in velocities prior to continuing in their existing stream condition. The three proposed 12'x12' RCB culvert and headwalls would require maintenance to maintain flow progression. The headwalls can be accessed via access road on either side of Decker Road. (Webb, 2024a, p. 1-4) The headwalls and inlet and outlet structures would be accessed via maintenance access roads and turnaround areas. Maintenance activities would be regular, with a minimum of once per year.

Accordingly, and as described above, all runoff generated on site would be appropriately treated prior to ultimate discharge from the site. Therefore, because all runoff would be treated through BMPs where required, including the proposed MWS units and bioretention areas, the proposed Project would not conflict with the Santa Ana Region Basin Plan, and impacts would therefore be less than significant.

Groundwater Management Plan – West San Jacinto Groundwater Basin

The EMWD adopted the SJGB GMP on June 8, 1995, which is intended to manage the SJGB in a manner that would supplement EMWD's water supplies, thereby increasing the amount of locally-available water and reducing the amount of water that needs to be imported through MWD. The GMP covers approximately 256-square miles (over 164,200 acres) and has been divided into six (6) groundwater management zones. The Project site is located in the Perris North GMZ. (EMWD, 1995; EMWD, 2021b)

There are no existing groundwater wells on the Project site, and the Project does not propose to construct any wells on site. As such, the Project would not directly extract groundwater, but would instead obtain potable water from the EMWD, which relies in part on groundwater resources. Accordingly, the Project only would have the potential to conflict with the West San Jacinto GMP if the Project were to obstruct infiltration of runoff into the groundwater basin, or if the Project were to contribute to or exacerbate existing water quality problems within the basin.

As noted above under the discussion of the Project's consistency with the Santa Ana Region Basin Plan, the Project Applicant would be required to obtain a NPDES Municipal Stormwater Permit for construction activities. The NPDES permit is required for all projects that include construction activities, such as clearing,

grading, and/or excavation that disturb at least one acre of total land area. Compliance with the NPDES permit and the Basin Plan involves the preparation and implementation of a SWPPP for construction-related activities. The SWPPP is required to specify the BMPs that the Project would be required to implement during construction activities to ensure that all potential pollutants of concern are prevented, minimized, and/or otherwise appropriately treated prior to being discharged from the subject property. Mandatory compliance with the SWPPP would ensure that construction of the proposed Project does result in polluted runoff that could adversely affect water quality within the SJGB. Additionally, the total amount of runoff from the Project site during construction would not change substantially in relation to existing conditions, thereby continuing to allow for infiltration into the SJGB. Accordingly, during construction the Project would not conflict with the West San Jacinto GMP, and a less-than-significant impact would occur.

Following construction activities, the southern portions of the Project site proposed for public park uses largely would continue to allow for infiltration into the groundwater table, with exception of flows originating within the proposed parking lots or within the southern extension of Decker Road. Following construction, infiltration on the northern portions of the Project site proposed for warehouse uses largely would be precluded and would be limited to landscaped areas, as remaining areas of the northern portions of the site would be covered with impervious surfaces (i.e., buildings, drive aisles, etc.). However, under existing conditions all runoff generated on and tributary to the northern portions of Project site is conveyed to existing storm drainage facilities located within Seaton Avenue and Cajalco Road. While a nominal amount of groundwater recharge may occur under existing conditions, the majority of runoff is conveyed to downstream facilities, which ultimately include unlined drainage channels and bodies of water (i.e., Canyon Lake, and Lake Elsinore) wherein groundwater recharge occurs. These conditions would not substantially change under the proposed Project. Groundwater recharge would continue to occur downstream, as it does under existing conditions.

With respect to groundwater quality under long-term operations, the Project Applicant would be required to identify measures to reduce pollutants in runoff generated on the Project site pursuant to the applicable NPDES permit requirements. Measures identified to address water quality are identified as part of the Project's WQMP (*Technical Appendix J2*).

As more fully described above under the analysis of consistency with the Santa Ana River Basin Plan, for the northern 50.04 gross acres proposed for warehouse uses, these measures would include an underground storage chamber that would detain flows before being pumped by a proposed on-site lift station to the proposed MWS units for water quality treatment. Following detention and water quality treatment, flows would be conveyed via a proposed 36-inch storm drain line that would be constructed as part of the Project and that would extend along the northern site boundary and off-site to the east within Cajalco Road to an existing point of connection near the intersection of Cajalco Expressway and Harvill Avenue. The proposed MWS units and underground storage chamber would be effective in removing pollutants of concern in runoff leaving the Project site, such as bacterial indicators, metals, nutrients, pesticides, toxic organic compounds, sediments, trash/debris, and oil/grease (Webb, 2024b, Table E.1).

For the public park proposed in the southern portions of the Project site, and as described in more detail above under the discussion of Project consistency with the Santa Ana River Basin Plan, onsite runoff would be conveyed through surface flows, with flows eventually draining towards the existing stream that runs through the southeast portion of the proposed public park site. The park would be split into multiple DMAs, DMA-E1

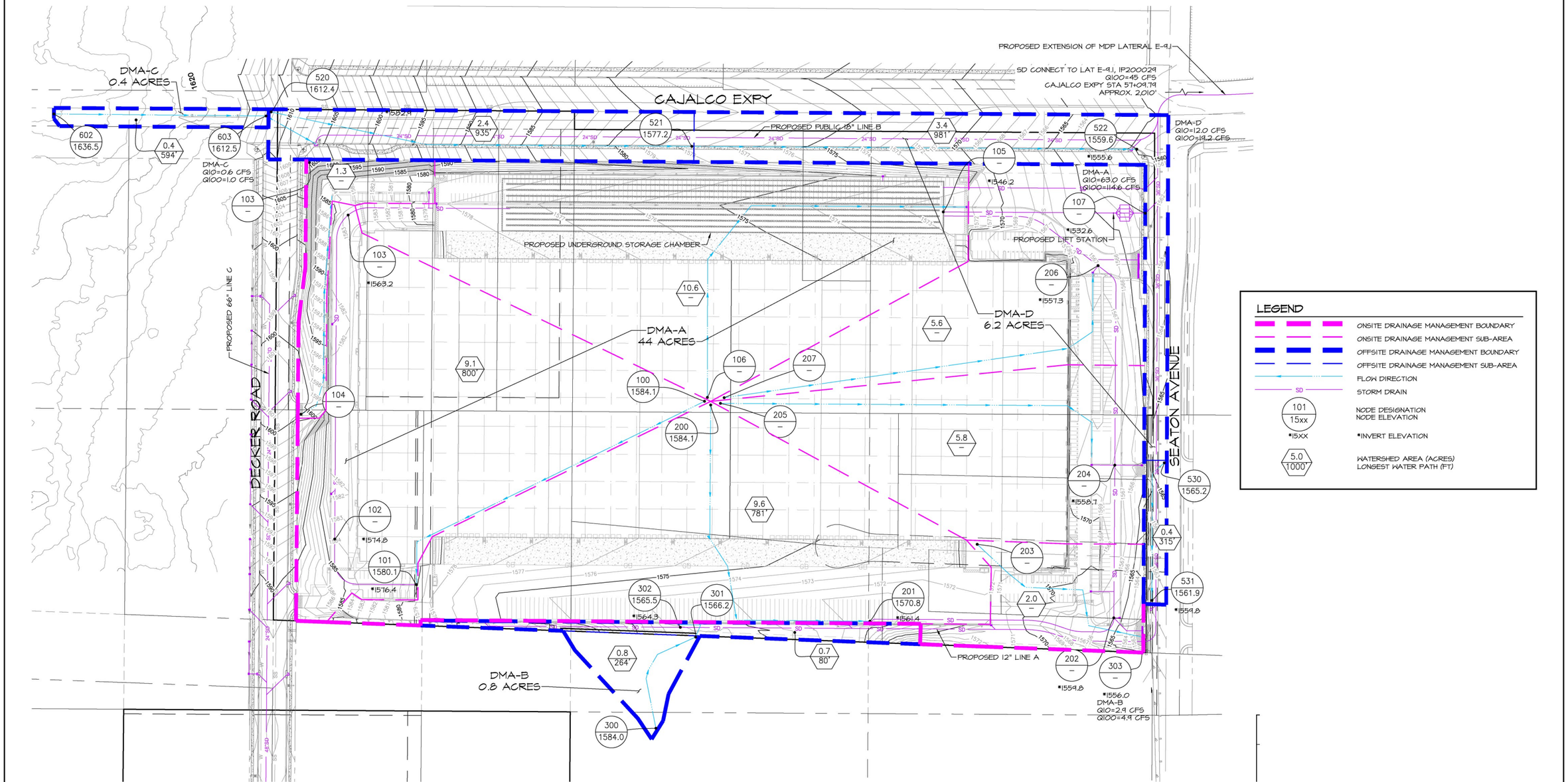
through E4, and DMA-W1, which would divide water quality treatment in areas that drain to depressed self-retaining areas. This would provide treatment of the proposed improvements through LID Principles, while allowing larger storm events to continue towards the existing stream. Off-site flows tributary to the proposed public park site also would be treated by the Project's proposed bioretention facilities. Water quality flows would filter through the media and gravel in the bioretention facilities before being picked up by perforated pipes in the gravel section, which would convey treated flows towards the proposed three 12'x12' RCB in the Decker Road cul-de-sac, which then would convey flows south towards the existing stream. In the bioretention basins, flows from larger storm events would be intercepted by an overflow grate inlet in the proposed basins, which would outlet through proposed Line C. These measures would ensure that first-flush runoff from the southern portions of the Project site proposed for public park uses is appropriately treated by bioretention facilities prior to ultimate discharge from the site. (Webb, 2024a, p. 1-3; Webb, 2024b, pp. 7-8)

With mandatory compliance with the Project's WQMP, the Project would not contribute substantial amounts of polluted runoff towards the Perris North Groundwater Basin. As such, long-term operation of the northern 50.04 gross acres and the southern 14.93 gross acres of the Project site would not conflict with or interfere with implementation of the GMP, and impacts would therefore be less than significant.

Threshold c.:	***Would the Project 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?***
Threshold f.:	***Would the Project 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?***

Please refer to the analysis of Thresholds a., b, and i. As indicated therein, with implementation of the Project's proposed drainage system, the Project would not generate substantial additional sources of polluted runoff. Accordingly, impacts associated with water quality would be less than significant.

Figure 4.10-2 (previously presented) depicts the existing drainage patterns for the northern 50.04 acres of the Project site, while the proposed drainage conditions for the northern 50.04 gross acres of the Project site that are proposed for development with a warehouse building are depicted on Figure 4.10-5, *Proposed Conditions Hydrology Map for Northern 50.04 Gross Acres*. As depicted on Figure 4.10-5, the existing drainage patterns within this portion of the Project site generally would be preserved, except as necessary to facilitate drainage and sewer flows. In the existing condition, onsite flows generally flow from west to east. In the developed condition, runoff would be captured by drainage inlets at low points around the Project site and conveyed to the proposed underground storage chamber in the northern portion of the site, where flows would then be pumped into proposed MWS units for water quality treatment. Following water quality treatment, flows would then be routed offsite via a proposed 36-inch storm drain line that would be constructed as part of the Project and that would extend along the northern site boundary and off-site to the east within Cajalco Road to an existing point of connection near the intersection of Cajalco Expressway and Harvill Avenue. The proposed conditions are similar to the existing drainage patterns of the Project site, wherein all flows generated on site sheet flow to the east into existing drainage facilities within Seaton Avenue and Cajalco Road. Thus,



Source(s): Albert A. Webb Associates (03-19-2024)

Figure 4.10-5

Not to Scale

Proposed Conditions Hydrology Map for Northern 50.04 Gross Acres

development of the northern 50.04 gross acres of the Project site would not substantially alter the existing drainage pattern of the Project site or surrounding areas, and impacts would be less than significant. (Webb, 2024a, pp. 1-1 through 1-3)

With respect to stormwater drainage facility capacity and the potential for increased flood hazards downstream, under existing conditions runoff from the northern 50.04 gross acres of the Project site is conveyed to MDP Lateral E-9.1. As shown in Table 4.10-2, *MDP Lateral E-9.1 Capacity*, following routing of off-site flows tributary to the Project site to Lateral E-9.1, the remaining available capacity within MDP Lateral E-9.1 would be 10.5 cfs, while the existing peak discharge rate for the northern 50.04 gross acres of the Project site is 23.69 cfs; thus, runoff from the northern portions of the Project site already exceeds the capacity of Lateral E-9.1 under existing conditions. With implementation of the proposed Project, a majority of the northern 50.04 gross acres of the Project site would be developed with impervious surfaces, with exception of proposed landscaped areas. Runoff generated in the northern 50.04 gross acres would be conveyed to the proposed underground storage chamber in the northern portion of the site, where flows would then be pumped into proposed MWS units for water quality treatment. All treated flows would then be conveyed offsite to a proposed 36-inch extension of MDP Lateral E-9.1.1 in Seaton Avenue and Cajalco Road, which would provide a connection to Perris Valley MDP Line E-9.1 at the Cajalco Road Station. (Webb, 2024a, pp. 4-1 and 4-2)

Table 4.10-2 MDP Lateral E-9.1 Capacity

Tributary Flow	Q_{100}
MDP Lateral E-9.1 Capacity, IP 20029	45 cfs
Offsite Flows in Proposed Line B (Offsite Flows + Seaton Ave Frontage)	6.3 cfs
Offsite Flows in Proposed Line C (Offsite Flows + Cajalco Road Frontage)	21.9 cfs
Water Quality BMP Outflow	1.96 cfs
Off-site Flows from Adjacent Property to the East	4.3 cfs
Capacity Leftover	**10.5 cfs**

(Webb, 2024a, Table 9)

Without appropriate detention the flows from the northern 50.04 gross acres of the Project site could continue to exceed the capacity of Perris Valley MDP Line E-9.1. While the final discharge volumes would be determined as part of final engineering for the Project, the Project's Drainage Study (*Technical Appendix J1*) includes a preliminary routing analysis for the proposed detention basin in the northern portions of the Project site. The preliminary routing analysis utilized a discharge of 10 cfs out of the detention chambers, which would allow for a dewatering of the 100-year flows from the chambers in less than 72 hours. The planned discharge flows include flows from off-site areas tributary to the northern portions of the Project site. Thus, although development on the northern portions of the Project site has the potential to exceed the capacity of existing storm drainage facilities and/or cause or contribute to increased flood hazards downstream, the proposed onsite storm drain system would be sized during the Project's final design phase to sufficiently restrict peak flow rates to a maximum of 10 cfs. With the proposed detention of flows from the northern portions of the Project site, the proposed extension of MDP Lateral E-9.1.1 and the existing MDP Lateral E-9.1.1 and MDP Line E-9.1 would have sufficient capacity accommodate peak runoff from the northern portions of the Project site and off-site areas tributary to this portion of the Project site. Therefore, development on the northern 50.04 gross acres of the Project site would not contribute runoff water which would exceed the

capacity of existing or planned stormwater drainage systems or that would cause or contribute to increased flood hazards downstream. Impacts would be less than significant. (Webb, 2024a, pp. 1-2 and 1-3)

As previously depicted on Figure 4.10-3, under existing conditions the southern portion of the Project site slopes down at approximately 1% to 8% grade from west to east, and as such the existing drainage pattern for the site and the general area is characterized by sheet flows that follow the slope to the east towards an existing stream that flows easterly along the south end to the proposed public park site. Figure 4.10-6, *Proposed Conditions Hydrology Map for Southern 14.93 Gross Acres*, depicts the proposed drainage conditions for the southern 14.93 gross acres of the Project site that are proposed for development with a public park. As shown, with implementation of the Project the drainage pattern for the proposed public park site would be similar to existing condition, with onsite runoff being conveyed through surface flows the would eventually drain towards the existing stream that runs through the southeast portion of the proposed public park site. Thus, implementation of the proposed public park use and associated improvements on the southern 14.93 gross acres of the Project site would not substantially alter the existing drainage pattern of the Project site or surrounding areas, and impacts would be less than significant.

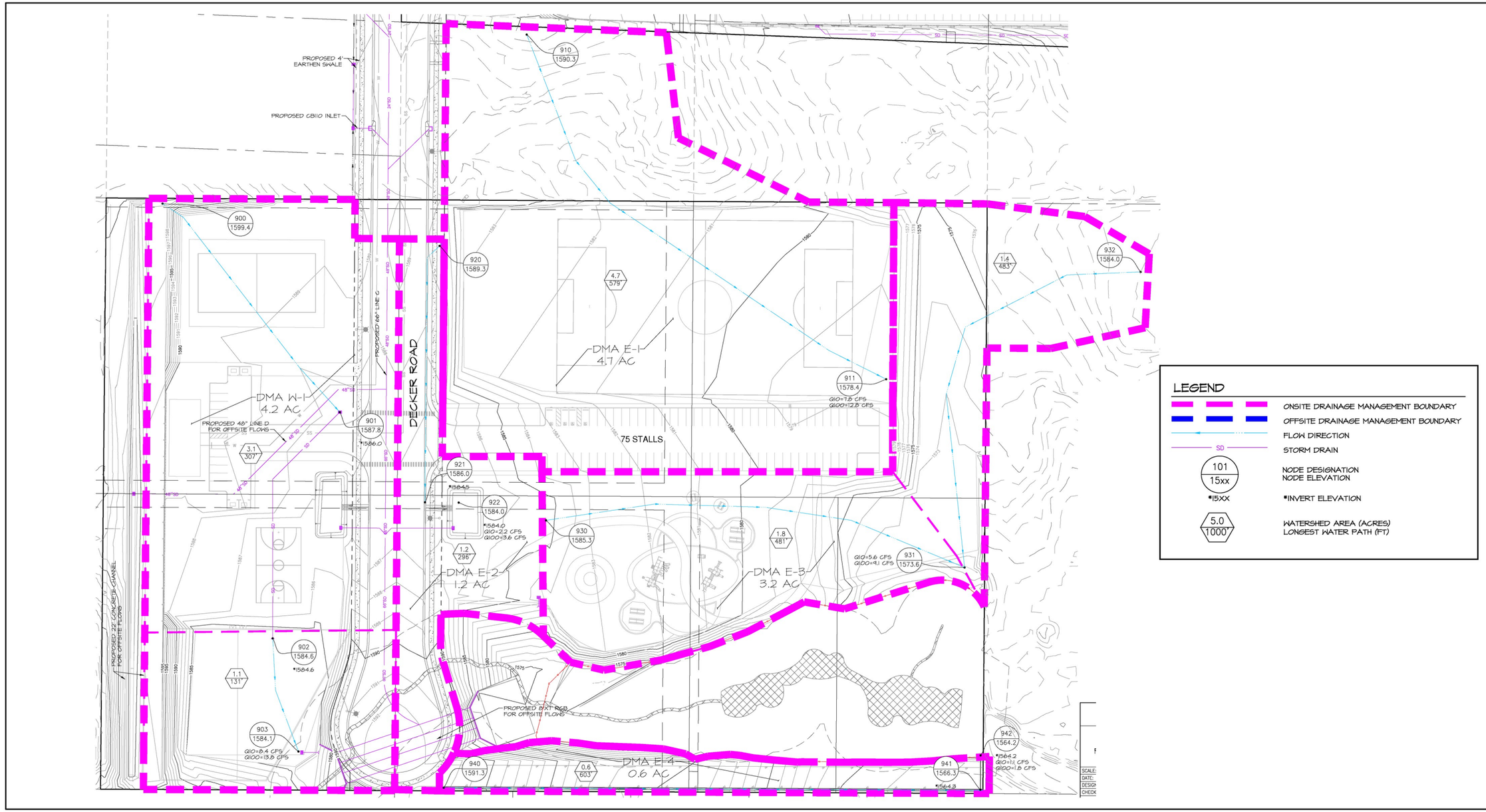
For the proposed park component of the Project, impervious surfaces generally would be limited to parking areas, the proposed recreation building, sidewalks/trails, the amphitheater, handball and basketball courts, and the southerly extension of Decker Road. Runoff generated within the southern portions of Decker Road would be retained by proposed bioretention areas prior to being discharged to proposed Line C in Decker Road, ultimately discharging to the existing stream within the proposed park site. Runoff generated within the park site would be conveyed through surface flows to depressed self-retaining areas, with flows eventually draining towards the existing stream that runs through the southeast portion of the proposed public park site. Due to the minimal amount of impervious surfaces proposed for the public park site and the depressed self-retaining areas proposed within this portion of the Project site, runoff from the park site would be similar to what occurs under existing conditions. Accordingly, the proposed drainage plan for the public park site would not exceed the capacity of existing or planned stormwater drainage systems and would not cause or contribute to increased flood hazards downstream. Impacts would be less than significant. (Webb, 2024a, p. 1-3)

Threshold d.: Would the Project result in substantial erosion or siltation on-site or off-site?

The Project has the potential to result in erosion or siltation during both construction and long-term operations. Each is discussed below.

Construction-Related Erosion Impacts

The Project has been designed to generally maintain the existing drainage patterns of the Project site, except as needed for proper site drainage and sewer flows. Nonetheless, construction of the proposed Project would involve substantial ground disturbance during clearing and grading of the site. In addition, on-site erosion could occur if graded slopes are not stabilized prior to ultimate development or landscaping. The proposed grading activities would generate silt which could be carried off-site during a heavy rainfall event. Should such an event occur in the absence of any preventative measures to contain silt and other soils on-site, erosion and/or siltation downstream could result.



