noise levels at nearby noise sensitive residential receiver locations, a daytime exterior construction noise level of 80 dBA L_{eq} is used as a reasonable threshold to assess construction noise level impacts based on the FTA detailed analysis construction noise criteria with a nighttime exterior construction noise level of 70 dBA L_{eq}. (Urban Crossroads, 2024a, p. 18)

2. Construction Vibration Standards

Construction activity can result in varying degrees of ground-borne vibration, depending on the equipment and methods used, distance to the affected structures and soil type. Construction vibration is generally associated with pile driving and rock blasting. Other construction equipment such as air compressors, light trucks, hydraulic loaders, etc., generates little or no ground vibration. To analyze vibration impacts originating from the operation and construction of the Project, vibration-generating activities are appropriately evaluated against standards established under the Municipal Code, if such standards exist. However, Riverside County does not identify specific construction vibration level limits. Therefore, the analysis within this Subsection relies on the Caltrans *Transportation and Construction Vibration Guidance Manual*. The nearest noise sensitive buildings adjacent to the Project site can best be described as "older residential structures," and based on Caltrans guidance, the maximum acceptable continuous vibration threshold is 0.3 PPV (in/sec). (Urban Crossroads, 2024a, pp. 18-19)

3. Construction Blasting Standards

The Riverside County General Plan and Municipal Code do not identify specific construction noise level limits for blasting activities; therefore, the Office of Surface Mining Reclamation and Enforcement (OSMRE) and the CFR Airblast Limits (30 CFR 816.67(b)) are used. Section 816.2 of Title 30 of the CFR indicates that the blasting regulations are intended to ensure that all surface mining activities are conducted in a manner which preserves and enhances environmental and other values in accordance with the Act. While the OSMRE regulates mining activities, the anticipated blasting activities at the Project site represent surface mining activities which, to satisfy CEQA guidelines, must demonstrate that they do not adversely affect the existing environment. Therefore, the OSMRE blasting regulations are applied. For mining operations, which require larger blasts than those anticipated at the Project, the lowest noise level threshold identified in the CFR is a maximum noise level 129 dBA L_{max} for blasting activity measured at the location of any dwelling, public building, school, church, or community or institutional building outside the permit area. The L_{max} threshold used in the noise analysis is suitable for single-event noise levels, such as blasting activities, since other noise regulations in L_{eq} (energy average), for example, average out a reference noise level over a given time period which reduces the single-event noise level over a longer period of time. The L_{max}, therefore, allows for the shorter-duration single-event noise levels to be evaluated against an appropriate threshold. It is anticipated that no more than two blasting events could occur per day for logistics and safety reasons. (Urban Crossroads, 2024a, p. 19)

C. Operational Noise Level Increases

Noise level increases resulting from the Project are evaluated at the closest sensitive receiver locations. Under CEQA, consideration must be given to the magnitude of the increase, the existing baseline ambient noise levels, and the location of noise-sensitive receivers to determine if a noise increase represents a significant

adverse environmental impact. This approach recognizes that there is no single noise increase that renders a noise impact significant. This is primarily because of the wide variation in individual thresholds of annoyance and differing individual experiences with noise. Thus, an important way of determining a person's subjective reaction to a new noise is the comparison of it to the existing environment to which one has adapted – the so-called ambient environment. In general, the more a new noise level exceeds the previously existing ambient noise level, the less acceptable the new noise level will typically be judged. (Urban Crossroads, 2024a, p. 23)

Sensitive receivers generally are defined as locations where people reside or where the presence of unwanted sound could otherwise adversely affect the use of the land. Noise-sensitive land uses are generally considered to include schools, hospitals, single-family dwellings, mobile home parks, churches, libraries, and recreation areas. Moderately noise-sensitive land uses typically include multi-family dwellings, hotels, motels, dormitories, outpatient clinics, cemeteries, golf courses, country clubs, athletic/tennis clubs, and equestrian clubs. Land uses that are considered relatively insensitive to noise include business, commercial, and professional developments. Land uses that are typically not affected by noise include: industrial, manufacturing, utilities, agriculture, undeveloped land, parking lots, warehousing, liquid and solid waste facilities, salvage yards, and transit terminals. (Urban Crossroads, 2024a, p. 45)

1. Noise-Sensitive Receptors

Noise level increases resulting from the Project are evaluated based on the Appendix G CEQA Guidelines described above at the closest sensitive receiver locations. Under CEQA, consideration must be given to the magnitude of the increase, the existing baseline ambient noise levels, and the location of noise-sensitive receivers to determine if a noise increase represents a significant adverse environmental impact. This approach recognizes that there is no single noise increase that renders a noise impact significant. This primarily is because of the wide variation in individual thresholds of annoyance and differing individual experiences with noise. Thus, an important way of determining a person's subjective reaction to a new noise is the comparison of it to the existing environment to which one has adapted – the so-called ambient environment. In general, the more a new noise level exceeds the previously existing ambient noise level, the less acceptable the new noise level typically will be judged. (Urban Crossroads, 2024a, p. 23)

The approach used in this analysis recognizes that there is no single noise increase that renders a noise impact significant. For example, if the ambient noise environment is quiet (<60 dBA) and the new noise source greatly increases the noise levels, an impact may occur if the noise criteria may be exceeded. Therefore, for this analysis, a readily perceptible 5 dBA or greater project-related noise level increase is considered a significant impact when the without Project noise levels are below 60 dBA. Per the FICON, in areas where the without Project noise levels range from 60 to 65 dBA, a 3 dBA barely perceptible noise level increase appears to be appropriate for most people. When the without Project noise levels already exceed 65 dBA, any increase in community noise louder than 1.5 dBA or greater is considered a significant impact if the noise criteria for a given land use is exceeded, since it likely contributes to an existing noise exposure exceedance. (Urban Crossroads, 2024a, pp. 23-24)

The FICON guidance provides an established source of criteria to assess the impacts of substantial temporary or permanent increase in baseline ambient noise levels. Based on the FICON criteria, the amount to which a

given noise level increase is considered acceptable is reduced when the without Project (baseline) noise levels already are shown to exceed certain land-use specific exterior noise level criteria. The specific levels are based on typical responses to noise level increases of 5 dBA or readily perceptible, 3 dBA or barely perceptible, and 1.5 dBA depending on the underlying without Project noise levels for noise-sensitive uses. These levels of increases and their perceived acceptance are consistent with guidance provided by both the FHWA and Caltrans. (Urban Crossroads, 2024a, p. 24)

D. Non-Noise-Sensitive Receivers

The Riverside County Noise Element, Table N-1, Land Use Compatibility for Community Noise Exposure, was used to establish the satisfactory noise levels of significance for non-noise-sensitive land uses in the Project study area. As shown in Table 4.13-3, the normally acceptable exterior noise level for non-noise-sensitive warehouse/industrial land uses are 75 dBA CNEL. Noise levels greater than 75 dBA CNEL are considered conditionally acceptable per the Land Use Compatibility for Community Noise Exposure. (Urban Crossroads, 2024a, p. 24)

To determine if Project-related traffic noise level increases would be significant at off-site non-noise-sensitive land uses, a barely perceptible 3 dBA criteria is used. When the without Project noise levels are greater than the normally acceptable 75 dBA CNEL land use compatibility criteria, a barely perceptible 3 dBA or greater noise level increase is considered a significant impact since the noise level criteria is already exceeded. The noise level increases used to determine significant impacts for non-noise-sensitive land uses is generally consistent with the FICON noise level increase thresholds for noise-sensitive land uses but instead rely on the Riverside County General Plan Noise Element, Table N-1, Land Use Compatibility for Community Noise Exposure normally acceptable 75 dBA CNEL exterior noise level criteria. (Urban Crossroads, 2024a, p. 24)

E. Summary of Significance Criteria

Noise impacts shall be considered significant if any of the following occur as a direct result of the proposed development. Table 4.13-4, *Significance Criteria Summary*, shows the significance criteria summary matrix that includes the allowable criteria used to identify potentially significant incremental noise level increases. (Urban Crossroads, 2024a, p. 25)

4.13.5 Methodology for Calculating Project-Related Noise Impacts

A. Sensitive Receiver Locations

To assess the potential for long-term operational and short-term construction noise impacts, sensitive receiver locations, as shown on Figure 4.13-5, *Receiver Locations*, were identified as representative locations for analysis. Sensitive receivers generally are defined as locations where people reside or where the presence of unwanted sound could otherwise adversely affect the use of the land. Noise-sensitive land uses generally are considered to include schools, hospitals, single-family dwellings, mobile home parks, churches, libraries, and recreation areas. Moderately noise-sensitive land uses typically include multi-family dwellings, hotels, motels, dormitories, outpatient clinics, cemeteries, golf courses, country clubs, athletic/tennis clubs, and equestrian

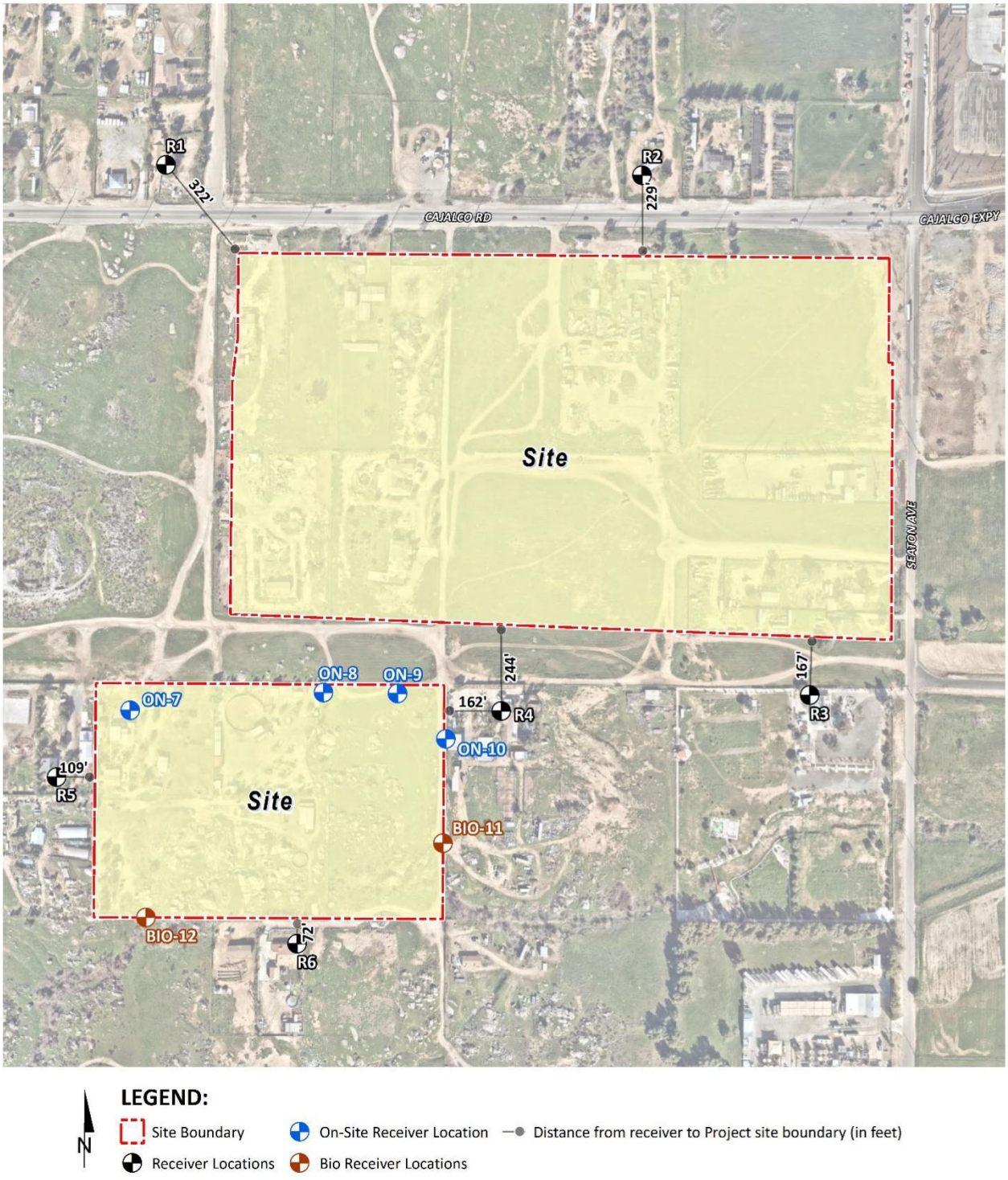
Table 4.13-4 Significance Criteria Summary

Analysis	Receiving Land Use	Condition(s)	Significance Criteria	
			Daytime	Nighttime
Off-Site Traffic	Noise-Sensitive[1]	If ambient is < 60 dBA CNEL	≥ 5 dBA CNEL Project increase	
		If ambient is 60 - 65 dBA CNEL	≥ 3 dBA CNEL Project increase	
		If ambient is > 65 dBA CNEL	≥ 1.5 dBA CNEL Project increase	
	Non-Noise-Sensitive[2]	If ambient is > 75 dBA CNEL	≥ 3 dBA CNEL Project increase	
Operational	Noise-Sensitive	Residential Exterior Noise Level[3]	55 dBA L_{eq}	45 dBA L_{eq}
		Public Facility Exterior Noise Level[3]	65 dBA L_{eq}	45 dBA L_{eq}
		If ambient is < 60 dBA Leq[1]	≥ 5 dBA L_{eq} Project increase	
		If ambient is 60 - 65 dBA Leq[1]	≥ 3 dBA L_{eq} Project increase	
		If ambient is > 65 dBA Leq[1]	≥ 1.5 dBA L_{eq} Project increase	
Construction	Noise-Sensitive	Noise Level Threshold[4]	80 dBA L_{eq}	70 dBA L_{eq}
		Airblast Threshold[5]	129 dBA L_{max}	n/a
		Vibration Level Threshold[6]	0.3 PPV (in/sec)	

[1] FICON, 1992.
[2] County of Riverside General Plan Noise Element, Table N-1.
[3] County of Riverside General Plan Municipal Code, Section 9.52.040.
[4] Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual.
[5] OSMRE and CFR lowest maximum Airblast Limit (30 CFR 816.67[b])
[6] Caltrans Transportation and Construction Vibration Manual, April 2020 Table 19
"Daytime" = 7:00 a.m. to 10:00 p.m.; "Nighttime" = 10:00 p.m. to 7:00 a.m.