Source(s): Albert A. Webb Associates (03-19-2024)

Figure 4.10-6

Not to Scale

Proposed Conditions Hydrology Map for Southern 14.93 Gross Acres

However, pursuant to requirements of the SWRCB, the Project Applicant would be required to obtain a NPDES permit for construction activities on-site. The NPDES permit is required for all projects that include construction activities, such as clearing, grading, and/or excavation that disturb at least one (1) acre of total land area. Compliance with the NPDES permit involves the preparation and implementation of a SWPPP for construction related activities. The SWPPP would specify BMPs to minimize the potential for erosion and siltation to occur and would include specific Project site measures to address the potential for the caving in of temporary excavations. Typical BMPs that are implemented at construction sites to protect water quality include the implementation of straw bale barriers, plastic sheeting/erosion control blankets, and outlet protection measures. With mandatory adherence to the SWPPP requirements, effects associated with construction-related erosion, siltation, water quality, and flooding on downstream water sources and flood control systems would be maintained at a level below significance.

Post-Development Erosion Impacts

With development of the Project site, a majority of the northern 50.04 gross acres of the Project site would be developed with impervious surfaces, with exception of proposed landscaped areas, while impervious surfaces within the southern 14.93 gross acres that are proposed for park uses generally would be limited to parking areas, the proposed recreation building, sidewalks/trails, the amphitheater, handball and basketball courts, and the proposed southerly extension of Decker Road. Thus, the potential for erosion hazards within the northern 50.04 gross acres of the Project site would be substantially decreased as compared to existing conditions with buildout of this portion of the Project site, while the potential for erosion hazards within the southern portions of the Project site would slightly decrease due to the introduction of impervious areas, depressed self-retaining areas, and the installation of irrigated landscaping. As such, long-term erosion impacts on site would be less than significant.

However, due to the increase in impervious surfaces on site, runoff from the site following development has the potential to contribute to erosion hazards downstream. As demonstrated by the Project's Preliminary Drainage Study technical report (*Technical Appendix J1*), although the Project has the potential to result in an increase in peak flows from the Project site, the proposed onsite storm drain system would be sized during the Project's final design phase to sufficiently restrict flow rates to a maximum of 10 cfs, which is less than the available capacity within MDP Lateral E-9.1. (Webb, 2024b, p. 1-3) As previously summarized in Table 4.10-2, MDP Lateral E9.1 would have adequate capacity to convey runoff generated by the Project site following development with the proposed detention of on-site flows. As such, and as compared to the existing condition, the Project would not result in an increase in peak runoff from the site, and therefore runoff from the Project site would not cause or contribute to any increased erosion hazards downstream. Impacts would be less than significant.

Threshold e.: ***Would the Project substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-site or off-site?***

Threshold g.: ***Would the Project impede or redirect flood flows?***

As previously indicated, according to FEMA Firm No. 06065C1410G, the Project site is located within "Zone X (unshaded)," which includes areas determined to be outside the 0.2% annual chance floodplain (FEMA, 2008). Accordingly, the Project has no potential to impede or redirect flood flows, and no impact would occur.

As demonstrated by the Project's Preliminary Drainage Study, (*Technical Appendix J1),* although the Project has the potential to result in a substantial increase in peak flows from the Project site, the proposed onsite storm drain system would be sized during the Project's final design phase to sufficiently restrict peak flow rates to a maximum of 10 cfs. With the proposed detention of flows from the northern portions of the Project site, the proposed extension of MDP Lateral E-9.1.1 and the existing MDP Lateral E-9.1.1 and MDP Line E-9.1 would have sufficient capacity accommodate peak runoff from the northern portions of the Project site and off-site areas tributary to this portion of the Project site. The 100-year flows of 104 cfs from a tributary area of approximately 50 acres would combine with the existing stream to the south earlier than in the pre-development condition. This slight change in the natural drainage patterns would be addressed though grading and an outlet structure design to ensure the flood limits and velocities of the stream are back to pre-developed conditions before reaching the easterly property line and impacting adjacent property owners. Maintenance of various storm drain infrastructure would be maintained by RCTD, RCFCWCD, or other public agency equivalent. Maintenance activities frequency will be regular with a minimum of once a year. Sediment and debris would be expected from the offsite undeveloped tributary area that would convey flows to these collection channels and RCB culverts. Peak runoff from the Project site also would not increase with development of the Project site as proposed. As such, the Project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-site or off-site, and impacts would be less than significant.

Threshold h.: ***In flood hazard, tsunami, or seiche zones, would the Project risk the release of pollutants due to Project inundation?***

As previously indicated, according to FEMA Firm No. 06065C1410G, the Project site is located within "Zone X (unshaded)," which includes areas determined to be outside the 0.2% annual chance floodplain (FEMA, 2008). Accordingly, the Project has no potential result in the release of pollutants due to site inundation from floods, and no impact would occur.

The Project site is located approximately 36 miles from the Pacific Ocean. (Google Earth, 2024) As such, the Project has no potential to risk the release of pollutants due to inundation by tsunamis, and no impact would occur.

A seiche is an underwater wave that oscillates through a body of water which may be triggered by earthquakes or landslides. In general, seiches are small (on the order of a few inches) and are present in larger lakes as a result of the depth, temperature, and contours of the body of water. Due to the lack of an on-site body of water or other bodies of water within close proximity to the site that have the potential to result in site inundation, the potential for the subject site to be impacted by seiches is considered low. Additionally, according to Figure 5 of the General Plan Safety Element, the Project site is not located within a dam inundation area, thereby further demonstrating that the Project site is not subject to inundation by seiches (Riverside County, 2021a, Safety Element Figure 5). As such, impacts due to seiches would be less than significant.

4.10.5 Cumulative Impact Analysis

The cumulative impact analysis considers construction and operation of the proposed Project in conjunction with other development projects in the vicinity of the Project site and resulting from full buildout of the

Riverside County General Plan and the general plans of local jurisdictions that are located within the Santa Ana River watershed.

As discussed under the analysis of Thresholds a., b., and i., the Project would result in less-than-significant impacts to surface and groundwater quality during construction because the Project Applicant would be required to obtain a NPDES Municipal Stormwater Permit for construction activities. Compliance with the NPDES permit and the Basin Plan involves the preparation and implementation of a SWPPP for construction-related activities. The SWPPP is required to specify the BMPs that the Project would be required to implement during construction activities to ensure that all potential pollutants of concern are prevented, minimized, and/or otherwise appropriately treated prior to being discharged from the subject property. Other cumulative developments within the cumulative study area also would be required to comply with the NPDES Municipal Stormwater Permit and would be required to implement BMPs during construction activities to preclude water quality impacts that could impair downstream waters or groundwater. As such, construction-related water quality impacts, as well as impacts due to a conflict with the Basin Plan and the GMP, would be less-than-cumulatively considerable. With respect to long-term impacts to water quality, EMWD would provide water service to the Project site, and no wells or direct groundwater extraction are proposed as part of the Project. Following Project implementation, onsite runoff for the northern 50.04 gross acres of the Project site would be conveyed via proposed ribbon gutters and curbs and gutters to a network of drainage inlets provided at lows points, which would convey flows to the proposed underground storage chamber in the northern portion of the site, where flows would then be pumped into proposed MWS units for water quality treatment. All treated flows would then be conveyed offsite to the proposed 36-inch extension of MDP Lateral E-9.1.1 in Seaton Avenue and Cajalco Road, which would connect to Perris Valley MDP Line E-9.1 at Cajalco Road Station 57+09.79 (Webb, 2024a, p. 1-2). For the southern 14.93 gross acre portion of the Project site, flows from Decker Road would be conveyed to bioretention facilities prior to ultimately discharging to the existing stream in the southeastern portion of the site. Flows generated on the park site would be conveyed through surface flows towards depressed self-retaining areas, with flows eventually draining towards the existing stream that runs through the southeast portion of the park. The proposed bioretention basins, MWS units, and depressed self-retaining areas in the park site would be effective in removing pollutants of concern in runoff leaving the Project site, such as bacterial indicators, metals, nutrients, pesticides, toxic organic compounds, sediments, trash/debris, and oil/grease (Webb, 2024b, Table E.1). Other cumulative developments similarly would be required to incorporate BMPs to treat water quality pollutants of concern. Accordingly, the Project's impacts to water and groundwater quality and supplies would be less than significant on a cumulatively-considerable basis.

As indicated under the analysis of Thresholds c. and f., grading proposed as part of the Project generally would maintain the site's existing drainage patterns, with runoff from the northern 50.04 gross acres of the Project site continuing to flow in a generally easterly direction towards existing storm drain facilities within Seaton Avenue and Cajalco Road and runoff from the southern 13.33 net acre site continuing to flow in a generally easterly direction towards an existing stream that flows easterly in the southeastern portion of the park site following retention by the proposed depressed self-retaining areas planned for the park site. As such, the Project would not substantially alter the existing drainage pattern of the Project site or surrounding areas, and impacts would be less than significant on a cumulatively-considerable basis. Additionally, although runoff from the northern portions of the Project has the potential to result in a substantial increase in peak flows as compared to existing conditions, the proposed onsite storm drain system for the northern 50.04 gross acres of

the Project site would be sized during the Project's final design phase to sufficiently restrict flow rates to a maximum of 10 cfs, resulting in a decrease in peak flows from this portion of the Project site and limiting flows and attendant effects to the planned available capacity within Line E-9.1 (Webb, 2024a, pp. 1-2 and 1-3). As such, implementation of the proposed Project would not result in an increase in peak runoff from the Project site and therefore would not result in the alteration of downstream receiving waters on either a direct or cumulatively-considerable basis. Additionally, because the Project would result in a decrease in peak runoff from the Project site as compared to existing conditions and because peak flows would be limited to 10 cfs, the Project would not contribute runoff water that could exceed the capacity of existing or planned stormwater drainage systems or cause or contribute to flood hazards downstream, and cumulatively-considerable impacts would be less than significant.

As discussed under the analysis of Threshold d., during construction the Project would be subject to compliance with the applicable NPDES permit, which requires the preparation and implementation of a SWPPP to address erosion hazards associated with construction activities. Other cumulative developments similarly would be required to prepare and implement a SWPPP. As such, erosion-related hazards during construction activities would be less-than-cumulatively considerable. With development of the Project site, large portions of the northern portions of the Project site would consist of impervious surfaces, with areas of pervious surfaces largely confined to landscaped areas, while impervious surfaces within the southern 14.93 gross acres that are proposed for park uses generally would be limited to parking areas, the proposed recreation building, sidewalks/trails, the amphitheater, handball and basketball courts, and Decker Road. Thus, the potential for erosion hazards on site would be decreased as compared to existing conditions with buildout of the Project site. Additionally, because peak runoff from the Project site would not increase as compared to existing conditions, the Project has no potential to cause or cumulatively contribute to erosion hazards downstream. As such, the Project would not contribute to any cumulatively-considerable impacts due to long-term erosion.

As discussed under the analysis of Thresholds e. and g., according to FEMA Firm No. 06065C1410G, the Project site is located within "Zone X (unshaded)," which includes areas determined to be outside the 0.2% annual chance floodplain (FEMA, 2008). Accordingly, the Project has no potential to impede or redirect flood flows. In addition, although the Project has the potential to result in a substantial increase in peak flows from the Project site, the proposed onsite storm drain system would be sized during the Project's final design phase to sufficiently restrict peak flow rates to a maximum of 10 cfs. With the proposed detention of flows from the northern portions of the Project site, the proposed extension of MDP Lateral E-9.1.1 and the existing MDP Lateral E-9.1.1 and MDP Line E-9.1 would have sufficient capacity accommodate peak runoff from the northern portions of the Project site and off-site areas tributary to this portion of the Project site. Additionally, peak runoff from the Project site would not increase as compared to existing conditions with development of the Project site as proposed. As such, the Project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-site or off-site, and cumulatively-considerable impacts would be less than significant.

The Project site is not subject to inundation due to floods, tsunamis, or seiches, and the Project site would therefore not be subject to inundation that could result in the release of pollutants. Cumulatively-considerable impacts would not occur.

4.10.6 Significance of Impacts Before Mitigation

Thresholds a., b., and i.: Less-than-Significant Impact. The Project would be served potable water by the EMWD and does not include any proposed groundwater wells on site; thus, Project impacts to groundwater supplies would be less than significant. In addition, with implementation of the proposed Project, all runoff generated on site would be appropriately treated by the Project's BMPs prior to ultimate discharge from the site, which would ensure that the Project does not adversely affect surface water or groundwater quality. Accordingly, the proposed Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface water or groundwater quality; would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge; and would not conflict with the Santa Ana Region Basin Plan or the San Jacinto GMP. Impacts would be less than significant.

Thresholds c. and f.: Less-than-Significant Impact. The existing drainage patterns within the Project site generally would be preserved, except as needed to facilitate proper site drainage and sewer flows. The proposed conditions are similar to the existing drainage patterns of the Project site, wherein all flows generated on the northern 50.04 gross acres of the Project site sheet flow to the east into existing drainage facilities within Seaton Avenue and Cajalco Road and all flows generated on the southern 14.93 gross acres of the Project site would sheet flow to the east/southeast towards an existing stream that flows easterly along the southeastern portion of the park site. Thus, development of the Project site as proposed would not substantially alter the existing drainage pattern of the Project site or surrounding areas, and impacts would be less than significant. In addition, although the Project has the potential to result in an increase in peak flows from the Project site, the proposed onsite storm drain system would be sized during the Project's final design phase to sufficiently restrict peak flow rates within the northern 50.04 gross acres of the Project site to a maximum of 10 cfs, which would represent a substantial reduction in peak flows as compared to existing conditions and would ensure that runoff from the northern portions of the Project site does not exceed the capacity of existing and planned stormwater drainage facilities downstream. Thus, because peak runoff from the Project site would not increase with development of the Project as proposed, the Project would not contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or that could result in increased flood hazards downstream. Impacts would be less than significant.

Threshold d.: Less-than-Significant Impact. With mandatory adherence to the SWPPP requirements, effects associated with construction-related erosion, siltation, water quality, and flooding on downstream water sources and flood control systems would be maintained at a level below significance. With development of the Project site, large portions of the Project site would consist of impervious surfaces, with areas of pervious surfaces largely confined to landscaped areas and the majority of the park site, where irrigated ornamental trees and landscaping is proposed. Thus, the potential for erosion hazards on site would be substantially decreased as compared to existing conditions with buildout of the Project site. In addition, as compared to the existing conditions of the Project site, the Project would not result in an increase in peak runoff from the site, and therefore runoff from the Project site would not cause or contribute to any increased erosion hazards downstream. As such, long-term erosion impacts would be less than significant.

Thresholds e. and g.: Less-than-Significant Impact. Although the Project has the potential to result in an increase in peak flows from the Project site, the Project's drainage plan for the northern 50.04 gross acres of the Project site would retain flows such that peak flows from this portion of the Project site would not exceed 10 cfs, which would be below the existing available capacity within MDP Lateral E-9.1 and also would

represent a substantial reduction in peak flows from this portion of the Project site as compared to existing conditions. Runoff within the southern portions of Decker Road would be retained by proposed bioretention areas prior to being discharged to the existing stream, and runoff within the proposed public park site would be drain to depressed self-retaining areas prior to being discharged to the existing stream. The 100-year flows of 104 cfs from a tributary area of approximately 50 acres would combine with the existing stream to the south earlier than in the pre-development condition. This slight change in the natural drainage patterns would be addressed though grading and an outlet structure design to ensure the flood limits and velocities of the stream are back to pre-developed conditions before reaching the easterly property line and impacting adjacent property owners. Maintenance of various storm drain infrastructure would be maintained by RCTD, RCFCWCD, or other public agency equivalent. Maintenance activities frequency will be regular with a minimum of once a year. Sediment and debris would be expected from the offsite undeveloped tributary area that would convey flows to these collection channels and RCB culverts. As such, the Project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-site or off-site, and impacts would be less than significant. In addition, the Project site is located within "Zone X (unshaded)," which includes areas determined to be outside the 0.2% annual chance floodplain. Accordingly, the Project has no potential to impede or redirect flood flows, and no impact would occur.

Threshold h.: Less-than-Significant Impact. The Project site is located within "Zone X (unshaded)," which includes areas determined to be outside the 0.2% annual chance floodplain. Accordingly, the Project has no potential to result in the release of pollutants due to site inundation, and no impacts would occur. The Project site is located approximately 36 miles from the Pacific Ocean. As such, the Project has no potential to risk the release of pollutants due to inundation by tsunamis, and no impact would occur. Due to the lack of an on-site body of water or other bodies of water within close proximity to the site that have the potential to result in site inundation, the potential for the subject site to be impacted by seiches is considered low. Additionally, according to Figure 5 of the General Plan Safety Element, the Project site is not located within a dam inundation area, thereby further demonstrating that the Project site is not subject to inundation by seiches. As such, impacts due to seiches would be less than significant.

4.10.7 County Regulations, Design Requirements, And Mitigation

Applicable County Regulations and Design Requirements

The following are regulations and design requirements that apply to the proposed Project and that reduce or preclude hydrology and water quality impacts. Although compliance with mandatory regulatory requirements does not technically meet CEQA's definition for mitigation, they are specified herein as requirements for the Project.

- The Project Applicant is required to comply with the provisions of the Project's NPDES permit, and the Project's SWPPP. Compliance with the NPDES permit and the SWPPP would identify and implement an effective combination of erosion control and sediment control measures (i.e., Best Management Practices) to reduce or eliminate discharge to surface water from storm water and non-stormwater discharges during construction activities.

- Prior to issuance of grading or building permits, the Project Applicant shall provide evidence to the Riverside County Flood Control and Water Conservation District (RCFCWCD) that the Project's

drainage system has been designed to ensure that peak flows from the Project site would not increase as compared to existing conditions.

Mitigation

Impacts to hydrology and water quality post design would be less than significant; therefore, mitigation measures are not required.

4.11 LAND USE AND PLANNING

This Subsection 4.11 discusses consistency of the proposed Project with applicable land use and planning policies adopted by Riverside County and other governing agencies for the purpose of reducing adverse effects on the physical environment. This Subsection also addresses present and future land uses, zoning, and the physical arrangement of uses on the land. Information used to support the analysis in this subsection was also obtained in part from the Riverside County General Plan (Riverside County, 2021a), the Mead Valley Area Plan (MVAP) (Riverside County, 2021b), and the Riverside County GIS database (RCIT, n.d.). Additionally, this Subsection relies in part on a separate analysis of the Project's consistency with the Riverside County General Plan and EAP, which is included as *Technical Appendix K* to this EIR. Refer to EIR Subsection 7.0, *References*, for a complete list of reference sources.

4.11.1 EXISTING CONDITIONS

A. Existing On-Site and Adjacent Land Uses

Under existing conditions, the northern portion of the Project site includes undeveloped land, multiple large-lot single-family residential homes with ancillary structures and outdoor storage, and a commercial structure (Craneology, Inc.). Under existing conditions, the southern portion of the Project site includes a mixture of undeveloped land and multiple single-family homes with a variety of ancillary structures and outdoor storage. Land uses in the immediate vicinity of the Project site previously were illustrated on EIR Figure 2-3 and described below.

- North: Land uses to the north of the Project site include Cajalco Road to the north, beyond which are undeveloped lands, an existing office use (J&D Multiple Services), agricultural uses, rural residential uses, and an existing church (Perris Spanish Seventh Day Adventist) that also provides school services. To the north of the southern 14.93 gross acres of the Project site is a~~n~~ ~~un~~developed utility corridor with subterranean aqueduct owned by Metropolitan Water District of Southern California (MWD), beyond which are the northern portions of the Project site and undeveloped lands.

- East: Seaton Avenue abuts the northern portions of the Project site to the east, beyond which are undeveloped land, several residential structures, a small business (JJ Rentals) and associated outdoor storage, and two large warehouse buildings. To the east of the southern 14.93 gross acres of the Project site is an existing single-family home with numerous ancillary structures and outdoor storage.

- South: Located to the south of the Project site are a Buddhist Temple (Huong Sen Buddhist Temple), several existing rural residential homes, numerous ancillary structures, and outdoor storage, with the majority of the areas south of the southern 14.93 gross acres of the Project site comprising undeveloped open space.

- West: To the west of the northern portions of the Project site is Decker Road, to the west of which are undeveloped land, a water tank, and numerous rural residential homes. To the west of the southern 14.93 gross acres of the Project site are several existing rural residential uses and associated ancillary structures, beyond which is undeveloped open space.

B. Existing On-Site and Surrounding Land Use Designations

The prevailing planning document for the Project site and its surrounding area is the Riverside County General Plan. The Project site is located within the MVAP of the Riverside County General Plan. As previously depicted on EIR Figure 2-4, approximately 4.7 acres in the northeastern portion of the northern portion of the Project site are designated by the Riverside County General Plan for "Community Development – Commercial Retail (CD-CR)" land uses, while the remaining +/- 60.3 acres of the Project site are designated for "Rural Community – Very Low Density Residential (RC-VLDR)" land uses.

As also previously depicted on EIR Figure 2-4, lands to the west of the Project site are designated for "Rural Community – Very Low Density Residential (RC-VLDR)" land uses; lands to the south are designated for "Rural Community – Very Low Density Residential (RC-VLDR)" and "Light Industrial (LI)" land uses; lands to the east are designated for "Light Industrial (LI)" land uses; and lands to the north are designated for "Commercial Retail (CR)" and "Rural Community – Very Low Density Residential (RC-VLDR)" land uses. The RC-VLDR land use designation allows single-family residences on large parcels of 1 to 2 acres, limited agriculture, intensive equestrian, and animal keeping uses. The CR land use allows for the development of commercial retail uses at a neighborhood, community regional level, as well as for professional office and tourist-oriented commercial uses. The LI land use designation allows for industrial and related uses including warehousing/distribution, assembly and light manufacturing, repair facilities, and supporting retail uses. (Riverside County, 2021a, Table LU-4; RCIT, n.d.)