(Urban Crossroads, 2024a, Table 4-1)

Figure 4.13-5 Receiver Locations



(Urban Crossroads, 2024a, Exhibit 8-A)

clubs. Land uses that are considered relatively insensitive to noise include business, commercial, and professional developments. Land uses that are typically not affected by noise include industrial, manufacturing, utilities, agriculture, undeveloped land, parking lots, warehousing, liquid and solid waste facilities, salvage yards, and transit terminals. (Urban Crossroads, 2024a, p. 45)

To describe the potential off-site Project noise levels, 12 receiver locations in the vicinity of the Project site were identified. This includes the nearest off-site existing noise sensitive receiver locations, identified as R1 to R6, ON7 to ON10 representing future on-site Project receivers within the proposed park, and BIO11 to BIO12 to address potential noise impacts to future conservation areas associated with the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). To the extent this analysis considers impacts in relation to future receivers within the proposed park, it does so for informational purposes to show compliance with Riverside County regulations. Impacts of the environment on a project are excluded from CEQA unless the project itself "exacerbates" such impacts. See *California Building Industry Assoc. v. Bay Area Air Quality Management District* (Dec. 17, 2015) 62 Cal.4th 369. As such, any impact on the receivers within the Project is not an impact under CEQA. Noise impacts affecting future potential biological receivers within the future MSHCP Conservation Areas to the south/southeast of the park site are provided herein for informational purposes only; please refer to EIR Subsection 4.4, *Biological Resources*, for an analysis of potential noise impacts to the future MSHCP Conservation Areas. Other sensitive land uses in the Project study area that are located at greater distances than those identified in this noise study will experience lower noise levels than those presented in this report due to the additional attenuation from distance and the shielding of intervening structures. Distance is measured in a straight line from the project boundary to each receiver location. (Urban Crossroads, 2024a, pp. 45, 47)

- Location R1: Location R1 represents the existing noise sensitive La Palapa Ranch building at 19451 Decker Road, approximately 322 feet northwest of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site, receiver R1 is placed at the building façade. A 24-hour noise measurement was taken near this location, L1, to describe the existing ambient noise environment.
- Location R2: Location R2 represents the existing noise sensitive residence at 22840 Cajalco Road, approximately 229 feet north of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site, receiver R2 is placed at the building façade. A 24-hour noise measurement was taken near this location, L2, to describe the existing ambient noise environment.
- Location R3: Location R3 represents the existing noise sensitive 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, receiver R3 is placed at the building façade. A 24-hour noise measurement was taken near this location, L4, to describe the existing ambient noise environment.
- Location R4: Location R4 represents the existing noise sensitive residence at 22761 Cajalco Road, approximately 162 feet east and 244 feet south of the Project site. Receiver R4 is placed in the private outdoor living areas (backyard) facing the Project site. A 24-hour noise measurement was taken near this location, L6, to describe the existing ambient noise environment. ambient noise environment.

- Location R5: Location R5 represents the existing noise sensitive residence west of 19754 Anderson Road, approximately 109 feet west of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site, receiver R5 is placed at the building façade. A 24-hour noise measurement was taken near this location, L5, to describe the existing ambient noise environment.
- Location R6: Location R6 represents the existing noise sensitive residence west of 22683 Cajalco Road, approximately 72 feet south of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site, receiver R6 is placed at the building façade. A 24-hour noise measurement was taken near this location, L7, to describe the existing ambient noise environment.
- Location ON7: Location ON7 represents the future receiver at the sports field proposed for the public park.
- Location ON8: Location ON8 represents the future receiver at the park soccer field sideline.
- Location ON9: Location ON9 represents the future receiver at the park soccer field sideline.
- Location ON10: Location ON10 represents the future receiver within the park.
- Location BIO11: Location BIO11 represents the limits of construction near the southern property line in potential close proximity to future MSHCP-conserved lands, and is evaluated herein for informational purposes only (refer to EIR Subsection 4.4 for a detailed discussion of potential indirect noise impacts affecting MSHCP Conservation Areas).
- Location BIO12: Location BIO12 represents the limits of construction near the eastern property line in potential close proximity to future MSHCP-conserved lands, and is evaluated herein for informational purposes only (refer to EIR Subsection 4.4 for a detailed discussion of potential indirect noise impacts affecting MSHCP Conservation Areas).

B. Construction Noise and Vibration Methodology

1. Construction Noise Methodology

To describe the Project construction noise levels, this construction noise analysis was prepared using reference construction equipment noise levels from the FHWA published the Roadway Construction Noise Model (RCNM), which includes a national database of construction equipment reference noise emission levels. The RCNM equipment database provides a comprehensive list of the noise generating characteristics for specific types of construction equipment. In addition, the database provides an acoustical usage factor to estimate the fraction of time each piece of construction equipment is operating at full power (i.e., its loudest condition) during a construction operation. (Urban Crossroads, 2024a, p. 65)

Using the reference construction equipment noise levels and the CadnaA noise prediction model, calculations of the Project construction noise level impacts at the nearby sensitive receiver locations were completed. Consistent with FTA guidance for general construction noise assessment, Table 4.13-5, *Construction Reference Noise Levels*, presents the combined noise levels for the loudest construction equipment, assuming they operate at the same time. (Urban Crossroads, 2024a, p. 67)

Table 4.13-5 Construction Reference Noise Levels

Construction Stage	Reference Construction Equipmnet[1]	Reference Noise Level @ 50 Feet (dBA L_{eq})	Composite Reference Noise Level (dBA L_{eq})[2]	Reference Power Level (dBA L_w)[3]
Demolition	Concrete Saw	83	86.8	118.4
	Grapple (on backhoe)	83		
	Gradall	79		
Site Preparation	Tractor	80	84.0	115.6
	Backhoe	74		
	Grader	81		
Grading	Scraper	80	83.3	114.9
	Excavator	77		
	Dozer	78		
Rock Crushing	Impact Hammer (hoe ram)	83	83.9	115.6
	Front End Loader	75		
	Dump Truck	72		
Building Construction	Crane	73	80.6	112.2
	Generator	78		
	Front End Loader	75		
Paving	Paver	74	77.8	109.5
	Dump Truck	72		
	Roller	73		
Architectural Coating	Man Lift	68	76.2	107.8
	Compressor (air)	74		
	Generator (<25kVA)	70		

[1] FHWA Road Construction Noise Model.
[2] Represents the combined noise level for all equipment assuming they operate at the same time consistent with FTA Transit Noise and Vibration Impact Assessment guidance.
[3] Sound power level represents the total amount of acoustical energy (noise level) produced by a sound source independent of distance or surroundings.
(Urban Crossroads, 2024a, Table 10-1)

2. Off-Site Roadway and Utility Improvements

To support the Project development, there would 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. The loudest phase of construction associated with off-site roadway and utility improvements likely would be grading/excavation activities, which would generate similar noise levels compared to the grading/excavation phase of the Project's on-site construction activities previously outlined on Table 4.13-5. (Urban Crossroads, 2024a, p. 69)

3. *Nighttime Concrete Pour Reference Noise Level Measurements*

Nighttime concrete pouring activities likely would occur as a part of Project building construction activities. To estimate the noise levels due to nighttime concrete pouring activities, sample reference noise level measurements were taken during a nighttime concrete pouring at a construction site. Urban Crossroads collected short-term nighttime concrete pour reference noise level measurements during the noise-sensitive nighttime hours between 1:00 a.m. to 2:00 a.m. at 27334 San Bernardino Avenue in the City of Redlands. The reference noise levels describe the expected concrete pour noise sources that may include concrete mixer truck movements and pouring activities, concrete paving equipment, rear mounted concrete mixer truck backup alarms, engine idling, air brakes, generators, and workers communicating/whistling. To describe the nighttime concrete pour noise levels associated with the construction of the Project, the analysis herein relies on reference sound pressure level of 67.7 dBA L_{eq} at 50 feet representing a sound power level of 100.3 dBA Lw. While the Project noise levels would depend on the actual duration of activities and specific equipment fleet in use at the time of construction, the reference sound power level of 100.3 dBA Lw is used to describe the expected Project nighttime concrete pour noise activities. (Urban Crossroads, 2024a, p. 70)

4. *Construction Vibration Methodology*

Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods employed. Operation of construction equipment causes ground vibrations that spread through the ground and diminish in strength with distance. Ground vibration levels associated with various types of construction equipment are summarized on Table 4.13-6, *Vibration Source Levels for Construction Equipment*. Based on the representative vibration levels presented for various construction equipment types, it is possible to estimate the potential Project construction vibration levels using the vibration assessment methods defined by the FTA, as more fully described in subsection 10.7 of the Project's NIA (*Technical Appendix L*). (Urban Crossroads, 2024a, p. 72)

Table 4.13-6 Vibration Source Levels for Construction Equipment

Equipment	PPV (in/sec) at 25 feet
Small bulldozer	0.003
Jackhammer	0.035
Loaded Trucks	0.076
Large bulldozer	0.089
Vibratory Roller	0.210

Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual
(Urban Crossroads, 2024a, Table 10-5)

5. Construction-Related Blasting Noise and Vibration Methodology

An analysis was completed to assess potential noise level and vibration impacts due to blasting activities (refer to EIR subsection 3.6.1.B for a detailed description of proposed blasting activities). Figure 4.13-6, *Blasting Activity and Receiver Locations*, shows the anticipated location of areas that would be subjected to blasting during Project construction in relation to the nearest receiver locations. To evaluate the potential noise levels from blasting activities during Project construction, the FHWA Roadway Construction Noise Model (RCNM) reference noise level of 94.1 dBA L_{max} is used at a reference distance of 50 feet. Each blast represents a point-source of noise which attenuates at a rate of 6 dB for each doubling of distance from the source. Because the type of blasting techniques planned within the Project site were unknown at the time of the analysis, the noise levels presented at the nearby sensitive receiver locations represent the worst-case conditions based on the RCNM reference noise level. (Urban Crossroads, 2024a, p. 75)

C. Operational Noise Methodology

Following is a summary of the methodology used to evaluated Project-related operational noise impacts. Refer to Section 9 of the Project's NIA (*Technical Appendix L*) for a complete discussion of the methodology and modeling inputs and assumptions.