C. Existing On-Site and Surrounding Zoning Classifications

As previously depicted on EIR Figure 2-5, under existing conditions, approximately 4.7 acres in the northeast portion of the Project site are zoned for "Rural Residential, Minimum ½-Acre Lot Sizes (R-R-1/2)," while the remaining approximately 60.3 acres of the Project site are zoned for "Light Agriculture (A-1-1)." The A-1-1 zoning classification allows for on-family dwellings and limited agricultural uses, with minimum one-acre lot sizes. The R-R-1/2 zone allows for one-family dwellings and limited agricultural uses, with minimum half-acre lot sizes. (Riverside County, 2021c; RCIT, n.d.)

Also as depicted on EIR Figure 2-5, lands to the north of the northern portion of the Project site are zoned for A-1-1, C-P-S (Scenic Highway Commercial), and R-R (Rural Residential). Lands to the west of both the northern and southern Project site are zoned for A-1-1 and R-R-1/2. Lands to the south of the northern portion of the Project site and lands to the east of the southern portion of the Project site are zoned for A-1-1, R-R-1/2, and R-A-1. Lands to the south of the southern portion of the Project site are zoned for R-R-1/2 and A-1-1. (RCIT, n.d.)

D. Applicable Land Use and Planning Policies

1. Riverside County General Plan

The Riverside County General Plan is a policy document that reflects the Riverside County's vision for the future. The General Plan was comprehensively revised in 2003 and most recently updated in 2021. The General Plan is organized into nine separate elements, including Land Use, Circulation, Multipurpose Open Space, Safety, Noise, Housing, Air Quality, Healthy Communities, and Administration. Each General Plan Element is instrumental to achieving the County's long-term development goals. Each element contains a series of

policies that guide the course of action the County must take to achieve the County's vision for future development. (Riverside County, 2021a)

In addition, the General Plan divides the County into 19 Area Plans. The purpose of these Area Plans is to provide more detailed land use and policy direction regarding local issues such as land use, circulation, open space, and other topical areas. The Project site is located within the MVAP of the General Plan (Riverside County, 2021b). The MVAP was most recently updated on September 28, 2021. The following subsection provides a summary of each General Plan Element, while the MVAP is discussed below in subsection 4.11.1.D.2.

Land Use Element

The General Plan Land Use Element functions as a guide to planners, the general public, and decision makers as to the ultimate pattern of development. The Land Use Element designates the general distribution, general location, and extent of land uses, such as housing, business, industry, open space, agriculture, natural resources, recreation, and public/quasi-public uses. These designations are reflected on the General Plan Land Use Map, which categorizes individual parcels of land into five basic categories known as "Foundation Components": Rural, Rural Community, Community Development, Agriculture, and Open Space. As reflected on the General Plan Land Use Map, the Land Use Element provides for a balanced mixture of land uses, including commercial, office, industrial, agriculture, and open space. For each of the various land use designations, the General Plan provides standards for residential density and non-residential intensity, and provides specific policies intended to ensure that product types, densities, and intensities respond to a multitude of market segments. The Land Use Element governs how land is to be utilized; therefore, many of the issues and policies contained in other plan elements are linked in some degree to this element. The County's General Plan designates approximately 4.7 acres in the northeastern portion of the northern portion of the Project site for "Community Development – Commercial Retail (CD-CR)" land uses, while the remaining +/- 60.3 acres of the Project site are designated for "Rural Community – Very Low Density Residential (RC-VLDR)" land uses. (Riverside County, 2021a, p. LU-1)

Circulation Element

The purpose of the Circulation Element is to provide for the movement of goods and people, including pedestrians, bicycles, transit, train, air, and automobile traffic flows within and through the community. Efficient traffic circulation is important to economic viability and the creation and preservation of a quality living environment (Riverside County, 2021a, p. C-1). The Circulation Element designates future road improvements and extensions; addresses non-motorized transportation alternatives; and identifies funding options. The various roadway improvements and extensions contemplated by the Circulation Element are reflected on the General Plan Circulation Plan. The various roadway classifications depicted on the Circulation Plan correspond to specific roadway cross-sections, which provide specific standards for right-of-way (ROW) widths, lane configurations, medians, and landscaping requirements. The Riverside County General Plan and MVAP classify Cajalco Road as an "Expressway (128' to 220' ROW)," and Decker Road and Seaton Avenue along the Project site's frontages are classified as "Secondary (100' ROW)" roadways. As shown on MVAP Figure 9 (MVAP

Trails and Bikeway System), there is a planned Class II (on-street, striped) bike lane along Cajalco Road west of Harvill Avenue. However, based on the future Cajalco Road widening project, Class II bike lanes only would be implemented in select areas, which does not include the segment of Cajalco Road along the Project site's frontage with this roadway. There are no other trails or bike lanes planned along roadways that abut the Project site. (Riverside County, 2021b, Figure 9; Urban Crossroads, 2023g, p. 31).

Multipurpose Open Space Element

The Multipurpose Open Space Element addresses forms of open space in the County, including scenic, habitat, and recreation. This element has the purpose of addressing the protection and preservation of natural resources, agriculture, and open space areas; managing mineral resources; preserving and enhancing cultural resources; and providing recreational opportunities for the residents of Riverside County. The Multipurpose Open Space Element also contains figures that detail the locations of water resources, vegetation communities, parks, forests, recreation areas, mineral resources, and cultural resources within the County. Together with the MSHCP, the Multipurpose Open Space Element seeks to preserve and protect identified open space areas in order to maintain or improve environmental quality. (Riverside County, 2021a, p. OS-1)

Safety Element

The Safety Element has the primary objective of reducing death, injuries, property damage, and economic and social impact of potential hazards within the County. The Safety Element serves to develop a framework by which safety considerations are introduced into the land use planning process; facilitate the identification and mitigation of hazards for new development; strengthen existing codes, project review, and permitting processes; present policies directed at identifying and reducing hazards in existing development; and strengthen earthquake, flood, inundation, and wildland fire preparedness planning and post-disaster reconstruction policies. Within the Safety Element, policies are presented which pertain to seismic, slope and soil instability; flood and inundation; fire safety; hazardous waste and materials; and disaster preparedness, response, and recovery hazards. The Safety Element was last updated in September 2021 to address California Senate Bill 379, which required the County to include climate adaptation and resiliency strategies in its Safety Element. (Riverside County, 2021a, pp. S-1 - S-2)

Noise Element

The purpose of the Noise Element is to identify sources of noise generation in the County and provide policies to ensure development does not expose people to unacceptable noise levels. The establishment of desirable maximum noise levels and implementation of noise regulations are also included as part of the Noise Element. The Noise Element provides a systematic approach to identifying and managing noise problems in the community; quantifies existing and projected noise levels; addresses excessive noise exposure; and directs community planning for regulation of noise. The Noise Element includes policies, standards, criteria, programs, diagrams, a reference to action items, and maps related to the protection of public health and welfare with respect to noise. (Riverside County, 2021a, p. N-3)

Housing Element

The 2021-2029 Housing Element identifies and establishes County policies intended to fulfill the housing needs of existing and future residents in Riverside County. It establishes policies that guide County decision-making and sets forth an action plan to implement its housing goals. The Housing Element includes a review of previous housing goals, an assessment of the effectiveness of those goals, and an assessment of housing needs. Additionally, the Housing Element includes an inventory of resources and constraints related to meeting housing needs in the County; an analysis of affordable housing developments and programs intended to preserve such housing; community goals for the maintenance, preservation, improvement, and development of housing; and a program which sets forth a five-year schedule of actions that the County is undertaking or intends to undertake in implementing the polices set forth in the Housing Element. (Riverside County, 2021a, p. H-3)

Air Quality Element

The intent of the Air Quality Element is to provide background information on the physical and regulatory environment affecting air quality in the County. This element also identifies goals, policies, and programs that are meant to balance the County's actions regarding land use, circulation, and other issues potentially affecting air quality. This element works in conjunction with local and regional air quality planning efforts to address ambient air quality standards set forth by the United States (U.S.) Environmental Protection Agency (EPA) and the California Air Resources Board (CARB). The Air Quality Element sets ambient air quality standards for various air pollutants based on State and federal standards. The Element also contains policies regarding sensitive receptors, mobile and stationary pollution sources, energy efficiency and conservation, jobs and housing, and transportation. (Riverside County, 2021a, pp. AQ-3 - AQ-31)

Healthy Communities Element

The Healthy Communities Element provides a framework for translating the General Plan vision for a healthy Riverside County into reality by identifying policies aimed at achieving that vision. The Element addresses areas where public health and planning intersect, including transportation and active living; access to nutritious foods; access to health care; mental health; quality of life; and environmental health. This Element addresses overall health; land uses and community design; transportation system (with an emphasis on non-motorized transportation); arts and culture; social capital; complete communities; parks, trails, and open space; access to healthy foods and nutrition; healthcare and mental healthcare; schools, recreational centers, and daycare centers; and environmental health. The County of Riverside incorporated environmental justice polices into the General Plan Healthy Communities Element in September 2021. The environmental justice policies apply to the Environmental Justice Communities identified in the Land Use Element Figure LU-4.1. The Project site is located within an Environmental Justice Community boundary. (Riverside County, 2021a, pp. HC-1 - HC-12 and Figure LU-4.1)

Administration Element

The Administration Element focuses on the administration of the General Plan, which is the sole responsibility of Riverside County, under the authority of the Board of Supervisors. Administration of

the General Plan policies includes establishing, maintaining, and applying tools and procedures for interpreting the intent of the General Plan and applying the interpretation to a variety of circumstances. This Element details the vision for Riverside County, General Planning Principles, Countywide Elements and Planning Policies/Area Plan, Appendices of the General Plan, and other administrative topics. (Riverside County, 2021a, pp. AQ-1 - AQ-20)

2. Mead Valley Area Plan (MVAP)

As noted above, the Project site is located within the MVAP of the Riverside County General Plan. The MVAP guides the evolving character of the area, and uses the Riverside County General Plan vision to establish policies for development and conservation within the specific area of Riverside County. The MVAP provides a description of the location, physical characteristic, and special features, in addition to a Land Use Plan, policies, and exhibits to better understand the physical, environmental, and regulatory characteristics that comprise the area. Each section of the MVAP addresses critical issues facing the Mead Valley community. The MVAP includes sections detailing the features, policy areas, land use, circulation, multipurpose open space, and hazards. (Riverside County, 2021b)

As shown on MVAP Figure 4, *Mead Valley Area Plan Overlays and Policy Areas*, the Project site is not located within any overlays or policy areas, although the Project site is located within the Airport Influence Area (AIA) for the March Air Reserve Base (MARB). However, MVAP Figure 7 shows that the Project site is located within Zone "B" of the "Mt. Palomar Night Time Lighting Policy Area," indicating that the Project is subject to the provisions of Riverside County Ordinance No. 655. (Riverside County, 2021b, Figures 4 and 7).

3. Riverside County Land Use Ordinance

The Riverside County Land Use Ordinance is intended to implement the Riverside County General Plan's Land Use Plan. Under existing conditions, a majority of the Project site is zoned for "Light Agriculture (A-1-1)" while a small portion of the northeastern portion of the Project site is zoned for "Rural Residential, Minimum ½-Acre Lot Sizes (R-R-1/2)." Refer to subsection 4.11.1.C for a more thorough discussion of the site's existing zoning classifications.

4. Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP)

Riverside County has adopted a MSHCP, which is a comprehensive, multi-jurisdictional Habitat Conservation Plan (HCP). The MSHCP promotes conservation of species and their associated habitats in Riverside County through implementation of several HCPs that affect lands within the County. The Western Riverside County MSHCP and the Coachella Valley MSHCP are the two dominant plans that impact the largest portions of the County. These plans coordinate multi-jurisdictional habitat-planning and conservation efforts in the region to promote biological and ecological diversity while accommodating the appropriate construction of new development and infrastructure projects. Riverside County catalogs acquisitions and conservation of lands with respect to the HCPs, and periodically updates the General Plan Land Use maps accordingly. (Riverside County, 2015a, p. 4.2-27)

The Project site is located within the Western Riverside County MSHCP. As previously shown on EIR Figure 2-6, *MSHCP Cell Groups and Criteria Cells*, the Project site is located within the northern portion of Criteria

Cell 2334, which is not a part of any MVAP Cell Groups. According to the MSHCP, conservation within Criteria Cell 2334 is intended to include approximately 5% of the Cell focusing in the southern portion of the Cell. Refer to EIR Subsection 4.4, *Biological Resources*, for a more thorough discussion of the MSHCP and the Project site's relationship thereto.

5. Stephen's Kangaroo Rat Habitat Conservation Plan (SKR HCP)

The Stephens' Kangaroo Rat Habitat Conservation Plan (SKR HCP) was prepared under the direction of the Riverside County Habitat Conservation Agency (RCHCA) Board of Directors, in consultation with U.S. Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW). Riverside County is a member agency of the RCHCA. The 30-year SKR HCP was designed to acquire and permanently conserve, maintain, and fund the conservation, preservation, restoration, and enhancement of Stephens' kangaroo rat-occupied habitat. The SKR HCP covers approximately 534,000 acres within the member jurisdictions and includes an estimated 30,000 acres of occupied Stephens' kangaroo rat habitat. The SKR HCP requires members to preserve and manage 15,000 acres of occupied habitat in seven core reserves encompassing over 41,000 acres. (Riverside County, 2015a, p. 4.8-52)

On May 3, 1996, the USFWS issued a permit to the Riverside County Habitat Conservation Agency to incidentally take the federally endangered Stephens' kangaroo rat ("SKR"; *Dipodomys stephensi*). Similarly, the CDFW issued a California Endangered Species Act Management Authorization for Implementation of the SKR HCP on May 6, 1996. To date, more than $50 million has been dedicated to the establishment and management of a system of regional preserves designed to ensure the survival of SKR in the plan area. This effort resulted in the permanent conservation of approximately 50% of the SKR-occupied habitat remaining in the HCP area. Through direct funding and in-kind contributions, SKR habitat in the regional reserve system is managed to ensure its continuing ability to support the species. Core reserves were deemed complete in December of 2003. (Riverside County, 2015a, p. 4.8-52)

Although the Project site is not targeted for conservation as part of the SKR HCP, the Project site is located within the SKR HCP fee area. Thus, the Project Applicant would be required to contribute fee payments pursuant to Riverside County Ordinance No. 663.

6. Southern California Association of Governments (SCAG)

The Southern California Association of Governments (SCAG) is a regional agency established pursuant to California Government Code § 6500, also referred to as the Joint Powers Authority law. SCAG is designated as a Council of Governments (COG), a Regional Transportation Planning Agency (RTPA), and a Metropolitan Planning Organization (MPO). The Project Site is within SCAG's regional authority (SCAG, 2018, p. ES-1). In April 2024, SCAG adopted the *2024-2050 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS)* ("RTP/SCS"); also referred to herein as "Connect SoCal" with goals to: 1) build and maintain an integrated multimodal transportation network; 2) develop, connect and sustain communities that are livable and thriving; 3) create a healthy region for the people of today and tomorrow; and 4) support a sustainable, efficient and productive regional economic environment that provides opportunities for all residents. Performance measures and funding strategies also are included to ensure that the adopted goals are achieved through implementation of the RTP. (SCAG, 2024)

Connect SoCal includes long-range regional transportation plans, regional transportation improvement programs, regional housing needs allocations, and other plans for the region. Connect SoCal also provides objectives for meeting emissions reduction targets set forth by the California Air Resources Board (CARB); these objectives were provided in a direct response to Senate Bill 375 (SB 375) which was enacted to reduce greenhouse gas emissions from automobiles and light trucks through integrated transportation, land use, housing, and environmental planning. Connect SoCal is updated periodically to allow for the consideration and inclusion of new transportation strategies and methods.

7. South Coast Air Quality Management District Air Quality Management Plan (SCAQMD AQMP)

California Health & Safety Code § 40702 et seq., the California Clean Air Act (CCAA), requires that an Air Quality Management Plan (AQMP) be developed and then updated every three years for air basins with non-attainment status. As discussed in EIR Section 4.3, *Air Quality*, the Project site is located in the South Coast Air Basin (SCAB). The SCAB is within the jurisdiction of the South Coast Air Quality Management District (SCAQMD), the agency charged with bringing air quality in the SCAB into conformity with federal and State air quality standards. Air quality within the SCAB is regulated by the SCAQMD and standards for air quality are documented in the SCAQMD's 2022 AQMP. Although air quality in the SCAB has improved over the past several decades, according to the SCAQMD, the SCAB currently does not meet National Ambient Air Quality Standards (NAAQS) attainment status for ozone (O_3) and particulate matter less than 2.5 microns ($PM_{2.5}$). The SCAB currently is considered non-attainment under the California Ambient Air Quality Standards (CAAQS) due to levels of O_3, $PM_{2.5}$, and particulate matter less than 10 microns (PM_{10}). (SCAQMD, 2022)

The SCAQMD AQMP is a plan for the regional improvement of air quality. Projects such as the proposed Project relate to the air quality planning process through the growth forecasts that were used as inputs into the regional transportation model. If a proposed project is consistent with these growth forecasts, and if all available emissions reduction strategies are implemented as effectively as possible on a project-specific basis, then the project is consistent with the AQMP. (SCAQMD, 2022)

4.11.2 Applicable Regulatory Requirements

The following is a brief description of the federal, State, and local environmental laws and related regulations related to land use and planning.

A. Federal Regulations

1. Clean Water Act

The Clean Water Act (CWA) establishes the basic structure for regulating discharges of pollutants into the waters of the United States and regulating quality standards for surface waters. The basis of the CWA was enacted in 1948 and was called the Federal Water Pollution Control Act, but the Act was substantially reorganized and expanded in 1972. "Clean Water Act" became the Act's common name with amendments in 1972. Under the CWA, the EPA has implemented pollution control programs such as setting wastewater standards for industry, and also has set water quality standards for all contaminants in surface waters. The CWA made it unlawful to discharge any pollutant from a point source into navigable waters, unless a permit was obtained. EPA's National Pollutant Discharge Elimination System (NPDES) permit program controls

discharges. Point sources are discrete conveyances such as pipes or man- made ditches. Individual homes that are connected to a municipal system, use a septic system, or do not have a surface discharge do not need an NPDES permit; however, industrial, municipal, and other facilities must obtain permits if their discharges go directly to surface waters. (EPA, 2023e)

2. Federal Aviation Regulations Part 77

Federal Regulation Title 14 Part 77 establishes standards and notification requirements for objects affecting navigable airspace. This notification serves as the basis for: (FAA, 2023)

- Evaluating the effect of the construction or alteration on operating procedures;
- Determining the potential hazardous effect of the proposed construction on air navigation;
- Identifying mitigating measures to enhance safe air navigation; and
- Charting of new objects.

Notification allows the Federal Aviation Administration (FAA) to identify potential aeronautical hazards in advance to prevent or minimize the adverse impacts to the safe and efficient use of navigable airspace. Any person/organization who intends to sponsor any of the following construction or alterations must notify the Administrator of the FAA: (FAA, 2023)

- Any construction or alteration exceeding 200 feet above ground level.
- Any construction or alteration:
  - within 20,000 feet of a public use or military airport which exceeds a 100:1 surface from any point on the runway of each airport with at least one runway more than 3,200 feet.
  - within 10,000 feet of a public use or military airport which exceeds a 50:1 surface from any point on the runway of each airport with its longest runway no more than 3,200 feet.
  - within 5,000 feet of a public use heliport which exceeds a 25:1 surface.
- Any highway, railroad, or other traverse way whose prescribed adjusted height would exceed that above noted standards.
- When requested by the FAA.
- Any construction or alteration located on a public use airport or heliport regardless of height or location. (FAA, 2023)

Persons failing to comply with the provisions of FAR Part 77 are subject to Civil Penalty under Section 902 of the Federal Aviation Act of 1958, as amended and pursuant to 49 U.S.C. Section 46301(a). (FAA, 2023)

B. State Regulations

1. Porter-Cologne Water Control Act

The Porter-Cologne Act is the principal law governing water quality regulation in California. It establishes a comprehensive program to protect water quality and the beneficial uses of water. The Porter-Cologne Act applies to surface waters, wetlands, and ground water and to both point and nonpoint sources of pollution. Pursuant to the Porter-Cologne Act (California Water Code § 13000 et seq.), the policy of the State is as follows: (SWRCB, 2014)

- That the quality of all the waters of the State shall be protected;
- That all activities and factors affecting the quality of water shall be regulated to attain the highest water quality within reason; and
- That the State must be prepared to exercise its full power and jurisdiction to protect the quality of water in the State from degradation.

The Porter-Cologne Act established nine Regional Water Boards (based on hydrogeologic barriers) and the State Water Board, which are charged with implementing its provisions and which have primary responsibility for protecting water quality in California. The State Water Board provides program guidance and oversight, allocates funds, and reviews Regional Water Boards decisions. In addition, the State Water Board allocates rights to the use of surface water. The Regional Water Boards have primary responsibility for individual permitting, inspection, and enforcement actions within each of nine hydrologic regions. The State Water Board and Regional Water Boards have numerous non-point source (NPS) related responsibilities, including monitoring and assessment, planning, financial assistance, and management. (SWRCB, 2014)

The Regional Water Boards regulate discharges under the Porter-Cologne Act primarily through issuance of NPDES permits for point source discharges and waste discharge requirements (WDRs) for NPS discharges. Anyone discharging or proposing to discharge materials that could affect water quality (other than to a community sanitary sewer system regulated by an NPDES permit) must file a report of waste discharge. The State Water Resources Control Board (SWRCB) and the Regional Water Quality Control Boards (RWQCBs) can make their own investigations or may require dischargers to carry out water quality investigations and report on water quality issues. The Porter-Cologne Act provides several options for enforcing WDRs and other orders, including cease and desist orders, cleanup and abatement orders, administrative civil liability orders, civil court actions, and criminal prosecutions. (SWRCB, 2014)

The Porter-Cologne Act also implements many provisions of the Clean Water Act, such as the NPDES permitting program. The Porter-Cologne Act also requires adoption of water quality control plans that contain the guiding policies of water pollution management in California. In addition, regional water quality control plans (basin plans) have been adopted by each of the Regional Water Boards and get updated as necessary and practical. These plans identify the existing and potential beneficial uses of waters of the State and establish water quality objectives to protect these uses. The basin plans also contain implementation, surveillance, and monitoring plans. (SWRCB, 2014)

2. California Water Code

The California Water Code is the principal state law regulating water quality in California. Water quality provisions must be complied with as contained in numerous code sections including: 1) the Health and Safety Code (HSC) for the protection of ground and surface waters from hazardous waste and other toxic substances; 2) the Fish and Game Code for the prevention of unauthorized diversions of any surface water and discharge of any substance that may be deleterious to fish, plant, animal, or bird life; 3) the Harbors and Navigation Code for the prevention of the unauthorized discharge of waste from vessels into surface waters; and 4) the Food and Agriculture Code for the protection of groundwater which may be used for drinking water supplies. The CDFW, through provisions of the Fish & Game Code (§§ 1601 - 1603) is empowered to issue agreements for

any alteration of a river, stream, or lake where fish or wildlife resources may be adversely affected. CDFW regulates wetland areas only to the extent that those wetlands are part of a river, stream, or lake as defined by CDFW. (CA Legislative Info, n.d.32)

Surface water quality is the responsibility of the RWQCB, water supply and wastewater treatment agencies, and city and county governments. The principal means of enforcement by the RWQCB is through the development, adoption, and issuance of water discharge permits. RWQCB basin plans establish water quality objectives that are defined as the limits or levels of water quality constituents or characteristics for the reasonable protection of beneficial uses of water. (CA Legislative Info, n.d.32)

3. California Planning and Zoning Law

The legal framework in which California cities and counties exercise local planning and land use functions is set forth in the California Planning and Zoning Law, §§ 65000 - 66499.58. Under State of California planning law, each city and county must adopt a comprehensive, long-term general plan. State law gives cities and counties wide latitude in how a jurisdiction may create a general plan, but there are fundamental requirements that must be met. These requirements include the inclusion of seven mandatory elements described in the Government Code, including a section on land use. Each of the elements must contain text and descriptions setting forth objectives, principles, standards, policies, and plan proposals; diagrams and maps that incorporate data and analysis; and mitigation measures. (OPR, n.d.)

4. Subdivision Map Act

The Subdivision Map Act ("Map Act") vests in the cities and counties the power to regulate and control the design and improvement of subdivisions within its boundaries. Each city must adopt an ordinance regulating and controlling subdivisions for which the Map Act requires a tentative and final or parcel map. The authority for a city or county to regulate land use, including subdivisions, flows from the general police power. However, the Map Act sets forth certain mandates that must be followed for subdivision processing. A city can impose conditions on the subdivision process when the Map Act is silent, but it cannot regulate contrary to specific provisions contained in the Map Act. (Curtin, Jr. & Merritt, 2002, p. 1) The Map Act's primary goals are:

- To encourage orderly community development by providing for the regulation and control of the design and improvement of the subdivision, with a proper consideration of its relation to adjoining areas;
- To ensure that the areas within the subdivision that are dedicated for public purposes will be properly improved by the subdivider so that they will not become an undue burden on the community; and
- To protect the public and individual transferees from fraud and exploitation. (Curtin, Jr. & Merritt, 2002, p. 1)

The Map Act is applied in conjunction with other state land use laws such as the general plan, specific plans, zoning, CEQA, and the Permit Streamlining Act. The Map Act provides for regulation of land divisions by a city or county and is interpreted and enforced by the city or county. (Curtin, Jr. & Merritt, 2002, p. 2)

5. Office of Planning and Research (OPR) General Plan Guidelines

Each city and county in California must prepare a comprehensive, long term general plan to guide its future. To assist local governments in meeting this responsibility, the Governor's Office of Planning and Research (OPR) is required to adopt and periodically revise guidelines for the preparation and content of local general plans pursuant to Government Code § 65040.2. The General Plan Guidelines are advisory, not mandatory. Nevertheless, it is the state's only official document explaining California's legal requirements for general plans. Planners, decision-making bodies, and the public depend upon the General Plan Guidelines for help when preparing local general plans. The courts have periodically referred to the General Plan Guidelines for assistance in determining compliance with planning law. For this reason, the General Plan Guidelines closely adheres to statute and case law. It also relies upon commonly accepted principles of contemporary planning practice. (OPR, 2017a, p. 1)

6. State Aeronautics Act

The State Aeronautics Commission Act of 1947 created the Division of Aeronautics ("Division"), and was later amended by statute to read the State Aeronautics Act (Aeronautics Act) in 1961. As a result of this legislation, the Division's first priorities are those mandated by the Aeronautics Act, then Caltrans guidance, then Division guidance as expressed through its Policy Element. As directed by the Aeronautics Act, the Division is a steward and advocate of aviation in California. To that end, its efforts are focused on activities that "protect the public interest in aeronautics and aeronautical progress." (§ 21002) (CA Legislative Info, n.d.41)

The Aeronautics Act itself is divided into seven chapters, the first five of which have not received significant cleanup legislation since its enabling in 1947. The first chapter begins with general provisions and definitions and explains the Legislature's intent for a State aviation program. Chapter two explains Caltrans' role in administering the Division, and explains the role of the California Transportation Commission (CTC). Chapter three includes many of the safety considerations from FAA regulations that help keep airports and the surrounding communities safe and compatible with flight operations. Chapter four deals with airport and heliport permitting, air navigation facilities, noise guidelines, funding, and importantly, the formation and authority of Airport Land Use Commissions (ALUC). Chapter five covers the investigations and hearings on matters covered in the Aeronautics Act. Chapter six introduces airport planning and specifically introduces the intent of the California Aviation Systems Plan (CASP) and how it can be used to support California aviation. Finally, Chapter 7 covers skydiving or sport parachuting operations to ensure they are in compliance with federal safety laws. (CA Legislative Info, n.d.41)

7. Senate Bill 375 (SB 375)

SB 375 contains five major components. The first is regional GHG emissions targets: California ARB's Regional Targets Advisory Committee guides the adoption of targets to be met by 2035 for each MPO in the state. These targets, which MPOs may propose themselves, are updated every eight years in conjunction with the revision schedule of housing and transportation elements. (CA Legislative Info, n.d.43)

Second, MPOs are required to prepare a Sustainable Communities Strategy (SCS) that provides a plan for meeting regional targets. The SCS and the Regional Transportation Plan (RTP) must be consistent with each

other, including action items and financing decisions. If the SCS does not meet the regional target, the MPO must produce an Alternative Planning Strategy that details an alternative plan to meet the target. (CA Legislative Info, n.d.43)

Third, SB 375 requires that regional housing elements and transportation plans be synchronized on 8-year schedules. In addition, Regional Housing Needs Assessment (RHNA) allocation numbers must conform to the SCS. If local jurisdictions are required to rezone land as a result of changes in the housing element, rezoning must take place within three years. (CA Legislative Info, n.d.43)

Fourth, SB 375 provides CEQA streamlining incentives for preferred development types. Certain residential or mixed-use projects qualify if they conform to the SCS. Transit-oriented developments (TODs) also qualify if they (1) are at least 50% residential, (2) meet density requirements, and (3) are within 0.5-mile of a transit stop. The degree of CEQA streamlining is based on the degree of compliance with these development preferences. (CA Legislative Info, n.d.43)

Finally, MPOs must use transportation and air emissions modeling techniques consistent with guidelines prepared by the CTC. Regional Transportation Planning Agencies, cities, and counties are encouraged, but not required, to use travel demand models consistent with the CTC guidelines. (CA Legislative Info, n.d.43)

8. SCAG Connect SoCal

The Southern California Association of Governments (SCAG) is a Joint Powers Authority (JPA) under California State law, established as an association of local governments and agencies that voluntarily convene as a forum to address regional issues. Under federal law, SCAG is designated as a MPO and under State law as a Regional Transportation Planning Agency and a Council of Governments. The SCAG region encompasses six counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura) and 191 cities in an area covering more than 38,000 square miles. SCAG develops long-range regional transportation plans including sustainable communities strategy and growth forecast components, regional transportation improvement programs, regional housing needs allocations and other plans for the region. (SCAG, n.d.1)

As an MPO and public agency, SCAG develops transportation and housing strategies that transcend jurisdictional boundaries that affect the quality of life for southern California as a whole. In April 2024, SCAG's Regional Council adopted *Connect SoCal (2024-2050 Regional Transportations Plan/Sustainable Communities Strategy* (herein, "RTP/SCS"). The RTP/SCS includes long-range regional transportation plans, regional transportation improvement programs, regional housing needs allocations, and other plans for the region. The RTP/SCS also provides objectives for meeting emissions reduction targets set forth by CARB; these objectives were provided in a direct response to Senate Bill 375 (SB 375) which was enacted to reduce greenhouse gas emissions from automobiles and light trucks through integrated transportation, land use, housing and environmental planning. (SCAG, 2024) The RTP/SCS is updated periodically to allow for the consideration and inclusion of new transportation strategies and methods.

Connect SoCal includes a Technical Appendix titled "Goods Movement" that is applicable to the Project because the Project entails a use that is closely associated with, and relies directly on, the goods movement system (e.g., manufacturing, construction, retail trade, wholesale trade and transportation, and warehousing).

In April 2018 SCAG published *Industrial Warehousing in the SCAG Region*. According to the document, the SCAG region is a vibrant hub for international and domestic trade because of its large transportation base and extensive multimodal transportation system. The SCAG region's freight transportation system includes warehouses and distribution centers; the Ports of Los Angeles, Long Beach, and Hueneme; airports; rail intermodal terminals; rail lines, and local streets, State highways and interstates. Together the system enables the movement of goods from source to market, facilitating uninterrupted global commerce. The region is home to approximately 34,000 warehouses with 1.17 billion square feet (s.f.) of warehouse building space, and undeveloped land that could accommodate an additional 338 million s.f. of new warehouse building space. These regions attract robust logistics activities, and are a major reason the region is a critical mode in the global supply chain. (SCAG, 2018, p. ES-1)

C. *Local Regulations*

1. Riverside County Ordinances

These existing Riverside County ordinances implement and guide various aspects of land use development, while protecting existing uses, people and property within Riverside County from conflict. (Riverside County, 2015a, pp. 4.2-25)

Ordinance No. 348 - Zoning and Land Use Ordinance: Establishes allowable uses of land and sets standards for what and how land may be developed. Protects the people and property of Riverside County from development of unsuitable land uses and ensures built areas are developed safely and with minimal conflict with surrounding lands. (Riverside County, 2015a, pp. 4.2-25)

Ordinance No. 448 - Airport Approaches Zoning: This ordinance was adopted pursuant to the Airport Approaches Zoning Law, (CGC Sections 50485-50485.14) and shall be liberally construed in support of the purposes and provisions within Section 50485-50485.14. Any proceedings for additions or amendments to the official plan of airports are required to conform to this ordinance. (Riverside County, 2015a, pp. 4.2-25)

Ordinance No. 460 - Subdivision Regulations: This ordinance regulates subdivisions pursuant to the Subdivision Map Act. All land divisions throughout unincorporated Riverside County are subject to all of the applicable provisions of the Subdivision Map Act and this ordinance. (Riverside County, 2015a, pp. 4.2-25)

Ordinance No. 461 - Road Improvement Standards and Specifications: This ordinance establishes proper standards, specifications and directions for the design and construction of any road or other land division improvements required to be constructed in the unincorporated territory of Riverside County. (Riverside County, 2015a, pp. 4.2-26)

Ordinance No. 509 - Agricultural Preserves: This ordinance establishes uniform rules for the agricultural and compatible uses allowed within an agricultural preserve. The ordinance ensures that incompatible uses are not allowed within established agricultural preserves and sets forth the powers of the County of Riverside in establishing and administering agricultural preserves pursuant to the California Land Conservation Act of 1965 (CGC Section 51200, et seq.), which are to be devoted to agricultural and compatible uses. Land uses not covered in the ordinance are prohibited within agricultural preserves. (Riverside County, 2015a, pp. 4.2-26)

Ordinance No. 576 - Regulating County Airports: The purpose of this ordinance is to provide minimum standards to safeguard life, limb, property and public welfare by regulating and controlling the various activities on airports, heliports or STOL (short takeoff and landing) ports owned or operated, or both, by the County of Riverside. (Riverside County, 2015a, pp. 4.2-26)

Ordinance No. 659 - Development Mitigation Fee for Residential Development: This ordinance establishes an impact mitigation fee to help mitigate the impacts caused by new developments on public facilities within Riverside County. The fees will be used to help establish new County of Riverside facilities that are necessary to meet the increased demand that will come about due to new development. These facilities include new fire and police stations, courts, libraries, regional parks and other facilities necessary to provide services to the residents of Riverside County. (Riverside County, 2015a, pp. 4.2-26)

Ordinance No. 671 - Consolidated Fees for Land Use and Related Functions: The purpose of this ordinance is to provide for the consolidation of certain schedules of fees related to the land use matters as provided for in the separate ordinances, resolutions and rules of the County of Riverside. (Riverside County, 2015a, pp. 4.2-26)

Ordinance No. 673 - Establishing the Coachella Valley Transportation Uniform Mitigation Fee: This ordinance establishes a mitigation fee program for funding the engineering, the purchase of right-of-way and construction of transportation improvements required of land developments within the Coachella Valley. (Riverside County, 2015a, pp. 4.2-26)

Ordinance No. 726 - Transportation Management Requirements - New Development Projects: This ordinance is intended to meet the requirements of the Riverside County Congestion Management Program and the Air Quality Management Plan as well as to promote consideration of transportation demand management objectives early in the development review process. Often, conventional land development promotes reliance on the single occupancy vehicle. This ordinance establishes policies and procedures to encourage and promote the use of alternative transportation modes through project design and facility planning. (Riverside County, 2015a, pp. 4.2-26)

Ordinance No. 748 - Traffic Signal Mitigation Program: This ordinance establishes a means of equitably assessing the costs of Traffic Signal installations needed to mitigate the cumulative environmental impacts resulting from the additional traffic generated by new development projects. (Riverside County, 2015a, pp. 4.2-26)

Ordinance No. 824 - Western Riverside County Transportation Uniform Mitigation Fee (TUMF) Program: This ordinance establishes fees to fund the mitigation of cumulative regional transportation impacts resulting from future development. The mitigation fees collected through the TUMF program will be utilized to complete transportation system capital improvements necessary to meet the increased travel demand and to sustain current levels of traffic. (Riverside County, 2015a, pp. 4.2-26)

2. Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP)

The continued loss of habitat to new development and the cumbersome process of environmental review and habitat mitigation on a project-by-project basis led to preparation of the MSHCP. The MSHCP is a multi-jurisdictional accomplishment that provides a regional conservation solution to species and habitat issues. The primary intent of the MSHCP is to provide for the conservation of a range of plants and animals within natural communities characteristic of western Riverside County and in return, provide take coverage and mitigation for projects throughout the plan area to avoid the cost and delays of mitigating biological impacts on a project-by-project basis. (Riverside County, 2015, p. 4.8-49)

The MSHCP was adopted by Riverside County on June 17, 2003, and is a comprehensive, multijurisdictional Habitat Conservation Plan (HCP) pursuant to Section 10(a)(1)(B) of FESA, as well as an NCCP pursuant to the California Fish and Game Code. The USFWS issued a Biological Opinion and Federal ESA Section 10 permit for the MSHCP on June 22, 2004, and CDFW issued a Natural Community Conservation Planning (NCCP) Approval and Take Authorization on the same date. As long as adherence to the policies and requirements of the MSHCP is maintained, participants in the MSHCP, which include the County of Riverside and 18 cities, are allowed to authorize 'incidental take' of covered plant and wildlife species. (Riverside County, 2015, p. 4.8-49)

The MSHCP provides for the long-term survival of protected and sensitive species by designating a contiguous system of habitat to be added to existing public/quasi-public lands. The Plan includes an impact fee collected by the permittees and used in part to acquire these lands. Depending on the location of the private or public development project, certain biological studies are required for Plan compliance. These studies may identify the need for specific measures to avoid, minimize and reduce impacts to covered species and their habitat. (Riverside County, 2015, pp. 4.8-49 and 4.8-50)

The MSHCP defines two distinct consistency processes for development projects based on their location within the MSHCP's coverage area, with separate processes for projects located outside of Criteria Areas and those within a Criteria Area. Criteria Areas consist of 160-acre 'cells' with identified conservation objectives. (Riverside County, 2015, p. 4.8-50)

4.11.3 Basis for Determining Significance

Section XI of Appendix G to the CEQA Guidelines, as updated in December 2018, addresses typical adverse effects on land use and planning, and includes the following threshold questions to evaluate the Project's impacts on land use and planning:

- Would the project physically divide an established community?

- Would the project cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Significance thresholds are set forth in Riverside County's Environmental Assessment Checklist, and have been updated to reflect the 2018 updates to Section XI of Appendix G to the CEQA Guidelines (listed above).

Accordingly, the proposed Project would have a significant impact on land use and planning if construction and/or operation of the Project would:

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; or*

b. *Disrupt or divide the physical arrangement of an established community (including a low-income or minority community).*

The significance thresholds set forth in Riverside County's Environmental Assessment Checklist, as modified/updated per the 2018 updates to the CEQA Guidelines, were used to evaluate the significance of the proposed Project's impacts on land use and planning. It should be noted that the Project's consistency with the Western Riverside County MSHCP and the SKR HCP, which are the only habitat conservation plans or natural community conservation plans applicable to the Project site, is evaluated in EIR Subsection 4.4, *Biological Resources*, under the analysis of Threshold a., and the analysis concludes that impacts due to a conflict with the MSHCP and SKR HCP would be less than significant with mitigation. Project consistency with the MSHCP and SKR HCP is not further discussed in this Subsection.

4.11.4 Impact Analysis

Threshold a.: ***Would the Project 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?***

The proposed Project has the potential to conflict with the Riverside County General Plan and MVAP, as well as Connect SoCal. Additionally, the Project's consistency with the SCAQMD AQMP is addressed under EIR Subsection 4.3, *Air Quality*. Similarly, the Project's consistency with the Western Riverside County MSHCP and the SKR HCP are addressed in EIR Subsection 4.4, *Biological Resources*. In addition, the Project's consistency with Riverside County's Climate Action Plan (CAP) is addressed in EIR Subsection 4.8, *Greenhouse Gas Emissions*. The Project's consistency with General Plan policies related to paleontological resources is presented in *Technical Appendix K*, while Project impacts to paleontological resources are discussed in EIR Subsection 4.14, *Paleontological Resources*. As discussed in EIR Subsection 4.3, although the Project would conflict with the 2022 SCAQMD AQMP, mitigation measures have been identified to reduce the Project's impacts due to air quality emissions to the maximum feasible extent. In addition, this impact already is disclosed as significant and unavoidable in EIR Subsection 4.3, and there would be no additional impacts due to a conflict with the AQMP beyond what is already evaluated and disclosed in Subsection 4.3. As indicated in EIR Subsections 4.4 and 4.8, with mitigation the Project would not conflict with the MSHCP, the SKR HCP, or the Riverside County CAP; thus, impacts due to a conflict with the MSHCP, SKR HCP, and CAP would be less than significant. The Project's consistency with the SCAQMD 2022 AQMP, MSHCP, SKR HCP, and the County's CAP is not further discussed below.

❑ SCAG 2024-2050 RTP/SCS

In April 2024, SCAG adopted the 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), also referred to as "Connect SoCal." The RTP/SCS seeks to improve mobility, promote

sustainability, facilitate economic development, and preserve the quality of life for the residents in the region. The long-range visioning plan balances future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health. The goals included in the RTP/SCS are pertinent to the proposed Project. These goals are meant to provide guidance for considering the proposed Project within the context of regional goals and policies. An analysis of the Project's consistency with the relevant goals of Connect SoCal is presented below in Table 4.11-1, *Analysis of Consistency with Connect SoCal Goals*. As indicated, the Project would not conflict with any Connect SoCal goals, and no impact would occur.