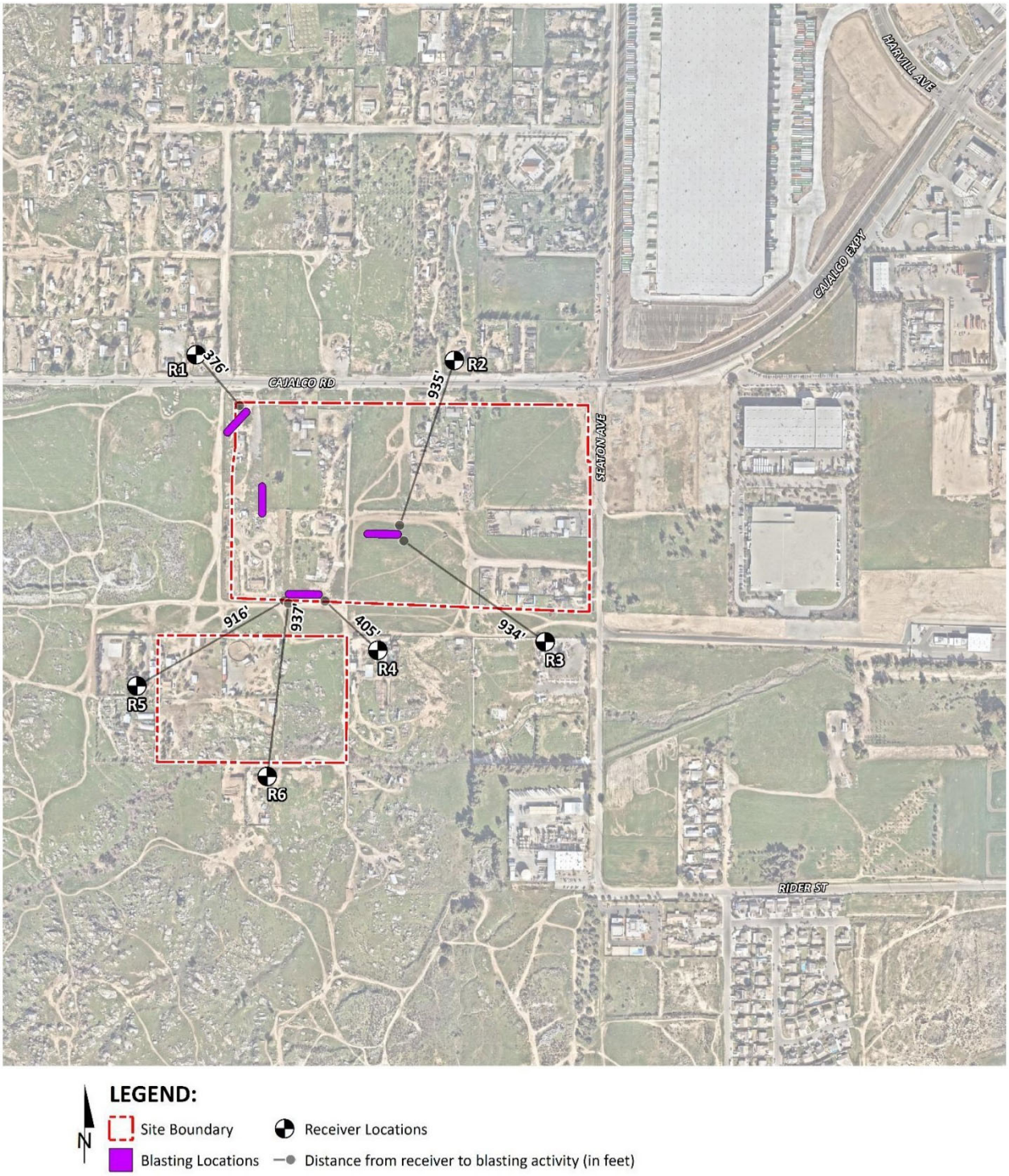
1. Reference Noise Levels

To estimate the Project operational noise impacts, reference noise level measurements were collected from similar types of activities to represent the noise levels expected with the development of the proposed Project. Subsection 9.2 of the Project's NIA (*Technical Appendix L*) provides a detailed description of the reference noise level measurements shown on Table 4.13-7, *Reference Noise Level Measurements*, which were used to estimate the Project operational noise impacts. The projected noise levels assume the worst-case noise environment with the 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 all operating at the same time. These sources of noise activity likely would vary throughout the day. (Urban Crossroads, 2024a, p. 49)

❑ Measurement Procedures

The reference noise level measurements presented in Section 9 of the Project's NIA (*Technical Appendix L*) were collected using a Larson Davis LxT Type 1 precision sound level meter (serial number 01146). The LxT sound level meter was calibrated using a Larson-Davis calibrator, Model CAL 200, was programmed in "slow" mode to record noise levels in "A" weighted form and was located at approximately five feet above the ground elevation for each measurement. The sound level meters and microphones were equipped with a windscreen during all measurements. All noise level measurement equipment satisfies the ANSI standard specifications for sound level meters ANSI S1.4-2014/IEC 61672-1:2013. (Urban Crossroads, 2024a, p. 49)

Figure 4.13-6 Blasting Activity and Receiver Locations



(Urban Crossroads, 2024a, Exhibit 10-C)

Table 4.13-7 Reference Noise Level Measurements

Reference Noise Source	Noise Source Height (Feet)	Min./ Hour[1]		Reference Noise Level (dBA L_{eq}) @ 50 Feet	Sound Power Level (dBA)[2]
		Day	Night		
Cold Storage Loading Dock Activity	8'	60	60	65.7	111.5
Dry Goods Loading Dock Activity	8'	60	60	62.8	103.4
Parking Lot Vehicle Movements	5'	60	60	52.6	81.1
Roof-Top Air Conditioning Units	5'	39	28	57.2	88.9
Trash Enclosure Activity	5'	60	30	57.3	89.0
Truck Movements	8'	60	60	59.8	93.2
Sports Field Activities	5'	60	0	61.4	94.0
Basketball Court Activity	5'	60	0	52.0	83.7
Dog Park Activity	3'	60	0	42.8	74.4
Amphitheater with Stage	8'	60	0	66.8	98.4
Outdoor Play Area	5'	60	0	49.4	81.1

[1] Anticipated duration (minutes within the hour) of noise activity during typical hourly conditions expected at the Project site.
"Daytime" = 7:00 a.m. - 10:00 p.m.; "Nighttime" = 10:00 p.m. - 7:00 a.m.
[2] Sound power level represents the total amount of acoustical energy (noise level) produced by a sound source independent of distance or surroundings. Sound power levels calculated using the CadnaA noise model at the reference distance to the noise source. Numbers may vary due to size differences between point and area noise sources.
(Urban Crossroads, 2024a, Table 9-1)

❑ Cold Storage Loading Dock Activity

The reference cold storage loading dock activities are intended to describe the typical outdoor operational noise activities associated with the Project. This includes truck idling, reefer activity (refrigerator truck/cold storage), deliveries, backup alarms, trailer docking including a combination of tractor trailer semi-trucks, two-axle delivery trucks, and background operation activities. Since the noise levels generated by cold storage loading dock activity can be slightly higher due to the use of refrigerated trucks or reefers, this reference noise level conservatively assumes that all loading dock activity is associated with cold storage facilities, even though only 15 percent cold storage is anticipated. The reference noise level measurement was taken in the center of the loading dock activity area and represents multiple concurrent noise sources resulting in a combined noise level of 65.7 dBA L_{eq} at a uniform distance of 50 feet. Specifically, the reference noise level measurement represents one truck located approximately 30 feet from the noise level meter with another truck passing by to park roughly 20 feet away, both with their engines idling. Throughout the reference noise level measurement, a separate docked and running reefer truck was located approximately 50 feet east of the measurement location. Additional background noise sources included truck pass-by noise, truck drivers talking to each other next to docked trucks, and air brake release noise when trucks parked. (Urban Crossroads, 2024a, p. 51)

❑ Dry Goods Loading Dock Activity

The reference dry goods loading dock activities are intended to describe the typical operational noise source levels associated with the Project. This includes truck idling, deliveries, backup alarms, unloading/loading, docking including a combination of tractor trailer semi-trucks, two-axle delivery trucks, and background forklift operations. At a uniform reference distance of 50 feet, Urban Crossroads collected a reference noise level of 62.8 dBA L_{eq} . The loading dock activity noise level measurement was taken over a fifteen-minute period and represents multiple noise sources taken from the center of activity. The reference noise level measurement includes employees unloading a docked truck container included the squeaking of the truck's shocks when weight was removed from the truck, employees playing music over a radio, as well as a forklift horn and backup alarm. In addition, during the noise level measurement a truck entered the loading dock area and proceeded to reverse and dock in a nearby loading bay, adding truck engine, idling, air brakes noise, in addition to on-going idling of an already docked truck. Loading dock activity is estimated during all the daytime, evening, and nighttime hours. (Urban Crossroads, 2024a, pp. 51-52)

❑ Parking Lot Vehicle Movements

To describe the on-site parking lot activity, a long-term 24-hour reference noise level measurement was collected in the center of activity within the staff parking lot of a warehouse distribution center. At 50 feet from the center of activity, the parking lot produced a reference noise level of 52.6 dBA L_{eq}. Parking activities are expected to take place during the full hour (60 minutes) throughout the daytime and evening hours. The parking lot noise levels are mainly due to cars pulling in and out of parking spaces in combination with car doors opening and closing. (Urban Crossroads, 2024a, p. 52)

❑ Roof-Top Air Conditioning Units

The noise level measurements describe a single mechanical roof-top air conditioning unit. The reference noise level represents a Lennox SCA120 series 10-ton model packaged air conditioning unit. At the uniform reference distance of 50 feet, the reference noise level is 57.2 dBA L_{eq} . Based on the typical operating conditions observed over a four-day measurement period, the roof-top air conditioning units are estimated to operate for and average 39 minutes per hour during the daytime hours, and 28 minutes per hour during the nighttime hours. These operating conditions reflect peak summer cooling requirements with measured temperatures approaching 96 degrees Fahrenheit (°F) with average daytime temperatures of 82°F. For this analysis, the air conditioning units are expected to be located on the roof of the Project's warehouse building. (Urban Crossroads, 2024a, p. 52)

❑ Trash Enclosure Activity

To describe the noise levels associated with a trash enclosure activity, Urban Crossroads collected a reference noise level measurement at an existing trash enclosure containing two dumpster bins. The trash enclosure noise levels describe metal gates opening and closing, metal scraping against concrete floor sounds, dumpster movement on metal wheels, and trash dropping into the metal dumpster. The reference noise levels describe trash enclosure noise activities when trash is dropped into an empty metal dumpster, as would occur at the Project Site. The measured reference noise level at the uniform 50-foot reference distance is 57.3 dBA L_{eq} for

the trash enclosure activity. The reference noise level describes the expected noise source activities associated with the trash enclosures for the Project's proposed building. (Urban Crossroads, 2024a, p. 52)

❑ Truck Movements

The truck movements reference noise level measurement was collected over a period of 1 hour and 28 minutes and represent multiple heavy trucks entering and exiting the outdoor loading dock area producing a reference noise level of 59.8 dBA L_{eq} at 50 feet. The noise sources included at this measurement location account for trucks entering and existing the Project driveways and maneuvering in and out of the outdoor loading dock activity area. (Urban Crossroads, 2024a, p. 53)

❑ Sports Field Activities

To represent the potential noise level impacts associated with the Project's Park activities, a reference noise level measurement was collected at a girls' youth soccer game with coaches shouting instructions, and parents speaking on cell phones and background noise levels from kids playing on swing sets and people cheering and clapping. At the uniform reference distance of 50 feet, the reference sports field activity noise level is 61.4 dBA L_{eq}. The playground activities are estimated to occur for 60 minutes during the peak hour conditions. (Urban Crossroads, 2024a, p. 53)

❑ Basketball Court Activities

To describe the potential noise levels associated with the Project's basketball courts, a reference noise level measurement was collected by Urban Crossroads, Inc. The reference noise level measurement includes children playing on one half of a full basketball court, and adults playing basketball on the other half. Using a uniform reference distance of 50 feet, the reference basketball court activity noise level is 52.0 dBA L_{eq}. Noise associated with basketball court activity is expected to last for 60 minutes per hour during all daytime hours from 7:00 a.m. to 10:00 p.m. (Urban Crossroads, 2024a, p. 53)

❑ Dog Park Activities

To describe the potential noise level impacts associated with the Project's dog park, Urban Crossroads, Inc. collected a reference noise level measurement representing both large and small dogs with people talking, dogs running, playing fetch, chasing each other, growling, barking, and owners talking on cell phones. At a uniform distance of 50 feet from the noise source, a reference noise level of 42.8 dBA L_{eq} is used. The noise associated with dog park activity is expected to last for 60 minutes per hour during all daytime hours from 7:00 a.m. to 10:00 p.m. (Urban Crossroads, 2024a, p. 53)

❑ Amphitheater with Stage

Urban Crossroads, Inc. collected sample (reference) noise level measurements of at an outdoor Revelation Classic Jazz Band. The noise level measurements collected a uniform distance of 50 feet from the noise source, a live band performance produced a reference noise level of 66.8 dBA L_{eq}. (Urban Crossroads, 2024a, p. 53)

❑ **Outdoor Play Area**

To represent the potential noise level impacts associated with the Project's Outdoor Play Areas, a reference noise level measurement is expected to reflect the noise level activities within the water fountain and playground equipment area. Using the uniform reference distance of 50 feet, the reference outdoor play area activity noise level is 49.4 dBA L_{eq}. The playground activities are estimated to occur for 60 minutes during the peak hour conditions. (Urban Crossroads, 2024a, pp. 53-54)

2. CadnaA Noise Prediction Model

To fully describe the exterior operational noise levels from the Project, Urban Crossroads developed a noise prediction model using the Computer Aided Noise Abatement (CadnaA) computer program. CadnaA can analyze multiple types of noise sources using the spatially accurate Project site plan, georeferenced Nearmap aerial imagery, topography, buildings, and barriers in its calculations to predict outdoor noise levels. Using the International Organization for Standardization (ISO) 9613-2 protocol, CadnaA calculates the distance from each noise source to the noise receiver locations, using the ground absorption, distance, and barrier/building attenuation inputs to provide a summary of noise level at each receiver and the partial noise level contributions by noise source. Consistent with the ISO 9613-2 protocol, the CadnaA noise prediction model relies on the reference sound power level (L_w) to describe individual noise sources. (Urban Crossroads, 2024a, pp. 53-54)