Table 4.11-1 Analysis of Consistency with Connect SoCal Goals

2024-2050 RTP/SCA Regional Planning Policies	Project Consistency
Mobility	
System Preservation and Resilience	
01. Prioritize repair, maintenance and preservation of the SCAG region's existing transportation assets, following a "Fix-It-First" principle	Not Applicable. RTP/SCS Policy 01 provides direction to City and regional agency staff and decision makers and is not applicable to the proposed Project.
02. Promote transportation investments that advance progress toward the achievement of asset management targets, including the condition of the National Highway System pavement and bridges and transit assets (rolling stock, equipment, facilities and infrastructure)	Not Applicable. RTP/SCS Policy 02 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
Complete Streets	
03. Pursue the development of Complete Streets that comprise a safe, multimodal network with flexible use of public rights-of-way for people of all ages and abilities using a variety of modes (e.g., people walking, biking, rolling, driving, taking transit)	Consistent with Applicable Components. As part of the Project, the Project Applicant would improve Seaton Avenue, Cajalco Road, and Decker Road along the Project Site's frontages with these roadways to include landscaped parkways with curb-separated sidewalks and would include a decomposed granite (d.g.) trail along Cajalco and a d.g. trail along Decker Road which would promote non-vehicular modes of transportation in the local area.
04. Ensure the implementation of Complete Streets that are sensitive to urban, suburban or rural contexts and improve transportation safety for all, but especially for vulnerable road users (e.g., people, especially older adults and children, walking and biking)	
05. Facilitate the implementation of Complete Streets and curb space management strategies that accommodate and optimize new technologies, micromobility devices and first/last mile connections to transit and last-mile delivery	
06. Support implementation of Complete Streets improvements in Priority Equity Communities, particularly with respect to Transportation Equity Zones, as a way to enhance mobility, safety and access to opportunities	
Transit and Multimodal Integration	
07. Encourage and support the implementation of projects, both physical and digital, that facilitate multimodal connectivity, prioritize transit and shared mobility, and result in improved mobility, accessibility and safety	Not Applicable. RTP/SCS Policies 07-11 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
08. Support connections across the public, private and nonprofit sectors to develop transportation projects and programs that result in improved connectivity	
09. Encourage residential and employment development in areas surrounding existing and planned transit/rail stations	
10. Support the implementation of transportation projects in	

2024-2050 RTP/SCA Regional Planning Policies	Project Consistency
Priority Equity Communities, particularly with respect to Transportation Equity Zones, as a way to enhance mobility, safety and access to opportunities	
11. Create a resilient transportation system by preparing for emergencies and the impacts of climate change	
Transportation System Management	
12. Pursue efficient use of the transportation system using a set of operational improvement strategies that maintain the performance of the existing transportation system instead of adding roadway capacity, where possible	Not Applicable. RTP/SCS policies 12 and 13 provide direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
13. Prioritize transportation investments that increase travel time reliability, including build-out of the regional express lanes network	
Transportation Demand Management	
14. Encourage the development of transportation projects that provide convenient, cost-effective and safe alternatives to single-occupancy vehicle travel (e.g., trips made by foot, on bikes, via transit, etc.)	Not Applicable. RTP/SCS Policy 14 relates to transportation projects and the proposed Project is not a transportation project. The Project entails the redevelopment of a property in an existing urban environment utilizing an existing street network. However, the Project Site is currently served by Riverside Transit Agency (RTA) with bus service along Cajalco Road. RTA Route 41 runs along Cajalco Road, with the nearest existing bus stops occurring at the intersection of Seaton Avenue and Cajalco Road.
15. Encourage jurisdictions and TDM practitioners to develop and expand local plans and policies to promote alternatives to single occupancy vehicle travel for residents, workers and visitors	Not Applicable. RTP/SCS Policy 15 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
16. Encourage municipalities to update existing (legacy) TDM ordinances by incorporating new travel modes and new technology and by incorporating employment and residential sites of certain populations – for example, employers who have less than 250 employees (below the 250 or more employees threshold identified in AQMD's Rule 2202)	Not Applicable. RTP/SCS Policy 16 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
Technology Integration	
17. Support the implementation of technology designed to provide equal access to mobility, employment, economic opportunity, education, health and other quality-of-life opportunities for all residents within the SCAG region	Not Applicable. RTP/SCS Policies 17 to 21 provide direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
18. Advocate for data sharing between the public and private sectors to effectively evaluate the services' benefits and impacts on communities while protecting data security and privacy	
19. Advocate for technology that is adaptive and responsive to ensure it remains up to date and meets the evolving needs of users and stakeholders	
20. Promote technology that has the capacity to facilitate economic growth, improve workforce development opportunities, and enhance safety and security	
21. Proactively monitor and plan for the development, deployment and commercialization of new technology as it relates to integration with transportation infrastructure	

2024-2050 RTP/SCA Regional Planning Policies	Project Consistency
Safety	
22. Eliminate transportation-related fatalities and serious injuries (especially those involving vulnerable road users, such as people, especially older adults and children, walking and biking) on the regional multimodal transportation system	Not Applicable. RTP/SCS Policy 22 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
23. Integrate the assessment of equity into the regional transportation safety and security planning process, focusing on the analysis and mitigation of disproportionate impacts on disadvantaged communities	Not Applicable. RTP/SCS Policy 23 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project. Additionally, although the Project site is located within a Census tract (Tract 6065042904) that is classified as a disadvantaged community pursuant to State Senate Bill 535, the analysis throughout this EIR demonstrates that the Project's localized impacts would be less than significant or would be reduced to less-than-significant levels with the implementation of mitigation measures.
24. Support innovative approaches for addressing transit safety and security issues so that impacts to transit employees and the public are minimized and those experiencing issues (e.g., unhoused persons) are supported	Not Applicable. RTP/SCS Policy 24 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
25. Support the use of transportation safety and system security data in investment decision-making, including consideration of new highway and transit/rail investments that would address safety and security needs	Not Applicable. RTP/SCS Policy 25 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
Funding the System/Users Fees	
26. Promote stability and sustainability for core state and federal transportation funding sources	Not Applicable. RTP/SCS Policy 26 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
27. Establish a user fee–based system that better reflects the true cost of transportation, provides firewall protection for new and existing transportation funds, and represents equitable distribution of costs and benefits	Not Applicable. RTP/SCS Policy 27 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project. Additionally, the Project's Traffic Study (EIR *Technical Appendix N2*) identifies improvements, fair share contributions, and fee contributions to the County's DIF and/or TUMF programs, which would ensure that all study area intersections would operate at an acceptable Level of Service (LOS).
28. Pursue funding tools that promote access to opportunity and support economic development through innovative mobility programs	Not Applicable. RTP/SCS Policies 28 to 31 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
29. Promote national and state programs that include return-to-source guarantees while maintaining the flexibility to reward regions that continue to commit substantial local resources	
30. Leverage locally available funding with innovative financing tools to attract private capital and accelerate project delivery	
31. Promote local funding strategies that maximize the value of public assets while improving mobility, sustainability and resilience	
Communities	
Priority Development Areas	
32. Promote the growth of origins and destinations, with a focus on future housing and population growth, in areas	Not Applicable. RTP/SCS Policies 32 and 33 provide direction to County and regional agency staff and decision

2024-2050 RTP/SCA Regional Planning Policies	Project Consistency
with existing and planned urban infrastructure that includes transit and utilities	makers and is not applicable to the proposed Project.
33. Promote the growth of origins and destinations, in areas with a proclivity toward multimodal options like transit and active transportation, to reduce single occupant vehicle (SOV) dependency and vehicle miles traveled	
34. Seek to realize scale economies or a critical mass of jobs and destinations in areas across the region that can support non-SOV options and shorter trip distances, combined trips and reduced vehicle miles traveled	Consistent. The Project Applicant proposes to develop a 1,003,510 s.f. warehouse building, which would increase employment opportunities in the local area and would establish development intensities that could support future transit in the local area.
Housing the Region	
35. Encourage housing development in areas with access to important resources and amenities (economic, educational, health, social and similar) to further fair housing access and equity across the region	Not Applicable. The proposed Project includes a proposed 1,003,510 s.f. warehouse building and does not include any proposed housing.
36. Encourage housing development in transit-supportive and walkable areas to create more interconnected and resilient communities	Consistent. The Project Applicant proposes to develop a 1,003,510 s.f. warehouse building, which would increase employment opportunities in the local area and would establish development intensities that could support future transit in the local area.
37. Support local, regional, state and federal efforts to produce and preserve affordable housing while meeting additional housing needs across the region	Not Applicable. The proposed Project includes a proposed 1,003,510 s.f. warehouse building and does not include any proposed housing.
38. Prioritize communities that are vulnerable to displacement pressures by supporting community stabilization and increasing access to housing that meets the needs of the region	Not Applicable. RTP/SCS Policies 38 to 41 provide direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
39. Promote innovative strategies and partnerships to increase homeownership opportunities across the region with an emphasis on communities that have been historically impacted by redlining and other systemic barriers to homeownership for people of color and other marginalized groups	
40. Advocate for and support programs that emphasize reducing housing cost burden (for renters and homeowners), with a focus on the communities with the greatest needs and vulnerabilities	
41. Support efforts to increase housing and services for people experiencing homelessness across the region	
15-Minute Communities	
42. Promote 15-minute communities as places with a mix of complementary land uses and accessible mobility options that align with and support the diversity of places (or communities) across the region. These are communities where residents can either access their most basic, day-to-day needs within a 15-minute walk, bike ride or roll from their home or as places that result in fewer and shorter trips because of the proximity of complementary land uses	Consistent. The Project Applicant proposes to develop a 1,003,510 s.f. warehouse building, which would increase employment opportunities in the local area and would establish development intensities that could support future transit in the local area.
43. Support communities across the region to realize 15-minute communities through incremental changes that improve equity, quality of life, public health, mobility, sustainability, resilience and economic vitality	Not Applicable. RTP/SCS Policy 43 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.

2024-2050 RTP/SCA Regional Planning Policies	Project Consistency
44. Encourage efforts that elevate innovative approaches to increasing access to neighborhood destinations and amenities through an array of people-centered mobility options	Not Applicable. RTP/SCS Policy 44 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
Equitable Engagement and Decision-Making	
45. Advance community-centered interventions, resources and programming that serve the most disadvantaged communities and people in the region, like Priority Equity Communities, with strategies that can be implemented in the short-to-long-term	Not Applicable. RTP/SCS Policies 45 to 47 provide direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
46. Promote racial equity that is grounded in the recognition of the past and current harms of systemic racism and one that advances restorative justice	
47. Increase equitable, inclusive, and meaningful representation and participation of people of color and disadvantaged communities in planning processes	
Environment	
Sustainable Development	
48. Promote sustainable development and best practices that enhance resource conservation, reduce resource consumption and promote resilience	Consistent. As presented throughout this EIR, the Project's impacts to the environment would be less than significant or would be reduced to the maximum feasible extent with the implementation of mitigation measures. Additionally, the analysis presented in EIR Subsection 4.6, *Energy*, with mandatory compliance with applicable federal and State regulations and requirements, including the provisions of the Title 24 Building Energy Standards, Project construction and operation would not result in the inefficient, wasteful, or unnecessary consumption of energy.
49. Support communities across the region to advance innovative sustainable development practices	Not Applicable. RTP/SCS Policy 49 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
50. Recognize and support the diversity of communities across the region by promoting local place-making, planning and development efforts that advance equity, mobility, resilience and sustainability	Not Applicable. RTP/SCS Policy 50 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
Air Quality	
51. Reduce hazardous air pollutants and greenhouse gas emissions and improve air quality throughout the region through planning and implementation efforts	Consistent with Applicable Components. As evaluated herein and in EIR Subsections 4.3, *Air Quality*, and 4.8, *Greenhouse Gas Emissions*, the Project's emissions would be below the SCAQMD thresholds of significance for criteria pollutants, with exception of NO_X emissions. However, the Project would not subject nearby sensitive emission receptors to substantial pollutant concentrations. The Project would be constructed in full compliance with the applicable Title 24 Energy Efficiency standards, and would promote non-vehicular forms of transportation.
52. Support investments that reduce hazardous air pollutants and greenhouse gas emissions	
53. Reduce the exposure and impacts of emissions and pollutants and promote local and regional efforts that improve air quality for vulnerable populations, including but not limited to Priority Equity Communities and the AB 617 Communities	
Clean Transportation	
54. Accelerate the deployment of a zero-emission transportation system and use near-zero-emission technology to offer short-term benefits where zero-emissions solutions are not yet feasible or commercially viable	Not Applicable. RTP/SCS Policies 54 to 57 provide direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.

2024-2050 RTP/SCA Regional Planning Policies	Project Consistency
55. Promote equitable use of and access to clean transportation technologies so that all may benefit from them	
56. Consider the full environmental life cycle of clean transportation technologies, including upstream production and end of life as an important part of meeting SCAG's objectives in economic development and recovery, resilience planning and achievement of equity	
57. Maintain a technology-neutral approach in the study of, advancement of and investment in clean transportation technology	
Natural and Agricultural Lands Preservation	
58. Prioritize the climate mitigation, adaptation, resilience and economic benefits of natural and agricultural lands in the region	Not Applicable. RTP/SCS Policy 58 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
59. Support conservation of habitats that are prone to hazards exacerbated by climate change, such as wildfires and flooding	Not Applicable. RTP/SCS Policy 59 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
60. Support regional conservation planning and collaboration across the region	Not Applicable. RTP/SCS Policy 60 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
61. Encourage the protection and restoration of natural habitat and wildlife corridors	Not Applicable. RTP/SCS Policy 49 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project. Additionally, the Project site is located in a fully urbanized area that contains no sensitive natural habitat and is not a part of any wildlife movement corridors.
62. Encourage the conservation and viability of agricultural lands to protect the regional and local food supply and ensure the sustainability of local agriculture as a vital part of the region's economy	Not Applicable. RTP/SCS Policy 49 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project. In addition, the Project site is located in a fully urbanized area and the Project site contains no agricultural lands under existing conditions.
63. Encourage policy development of the link between natural and agricultural conservation with public health	Not Applicable. RTP/SCS Policy 63 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
Climate Resilience	
64. Prioritize the most vulnerable populations and communities subject to climate hazards to help the people, places and infrastructure that are most at risk for climate change impacts. In doing so, recognize that disadvantaged communities are often overburdened	Not Applicable. RTP/SCS Polices 64 to 68 provide direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
65. Support local and regional climate and hazard planning and implementation efforts for transportation, land use, and other factors	
66. Support nature-based solutions to increase regional resilience of the natural and built environment	
67. Promote sustainable water use planning, practices and storage that improve regional water security and resilience in a drier environment	
68. Support an integrated planning approach to help local jurisdictions meet housing production needs in a drier environment	

2024-2050 RTP/SCA Regional Planning Policies	Project Consistency
Economy	
Goods Movement	
69. Leverage and prioritize investments, particularly where there are mutual co-benefits to both freight and passenger/commuter rail	Not Applicable. RTP/SCS Policies 69 to 73 provide direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
70. Prioritize community and environmental justice concerns, together with economic needs, and support workforce development opportunities, particularly around deployment of zero-emission and clean technologies and their supporting infrastructure	
71. Explore and advance the transition toward zero-emission and clean technologies and other transformative technologies, where viable	
72. Advance comprehensive, systems-level planning of corridor/supply chain operational strategies that is integrated with road and rail infrastructure and inland port concepts	
73. Ensure continued, significant investment in a safe, secure, clean and efficient transportation system – including both highways and rail – to support the intermodal movement of goods across the region	
Broadband	
74. Support ubiquitous regional broadband deployment and access to provide the necessary infrastructure and capability for Smart Cities strategies—to ensure the benefits of these strategies improve safety and are distributed equitably	Not Applicable. RTP/SCS Policies 74 to 79 provide direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
75. Develop networks that are efficient, scalable, resilient and sustainable to support transportation systems management, operations services and "tele-everything" strategies that reduce vehicle miles traveled, optimize efficiency and accommodate future growth of regional economies	
76. Encourage investments that provide access to digital activities that support educational, financial and economic growth	
77. Advocate for current, accurate data to identify opportunity zones and solutions that support the development of broadband services to community anchor institutions and local businesses	
78. Promote an atmosphere that allows for healthy competition and speed-driven innovative solutions while remaining technologically neutral	
79. Use a bottom-up approach to identify and support a community's broadband needs	
Universal Basic Mobility	
80. Encourage partnerships and policies to broaden safe and efficient access to a range of mobility services that improve connections to jobs, education and basic services	Not Applicable. RTP/SCS Policy 80 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project. Notwithstanding, the Project Site is located in a portion of the County with access to public transit, basic services, and employment opportunities.
81. Promote increased payment credentials for disadvantaged community members and the transition of	Not Applicable. RTP/SCS Policy 81 provides direction to County and regional agency staff and decision makers and

2024-2050 RTP/SCA Regional Planning Policies	Project Consistency
cash users to digital payment technologies to address payment barriers	is not applicable to the proposed Project.
Workforce Development	
82. Foster a positive business climate by promoting regional collaboration in workforce and economic development between cities, counties, educational institutions and employers	Not Applicable. RTP/SCS Policies 82 to 86 provide direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
83. Encourage inclusive workforce development that promotes upward economic mobility	
84. Support entrepreneurial growth with a focus on underrepresented communities	
85. Foster a resilient workforce that is poised to effectively respond to changing economic conditions (e.g., market dynamics, technological advances and climate change)	
86. Inform and facilitate data-driven decision-making about the region's workforce	
Tourism	
87. Consult and collaborate with state, county and local agencies within the region that are charged with promoting tourism and transportation	Not Applicable. RTP/SCS Policies 87 and 88 provide direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
88. Encourage the reduced use of cars by visitors to the region by working with state, county and local agencies (e.g., park services, transportation agencies) to highlight and increase access to alternative options, including transit, passenger rail and active transportation	

(SCAG, 2024, pp. 113-121)

B. Project Consistency with the Riverside County General Plan and MVAP

1. General Plan and MVAP Land Use Consistency

Under existing conditions, the General Plan and MVAP designate the Project site for RC-VLDR and CR land uses. The Project Applicant proposes a Foundation Component General Plan Amendment (GPA No. 240005) to modify the land use designations assigned to the 64.97-acre Project site. As part of the Project's Foundation Component GPA, the Project Applicant is seeking to re-designate the northern 44.66 net acres of the Project site to instead allow for "Community Development – Light Industrial (CD-LI)" land uses, and to re-designate the southern 13.33 net acres of the Project site for "Open Space – Recreation (OS-R)" land uses. With approval of the Project's Foundation Component GPA, the Project would be fully consistent with the General Plan and MVAP land use designations for the 64.97-acre property. Moreover, impacts associated with the proposed land uses have been evaluated throughout this EIR. Where significant impacts are identified, mitigation measures are identified to reduce impacts to the maximum feasible extent. Based on the foregoing analysis, the proposed Project would not result in a significant environmental impact due to a conflict with any land use plan adopted for the purpose of avoiding or mitigating an environmental effect, and impacts would be less than significant.

2. General Plan and MVAP Policy Consistency

A General Plan Policies Consistency Analysis was prepared for the proposed Project in order to demonstrate the Project's consistency with applicable General Plan Policies, and is included as EIR *Technical Appendix K*.

For more information regarding the Project's consistency with specific applicable Riverside County General Plan and MVAP policies, please refer to *Technical Appendix K*. As concluded therein, the Project would not conflict with any of the applicable General Plan or MVAP policies adopted for the purpose of avoiding or reducing significant environmental effects, including policies related to the protection of paleontological resources. Accordingly, impacts due to a conflict with applicable General Plan or MVAP policies would be less than significant.

C. *Project Consistency with Connect SoCal*

As previously noted, on September 3, 2020, SCAG adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), also referred to as "Connect SoCal." Connect SoCal seeks to improve mobility, promote sustainability, facilitate economic development, and preserve the quality of life for the residents in the region. The long-range visioning plan balances future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health. The goals included in Connect SoCal are pertinent to the proposed Project. These goals are meant to provide guidance for considering the proposed Project within the context of regional goals and policies. An analysis of the Project's consistency with the relevant goals of Connect SoCal is presented above in Table 4.11-1. As indicated, the Project would not conflict with any Connect SoCal goals, and no impact would occur.

D. *Conclusion*

Based on the foregoing analysis, the proposed Project would not 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, and impacts would be less than significant.

Threshold b.: ***Would the Project disrupt or divide the physical arrangement of an established community (including a low-income or minority community)?***

Under existing conditions, there are existing rural residential uses located to the east, south, west, and north of the Project site. However, as part of the Project frontage improvements would be constructed along the Project site's frontages with Cajalco Road, Seaton Avenue, and Decker Road, all of which would include sidewalks that would accommodate non-vehicular travel between these existing residential areas. There are no components of the proposed Project that would physically divide an established community. Accordingly, the Project would not disrupt or divide the physical arrangement of an established community (including a low-income or minority community), and impacts would be less than significant.

4.11.5 Cumulative Impact Analysis

As indicated under the analysis of Threshold a., with approval of the Project's Foundation Component GPA, the Project would be fully consistent with the MVAP land use designations applied to the Project site. In addition, the proposed Project would not conflict with any of the policies included in the Riverside County General Plan or MVAP, and would not conflict with Connect SoCal. Other developments within the western Riverside County region similarly would be required to demonstrate compliance with applicable General Plan and Connect SoCal policies. Thus, the Project's impacts due to a conflict with a land use plan, policy, or

regulation adopted for the purpose of avoiding or mitigating an environmental effect would be less-than-cumulatively considerable.

As indicated under the analysis of Threshold b., the Project would not disrupt or divide the physical arrangement of an established community (including a low-income or minority community). As such, cumulatively-considerable impacts would not occur.

4.11.6 Significance of Impacts Before Mitigation

Threshold a.: Less-than-Significant Impact. The Project would not conflict with the General Plan, MVAP, Connect SoCal, or any other land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Additionally, there are no impacts due to land use incompatibility that have not already been evaluated and mitigated to the maximum feasible extent in relevant sections of this EIR; therefore, Project impacts due to land use incompatibility would be less than significant.

Threshold b.: Less-than-Significant Impact. The Project would not disrupt or divide the physical arrangement of an established community (including a low-income or minority community), and impacts would be less than significant.

4.11.7 County Regulations, Design Requirements, and Mitigation

Impacts to land use and planning would be less than significant; therefore, mitigation measures are not required.

4.12 MINERAL RESOURCES

This Subsection 4.12 describes the potential mineral resources that are located on or beneath the Project site and in the Project vicinity and evaluates the potential effects that the Project may have on these resources. The following analysis is based in part on information obtained in the County's General Plan (Riverside County, 2021a). The analysis in this subsection also is based, in part, on information from the report titled, "Geotechnical Investigation, Proposed Warehouse Development, SWC Cajalco Road and Seaton Avenue," prepared by Southern California Geotechnical (herein, "SCG"), dated December 9, 2022, and included as EIR *Technical Appendix G* (SCG, 2022). Refer to EIR Subsection 7.0, *References*, for a complete list of reference sources.

4.12.1 EXISTING CONDITIONS

A. Geology

The Project site is located in the Peninsular Ranges geomorphic province of California. The Peninsular Ranges province extends from the Los Angeles Basin southeast to Baja California and from the Pacific Ocean eastward to the Coachella Valley and Colorado Desert. The province consists of numerous northwest to southeast-trending mountain ranges and valleys that are geologically controlled by several major active faults. The Project site is located within and near the central part of the Perris block, which is bounded on the northeast by the San Jacinto fault zone, on the north by the Sierra Madre-Cucamonga fault zone, and on the west by the Elsinore Fault zone.

The Project site is predominantly underlain by early Pleistocene (Map Symbol Qvof) old alluvial valley deposits in the eastern portion and some Val Verde tonalite (Map Symbol Kvt) formation in the western portion of the site. The older alluvium deposits are described as predominantly composed of moderately indurated, slightly dissected, sandy alluvium, containing lesser silt, and clay-bearing alluvium. The Val Verde tonalite formation is described as gray-weathering, relatively homogeneous, massive to well-foliated, medium to coarse grained, hypautomorphic granular biotite-hornblende tonalite. The geologic conditions encountered at the site are consistent with the mapped geologic conditions. (SCG, 2022, p. 7)

B. Mineral Resources Potential

The Surface Mining and Reclamation Act of 1975 (SMARA) Public Resources Code (PRC), Sections (§§) 2710-2796 provides a comprehensive surface mining and reclamation policy with the regulation of surface mining operations to assure that adverse environmental impacts are minimized and mined lands are reclaimed to a usable condition. The SMARA requires the State Geologist to classify land according to the presence, absence, or likely occurrence of significant mineral deposits in certain areas of the State subject to urban expansion or land uses incompatible with mining. The State classification system is broken out into four general zones, as shown below in Table 4.12-1, *Mineral Resources Zones*. According to mapping information available from the California Department of Conservation (CDC), the Project site is classified as MRZ-3, which indicates that the Project site occurs in an area of undetermined mineral resource significance (CDC, n.d.1). Accordingly, the Project site does not contain any areas of known mineral resources.

Table 4.12-1 Mineral Resources Zones

Zone	Significance
MRZ-1	Areas where the available geologic information indicates no significant mineral deposits or a minimal likelihood of significant mineral deposits.
MRZ-2a	Areas where the available geologic information indicates that there are significant mineral deposits.
MRZ-2b	Areas where the available geologic information indicates that there is a likelihood of significant mineral deposits.
MRZ-3a	Areas where the available geologic information indicates that mineral deposits are likely to exist, however, the significance of the deposit is undetermined.
MRZ-4	Areas where there is not enough information available to determine the presence or absence of mineral deposits.

(Riverside County, 2021a, pp. OS-37 to OS-38)

4.12.2 Applicable Environmental Regulations

The following is a brief description of the applicable State law related to mineral resources.

A. State Regulations

1. Surface Mining and Reclamation Act of 1975

The Surface Mining and Reclamation Act (SMARA) PRC, §§ 2710-2796 provides a comprehensive surface mining and reclamation policy with the regulation of surface mining operations to assure that adverse environmental impacts are minimized and mined lands are reclaimed to a usable condition. SMARA also encourages the production, conservation, and protection of California's mineral resources. PRC § 2207 provides annual reporting requirements for all mines in the State, under which the State Mining and Geology Board is also granted authority and obligations. (CDC, n.d.3) SMARA, Chapter 9, Division 2 of the PRC, requires the State Mining and Geology Board to adopt State policy for the reclamation of mined lands and the conservation of mineral resources. These policies are prepared in accordance with the Administrative Procedures Act, (Government Code) and are found in California Code of Regulations, Title 14, Division 2, Chapter 8, Subchapter 1. (CDC, n.d.3)

B. Riverside County Regulations

The following policies are intended to ensure the conservation of mineral resources in Riverside County:

Ordinance No. 555 – Implementing SMARA: This ordinance addresses the importance of mineral extraction to the economic well-being of Riverside County. It regulates all surface mining operations in the unincorporated portions of Riverside County, as authorized by SMARA, to ensure that (Riverside County, 2015a, pp. 4.14-14):

- The production and conservation of minerals is encouraged while considering and balancing values relating to recreation, watershed, wildlife, range and forage, and aesthetic enjoyment. And, at the same time, eliminating or minimizing the residual hazards to public health and safety.

- The adverse effects of surface mining operations are precented or minimized and that mined lands are reclaimed to a useable condition readily adaptable for alternative land use.
- The reclamation of mined lands is carried out in a way that permits the continued mining of minerals.

4.12.3 Basis for Determining Significance

Section XII of Appendix G to the State CEQA Guidelines addresses typical adverse effects to mineral resources, and includes the following threshold questions to evaluate the Project's impacts on mineral resources:

- *Would the Project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?*
- *Would the Project result in the loss of availability of a locally-important mineral resource recover site delineated on a local general plan, specific plan, or other land use plan.*

Significance thresholds as implemented by Riverside County are set forth in Riverside County's Environmental Assessment Checklist form, which are derived from Section XII of Appendix G to the State CEQA Guidelines (listed above), and state that the proposed Project would have a significant impact on mineral resources if construction and/or operation of the Project would:

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;*
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;*
c. *Be an incompatible land use located adjacent to a State classified or designated area or existing surface mine; or*
d. *Expose people or property to hazards from proposed, existing or abandoned quarries or mines.*

The significance thresholds set forth in Riverside County's Environmental Assessment Checklist were used to evaluate the significance of the proposed Project's impacts on mineral resources.

4.12.4 Impact Analysis

Threshold 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?***

According to the CDC, the Project site is classified as Mineral Resources Zone (MRZ) 3, which includes "areas where the available geologic information indicates that mineral deposits are likely to exist, however, the significance of the deposit is undetermined" (CDC, n.d.1). Therefore, the Project site does not contain any

known mineral resources that would be of value to the region or the residents of the State. Accordingly, with implementation of the proposed Project there would be no impact on known mineral resources.

Threshold 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?***

The Project site is not designated as a mineral resource recovery site by the County's General Plan or the Mead Valley Area Plan (MVAP) and is not located within the boundaries of any specific plans. There are no other land use plans that identify the Project site for containing mineral resources. Accordingly, the Project would not 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, and no impact would occur.

Threshold c.: ***Be an incompatible land use located adjacent to a State classified or designated area or existing surface mine?***

As mapped by the CDC Mineral Land Classification Map (Plate 7.18), there are no areas located adjacent to the Project site that contain known mineral resources. Historically, a mapped quarry was located approximately 0.42-mile south of the Project site (CDC, n.d.1). There are no known surface mines located adjacent to the Project site. According to the CDC Mines Online mapper, the closest site is Markham Materials Site (Site 91-33-0054), located approximately one mile northwest of the Project site, and is an open pit operation type whose primary product is sand and gravel (CDC, n.d.4) Due to distance and intervening topography between the Project site and the nearest active mining activities, the Project would not be an incompatible land use located adjacent to a State classified or designated area or existing surface mine, and no impact would occur.

Threshold d.: ***Expose people or property to hazards from proposed, existing, or abandoned quarries or mines?***

According to Appendix B of the Project's Phase I Environmental Site assessment record search, records indicate that no mining activities occurred on the Project site, and no mines or abandoned mines exist within 0.25-mile of the Project site (Group Delta, 2022). According to the CDC Mineral Land Classification Map (Plate 7.18), historically, a mapped quarry is located approximately 0.42-mile south of the Project site (CDC, n.d.1). According to the CDC Mines Online mapper, the closest site is Markham Materials Site (Site 91-33-0054), located approximately one mile northwest of the Project site, and is an open pit operation type whose primary product is sand and gravel (CDC, n.d.4) Due to distance and intervening topography between the Project site and the nearest active mining activities, the Project would not expose people or property to hazards from proposed, existing, or abandoned quarries or mines, and no impact would occur.

4.12.5 Cumulative Impact Analysis

This cumulative impact analysis considers development of the proposed Project in conjunction with other development projects within the western Riverside County region. This cumulative study area was selected because western Riverside County encompasses large areas that include geologic conditions similar to those that occur on the Project site, and because this study area encompasses a large portion of the local market for the production and consumption of mineral resources.

As mapped by the CDC, the Project site is classified as MRZ-3 and contains no known mineral resource deposits. As such, the Project has no potential to result in cumulatively-considerable impacts due to the loss of availability of a known mineral resource that would be of value to the region or residents of the State. No cumulatively-considerable impacts would occur.

Riverside County's General Plan, and the MVAP do not designate the Project site or surrounding areas as a mineral resource recovery site, and there are no other land use plans that identify the site or surrounding areas for containing mineral resources. As such, the Project has no potential to result in cumulatively-considerable impacts due to 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. No cumulatively-considerable impacts would occur.

According to the CDC Mineral Land Classification Map (Plate 7.18), historically a mapped quarry is located approximately 0.42-mile south of the Project site. According to the CDC Mines Online mapper, the closest site is Markham Materials Site (Site 91-33-0054), located approximately 1-mile northwest of the Project site, and is an open pit operation type whose primary product is sand and gravel (CDC, n.d.4) Due to distance and intervening topography between the Project site and the nearest active mining activities, no cumulatively-considerable impacts to State classified or designated areas or existing surface mines would occur with implementation of the Project.

There are no known proposed, existing, or abandoned quarries or mines adjacent to the Project site. As such, the Project has no potential to expose people or property to hazards from proposed, existing, or abandoned quarries or mines, and no cumulatively-considerable impacts would occur.

4.12.6 Significance of Impacts Before Mitigation

Threshold a.: No Impact. The Project site does not contain any known mineral resources that would be of value to the region or the residents of the State. Accordingly, with implementation of the proposed Project there would be no impact on known mineral resources.

Threshold b.: No Impact. The Project would not 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, and no impact would occur.

Threshold c.: No Impact. The Project would not be an incompatible land use located adjacent to a State classified or designated area or existing surface mine, and no impact would occur.

Threshold d.: No Impact. The Project would not expose people or property to hazards from proposed, existing, or abandoned quarries or mines, and no impact would occur.

4.12.7 Applicable Regulations, Design Requirements, and Mitigation

No impact to mineral resources would occur with implementation of the proposed Project; thus, mitigation measures are not required.

4.13 NOISE

This Subsection 4.13 addresses the environmental issue of noise. The information in this Subsection is based in part on a technical report prepared by Urban Crossroads, Inc. (herein, "Urban Crossroads"), titled "Mead Valley Commerce Center (PPT220050) Noise and Vibration Analysis" (herein, "NIA"), dated February 15, 2024, and included as *Technical Appendix L* to this EIR (Urban Crossroads, 2024a). Refer to Section 7.0*, References*, for a complete list of reference sources.

4.13.1 NOISE FUNDAMENTALS

Noise is simply defined as "unwanted sound." Sound becomes unwanted when it interferes with normal activities, when it causes actual physical harm, or when it has adverse effects on health. Noise is measured on a logarithmic scale of sound pressure level known as a decibel (dB). A-weighted decibels (dBA) approximate the subjective response of the human ear to broad frequency noise sources by discriminating against very low and very high frequencies of the audible spectrum. They are adjusted to reflect only those frequencies which are audible to the human ear. Figure 4.13-1, *Typical Noise Levels*, presents a summary of the typical noise levels and their subjective loudness and effects that are described in more detail below. (Urban Crossroads, 2024a, p. 7)

Figure 4.13-1 Typical Noise Levels

COMMON OUTDOOR ACTIVITIES	COMMON INDOOR ACTIVITIES	A - WEIGHTED SOUND LEVEL dBA	SUBJECTIVE LOUDNESS	EFFECTS OF NOISE
THRESHOLD OF PAIN		140	INTOLERABLE OR DEAFENING	HEARING LOSS
NEAR JET ENGINE		130		
		120		
JET FLY-OVER AT 300m (1000 ft)	ROCK BAND	110		
LOUD AUTO HORN		100	VERY NOISY	
GAS LAWN MOWER AT 1m (3 ft)		90		
DIESEL TRUCK AT 15m (50 ft), at 80 km/hr (50 mph)	FOOD BLENDER AT 1m (3 ft)	80		SPEECH INTERFERENCE
NOISY URBAN AREA, DAYTIME	VACUUM CLEANER AT 3m (10 ft)	70	LOUD	
HEAVY TRAFFIC AT 90m (300 ft)	NORMAL SPEECH AT 1m (3 ft)	60		
QUIET URBAN DAYTIME	LARGE BUSINESS OFFICE	50	MODERATE	SLEEP DISTURBANCE
QUIET URBAN NIGHTTIME	THEATER, LARGE CONFERENCE ROOM (BACKGROUND)	40		
QUIET SUBURBAN NIGHTTIME	LIBRARY	30	FAINT	NO EFFECT
QUIET RURAL NIGHTTIME	BEDROOM AT NIGHT, CONCERT HALL (BACKGROUND)	20		
	BROADCAST/RECORDING STUDIO	10	VERY FAINT	
LOWEST THRESHOLD OF HUMAN HEARING	LOWEST THRESHOLD OF HUMAN HEARING	0		

Source: Environmental Protection Agency Office of Noise Abatement and Control, Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety (EPA/ONAC 550/9-74-004) March 1974.
(Urban Crossroads, 2024a, Exhibit 2-A)

A. Range of Noise

Since the range of intensities that the human ear can detect is so large, the scale frequently used to measure intensity is a scale based on multiples of 10, the logarithmic scale. The scale for measuring intensity is the decibel scale. Each interval of 10 decibels indicates a sound energy 10 times greater than before, which is perceived by the human ear as being roughly twice as loud. The most common sounds vary between 40 dBA (very quiet) to 100 dBA (very loud). Normal conversation at three feet is roughly 60 dBA, while loud jet engine noises equate to 110 dBA at approximately 1,000 feet, which can cause serious discomfort. Another important aspect of noise is the duration of the sound and the way it is described and distributed in time. (Urban Crossroads, 2024a, pp. 7-8)

B. Noise Descriptors

Environmental noise descriptors generally are based on averages, rather than instantaneous, noise levels. The most used figure is the equivalent continuous sound pressure level (L_{eq}). L_{eq} is not measured directly but is calculated from sound pressure levels typically measured in dBA. L_{eq} represents a steady state sound level containing the same total energy as a time varying signal over a given sample period and is commonly used to describe the "average" noise levels within the environment. (Urban Crossroads, 2024a, p. 8)

Peak hour or average noise levels, while useful, do not completely describe a given noise environment. Noise levels lower than peak hour may be disturbing if they occur during times when quiet is most desirable, namely evening and nighttime (sleeping) hours. To account for this, the Community Noise Equivalent Level (CNEL), representing a composite 24-hour noise level is utilized. The CNEL is the weighted average of the intensity of a sound, with corrections for time of day, and averaged over 24 hours. The time-of-day corrections require the addition of 5 decibels to dBA L_{eq} sound levels in the evening from 7:00 p.m. to 10:00 p.m., and the addition of 10 decibels to dBA L_{eq} sound levels at night between 10:00 p.m. and 7:00 a.m. These additions are made to account for the noise sensitive time periods during the evening and night hours when sound appears louder. CNEL does not represent the actual sound level heard at any time, but rather represents the total sound exposure. Riverside County relies on the 24-hour CNEL level to assess land use compatibility with transportation-related noise sources. (Urban Crossroads, 2024a, p. 8)

C. Sound Propagation

When sound propagates over a distance, it changes in level and frequency content. The way noise reduces with distance depends on the factors described below. (Urban Crossroads, 2024a, p. 8)

1. Geometric Spreading

Sound from a localized source (i.e., a stationary point source) propagates uniformly outward in a spherical pattern. The sound level attenuates (or decreases) at a rate of 6 dB for each doubling of distance from a point source. Highways consist of several localized noise sources on a defined path and hence can be treated as a line source, which approximates the effect of several point sources. Noise from a line source propagates outward in a cylindrical pattern, often referred to as cylindrical spreading. Sound levels attenuate at a rate of 3 dB for each doubling of distance from a line source. (Urban Crossroads, 2024a, p. 8)

2. Ground Absorption

The propagation path of noise from a highway to a receiver is usually very close to the ground. Noise attenuation from ground absorption and reflective wave canceling adds to the attenuation associated with geometric spreading. Traditionally, the excess attenuation has also been expressed in terms of attenuation per doubling of distance. This approximation usually is sufficiently accurate for distances of less than 200 feet. For acoustically hard sites (i.e., sites with a reflective surface between the source and the receiver, such as a parking lot or body of water), no excess ground attenuation is assumed. For acoustically absorptive or soft sites (i.e., those sites with an absorptive ground surface between the source and the receiver such as soft dirt, grass, or scattered bushes and trees), an excess ground attenuation value of 1.5 dB per doubling of distance is normally assumed. When added to the cylindrical spreading, the excess ground attenuation results in an overall drop-off rate of 4.5 dB per doubling of distance from a line source. (Urban Crossroads, 2024a, pp. 8-9)

3. Atmospheric Effects

Receivers located downwind from a source can be exposed to increased noise levels relative to calm conditions, whereas locations upwind can have lowered noise levels. Sound levels can be increased at large distances (e.g., more than 500 feet) due to atmospheric temperature inversion (i.e., increasing temperature with elevation). Other factors such as air temperature, humidity, and turbulence can also have significant effects. (Urban Crossroads, 2024a, p. 9)

4. Shielding

A large object or barrier in the path between a noise source and a receiver can substantially attenuate noise levels at the receiver. The amount of attenuation provided by shielding depends on the size of the object and the frequency content of the noise source. Shielding by trees and other such vegetation typically only has an "out of sight, out of mind" effect. That is, the perception of noise impact tends to decrease when vegetation blocks the line-of-sight to nearby residents. However, for vegetation to provide a substantial, or even noticeable, noise reduction, the vegetation area must be at least 15 feet in height, 100 feet wide, and dense enough to completely obstruct the line-of-sight between the source and the receiver. This size of vegetation may provide up to 5 dBA of noise reduction. The Federal Highway Administration (FHWA) does not consider the planting of vegetation to be a noise abatement measure. (Urban Crossroads, 2024a, p. 9)

D. Noise Control

Noise control is the process of obtaining an acceptable noise environment for an observation point or receiver by controlling the noise source, transmission path, receiver, or all three. This concept is known as the source-path-receiver concept. In general, noise control measures can be applied to these three elements. (Urban Crossroads, 2024a, p. 9)

E. Noise Barrier Attenuation

Effective noise barriers can reduce noise levels by 10 to 15 dBA, cutting the loudness of traffic noise in half. A noise barrier is most effective when placed close to the noise source or receiver. Noise barriers, however,

do have limitations. For a noise barrier to work, it must block the line-of-sight path of sound from the noise source. (Urban Crossroads, 2024a, p. 9)

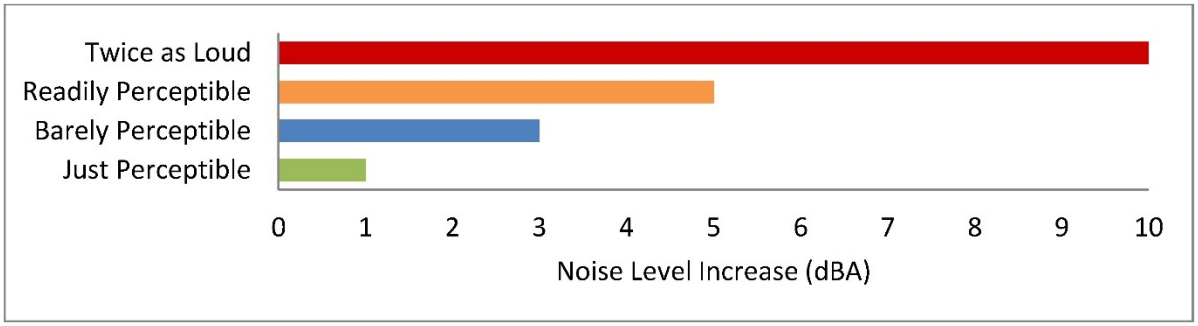
F. *Land Use Compatibility With Noise*

Some land uses are more tolerant of noise than others. For example, schools, hospitals, churches, and residences are more sensitive to noise intrusion than are commercial or industrial developments and related activities. As ambient noise levels affect the perceived amenity or livability of a development, so too can the mismanagement of noise impacts impair the economic health and growth potential of a community by reducing the area's desirability as a place to live, shop, and work. For this reason, land use compatibility with the noise environment is an important consideration in the planning and design process. The FHWA encourages State and local government to regulate land development in such a way that noise-sensitive land uses are either prohibited from being located adjacent to a highway, or that the developments are planned, designed, and constructed in such a way that noise impacts are minimized. (Urban Crossroads, 2024a, p. 10)