While sound pressure levels (e.g., L_{eq}) quantify in decibels the intensity of given sound sources at a reference distance, L_w is connected to the sound source and is independent of distance. L_w varies substantially with distance from the source and diminishes from intervening obstacles and barriers, air absorption, wind, and other factors. Sound power is the acoustical energy emitted by the sound source and is an absolute value that is not affected by the environment. The operational noise level calculations provided herein account for the distance attenuation provided due to geometric spreading, when sound from a localized stationary source (i.e., a point source) propagates uniformly outward in a spherical pattern. A default ground attenuation factor of 0.5 was used to account for mixed ground representing a combination of hard and soft surfaces consistent with study area conditions. Appendix 9.1 to the Project's NIA (*Technical Appendix L*) includes the detailed noise model inputs. (Urban Crossroads, 2024a, p. 54)

D. Off-Site Traffic Modeling Methodology

1. FHWA Traffic Noise Prediction Model

The expected roadway noise level increases from vehicular traffic were calculated by Urban Crossroads using a computer program that replicates the FHWA Traffic Noise Prediction Model FHWA-RD-77-108. The FHWA Model arrives at a predicted noise level through a series of adjustments to the Reference Energy Mean Emission Level (REMEL). In California the national REMELs are substituted with the California Vehicle Noise (Calveno) Emission Levels. Adjustments are then made to the REMEL to account for: the roadway classification (e.g., collector, secondary, major, or arterial); the roadway active width (i.e., the distance between the center of the outermost travel lanes on each side of the roadway); the total average daily traffic (ADT); the travel speed; the percentages of automobiles, medium trucks, and heavy trucks in the traffic volume; the roadway grade; the angle of view (e.g., whether the roadway view is blocked); the site conditions ("hard" or "soft" relates to the absorption of the ground, pavement, or landscaping); and the percentage of total ADT

which flows each hour throughout a 24-hour period. Research conducted by Caltrans has shown that the use of soft site conditions is appropriate for the application of the FHWA traffic noise prediction model used in the analysis. (Urban Crossroads, 2024a, p. 31)

2. Off-Site Traffic Noise Prediction Model Inputs

Table 6-1 of the Project's NIA (*Technical Appendix L*) presents the roadway parameters used to assess the Project's off-site transportation noise impacts. NIA Table 6-1 identifies the 13 off-site study area roadway segments, the distance from the centerline to adjacent land use based on the functional roadway classification per the Riverside County General Plan Circulation Element, and the vehicle speeds. The ADT volumes used in the analysis area presented on Table 6-2 of the Project's NIA are based on the Project's Traffic Analysis ("TA"; EIR *Technical Appendix N2*) for the following traffic scenarios: Existing (E); Existing plus Project (E+P); Existing plus Ambient Growth plus Cumulative (EAC) (2026) without Project Conditions; Existing plus Ambient Growth plus Cumulative (EAPC) (2026) with Project Conditions; Horizon Year (2045) without Project Conditions; and Horizon Year (2045) with Project Conditions. (Urban Crossroads, 2024a, p. 31)

The ADT volumes vary for each roadway segment based on the existing traffic volumes and the combination of Project traffic distributions. The analysis herein relies on comparative analysis of the off-site traffic noise impacts at the boundary of the right-of-way of receiving adjacent land uses, without and with project ADT traffic volumes from the Project's TA (*Technical Appendix N2*). Consistent with the Project's TA, the Project is anticipated to generate a net total of 2,448 two-way trips per day (actual vehicles) that includes 438 truck trips. (Urban Crossroads, 2024a, pp. 31-32)

To quantify the off-site noise levels, the Project related truck trips were added to the heavy truck category in the FHWA noise prediction model. The addition of the Project-related truck trips increases the percentage of heavy trucks in the vehicle mix. This approach recognizes that the FHWA noise prediction model is significantly influenced by the number of heavy trucks in the vehicle mix. Table 6-3 of the Project's NIA (*Technical Appendix L*) provides the time of day (daytime, evening, and nighttime) vehicle splits. The daily Project truck trip-ends were assigned to the individual off-site study area roadway segments based on the Project truck trip distribution percentages documented in the Project's TA (*Technical Appendix N2*). Using the Project truck trips in combination with the Project trip distribution, Urban Crossroads, Inc. calculated the number of additional Project truck trips and vehicle mix percentages for each of the study area roadway segments. Table 6-4 of the Project's NIA shows the traffic flow by vehicle type (vehicle mix) used for all without Project traffic scenarios, and Tables 6-5 to 6-7 of the Project's NIA show the vehicle mixes used for the "with" Project traffic scenarios. (Urban Crossroads, 2024a, p. 33)

Due to the added Project truck trips, the increase in Project traffic volumes and the distributions of trucks on the study area road segments, the percentage of autos, medium trucks and heavy trucks will vary for each of the traffic scenarios. This explains why the existing and future traffic volumes and vehicle mixes vary between seemingly identical study area roadway segments. (Urban Crossroads, 2024a, p. 33)

4.13.6 IMPACT ANALYSIS

Threshold a.: ***For a project located within an airport land use plan or, where such a plan has not been adopted, within two (2) miles of a public airport or public use airport, would the Project expose people residing or working in the Project area to excessive noise levels?***

The Project site is located approximately 1.7 miles southwest of the nearest runway at the March Air Reserve Base/Inland Port Airport (MARB/IPA). According to Map MA-1 of the Riverside County Airport Land Use Commission (ALUC) Airport Land Use Compatibility Plan (ALUCP) for the MARB/IPA, the Project site is located within compatibility zone C2, Flight Corridor Zone. In this zone, highly noise-sensitive outdoor residential uses and uses considered hazards to flight are restricted. According to the ALUCP, hazards to flight include physical (e.g., tall objects), visual, and electronic forms of interference with the safety of aircraft operations. Land use development may cause the attraction of birds to increase along with certain farm crops and farming practices that tend to attract birds are strongly discouraged. Examples of noise-sensitive outdoor nonresidential uses that should be prohibited include major spectator-oriented sports stadiums, amphitheaters, concert halls, and drive-in theaters. (Riverside County ALUC, 2014, pp. 9-11) As such, the Project site's warehouse and park uses are not restricted in this zone and would be compatible with the ALUCP for MARB/IPA.

The Riverside County ALUCP includes policies for determining the land use compatibility of the Project. Policy 4.1.5, Noise Exposure for Other Land Uses, requires that land uses demonstrate compatibility with the acceptable noise levels on Table 2B of the ALUCP. Table 2B, *Supporting Compatibility Criteria: Noise*, is shown on Exhibit 3-B of the Project's NIA and indicates that the Project's industrial land uses experience clearly acceptable exterior noise levels below 60 dBA CNEL. Normally acceptable noise levels for industrial land use range from 60 to 65 dBA CNEL. Marginally acceptable noise levels at industrial land uses range from 65 to 70 dBA CNEL. The Project proposed park uses are considered clearly acceptable with exterior noise levels of up to 55 dBA CNEL, conditionally acceptable with exterior noise levels between 55-65 dBA CNEL and marginally acceptable with exterior noise levels above 65 dBA CNEL. The 70, 65 and 60 dBA CNEL noise contour boundaries used to determine the potential aircraft-related noise impacts at the Project site are found on Figure 6-9 of the March Air Reserve Base 2018 Final Air Installations Compatible Uses Zones Study and are presented on Exhibit 3-C of the Project's NIA. Based on the noise level contours for the MARB/IPA, the Project site is located well outside of the 60 dBA CNEL noise level contour boundaries, and the Project's industrial and park land uses would be exposed to "normally acceptable" noise levels of 55 dBA CNEL or less. (Urban Crossroads, 2024a, pp. 19-21)

As such, implementation of the Project would not expose people residing or working in the area to excessive noise levels from airport operations, and impacts would be less-than-significant.

Threshold b.: ***For a project located within the vicinity of a private airstrip, would the Project expose people residing or working in the Project area to excessive noise levels?***

There are no private airstrips in the Project vicinity. The nearest privately-owned public-use airport facility is the Perris Valley Airport, located approximately 5.5 miles southeast of the Project site within the City of Perris.

According to Map PV-3 of the Riverside County Airport Land Use Compatibility Plan (ALUCP), the Project site is located well outside of the 55 dBA CNEL noise contour for the Perris Valley Airport, indicating that the Project site would be subject to noise levels of less than 55 dBA CNEL associated with the Perris Valley Airport. (ALUC, 2010) As previously noted, the Project's warehouse/light industrial land use is considered normally acceptable with unmitigated exterior noise levels below 75 dBA CNEL, while the Project's park use is considered normally acceptable with unmitigated exterior noise levels below 70 dBA CNEL. As such, both the warehouse building and park components of the Project would not be exposed to excessive noise levels associated with the Perris Valley Airport, and impacts would therefore be less-than-significant.

Threshold c.: ***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, noise ordinance, or applicable standards of other agencies?***

The Project has the potential to result in the generation of substantial noise levels associated with construction activities, site operations, and Project-related traffic. Each is discussed below.

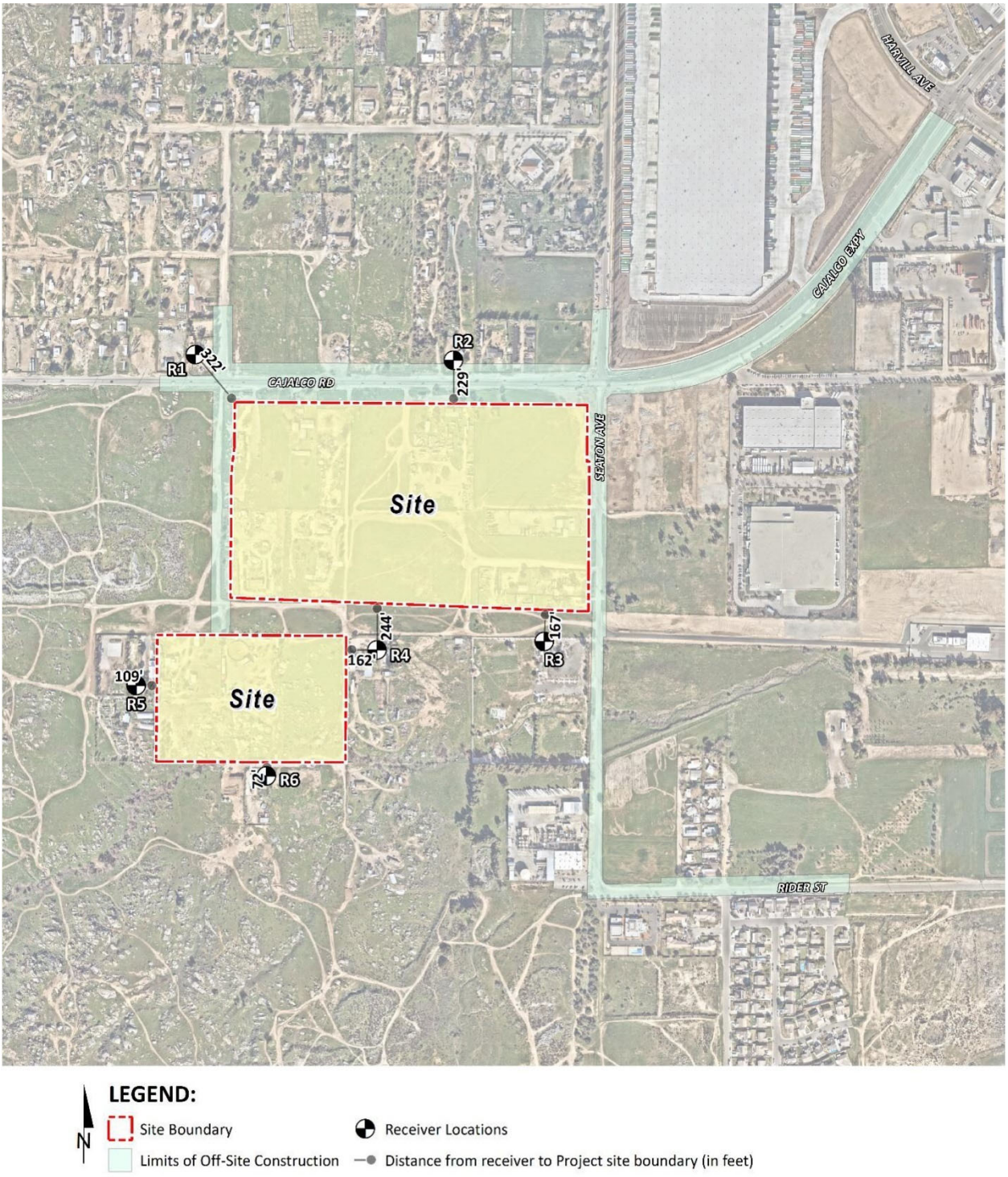
A. Construction Noise Impacts

Following is an analysis of the potential average dBA L_{eq} impacts resulting from short-term construction activities associated with the development of the Project. Figure 4.13-7, *Construction Noise Source Locations,* shows the on-site construction noise source activity including the off-site roadway and utility improvements in relation to the nearest sensitive receiver locations previously depicted on Figure 4.13-5. According to Section 2i of Riverside County Ordinance No. 847 (Regulating Noise), 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. (Urban Crossroads, 2024a, p. 65)

1. Construction Noise Levels

The FTA *Transit Noise and Vibration Impact Assessment Manual* recognizes that construction projects are accomplished in several different stages and outlines the procedures for assessing noise impacts during construction. Each stage has a specific equipment mix, depending on the work to be completed during that stage. As a result of the equipment mix, each stage has its own noise characteristics; some stages have higher continuous noise levels than others, and some have higher impact noise levels than others. The Project construction activities are expected to occur in the following stages: demolition; site preparation; grading; building construction; paving; architectural coating; and landscaping and installation of park features. (Urban Crossroads, 2024a, p. 65)

Figure 4.13-7 Construction Noise Source Locations



(Urban Crossroads, 2024a, Exhibit 10-A)

2. Construction Noise Analysis

Using the reference construction equipment noise levels and the CadnaA noise prediction model, calculations of the Project construction noise level impacts at the nearest sensitive receiver locations were completed. As shown in Table 4.13-8, *Construction Equipment Noise Level Summary*, the construction noise levels are expected to range from 46.2 to 66.0 dBA L_{eq} at the nearest receiver locations. Appendix 10.1 to the Project's NIA (*Technical Appendix L*) includes the detailed CadnaA construction noise model inputs. (Urban Crossroads, 2024a, p. 67)

Table 4.13-8 Construction Equipment Noise Level Summary

Receiver Location[1]	Construction Noise Levels (dBA L_{eq})							
	Demolition	Site Preparation	Grading	Rock Crushing	Building Construction	Paving	Architectural Coating	Highest Levels[2]
R1	56.8	54.0	53.3	53.9	50.6	47.8	46.2	56.8
R2	59.6	56.8	56.1	56.7	53.4	50.6	49.0	59.6
R3	60.1	57.3	56.6	57.2	53.9	51.1	49.5	60.1
R4	63.6	60.8	60.1	60.7	57.4	54.6	53.0	63.6
R5	64.4	61.6	60.9	61.5	58.2	55.4	53.8	64.4
R6	66.0	63.2	62.5	63.1	59.8	57.0	55.4	66.0

[1] Construction noise source and receiver locations are shown on Figure 4.13-7.

[2] Construction noise level calculations based on distance from the construction activity, which is measured from the Project site boundary to the nearest receiver locations. CadnaA construction noise model inputs are included in Appendix 10.1 to the Project's NIA (EIR *Technical Appendix L*).

(Urban Crossroads, 2024a, Table 10-2)

3. Construction Noise Level Compliance

To evaluate whether the Project will generate potentially significant short-term noise levels at nearby receiver locations, a construction-related noise level threshold of 80 dBA L_{eq} is used as a reasonable threshold to assess the daytime construction noise level impacts. The construction noise analysis shows that the noise levels at the nearest receiver locations would fall below the reasonable daytime 80 dBA L_{eq} significance threshold during Project construction activities as shown on Table 4.13-9, *Construction Noise Level Compliance*. Therefore, the noise impacts due to Project construction noise would be less than significant at all receiver locations. (Urban Crossroads, 2024a, p. 68)

4. Off-Site Roadway and Utility Improvements Construction Noise Analysis

To support the Project development, there would 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. The loudest phase of construction associated with off-site roadway and utility improvements would likely be grading/excavation activities, which would generate similar noise

Table 4.13-9 Construction Noise Level Compliance

Receiver Location[1]	Construction Noise Levels (dBA L_{eq})		
	Highest Construction Noise Levels[2]	Threshold[3]	Threshold Exceeded?[4]
R1	56.8	80	No
R2	59.6	80	No
R3	60.1	80	No
R4	63.6	80	No
R5	64.4	80	No
R6	66.0	80	No

[1] Construction noise source and receiver locations are shown on Figure 4.13-7.
[2] Highest construction noise level calculations based on distance from the construction noise source activity to the nearest receiver locations as shown on Table 4.13-8.
[3] Construction noise level thresholds as shown on Table 4.13-4.
[4] Do the estimated Project construction noise levels exceed the construction noise level threshold?
(Urban Crossroads, 2024a, Table 10-3)

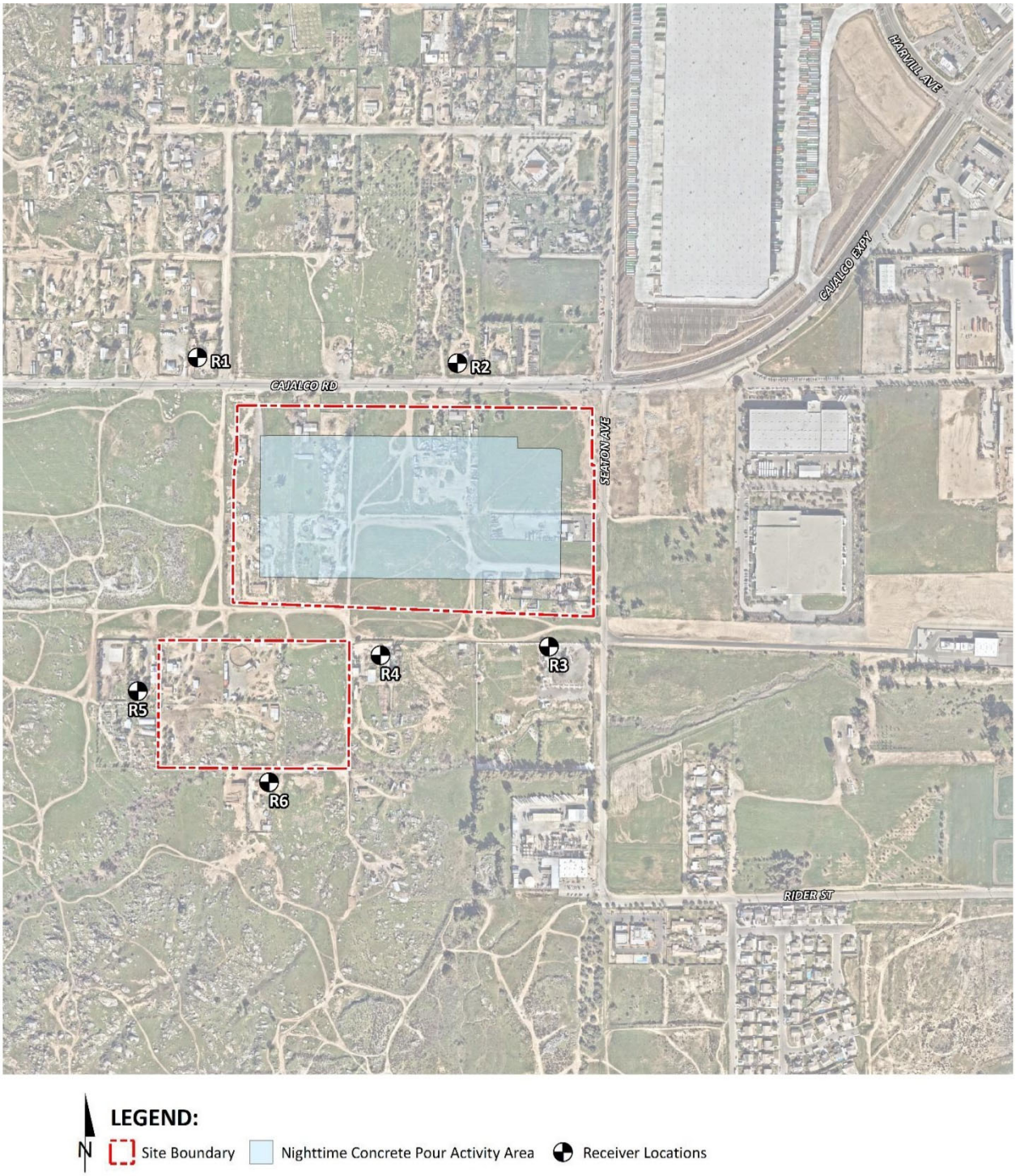
levels compared to the grading/excavation phase of the Project's on-site construction activities, as previously outlined on Table 4.13-5. (Urban Crossroads, 2024a, p. 69)

It is expected that the off-site construction activities would not take place at any one location for more than four days due to the nature of the linear construction activity. Construction noise from this off-site work would, therefore, be relatively short-term and the noise levels would be reduced as construction work moves linearly along the selected alignment and farther from sensitive uses. Although not required to address a potentially significant impact, Urban Crossroads recommends noise abatement measures to further reduce potential construction noise impacts from the Project construction and the off-site roadway and utility improvements. Accordingly, and in order to provide a conservative analysis of potential impacts due to off-site Project construction-related activities, a potentially significant impact is identified. (Urban Crossroads, 2024a, p. 69)

5. Nighttime Concrete Pour Analysis

Nighttime concrete pouring activities are anticipated to occur as a part of Project building construction activities. Nighttime concrete pouring activities are often 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 as shown on Figure 4.13-8, *Nighttime Concrete Pour Noise Source and Receiver Locations*. Since the nighttime concrete pours would take place outside the hours permitted by Section 2i of Riverside County Ordinance No. 847 (Regulating Noise), the Project Applicant would be required to obtain authorization for nighttime work from Riverside County. Any nighttime construction noise activities are evaluated against the FTA nighttime exterior construction noise level threshold of 70 dBA L_{eq} for noise-sensitive residential land use. (Urban Crossroads, 2024a, p. 70)

Figure 4.13-8 Nighttime Concrete Pour Noise Source and Receiver Locations



(Urban Crossroads, 2024a, Exhibit 10-B)

As shown on Table 4.13-10, *Nighttime Concrete Pour Noise Level Compliance*, the noise levels associated with the nighttime concrete pour activities are estimated to range from 34.4 to 40.5 dBA L_{eq}. The analysis shows that the unmitigated nighttime concrete pour activities would satisfy the FTA 70 dBA L_{eq} nighttime residential noise level threshold at all the nearest noise sensitive receiver locations. Therefore, the noise impacts due to Project construction-related nighttime concrete pour noise activity would be less than significant at all receiver locations with prior authorization for nighttime work from Riverside County. Appendix 10.2 to the Project's NIA (*Technical Appendix L*) includes the CadnaA nighttime concrete pour noise model inputs. (Urban Crossroads, 2024a, p. 70)

Table 4.13-10 Nighttime Concrete Pour Noise Level Compliance

Receiver Location[1]	Concrete Pour Construction Noise Levels (dBA L_{eq})		
	Exterior Noise Levels[2]	Threshold[3]	Threshold Exceeded?[4]
R1	36.9	70	No
R2	40.5	70	No
R3	39.5	70	No
R4	40.4	70	No
R5	34.4	70	No
R6	34.5	70	No

[1] Construction noise source and receiver locations are shown on Figure 4.13-7.
[2] Nighttime Concrete Pour noise model inputs are included in Appendix 10.2 to the Project's NIA (EIR *Technical Appendix L*).
[3] Construction noise level thresholds as shown on Table 4.13-4.
[4] Do the estimated Project construction noise levels exceed the construction noise level threshold?
(Urban Crossroads, 2024a, Table 10-4)

6. Construction-Related Blasting Noise Analysis and Compliance

As previously described in EIR subsection 3.6.1.B, the Project would require blasting activities in order to facilitate grading activities in portions of the Project site. Blasting would be limited to the areas shown on Figure 4.13-6 (previously presented).