G. *Community Response to Noise*

Approximately 16% of the population has a very low tolerance for noise and will object to any noise not of their making. Consequently, even in the quietest environment, some complaints may occur. Approximately 20 to 30% of the population will not complain even in very severe noise environments. Thus, a variety of reactions can be expected from people exposed to any given noise environment. Surveys have shown that community response to noise varies from no reaction to vigorous action for newly introduced noises averaging from 10 dB below existing to 25 dB above existing. According to research originally published in the *Noise Effects Handbook*, the percentage of high annoyance ranges from approximately 0 percent at 45 dB or less, 10 percent are highly annoyed around 60 dB, and increases rapidly to approximately 70 percent being highly annoyed at approximately 85 dB or greater. Despite this variability in behavior on an individual level, the population can be expected to exhibit the following responses to changes in noise levels as shown in Figure 4.13-2, *Noise Level Increase Perception*. A change of 3 dBA is considered barely perceptible, and changes of 5 dBA are considered readily perceptible. (Urban Crossroads, 2024a, p. 10)

Figure 4.13-2 Noise Level Increase Perception



(Urban Crossroads, 2024a, Exhibit 2-B)

H. Vibration

Per the Federal Transit Administration (FTA) *Transit Noise Impact and Vibration Assessment*, vibration is the periodic oscillation of a medium or object. The rumbling sound caused by the vibration of room surfaces is called structure-borne noise. Sources of ground-borne vibrations include natural phenomena (e.g., earthquakes, volcanic eruptions, sea waves, landslides) or human-made causes (e.g., explosions, machinery, traffic, trains, construction equipment). Vibration sources may be continuous, such as factory machinery, or transient, such as explosions. As is the case with airborne sound, ground-borne vibrations may be described by amplitude and frequency. (Urban Crossroads, 2024a, p. 11)

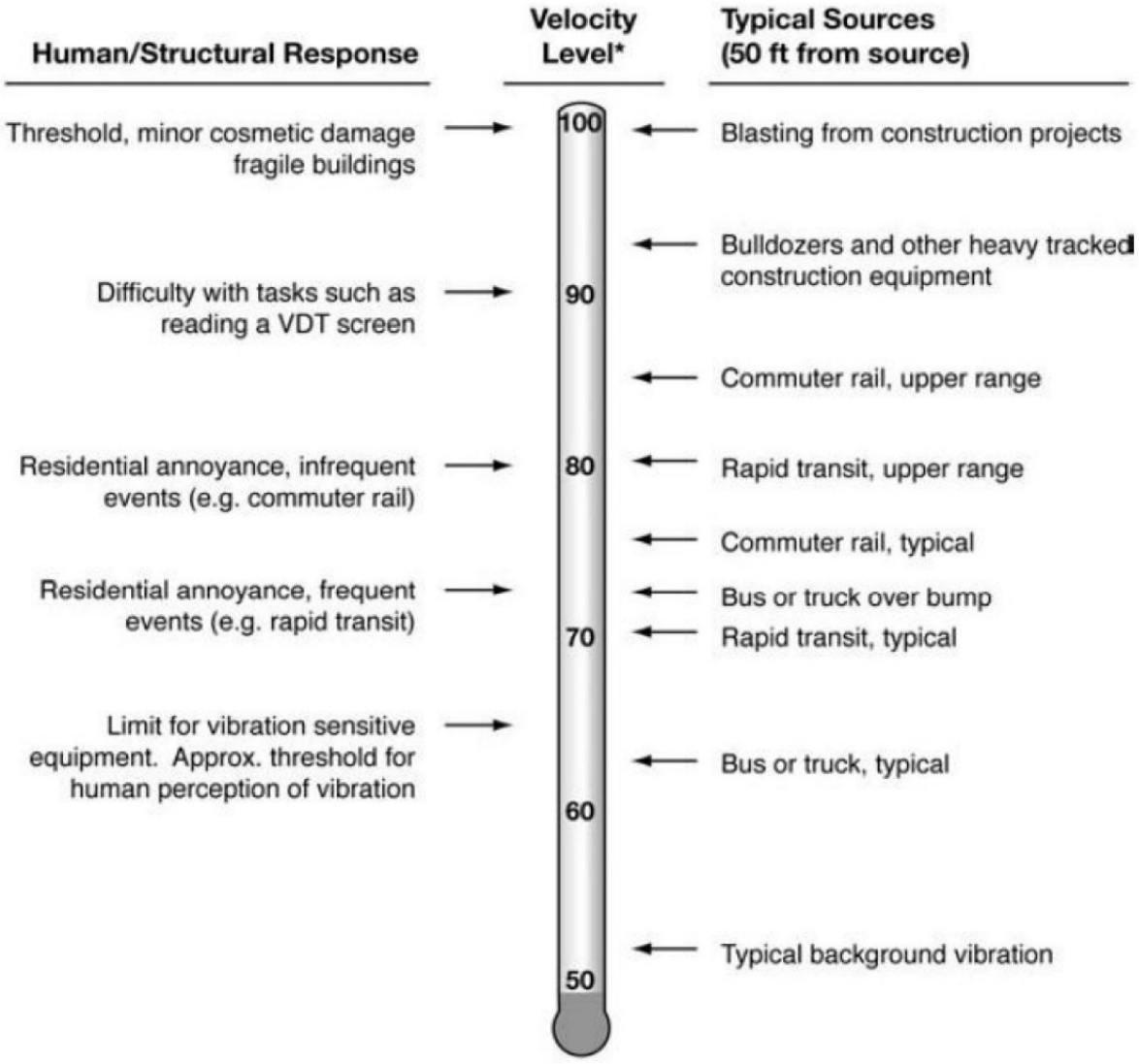
There are several different methods that are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal. The PPV is most frequently used to describe vibration impacts to buildings but is not always suitable for evaluating human response (annoyance) because it takes some time for the human body to respond to vibration signals. Instead, the human body responds to average vibration amplitude often described as the root mean square (RMS). The RMS amplitude is defined as the average of the squared amplitude of the signal and is most frequently used to describe the effect of vibration on the human body. Decibel notation (VdB) is commonly used to measure RMS. VdB serves to reduce the range of numbers used to describe human response to vibration. Typically, ground-borne vibration generated by man-made activities attenuates rapidly with distance from the source of the vibration. Sensitive receivers for vibration include structures (especially older masonry structures), people (especially residents, the elderly, and sick), and vibration-sensitive equipment and/or activities. (Urban Crossroads, 2024a, p. 11)

The background vibration-velocity level in residential areas is generally 50 VdB. Ground-borne vibration is normally perceptible to humans at approximately 65 VdB. For most people, a vibration-velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels. Typical outdoor sources of perceptible ground-borne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the ground-borne vibration is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration-velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings. Figure 4.13-3, *Typical Levels of Ground-Borne Vibration*, illustrates common vibration sources and the human and structural response to ground-borne vibration. (Urban Crossroads, 2024a, p. 11)

4.13.2 Existing Conditions

To assess the existing noise level environment, 24-hour noise level measurements were taken at seven locations in the Project study area. The receiver locations were selected to describe and document the existing noise environment within the Project study area. Figure 4.13-4, *Noise Measurement Locations,* provides the boundaries of the Project study area and the noise level measurement locations. To fully describe the existing noise conditions, noise level measurements were collected by Urban Crossroads, Inc. on Friday, April 21, 2023 and Wednesday, September 6, 2023. (Urban Crossroads, 2024a, p. 27)

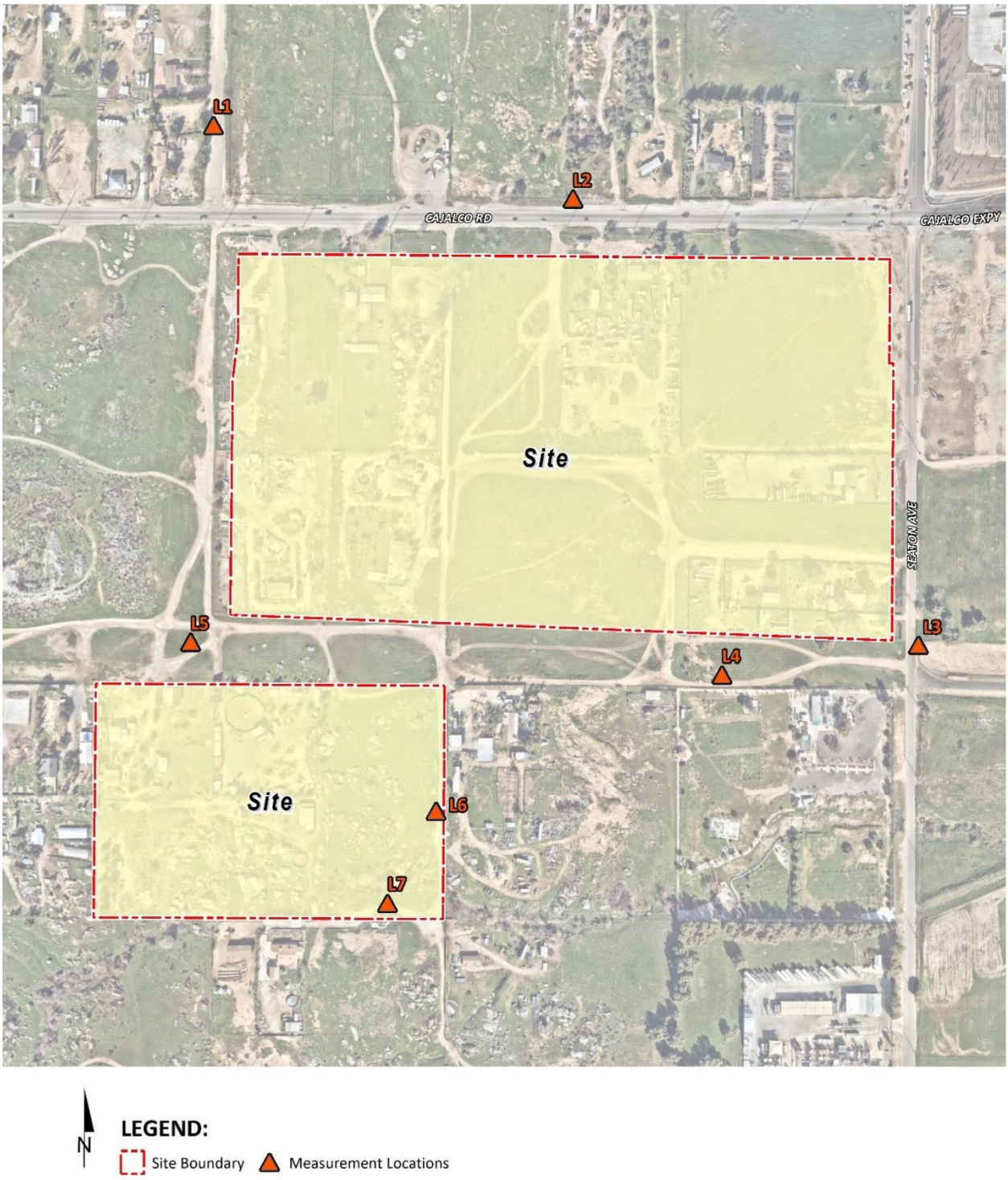
Figure 4.13-3 Typical Levels of Ground-Borne Vibration



** RMS Vibration Velocity Level in VdB relative to 10^{-6} inches/second*

Source: Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment Manual.
(Urban Crossroads, 2024a, Exhibit 2-C)

Figure 4.13-4 Noise Measurement Locations



(Urban Crossroads, 2024a, Exhibit 5-A)

A. Measurement Procedure and Criteria

To describe the existing noise environment, the hourly noise levels were measured during typical weekday conditions over a 24-hour period. By collecting individual hourly noise level measurements, it is possible to describe the equivalent daytime and nighttime hourly noise levels and calculate the 24-hour CNEL. The long-term noise readings were recorded using Piccolo Type 2 integrating sound level meter and dataloggers. The Piccolo sound level meters were calibrated using a Larson-Davis calibrator, Model CAL 150. All noise meters were programmed in "slow" mode to record noise levels in "A" weighted form. The sound level meters and microphones were equipped with a windscreen during all measurements. All noise level measurement equipment satisfies the American National Standards Institute (ANSI) standard specifications for sound level meters ANSI S1.4-2014/IEC 61672-1:2013. (Urban Crossroads, 2024a, p. 27)

B. Noise Measurement Locations

The long-term noise level measurements were positioned as close to the nearest sensitive receiver locations as possible to assess the existing ambient hourly noise levels surrounding the Project site. Both Caltrans and the FTA recognize that it is not reasonable to collect noise level measurements that can fully represent every part of a private yard, patio, deck, or balcony normally used for human activity when estimating impacts for new development projects. This is demonstrated in the Caltrans general site location guidelines which indicate that *"sites must be free of noise contamination by sources other than sources of interest. Avoid sites located near sources such as barking dogs, lawnmowers, pool pumps, and air conditioners unless it is the express intent of the analyst to measure these sources. Further, FTA guidance states that it is not necessary nor recommended that existing noise exposure be determined by measuring at every noise-sensitive location in a project area. Rather, the recommended approach is to characterize the noise environment for clusters of sites based on measurements or estimates at representative locations in the community*." (Urban Crossroads, 2024a, p. 27)

Based on recommendations of Caltrans and the FTA, it is not necessary to collect measurements at each individual building or residence, because each receiver measurement represents a group of buildings that share acoustical equivalence. In other words, the area represented by the receiver shares similar shielding, terrain, and geometric relationship to the reference noise source. Receivers represent a location of noise sensitive areas and are used to estimate the future noise level impacts. Collecting reference ambient noise level measurements at the nearby sensitive receiver locations allows for a comparison of the before and after Project noise levels and is necessary to assess potential noise impacts due to the Project's contribution to the ambient noise levels. (Urban Crossroads, 2024a, pp. 27-28)

C. Noise Measurement Results

The noise measurements presented below focus on L_{eq}. L_{eq} represents a steady state sound level containing the same total energy as a time-varying signal over a given sample period. Table 4.13-1, *Ambient Noise Level Measurement*, identifies the hourly daytime (7:00 a.m. to 10:00 p.m.) and nighttime (10:00 p.m. to 7:00 a.m.) noise levels at each noise level measurement location. Table 4.13-1 provides the equivalent noise levels used to describe the daytime and nighttime ambient conditions. These daytime and nighttime energy average noise levels represent the average of all hourly noise levels observed during these time periods expressed as a single number. Appendix 5.2 of the Project's NIA (*Technical Appendix L*) provides summary worksheets of the noise

levels for each hour as well as the minimum, maximum, L_1, L_2, L_5, L_8, L_{25}, L_{50}, L_{90}, L_{95}, and L_{99} percentile noise levels observed during the daytime and nighttime periods. (Urban Crossroads, 2024a, p. 28)

Table 4.13-1 Ambient Noise Level Measurement

Location[1]	Description	Energy Average Noise Level (dBA L_{eq})[2]		CNEL
		Daytime	Nighttime	
L1	Located north of the site near the La Palapa Ranch building at 19451 Decker Rd.	65.1	61.5	69.3
L2	Located north of the site near the residence at 22840 Cajalco Rd.	75.2	75.2	81.9
L3	Located south of the site near the residence at 19701 Seaton Ave.	65.7	61.8	69.5
L4	Located south of the site near the Huong Sen Buddhist Temple at 19865 Seaton Avenue.	62.6	53.2	64.3
L5	Located southwest of the site near the residence at 22655 Cajalco Rd.	63.5	53.3	64.2
L6	Located west of the residence at 22761 Cajalco Rd.	65.1	56.9	66.1
L7	Located northeast the residence at 22683 Cajalco Rd.	62.2	59.9	67.1

[1] See Figure 4.13-4 for the noise level measurement locations.
[2] Energy (logarithmic) average levels. The long-term 24-hour measurement worksheets are included in Appendix 5.2 of the Project NIA (*Technical Appendix L*).
"Daytime" = 7:00 a.m. to 10:00 p.m.; "Nighttime" = 10:00 p.m. to 7:00 a.m.
(Urban Crossroads, 2024a, Table 5-1)

4.13.3 Applicable Regulatory Requirements

The following is a brief description of the federal, State, and local environmental laws and related regulations related to noise.

A. Federal Regulations

1. Noise Control Act of 1972

The Noise Control Act of 1972 establishes a national policy to promote an environment for all Americans free from noise that jeopardizes their health and welfare. The Act also serves to (1) establish a means for effective coordination of federal research and activities in noise control; (2) authorize the establishment of federal noise emission standards for products distributed in commerce; and (3) provide information to the public respecting the noise emission and noise reduction characteristics of such products. (EPA, 2022i)

While primary responsibility for control of noise rests with State and local governments, federal action is essential to deal with major noise sources in commerce, control of which requires national uniformity of treatment. The United States (U.S.) Environmental Protection Agency (EPA) is directed by Congress to coordinate the programs of all federal agencies relating to noise research and noise control. (EPA, 2022i)

2. Federal Transit Administration

The FTA has published a Noise and Vibration Impact Assessment (NVIA), which provides guidance for preparing and reviewing the noise and vibration sections of environmental documents. In the interest of promoting quality and uniformity in assessments, the manual is used by project sponsors and consultants in performing noise and vibration analyses for inclusion in environmental documents. The manual sets forth the methods and procedures for determining the level of noise and vibration impact resulting from most federally-funded transit projects and for determining what can be done to mitigate such impact. (FTA, 2006, pp. p. 1-1)

The NVIA also establishes criteria for acceptable ground-borne vibration, which are expressed in terms of RMS velocity levels in decibels, and the criteria for acceptable ground-borne noise expressed in terms of A-weighted sound levels. As shown in Table 4.13-2, *Ground-Borne Vibration and Ground-Borne Noise Impact Criteria for General Assessment*, the FTA identifies three categories of land uses and provides Ground-Based Vibration (GBV) and Ground-Based Noise (GBN) criteria for each category of land use. (FTA, 2006, pp. 8-3 and 8-4)

3. Federal Aviation Administration

The Federal Aviation Administration (FAA) regulates the maximum noise level that an individual civil aircraft can emit through requiring aircraft to meet certain noise certification standards. These standards designate changes in maximum noise level requirements by "stage" designation. The standard requires that the aircraft meet or fall below designated noise levels. For civil jet aircraft, there are four stages identified, with Stage 1 being the loudest and Stage 4 being the quietest. For helicopters, two different stages exist, Stage 1 and Stage 2. As with civil jet aircraft, Stage 2 is quieter than Stage 1. In addition, the FAA is currently working to adopt the latest international standards for helicopters, which will be called Stage 3 and will be quieter than Stage 2. (FAA, 2020b)

The FAA has undertaken a phase out of older, noisier civil aircraft, resulting in some stages of aircraft no longer being in the fleet. Currently within the contiguous US, civil jet aircraft over 75,000 pounds maximum take-off weight must meet Stage 3 and Stage 4 to fly. In addition, aircraft at or under 75,000 pounds maximum take-off weight must meet Stage 2, 3, or 4 to operate within the U.S. In addition, by December 31, 2015, all civil jet aircraft, regardless of weight must meet Stage 3 or Stage 4 to fly within the contiguous U.S. Both Stage 1 and Stage 2 helicopters are allowed to fly within the U.S. (FAA, 2020b)

The U.S. noise standards are defined in the Code of Federal Regulations (CFR) Title 14 Part 36 – *Noise Standards: Aircraft Type and Airworthiness Certification* (14 CFR Part 36). The FAA publishes certificated

Table 4.13-2 Ground-Borne Vibration and Ground-Borne Noise Impact Criteria for General Assessment

Land Use Category	GBV Impact Levels (VdB re 1 micro-inch /sec)			GBN Impact Levels (dB re 20 micro Pascals)		
	Frequent Events[1]	Occasional Events[2]	Infrequent Events[3]	Frequent Events[1]	Occasional Events[2]	Infrequent Events[3]
Category 1: Buildings where vibration would interfere with interior operations.	65 VdB[4]	65 VdB[4]	65 VdB[4]	N/A[4]	N/A[4]	N/A[4]
Category 2: Residences and buildings where people normally sleep.	72 VdB	75 VdB	80 VdB	35 dBA	38 dBA	43 dBA
Category 3: Institutional land uses with primarily daytime use.	75 VdB	78 VdB	83 VdB	40 dBA	43 dBA	48 dBA

Notes:

1. "Frequent Events" is defined as more than 70 vibration events of the same source per day. Most rapid transit projects fall into this category.
2. "Occasional Events" is defined as between 30 and 70 vibration events of the same source per day. Most commuter trunk lines have this many operations.
3. "Infrequent Events" is defined as fewer than 30 vibration events of the same kind per day. This category includes most commuter rail branch lines.
4. This criterion limit is based on levels that are acceptable for most moderately sensitive equipment such as optical microscopes. Vibration-sensitive manufacturing or research will require detailed evaluation to define the acceptable vibration levels. Ensuring lower vibration levels in a building often requires special design of the HVAC systems and stiffened floors.
5. Vibration-sensitive equipment is generally not sensitive to ground-borne noise.