To evaluate the potential noise levels from blasting activities during Project construction, the FHWA Roadway Construction Noise Model (RCNM) reference noise level of 94.1 dBA L_{max} is used at a reference distance of 50 feet. Each blast represents a point-source of noise which attenuates at a rate of 6 dB for each doubling of distance from the source. The closest residential homes to the Project construction area are represented by receiver location R1, located approximately 376 feet northwest of the nearest blasting area. With the distance attenuation from the closest blasting activities, the unmitigated noise levels at nearby receiver locations are expected to range from 70.5 to 78.5 dBA L_{max} based on the RCNM reference noise levels shown in Table 4.13-11, *Blasting Construction Noise* Levels. However, since the type of blasting techniques planned within the Project site were unknown at the time of the analysis, the noise levels presented at the nearby sensitive receiver locations represent the worst-case conditions based on the RCNM reference noise level. Appendix 10.4 of the

Project's NIA (*Technical Appendix L*) includes the detailed CadnaA blasting noise calculations. (Urban Crossroads, 2024a, p. 75)

The County of Riverside General Plan and County Code of Ordinances do not identify specific construction noise level limits for blasting activities. Therefore, the OSMRE and CFR lowest maximum Airblast Limit (30 CFR 816.67(b)) of 129 dBA L_{max} at nearby sensitive uses is used in this analysis as previously discussed herein in subsection 4.13.4.B.3. Based on the reference blasting noise level, the closest residential receiver would experience noise levels of 78.5 dBA L_{max} over the course of the blast, which will likely occur for only a few seconds. While some blasting noise may be noticeable by nearby residents, the single-event, temporary noise levels generated by the blast would not exceed the OSMRE and the CFR standards for airblasts. Therefore, the noise levels due to blasting activities would result in a less-than-significant noise impact. (Urban Crossroads, 2024a, p. 76)

Table 4.13-11 Blasting Construction Noise Levels

Receiver Location[1]	Distance to Blasting Activity (Feet)	Blasting Construction Noise Level (dBA Lmax)[2]
R1	376	78.5
R2	935	74.3
R3	934	70.5
R4	405	76.7
R5	916	73.3
R6	937	72.1

[1] Blasting construction noise source and receiver locations are shown on Figure 4.13-6.
[2] Based on FHWA Roadway Construction Noise Model reference noise level of 94 dBA Lmax. CadnaA noise model calculations are included in Appendix 10.4 of the Project's NIA.
(Urban Crossroads, 2024a, Table 10-7)

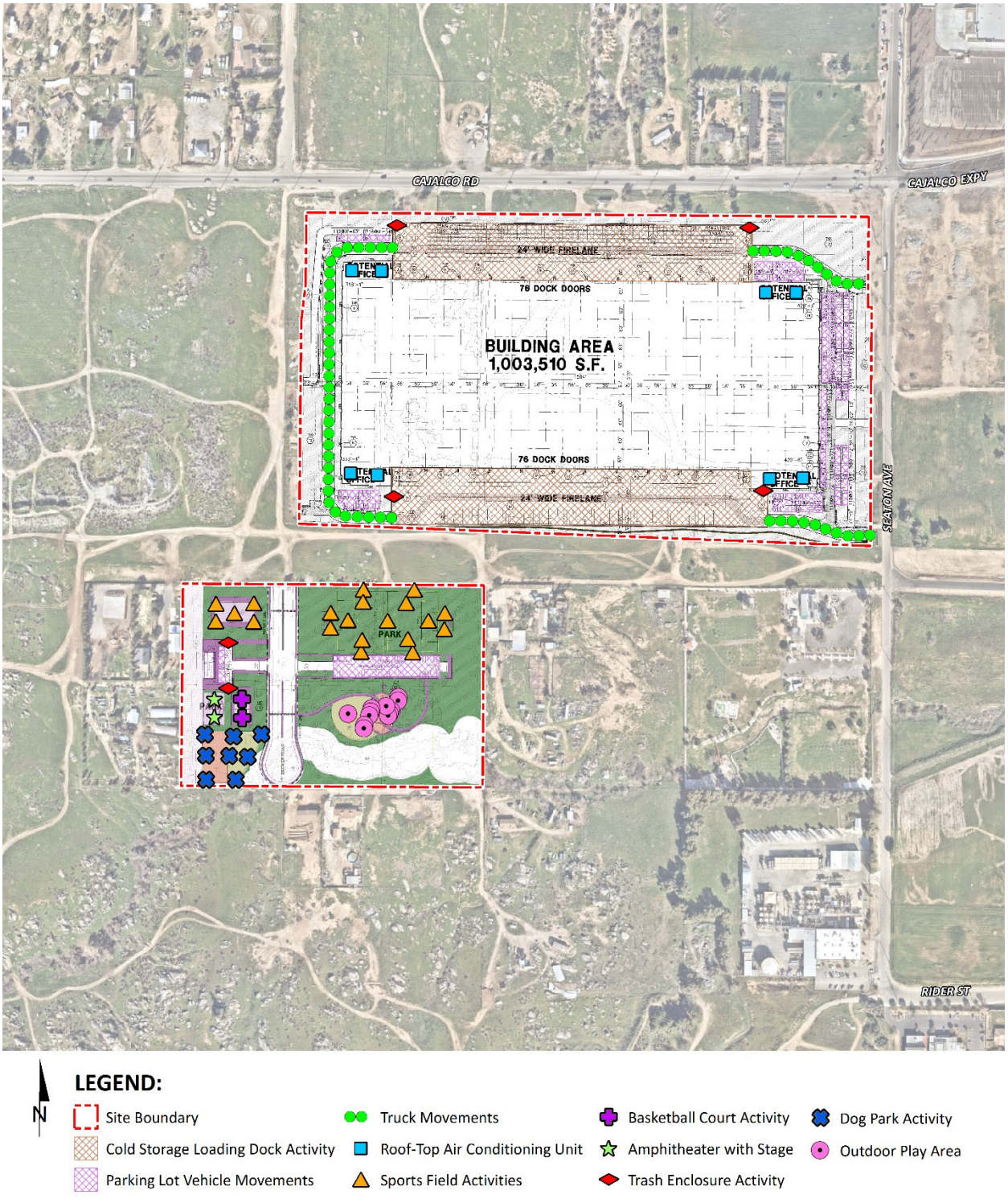
B. Operational Noise Impacts

Following is an analysis of the potential stationary-source operational noise impacts at the nearest receiver location resulting from the operation of the proposed Project. Figure 4.13-9, *Operational Noise Source Locations*, identifies the noise source locations used to assess the hourly average L_{eq} operational noise levels. (Urban Crossroads, 2024a, p. 49)

1. Operational Noise Sources

The operational noise analysis is intended to describe noise level impacts associated with the expected typical daytime and nighttime activities at the Project site. Consistent with similar warehouse uses, the Project business operations would primarily be conducted within the enclosed building, except for traffic movement, parking, as well as loading and unloading of trucks at designated loading bays. The on-site Project-related noise sources

Figure 4.13-9 Operational Noise Source Locations



(Urban Crossroads, 2024a, Exhibit 9-A)

are expected to include: 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. It is important to note that the projected noise levels assume the worst-case noise environment with noise sources operating at the same time. These sources of noise activity likely would vary throughout the day. (Urban Crossroads, 2024a, p. 49)

2. Project Operational Noise Levels

Using the reference noise levels to represent the proposed Project operations that include 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, Urban Crossroads calculated the operational source noise levels that are expected to be generated at the Project site and the Project-related noise level increase that would be experienced at each of the sensitive receiver locations. Table 4.13-12, *Daytime Project Operational Noise Levels*, shows the Project operational noise levels during the daytime hours of 7:00 a.m. to 10:00 p.m. The daytime hourly noise levels at the off-site receiver locations are expected to range from 50.2 to 57.6 dBA L_{eq}. (Urban Crossroads, 2024a, p. 54)

Table 4.13-12 Daytime Project Operational Noise Levels

Noise Source[1]	Operational Noise Levels by Receiver Location (dBA Leq)											
	R1	R2	R3	R4	R5	R6	ON7	ON8	ON9	ON10	BIO11	BIO12
Cold Storage Loading Dock Activity	49.5	56.4	53.8	56.4	46.7	47.9	48.7	54.8	56.6	54.8	51.4	46.6
Dry Goods Loading Dock Activity	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Parking Lot Vehicle Movements	24.5	23.9	31.5	27.6	32.1	27.6	34.8	33.1	31.4	30.6	29.4	28.6
Roof-Top Air Conditioning Units	30.7	31.5	33.9	30.8	28.1	28.3	30.2	33.7	32.6	30.9	29.5	27.8
Trash Enclosure Activity	32.5	35.2	36.0	34.5	41.3	34.6	46.7	38.9	37.5	35.1	33.5	38.4
Truck Movements	34.5	35.9	44.0	33.7	31.6	30.8	34.3	37.5	35.0	33.3	31.7	30.4
Sports Field Activities	38.3	26.3	41.3	50.8	50.3	48.3	-[2]	-[2]	-[2]	-[2]	50.8	47.8
Basketball Court Activity	18.4	8.0	18.4	24.1	33.7	30.3	-[2]	-[2]	-[2]	-[2]	26.2	36.5
Dog Park Activity	18.8	9.2	19.2	24.4	34.2	32.5	-[2]	-[2]	-[2]	-[2]	26.9	51.9
Amphitheater with Stage	33.1	22.6	32.7	38.1	51.0	43.8	-[2]	-[2]	-[2]	-[2]	40.0	51.3
Outdoor Play Area	23.3	12.5	26.1	33.8	31.7	39.4	-[2]	-[2]	-[2]	-[2]	38.9	34.7
Total (All Noise Sources)	**50.2**	**56.5**	**54.6**	**57.6**	**54.8**	**52.3**	**51.1**	**55.0**	**56.7**	**54.9**	**54.5**	**56.2**

[1] See Figure 4.13-9 for the noise source locations. CadnaA noise model calculations are included in Appendix 9.1 to the Project's NIA (EIR *Technical Appendix L*).

[2] On-site receiver locations are included to describe the noise levels from the warehouse building to Seaton Park. Noise source activities from Seaton Park are not included in the overall operational noise level totals.

(Urban Crossroads, 2024a, Table 9-2)

Table 4.13-13, *Nighttime Project Operational Noise Levels*, shows the Project operational noise levels during the nighttime hours of 10:00 p.m. to 7:00 a.m. The nighttime hourly noise levels at the off-site receiver locations are expected to range from 47.0 to 56.5 dBA L_{eq}. The proposed park noise source activities would be limited to the daytime hours with no nighttime use. The differences between the daytime and nighttime noise levels are largely related to the estimated duration of noise activity. (Urban Crossroads, 2024a, p. 54)

Table 4.13-13 Nighttime Project Operational Noise Levels

Noise Source[1]	Operational Noise Levels by Receiver Location (dBA Leq)											
	R1	R2	R3	R4	R5	R6	ON7	ON8	ON9	ON10	BIO11	BIO12
Cold Storage Loading Dock Activity	49.5	56.4	53.8	56.4	46.7	47.9	-[2]	-[2]	-[2]	-[2]	51.4	46.6
Dry Goods Loading Dock Activity	0.0	0.0	0.0	0.0	0.0	0.0	-[2]	-[2]	-[2]	-[2]	0.0	0.0
Parking Lot Vehicle Movements	23.9	23.8	31.3	23.5	19.9	19.2	-[2]	-[2]	-[2]	-[2]	21.4	18.7
Roof-Top Air Conditioning Units	28.3	29.1	31.5	28.4	25.7	25.9	-[2]	-[2]	-[2]	-[2]	27.1	25.4
Trash Enclosure Activity	28.5	31.2	32.0	30.5	37.3	30.6	-[2]	-[2]	-[2]	-[2]	29.5	34.4
Truck Movements	34.5	35.9	44.0	33.7	31.6	30.8	-[2]	-[2]	-[2]	-[2]	31.7	30.4
Sports Field Activities	0.0	0.0	0.0	0.0	0.0	0.0	-[2]	-[2]	-[2]	-[2]	0.0	0.0
Basketball Court Activity	0.0	0.0	0.0	0.0	0.0	0.0	-[2]	-[2]	-[2]	-[2]	0.0	0.0
Dog Park Activity	0.0	0.0	0.0	0.0	0.0	0.0	-[2]	-[2]	-[2]	-[2]	0.0	0.0
Amphitheater with Stage	0.0	0.0	0.0	0.0	0.0	0.0	-[2]	-[2]	-[2]	-[2]	0.0	0.0
Outdoor Play Area	0.0	0.0	0.0	0.0	0.0	0.0	-[2]	-[2]	-[2]	-[2]	0.0	0.0
Total (All Noise Sources)	**49.7**	**56.5**	**54.3**	**56.4**	**47.3**	**48.1**	-[2]	-[2]	-[2]	-[2]	**51.5**	**47.0**

[1] See Figure 4.13-9 for the noise source locations. CadnaA noise model calculations are included in Appendix 9.1 to the Project's NIA (EIR *Technical Appendix L*).

[2] On-site receiver locations are included to describe the noise levels from the warehouse building to the park. Noise source activities from the park are not included in the overall operational noise level totals. The park does not include nighttime receivers with park activities limited to the daytime hours.

(Urban Crossroads, 2024a, Table 9-3)

3. Project Operational Noise Level Compliance

To demonstrate compliance with local noise regulations, the Project-only operational noise levels are evaluated against exterior noise level thresholds based on the Riverside County exterior noise level standards at nearby noise-sensitive receiver locations. Table 4.13-14, *Unmitigated Operational Noise Level* Compliance, shows the operational noise levels associated with the proposed Project would exceed the Riverside County daytime and nighttime exterior noise level standards at the nearest receiver locations. Therefore, the operational noise impacts are considered potentially significant at the nearest noise-sensitive receiver locations and noise mitigation measures would be required. (Urban Crossroads, 2024a, p. 57)

4. Project Operational Noise Level Increases

To describe the Project operational noise level increases, the Project operational noise levels are combined with the existing ambient noise levels measurements for the nearest receiver locations potentially impacts by Project operational noise sources. Since the dB units used to measure noise are logarithmic units, the Project-operational and existing ambient noise levels cannot be combined using standard arithmetic equations. Instead, they must be logarithmically added using the following formula: (Urban Crossroads, 2024a, p. 62)

$$SPL_{Total} = 10\log_{10}[10^{SPL1/10} + 10^{SPL2/10} + \ldots 10^{SPLn/10}]$$

Table 4.13-14 Unmitigated Operational Noise Level Compliance

Receiver Location[1]	Project Operational Noise Levels (dBA Leq)[2]		Noise Level Standards (dBA Leq)[3]		Noise Level Standards Exceeded?[4]	
	Daytime	Nighttime	Daytime	Nighttime	Daytime	Nighttime
R1	50.2	49.7	55	45	No	**Yes**
R2	56.5	56.5	55	45	**Yes**	**Yes**
R3	54.6	54.3	55	45	No	**Yes**
R4	57.6	56.4	55	45	**Yes**	**Yes**
R5	54.8	47.3	55	45	No	**Yes**
R6	52.3	48.1	55	45	No	**Yes**
ON7	51.1	-[5]	65	-[5]	No	No
ON8	55.0	-[5]	65	-[5]	No	No
ON9	56.7	-[5]	65	-[5]	No	No
ON10	54.9	-[5]	65	-[5]	No	No
BIO11	54.5	51.5	-[6]	-[6]	-[6]	-[6]
BIO12	56.2	47.0	-[6]	-[6]	-[6]	-[6]

[1] See Figure 4.13-5 for the receiver locations.
[2] Proposed operational noise level calculations are shown on Table 4.13-12 and Table 4.13-13.
[3] Exterior noise level standards, as shown on Table 4.13-4.
[4] Do the estimated Project operational noise source activities exceed the noise level standards?
[5] The park does not include nighttime receivers with park activities limited to the daytime hours.
"Daytime" = 7:00 a.m. - 10:00 p.m.; "Nighttime" = 10:00 p.m. - 7:00 a.m.
(Urban Crossroads, 2024a, Table 9-4)

Where "SPL1," "SPL2," etc. are equal to the sound pressure levels being combined, or in this case, the Project-operational and existing ambient noise levels. The difference between the combined Project and ambient noise levels describes the Project noise level increases to the existing ambient noise environment. Noise levels that would be experienced at receiver locations when Project-source noise is added to the daytime and nighttime ambient conditions are presented on Table 4.13-15, *Daytime Project Operational Noise Level Increases*, and Table 4.13-16, *Nighttime Operational Noise Level Increases*. As shown in Table 4.13-15, the Project would generate a daytime operational noise level increases ranging from 0.0 to 0.3 dBA L_{eq} at the nearest receiver locations. As shown in Table 4.13-16, the Project would generate a nighttime operational noise level increases ranging from 0.0 to 0.5 dBA L_{eq} at the nearest receiver locations. Project-related operational noise level increases would not exceed the operational noise level increase significance criteria presented in Table 4.13-4, and therefore the Project noise level increases at the sensitive receiver locations would be less than significant. (Urban Crossroads, 2024a, p. 62)

C. *Off-Site Transportation Noise Impacts*

To assess the off-site transportation CNEL noise levels impacts associated with the proposed Project, noise contours were developed based on the Project's TA (*Technical Appendix N2*). Noise contour boundaries represent the equal levels of noise exposure and are measured in CNEL from the center of the roadway. The

Table 4.13-15 Daytime Project Operational Noise Level Increases

Receiver Location[1]	Total Project Operational Noise Level[2]	Measurement Location[3]	Reference Ambient Noise Levels[4]	Combined Project and Ambient[5]	Project Increase[6]	Increase Criteria[7]	Increase Criteria Exceeded?
R1	42.7	L1	65.1	65.1	0.0	1.5	No
R2	42.9	L2	75.2	75.2	0.0	1.5	No
R3	46.2	L4	62.6	62.7	0.1	5.0	No
R4	51.7	L6	65.1	65.3	0.2	1.5	No
R5	54.1	L5	63.5	64.0	0.5	5.0	No
R6	50.5	L7	62.2	62.5	0.3	5.0	No

[1] See Figure 4.13-5 for the receiver locations.
[2] Total Project mitigated daytime operational noise levels as shown on Table 4.13-21.
[3] Reference noise level measurement locations as shown on Figure 4.13-4.
[4] Observed daytime ambient noise levels as shown on Table 4.13-1.
[5] Represents the combined ambient conditions plus the Project activities.
[6] The noise level increase expected with the addition of the proposed Project activities.
[7] Significance increase criteria as shown on Table 4.13-4.
(Urban Crossroads, 2024a, Table 9-8)

Table 4.13-16 Nighttime Operational Noise Level Increases

Receiver Location[1]	Total Project Operational Noise Level[2]	Measurement Location[3]	Reference Ambient Noise Levels[4]	Combined Project and Ambient[5]	Project Increase[6]	Increase Criteria[7]	Increase Criteria Exceeded?
R1	39.4	L1	61.5	61.5	0.0	5.0	No
R2	42.5	L2	75.2	75.2	0.0	1.5	No
R3	43.8	L4	53.2	53.7	0.5	5.0	No
R4	42.4	L6	56.9	57.0	0.1	5.0	No
R5	40.0	L5	53.3	53.5	0.2	5.0	No
R6	37.4	L7	59.9	59.9	0.0	5.0	No

[1] See Figure 4.13-5 for the receiver locations.
[2] Total Project nighttime mitigated operational noise levels as shown on Table 4.13-22.
[3] Reference noise level measurement locations as shown on Figure 4.13-4.
[4] Observed daytime ambient noise levels as shown on Table 4.13-1.
[5] Represents the combined ambient conditions plus the Project activities.
[6] The noise level increase expected with the addition of the proposed Project activities.
[7] Significance increase criteria as shown on Table 4.13-4.
(Urban Crossroads, 2024a, Table 9-9)

noise contours do not consider the effect of any existing noise barriers or topography that may attenuate ambient noise levels. In addition, because the noise contours reflect modeling of vehicular noise on area roadways, they appropriately do not reflect noise contributions from the surrounding stationary noise sources

within the Project study area. Refer to Subsection 7.1 of the Project's NIA (*Technical Appendix L*) for a discussion of traffic noise contours developed for the Project, which are presented in NIA Tables 7-1 through 7-6. (Urban Crossroads, 2024a, pp. 37-40)

2. Existing Project Traffic Noise Level Increases

An analysis of existing traffic noise levels plus traffic noise generated by the proposed Project has been included in this report to fully analyze all the existing traffic scenarios identified in the Project's TA (*Technical Appendix N2*). This condition is provided solely for informational purposes and would not occur, since the Project would not be fully developed and occupied under Existing conditions. Table 7-1 of the Project's NIA (*Technical Appendix L)* shows the Existing without Project conditions CNEL noise levels. The Existing without Project exterior noise levels are expected to range from 60.4 to 73.5 dBA CNEL, without accounting for any noise attenuation features such as noise barriers or topography. Table 7-2 of the Project's NIA shows the Existing with Project conditions would range from 60.5 to 73.7 dBA CNEL. Table 4.13-17, *Existing With Project Traffic Noise Level Increase*, shows that the Project off-site traffic noise level increases range from 0.0 to 5.2 dBA CNEL on the study area roadway segments, which would not exceed the identified thresholds of significance. (Urban Crossroads, 2024a, p. 40)

3. Existing Plus Ambient Growth Plus Cumulative (EAC) 2026 Traffic Noise Level Increases

Table 7-3 of the Project's NIA (*Technical Appendix L*) presents the Existing plus Ambient Growth plus Cumulative (EAC) without Project conditions CNEL noise levels. The EAC without Project exterior noise levels are expected to range from 60.7 to 76.4 dBA CNEL, without accounting for any noise attenuation features such as noise barriers or topography. Table 7-4 of the Project's NIA shows that the EAC with Project conditions are expected to range 60.8 to 76.4 dBA CNEL. Table 4.13-18, *Project Traffic Noise Increases – EAC 2026*, shows that the Project off-site traffic noise level increases would range from 0.0 to 5.1 dBA CNEL, which would not exceed the identified thresholds of significance. As such, Project traffic-related noise impacts under EAC (2026) conditions would be less than significant, requiring no mitigation. (Urban Crossroads, 2024a, p. 40)

4. Horizon Year (2045) Project Traffic Noise Level Increases

Table 7-5 of the Project's NIA (*Technical Appendix L*) presents the Horizon Year (HY) 2045 without Project conditions CNEL noise levels. The HY 2045 without Project exterior noise levels are expected to range from 61.1 to 76.8 dBA CNEL, without accounting for any noise attenuation features such as noise barrier or topography. Table 7-6 of the Project's NIA shows that the HY 2045 with Project conditions are expected to range from 61.2 to 76.8 dBA CNEL. Table 4.13-19, *Project Traffic Noise Increases – Horizon Year*, shows that the Project off-site traffic noise level increases would range from 0.0 to 4.7 dBA CNEL, which would not exceed the identified thresholds of significance. As such, Project traffic-related noise impacts under Horizon Year (2045) conditions would be less than significant, requiring no mitigation. (Urban Crossroads, 2024a, p. 41)

Table 4.13-17 Existing With Project Traffic Noise Level Increase

ID	Road	Segment	Receiving Land Use[1]	CNEL at Receiving Land Use (dBA)[1]			Incremental Noise Level Increase Threshold[2]	
				No Project	With Project	Project Addition	Limit	Exceeded?
1	Clark St.	n/o Cajalco Rd.	Sensitive	69.6	69.6	0.0	1.5	No
2	Clark St.	s/o Cajalco Rd.	Sensitive	72.1	72.1	0.0	1.5	No
3	Seaton Av.	n/o Cajalco Rd.	Sensitive	60.4	60.5	0.1	3.0	No
4	Seaton Av.	s/o Cajalco Rd.	Non-Sensitive	63.7	68.9	5.2	n/a	No
5	Seaton Av.	n/o Rider St.	Sensitive	63.7	66.2	2.5	3.0	No
6	Harvill Av.	n/o Cajalco Rd.	Non-Sensitive	72.1	72.2	0.1	n/a	No
7	Harvill Av.	s/o Cajalco Rd.	Non-Sensitive	72.7	72.7	0.0	n/a	No
8	Cajalco Rd.	w/o Clark St.	Sensitive	71.9	72.0	0.1	1.5	No
9	Cajalco Rd.	w/o Day St.	Sensitive	72.5	72.7	0.2	1.5	No
10	Cajalco Rd.	w/o Decker Rd.	Sensitive	73.0	73.1	0.1	1.5	No
11	Cajalco Rd.	e/o Decker Rd.	Sensitive	73.5	73.7	0.2	1.5	No
12	Cajalco Rd.	e/o Seaton Av.	Non-Sensitive	72.8	73.2	0.4	n/a	No
13	Cajalco Rd.	e/o Harvill Av.	Non-Sensitive	72.9	73.3	0.4	n/a	No

[1] Based on a review of existing aerial imagery. Noise sensitive uses are limited to existing residential land uses.

[2] The CNEL is calculated at the boundary of the right-of-way of each roadway and the property line of the receiving land use.

[3] Does the Project create an incremental noise level increase exceeding the significance criteria (Table 4.13-4)?

"n/a" Per the County of Riverside General Plan Noise Element Table N-1, unmitigated normally acceptable exterior noise levels of less than 75 dBA CNEL are considered less-than-significant and a barely perceptible 3 dBA or greater noise level increase is considered a significant impact when the non-noise sensitive noise level is greater than the normally acceptable 75 dBA CNEL land use compatibility criteria.

(Urban Crossroads, 2024a, Table 7-7)

Table 4.13-18 Project Traffic Noise Increases – EAC 2026

ID	Road	Segment	Receiving Land Use[1]	CNEL at Receiving Land Use (dBA)[1]			Incremental Noise Level Increase Threshold[2]	
				No Project	With Project	Project Addition	Limit	Exceeded?
1	Clark St.	n/o Cajalco Rd.	Sensitive	70.8	70.8	0.0	1.5	No
2	Clark St.	s/o Cajalco Rd.	Sensitive	73.0	73.0	0.0	1.5	No
3	Seaton Av.	n/o Cajalco Rd.	Sensitive	60.7	60.8	0.1	3.0	No
4	Seaton Av.	s/o Cajalco Rd.	Non-Sensitive	63.9	69.0	5.1	n/a	No
5	Seaton Av.	n/o Rider St.	Sensitive	63.9	66.3	2.4	3.0	No
6	Harvill Av.	n/o Cajalco Rd.	Non-Sensitive	76.4	76.4	0.0	3.0	No
7	Harvill Av.	s/o Cajalco Rd.	Non-Sensitive	76.4	76.4	0.0	3.0	No
8	Cajalco Rd.	w/o Clark St.	Sensitive	73.4	73.6	0.2	1.5	No
9	Cajalco Rd.	w/o Day St.	Sensitive	74.3	74.4	0.1	1.5	No
10	Cajalco Rd.	w/o Decker Rd.	Sensitive	74.7	74.7	0.0	1.5	No
11	Cajalco Rd.	e/o Decker Rd.	Sensitive	75.1	75.2	0.1	1.5	No
12	Cajalco Rd.	e/o Seaton Av.	Non-Sensitive	74.5	74.8	0.3	n/a	No
13	Cajalco Rd.	e/o Harvill Av.	Non-Sensitive	76.2	76.4	0.2	3.0	No

[1] Based on a review of existing aerial imagery. Noise sensitive uses are limited to existing residential land uses.

[2] The CNEL is calculated at the boundary of the right-of-way of each roadway and the property line of the receiving land use.

[3] Does the Project create an incremental noise level increase exceeding the significance criteria (Table 4.13-4)?

"n/a": Per the County of Riverside General Plan Noise Element Table N-1, unmitigated normally acceptable exterior noise levels of less than 75 dBA CNEL are considered less-than-significant and a barely perceptible 3 dBA or greater noise level increase is considered a significant impact when the non-noise sensitive noise level is greater than the normally acceptable 75 dBA CNEL land use compatibility criteria.