(FTA, 2006, Table 8-1)

noise levels in the advisory circular, *Noise Levels for U.S Certificated and Foreign Aircraft*. This advisory circular provides noise level data for aircraft certificated under 14 CFR Part 36 and categorizes aircraft into their appropriate "stages." Any aircraft that is certified for airworthiness in the U.S. needs to also comply with noise standard requirements to receive a noise certification. The purpose of the noise certification process is to ensure that the latest available safe and airworthy noise reduction technology is incorporated into aircraft design and enables the noise reductions offered by those technologies to be reflected in reductions of noise experienced by communities. As noise reduction technology matures, the FAA works with the international community to determine if a new stringent noise standard is needed. If so, the international community through the International Civil Aviation Organization (ICAO) embarks on a comprehensive analysis to determine what that new standard will be. (FAA, 2016)

The current FAA noise standards applicable to new type certifications of jet and large turboprop aircraft is Stage 4. It is equivalent to the ICAO Annex 16, Volume 1 Chapter 4 standards. Recently, the international community has established and approved a more stringent standard within the ICAO Annex 16, Volume 1 Chapter 14, which became effective July 14, 2014. The FAA adopted this standard and promulgated the rule

for Stage 5 effective for new type certificates after December 31, 2017 and December 31, 2020, depending on the weight of the aircraft. The Final Rule for Stage 5 was published in the Federal Register on October 4, 2017. (FAA, 2016)

For helicopters, the FAA has noise standards for a Stage 3 helicopter that became effective on May 5, 2014. These more stringent standards apply to new type helicopters and are consistent with ICAO Annex 16, Volume 1 Chapter 8 and Chapter 11. (FAA, 2016)

The FAA Modernization and Reform Act of 2012, in Section 513, had a prohibition on operating certain aircraft weighing 75,000 pounds or less not complying with Stage 3 noise levels, and on July 2, 2013, the FAA published a Final Rule in the Federal Register for the *Adoption of Statutory Prohibition the Operation of Jets Weighing 75,000 Pounds or Less That Are Not Stage 3 Noise Compliant*. In 1990, Congress passed the Aviation Noise and Capacity Act, which required that by the year 2000 all jet and large turboprop aircraft at civilian airports be Stage 3. (FAA, 2016)

4. Federal Highway Administration (FHWA)

The FHWA is the agency responsible for administering the federal-aid highway program in accordance with federal statutes and regulations. The FHWA developed the noise regulations as required by the Federal-Aid Highway Act of 1970 (Public Law 91-605, 84 Stat. 1713). The Code of Federal Regulations (CFR) Title 23 Part 772 (23 CFR 772), *Procedures for Abatement of Highway Traffic Noise and Construction Noise*, applies to highway construction projects where a state department of transportation has requested federal funding for participation in a project. The regulation requires the highway agency to investigate traffic noise impacts in areas adjacent to federally-aided highways for proposed construction of a highway on a new location or the reconstruction of an existing highway to either significantly change the horizontal or vertical alignment or increase the number of through-traffic lanes. If the highway agency identifies impacts, it must consider abatement. The highway agency must incorporate all feasible and reasonable noise abatement into the project design. (FHWA, 2017)

The FHWA regulations for mitigation of highway traffic noise in the planning and design of federally aided highways are contained in 23 CFR 772. The regulations require the following during the planning and design of a highway project:

- Identification of traffic noise impacts;
- Examination of potential mitigation measures;
- The incorporation of reasonable and feasible noise mitigation measures into the highway project; and
- Coordination with local officials to provide helpful information on compatible land use planning and control. (FHWA, 2022)

The regulations contain noise abatement criteria, which represent the upper limit of acceptable highway traffic noise for different types of land uses and human activities. The regulations do not require meeting the abatement criteria in every instance. Rather, they require that highway agencies make every reasonable and feasible effort to provide noise mitigation when the criteria are approached or exceeded. Compliance with the

noise regulations is a prerequisite for the granting of federally aided highway funds for construction or reconstruction of a highway. (FHWA, 2022)

5. Construction-Related Hearing Conservation

The Occupational Safety and Health Administration (OSHA) hearing conservation program is designed to protect workers with significant occupational noise exposures from hearing impairment even if they are subject to such noise exposures over their entire working lifetimes. Standard 29 CFR Part 1910 indicates the noise levels under which a hearing conservation program is required to be provided to workers exposed to high noise levels. (OSHA, 2022)

This analysis does not evaluate the noise exposure of construction workers within the Project site based on CEQA requirements, and instead, evaluates the Project-related construction noise levels at the nearby sensitive receiver locations in the Project study area. Further, periodic exposure to high noise levels in short duration, such as Project construction, is typically considered an annoyance and not impactful to human health. It would take several years of exposure to high noise levels to result in hearing impairment.

B. State Regulations

1. Building Standards Code

The State of California's noise insulation standards are codified in the California Code of Regulations (CCR) Title 24, Building Standards Administrative Code, Part 2, and the California Building Standards Code. These noise standards are applied to new construction in California for the purpose of controlling interior noise levels resulting from exterior noise sources. The regulations specify that acoustical studies must be prepared when noise-sensitive structures, such as residential buildings, schools, or hospitals, are developed near major transportation noise sources, and where such noise sources create an exterior noise level of 60 dBA CNEL or higher. Acoustical studies that accompany building plans for noise-sensitive land uses must demonstrate that the structure has been designed to limit interior noise in habitable rooms to acceptable noise levels. For new residential buildings, schools, and hospitals, the acceptable interior noise limit for new construction is 45 dBA CNEL. (CBSC, 2022)

2. California Noise Insulation Standards

The California Noise Insulation Standards (CCR Title 25 Section 1092) establish uniform minimum noise insulation performance standards for new hotels, motels, dormitories, apartment houses, and dwellings other than detached single-family dwellings. Specifically, Title 25 specifies that interior noise levels attributable to exterior sources shall not exceed 45 dBA Ldn/CNEL (i.e., the same levels that the EPA recommends for residential interiors) in any habitable room of a new dwelling. An acoustical study must be prepared for proposed multiple unit residential and hotel/motel structures where outdoor Ldn/CNEL is 60 dBA or greater. The study must demonstrate that the design of the building would reduce interior noise to 45 dBA Ldn/CNEL or lower. Because noise levels can increase over time in developing areas, Title 25 also specifies that dwellings are to be designed so that interior noise levels will meet this standard for at least 10 years from the time of building permit application. (MLA, n.d.)

3. OPR General Plan Guidelines

Though not adopted by law, the 2017 California General Plan Guidelines, published by the California Governor's Office of Planning and Research (OPR), provides guidance for local agencies in preparing or updating general plans. The General Plan Guidelines provide direction on the required noise element portion of the general plans. The purpose of the noise element is to limit the exposure of the community to excessive noise levels. Local governments must "analyze and quantify" noise levels and the extent of noise exposure through actual measurement or the use of noise modeling. Technical data relating to mobile and point sources must be collected and synthesized into a set of noise control policies and programs that "minimizes the exposure of community residents to excessive noise." Noise level contours must be mapped, and the conclusions of the element used as a basis for land use decisions. The element must include implementation measures and possible solutions to existing and foreseeable noise problems. Furthermore, the policies and standards must be sufficient to serve as a guideline for compliance with sound transmission control requirements. A general plan's noise element directly correlates to the land use, circulation, and housing elements. The noise element must be used to guide decisions concerning land use and the location of new roads and transit facilities since these are common sources of excessive noise levels. The noise levels from existing land uses, including mining, agricultural, and industrial activities, must be closely analyzed to ensure compatibility, especially where residential and other sensitive receptors have encroached into areas previously occupied by these uses. (OPR, 2017a, pp. 131-132)

C. Local Regulations

1. Riverside County General Plan

The Riverside County General Plan Noise Element was adopted to control and abate environmental noise, and to protect the citizens of Riverside County from excessive exposure to noise. The Noise Element specifies the maximum allowable exterior noise levels for new developments impacted by transportation noise sources such as arterial roads, freeways, airports, and railroads. In addition, the Noise Element identifies several polices to minimize the impacts of excessive noise levels throughout the community and establishes noise level requirements for all land uses. To protect Riverside County residents from excessive noise, the Noise Element contains the following policies related to the Project:

N 1.1 Protect noise-sensitive land uses from high levels of noise by restricting noise-producing land uses from these areas. If the noise-producing land use cannot be relocated, then noise buffers such as setbacks, landscaping, or block walls shall be used.

N 1.3 Consider the following uses noise sensitive and discourage these uses in areas in excess of 65 CNEL:

- *Schools*
- *Hospitals*
- *Rest Homes*
- *Long Term Care Facilities*
- *Mental Care Facilities*
- *Residential Uses*

- *Libraries*
- *Passive Recreation Uses*
- *Places of Worship*

N 1.5 Prevent and mitigate the adverse impacts of excessive noise exposure on the residents, employees, visitors, and noise-sensitive uses of Riverside County.

N 4.1 Prohibit facility-related noise, received by any sensitive use, from exceeding the following worst-case noise levels:

a. 45 dBA 9-minute L_{eq} between 10:00 p.m. and 7:00 a.m.;

b. 65 dBA 9-minute L_{eq} between 7:00 a.m. and 10:00 p.m.

N 13.1 Minimize the impacts of construction noise on adjacent uses within acceptable standards.

N 13.2 Ensure that construction activities are regulated to establish hours of operation in order to prevent and/or mitigate the generation of excessive or adverse impacts on surrounding areas.

N 13.3 Condition subdivision approval adjacent to developed/occupied noise-sensitive land uses (see policy N 1.3) by requiring the developer to submit a construction-related noise mitigation plan to the [County] for review and approval prior to issuance of a grading permit. The plan must depict the location of construction equipment and how the noise from this equipment will be mitigated during construction of this project, through the use of such methods as:

i. Temporary noise attenuation fences;

ii. Preferential location and equipment; and

iii. Use of current noise suppression technology and equipment.

N 14.1 Enforce the California Building Standards that sets standards for building construction to mitigate interior noise levels to the tolerable 45 CNEL limit. These standards are utilized in conjunction with the Uniform Building Code by the County's Building Department to ensure that noise protection is provided to the public. Some design features may include extra-dense insulation, double-paned windows, and dense construction materials.

N 16.3 Prohibit exposure of residential dwellings to perceptible ground vibration from passing trains as perceived at the ground or second floor. Perceptible motion shall be presumed to be a motion velocity of 0.01 inches/second over a range of 1 to 100 Hz. (Urban Crossroads, 2024a, pp. 13-14)

To ensure noise-sensitive land uses are protected from high levels of noise (N 1.1), Table N-1 of the Noise Element identifies guidelines to evaluate proposed developments based on exterior and interior noise level limits for land uses and requires a noise analysis to determine needed mitigation measures if necessary. The Noise Element identifies residential use as a noise-sensitive land use (N 1.3) and discourages new development in areas with transportation related levels of 65 dBA CNEL or greater existing ambient noise levels. To prevent and mitigate noise impacts for its residents (N 1.5), Riverside County requires exterior noise attenuation measures for sensitive land use exposed to transportation related noise levels higher than 65 dBA CNEL. In

addition, Riverside County had adopted an interior noise level limit of 45 dBA CNEL. (Urban Crossroads, 2024a, p. 14)

Policy N 4.1 of the Noise Element sets a stationary-source exterior noise limit to not to be exceeded for a cumulative period of more than ten minutes in any hour of 65 dBA L_{eq} for daytime hours of 7:00 a.m. to 10:00 p.m., and 45 dBA L_{eq} during the noise-sensitive nighttime hours of 10:00 p.m. to 7:00 a.m. To prevent high levels of construction noise from impacting noise-sensitive land uses, policies N 13.1 through 13.3 identify construction noise mitigation requirements for new development located near existing noise-sensitive land uses. (Urban Crossroads, 2024a, pp. 14-15)

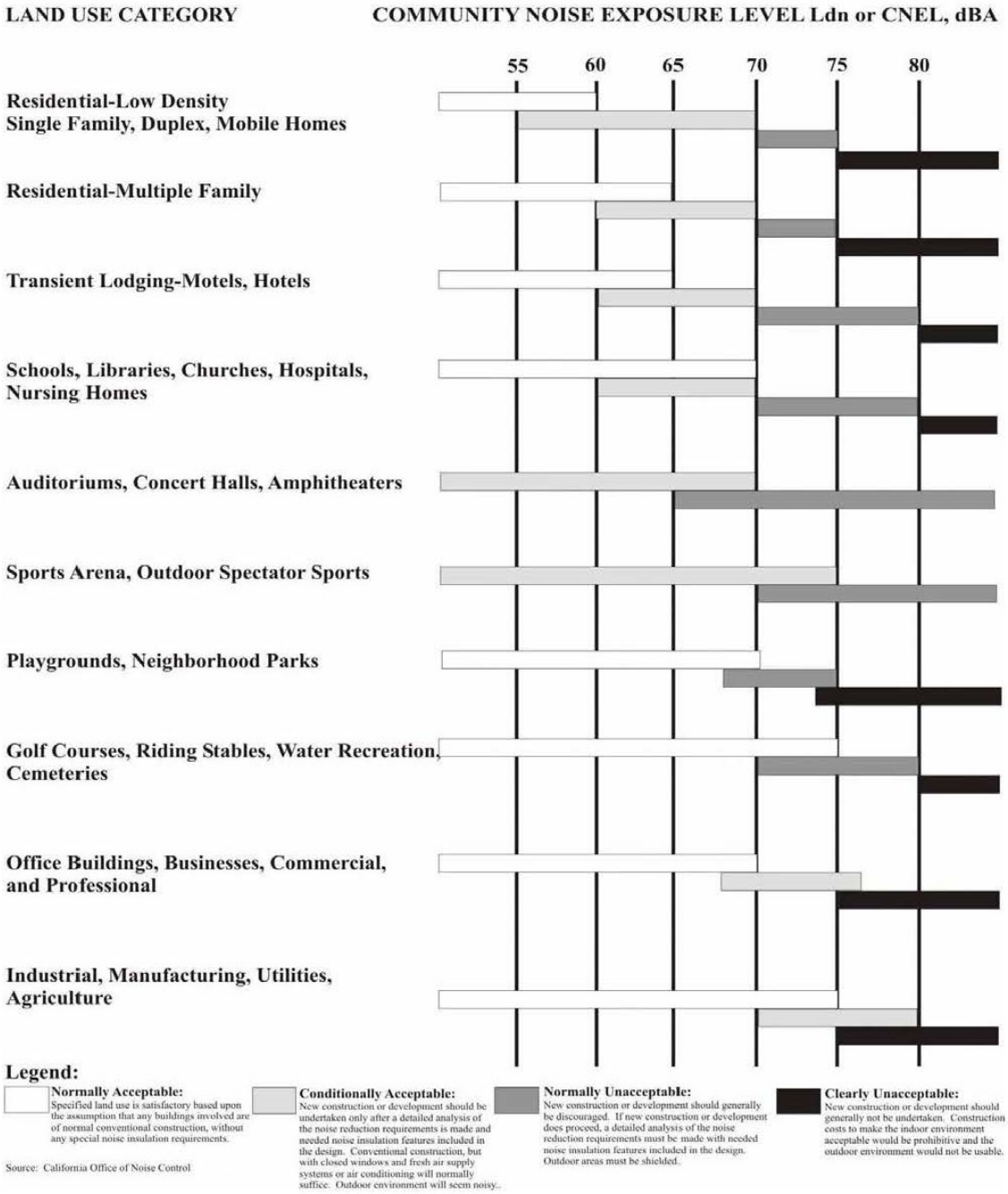
Land Use Compatibility

The noise criteria identified in the Riverside County General Plan Noise Element (Table N-1) are guidelines to evaluate the land use compatibility of transportation related noise. The compatibility criteria, shown on Table 4.13-3, *Land Use Compatibility for Community Noise Exposure*, provides the County with a planning tool to gauge the compatibility of land uses relative to existing and future exterior noise levels. Table 4.13-3 describes categories of compatibility and not specific noise standards. The non-noise sensitive warehouse/industrial use of the Project is considered normally acceptable with unmitigated exterior noise levels of less than 75 dBA CNEL based on the Industrial, Manufacturing, Utilities, Agriculture land use compatibility criteria shown on Table 4.13-3. The proposed park use of the Project is considered normally acceptable with unmitigated exterior noise levels of less than 70 dBA CNEL. Noise sensitive residential designated land uses in the Project study area are considered normally acceptable with exterior noise levels below 60 dBA CNEL, and conditionally acceptable with exterior noise levels of up to 70 dBA CNEL. For conditionally acceptable exterior noise levels, of up to 80 dBA CNEL for Project warehouse/industrial use land uses, new construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and the needed noise insulation features are included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice. (Urban Crossroads, 2024a, p. 15)

Riverside County Exterior Stationary Source Noise Standards

Riverside County has set stationary-source hourly average L_{eq} exterior noise limits to control loading dock activity, parking lot vehicle activities, roof-top air conditioning units, trash enclosure activity, truck movements, sports field activities, basketball court activity, dog park activity, and outdoor play area associated with the development of the proposed Project. The County considers noise generated using motor vehicles to be a stationary noise source when operated on private property such as at a loading dock. These facility-related noises, as projected to any portion of any surrounding property containing a habitable dwelling, hospital, school, library or nursing home, must not exceed the following worst-case noise levels. Policy N 4.1 of the Riverside County General Plan Noise Element sets a stationary-source average L_{eq} exterior noise limit not to be exceeded for a cumulative period of more than ten minutes in any hour of 65 dBA L_{eq} for daytime hours of 7:00 a.m. to 10:00 p.m., and 45 dBA L_{eq} during the noise-sensitive nighttime hours of 10:00 p.m. to 7:00 a.m.. (Urban Crossroads, 2024a, pp. 15-16)

Table 4.13-3 Land Use Compatibility for Community Noise Exposure



(Urban Crossroads, 2024a, Exhibit 3-A)

2. Riverside County Ordinance No. 847 (Regulating Noise)

Construction Noise Standards

To control noise impacts associated with the construction of projects, such as the proposed Project, Riverside County has established limits to the hours of construction activities. Section 2.i of Riverside County Ordinance No. 847 (herein, "Noise Ordinance") indicates that noise associated with any private construction activity located within one-quarter of a mile from an inhabited dwelling is considered exempt between the hours of 6:00 a.m. and 6:00 p.m., during the months of June through September, and 7:00 a.m. and 6:00 p.m., during the months of October through May. However, neither the County's General Plan nor County Code establish numeric maximum acceptable construction source noise levels at potentially affected receivers for CEQA analysis purposes. (Urban Crossroads, 2024a, p. 17)

Operational Noise Standards

To analyze noise impacts originating from a designated fixed location or private property such as the proposed Project, stationary-source (operational) noise such as the expected loading dock activity, parking lot vehicle activities, roof-top air conditioning units, trash enclosure activity, truck movements, sports field activities, basketball court activity, dog park activity, and outdoor play area activities typically are evaluated against standards established under a jurisdiction's Municipal Code. Riverside County Ordinance No. 847 (Regulating Noise) includes standards related to stationary noise impacts that exceed the standards identified in the General Plan. Specifically, Section 4 of Ordinance No. 847, *General sound level standards*, identifies residential exterior noise level limits of 55 dBA L_{eq} during the daytime hours of 7:00 a.m. to 10:00 p.m., and 45 dBA L_{eq} during the noise-sensitive nighttime hours of 10:00 p.m. to 7:00 a.m., commercial exterior noise level limits of 65 dBA L_{eq} during the daytime hours, and 55 dBA L_{eq} during the noise-sensitive nighttime hours, and public facility exterior noise level limits of 65 dBA L_{eq} during the daytime hours, and 45 dBA L_{eq} during the noise-sensitive nighttime hours. (Urban Crossroads, 2024a, pp. 15-16)

Based on several discussions with the Riverside County Department of Environmental Health (DEH), Office of Industrial Hygiene (OIH), it is important to recognize that Riverside County Municipal Code noise level standards, incorrectly identify maximum noise level (L_{max}) standards that should instead reflect the average L_{eq} noise levels. Moreover, Riverside County's DEH OIH's April 15th, 2015, *Requirements for determining and mitigating, non-transportation noise source impacts to residential properties,* also identifies operational (stationary-source) noise level limits using the L_{eq} metric, consistent with the direction of the Riverside County General Plan guidelines and standards provided in the Noise Element. Therefore, the analysis herein was conducted consistent with direction of the County of Riverside DEH OIH guidelines and standards using the average L_{eq} noise level metric for stationary-source (operational) noise level evaluation. (Urban Crossroads, 2024a, p. 17)

4.13.4 Basis for Determining Significance

A. Significance Thresholds

Section XIII of Appendix G to the CEQA Guidelines addresses typical adverse effects to noise, and includes the following threshold questions to evaluate a project's impacts on noise:

- Would the project result in the 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 or noise ordinance, or applicable standards of other agencies?
- Would the project result in the generation of excessive ground-borne vibration or noise levels?
- For a project located within the vicinity of a private airstrip or an airport land use plan, or where such a plan has not been adopted, within two 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?

Additionally, the following thresholds are derived from Riverside County's Environmental Assessment Checklist and are used to evaluate the significance of the proposed Project's impacts due to noise. Thus, for purposes of analysis herein, significant impacts to noise would occur if the Project or any Project-related component would:

a. *For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels;*

b. *For a project within the vicinity of a private airstrip, expose people residing or working in the project area to excessive noise levels;*

c. *Result in the 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; or*

d. *Generate excessive ground-borne vibration or ground-borne noise levels.*

B. Construction-Related Noise and Vibration Limits

1. General Construction Noise Level Limits

According to the FTA, local noise ordinances typically are not very useful in evaluating construction noise. They usually relate to nuisance and hours of allowed activity, and sometimes specify limits in terms of maximum levels, but are generally not practical for assessing the impact of a construction project. Project construction noise criteria should account for the existing noise environment, the absolute noise levels during construction activities, the duration of the construction, and the adjacent land use. Due to the lack of standardized construction noise thresholds, the FTA provides guidelines that can be considered reasonable criteria for construction noise assessment. The FTA identifies two types of construction noise assessment criteria, general and detailed. For general construction noise assessments, the analysis is limited to the two noisiest pieces of equipment with an hourly daytime exterior noise level threshold for residential land use of 90 dBA $L_{eq(1hr)}$. However, for long-term construction projects that would expose sensitive receivers to noise for extended periods of time, the FTA considers a daytime 8-hour average exterior construction noise level of 80 dBA $L_{eq(8hr)}$. Therefore, to evaluate whether the Project would generate potentially significant short-term