(Urban Crossroads, 2024a, Table 7-8)

Table 4.13-19 Project Traffic Noise Increases – Horizon Year

ID	Road	Segment	Receiving Land Use[1]	CNEL at Receiving Land Use (dBA)[1]			Incremental Noise Level Increase Threshold[2]	
				No Project	With Project	Project Addition	Limit	Exceeded?
1	Clark St.	n/o Cajalco Rd.	Sensitive	71.4	71.4	0.0	1.5	No
2	Clark St.	s/o Cajalco Rd.	Sensitive	73.4	73.4	0.0	1.5	No
3	Seaton Av.	n/o Cajalco Rd.	Sensitive	61.1	61.2	0.1	3.0	No
4	Seaton Av.	s/o Cajalco Rd.	Non-Sensitive	64.4	69.1	4.7	n/a	No
5	Seaton Av.	n/o Rider St.	Sensitive	64.4	66.6	2.2	3.0	No
6	Harvill Av.	n/o Cajalco Rd.	Non-Sensitive	76.8	76.8	0.0	3.0	No
7	Harvill Av.	s/o Cajalco Rd.	Non-Sensitive	76.8	76.8	0.0	3.0	No
8	Cajalco Rd.	w/o Clark St.	Sensitive	73.9	74.0	0.1	1.5	No
9	Cajalco Rd.	w/o Day St.	Sensitive	74.8	74.8	0.0	1.5	No
10	Cajalco Rd.	w/o Decker Rd.	Sensitive	75.1	75.1	0.0	1.5	No
11	Cajalco Rd.	e/o Decker Rd.	Sensitive	75.5	75.6	0.1	1.5	No
12	Cajalco Rd.	e/o Seaton Av.	Non-Sensitive	74.9	75.2	0.3	n/a	No
13	Cajalco Rd.	e/o Harvill Av.	Non-Sensitive	76.6	76.8	0.2	3.0	No

[1] Based on a review of existing aerial imagery. Noise sensitive uses are limited to existing residential land uses.
[2] The CNEL is calculated at the boundary of the right-of-way of each roadway and the property line of the receiving land use.
[3] Does the Project create an incremental noise level increase exceeding the significance criteria (Table 4.13-4)?
"n/a" Per the County of Riverside General Plan Noise Element Table N-1, unmitigated normally acceptable exterior noise levels of less than 75 dBA CNEL are considered less-than-significant and a barely perceptible 3 dBA or greater noise level increase is considered a significant impact when the non-noise sensitive noise level is greater than the normally acceptable 75 dBA CNEL land use compatibility criteria.
(Urban Crossroads, 2024a, Table 7-9)

D. Summary of Significance of Project-Related Noise Impacts

As indicated in the preceding analysis, Project-related construction activities on site, nighttime concrete pouring activities, and construction-related blasting activities on site are not anticipated to expose nearby sensitive receptors to noise increases exceeding the thresholds of significant presented in Table 4.13-4. However, to minimize the potential construction noise impacts from the Project's off-site roadway and utility improvements, Urban Crossroads recommends imposing noise abatement measures. Accordingly, and in order to provide a conservative analysis of potential impacts due to off-site Project construction-related activities, a potentially significant impact is identified.

As discussed previously, and shown in Table 4.13-14, the operational noise levels associated with the proposed Project would exceed the Riverside County daytime and nighttime exterior noise level standards at the nearest receiver locations. Although the Project's operational noise level increases would not exceed the identified thresholds of significance and thus would be less than significant (as shown in Table 4.13-15 and Table 4.13-16), the Project's operational noise impacts at the nearest noise-sensitive receiver locations as identified in

Table 4.13-14 are considered potentially significant and noise mitigation measures would be required. As previously indicated in Table 4.13-18 and Table 4.13-19, Project-related traffic noise impacts under EAC 2026 and Horizon Year 2024 conditions would not exceed the identified thresholds of significance, and traffic-related noise impacts would therefore be less than significant.

Threshold d.: ***Would the Project result in the generation of excessive ground-borne vibration or ground-borne noise levels?***

The construction and operation of the proposed Project has the potential to result in ground-borne vibration or ground-borne noise during both construction and long-term operation. Each is discussed below.

A. Construction-Related Vibration Impacts

1. Typical Construction Vibration Impacts

Using the vibration source level of construction equipment previously presented on Table 4.13-6 and the construction vibration assessment methodology published by the FTA, it is possible to estimate the Project vibration impacts. Table 4.13-20, *Project Construction Vibration Levels*, presents the expected Project related vibration impacts at the nearby receiver locations. At distances ranging from 72 to 322 feet from Project on-site construction activities, construction vibration velocity levels are estimated to range from 0.005 to 0.043 in/sec PPV. Based on a maximum acceptable continuous vibration threshold of 0.3 PPV (in/sec), the typical Project construction vibration levels would fall below the building damage thresholds at all the noise sensitive receiver locations. Therefore, the Project-related vibration impacts would be less-than-significant during typical construction activities at the Project site. Moreover, the vibration levels reported at the sensitive receiver locations are unlikely to be sustained during the entire construction period but will occur rather only during the times that heavy construction equipment is operating adjacent to the Project site perimeter. (Urban Crossroads, 2024a, pp. 72-73)

2. Blasting Vibration Analysis

Blasting associated with the Project construction is expected to occur in the areas previously shown on Figure 4.13-6. 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), which have many requirements for the safe handling, use, and storage of explosives and recommend various measures and controls, including, but not limited to monitoring and reporting of each blast to verify no damage has occurred at nearby structures, notifications to surrounding neighbors, limitations on the amounts and times blast may occur. Without vibration controls and measures, blasting could exceed thresholds at the areas near existing residential homes surrounding the Project site. (Urban Crossroads, 2024a, p. 76) This is evaluated as a potentially significant impact for which mitigation would be required.

Table 4.13-20 Project Construction Vibration Levels

Location[1]	Distance to Const. Activity (Feet)[2]	Typical Construction Vibration Levels PPV (in/sec)[3]						Thresholds PPV (in/sec)[4]	Thresholds Exceeded?[5]
		Small bulldozer	Jack-hammer	Loaded Trucks	Large bulldozer	Vibratory Roller	Highest Vibration Level		
R1	322'	0.000	0.001	0.002	0.002	0.005	0.005	0.3	No
R2	229'	0.000	0.001	0.003	0.003	0.008	0.008	0.3	No
R3	167'	0.000	0.002	0.004	0.005	0.012	0.012	0.3	No
R4	162'	0.000	0.002	0.005	0.005	0.013	0.013	0.3	No
R5	109'	0.000	0.004	0.008	0.010	0.023	0.023	0.3	No
R6	72'	0.001	0.007	0.016	0.018	0.043	0.043	0.3	No

[1] Construction noise source and receiver locations are shown on Figure 4.13-7.
[2] Distance from receiver building facade to Project construction boundary (Project site boundary).
[3] Based on the Vibration Source Levels of Construction Equipment (Table 4.13-6).
[4] Caltrans Transportation and Construction Vibration Guidance Manual, April 2020, Table 19, p. 38.
[5] Does the peak vibration exceed the acceptable vibration thresholds?
"PPV" = Peak Particle Velocity
(Urban Crossroads, 2024a, Table 10-6)

3. Off-Site Roadway and Utility Improvements Vibration

To support the Project development, there would 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 ROW on Decker Road, Seaton Avenue, Cajalco Road, and Rider Street. The construction phase most likely to result in vibration impacts associated with off-site roadway and utility improvements would be grading/excavation activities. It is expected that the off-site construction activities would not take place at any one location for more than four days due to the nature of the linear construction activity. Construction-related vibration from this off-site work would, therefore, be relatively short-term and the vibration levels would be reduced as construction work moves linearly along the selected alignment and farther from sensitive uses. However, to minimize the potential vibration noise impacts from the Project-related off-site roadway and utility improvements, Urban Crossroads recommends imposing abatement measures. Accordingly, and in order to provide a conservative analysis of potential impacts due to off-site Project construction-related vibration, a potentially significant impact is identified.

B. Operational-Related Vibration Impacts

Under long-term conditions, the Project would not include or require equipment or activities that would result in perceptible ground-borne vibration beyond the Project site. Caltrans has issued a publication entitled, "Transportation and Construction Vibration Guidance Manual," dated April 2020 (Caltrans, 2020). As noted by Caltrans:

> "B*ecause vehicles traveling on highway are supported on flexible suspension systems and pneumatic tires, these vehicles are not an efficient source of ground vibration. They can, however, impart*

vibration into the ground when they roll over pavement that is not smooth. Continuous traffic traveling on a smooth highway creates a fairly continuous but relatively low level of vibration. Where discontinuities exist in the pavement, heavy truck passages can be the primary source of localized, intermittent vibration peaks. These peaks typically last no more than a few seconds and often for only a fraction of a second. Because vibration drops off rapidly with distance, there is rarely a cumulative increase in ground vibration from the presence of multiple trucks." (Caltrans, 2020, p. 10)

All trucks generated by the Project would travel along County roadways that are regularly maintained to prevent discontinuous pavement (e.g., potholes). As such, and based on guidance from Caltrans, the Project's operational traffic-related vibration impacts would be less than significant.

4.13.7 CUMULATIVE IMPACT ANALYSIS

The cumulative study area for the issue of noise includes the Project vicinity as well as areas adjacent to roadways evaluated by the Project's TA (*Technical Appendix N2*). Areas outside of the cumulative study area are too far away to be adversely impacted by noise and ground-borne vibration generated as a result of the proposed Project.

A. Threshold a.

As indicated under the analysis of Threshold a., the Project site is located approximately 1.7 miles southwest of the MARB/IPA airport. However, the Project site is located outside of the 60 dBA CNEL contour and the Project's industrial and park land uses are considered normally acceptable. There are no components of the proposed Project that would cause or contribute to increased airport-related noise in the area. As such, impacts would be less-than-cumulatively considerable.

B. Threshold b.

As indicated under the analysis of Threshold b., there are no private airstrips in the Project vicinity. As such, the Project would not be exposed to excessive noise levels associated with public or private airport operations. There are no components of the proposed Project that would cause or contribute to increased airport-related noise in the area. Thus, impacts would be less-than-cumulatively considerable.

C. Threshold c.

1. Construction Noise

- **Typical Construction Noise**

As previously indicated in Table 4.13-8, the construction noise levels are expected to range from 46.2 to 66.0 dBA L_{eq} at the nearest receiver locations, which would not exceed the construction-related noise level threshold of 80 dBA L_{eq}. Although it is possible that other cumulative developments could be under construction at the same time as the proposed Project, based on the noise levels presented in Table 4.13-8, Project construction-related noise, even when combined with noise from cumulative developments, does not have the potential to result in cumulative noise levels exceeding 80 dBA L_{eq} at the nearest sensitive receptors. Accordingly, Project

impacts due to on-site construction-related noise would be less than significant on a cumulatively-considerable basis.

❑ **Noise Impacts from Off-Site Roadway and Utility Improvements**

It is expected that the off-site construction activities would not take place at any one location for more than four days due to the nature of the linear construction activity. Construction noise from this off-site work would, therefore, be relatively short-term and the noise levels would be reduced as construction work moves linearly along the selected alignment and farther from sensitive uses. However, to minimize the potential construction noise impacts from the Project construction and the off-site roadway and utility improvements, Urban Crossroads recommends imposing noise abatement measures. As off-site Project-related construction noise has the potential to combine with noise from other cumulative developments, noise impacts associated with the Project's off-site roadway and utility improvements conservatively are evaluated as significant on a cumulatively-considerable basis.

❑ **Nighttime Concrete Pour Analysis**

As previously shown in Table 4.13-10, the nighttime concrete pour activities are estimated to range from 34.4 to 40.5 dBA L_{eq} at the existing noise sensitive receiver locations, which is well below the FTA 70 dBA Leq nighttime residential noise level threshold. Thus, even if noise from Project nighttime concrete pour activities were to be combined with noise from other cumulative developments, the combined noise levels would not exceed 70 dBA Leq at the nearest sensitive receptor; thus, cumulatively-considerable impacts due to nighttime concrete pouring activities would be less than significant.

❑ **Blasting-Related Noise Impacts**

As previously indicated in Table 4.13-11, Project blasting-related noise levels at the nearest sensitive receptors would not exceed 78.5 dBA L_{max}, which is well below the airblast threshold of 133 dBA. Although the Project's blasting-related noise has the potential to result in significant direct impacts if appropriate measures are not undertaken to reduce peak noise levels, blasting activities represent an instantaneous single-source event, and it is highly unlikely that Project-related blasting noise would combine with blasting noise from other cumulative developments. As such, Project-related blasting noise impacts would be less than significant on a cumulatively-considerable basis.

2. Operational Noise Impacts

❑ **On-Site Operational Noise Impacts**

Table 4.13-12 shows the Project operational noise levels during the daytime at the off-site receiver locations are expected to range from 50.2 to 57.6 dBA L_{eq}, while Table 4.13-13 shows the Project operational noise levels during the nighttime hours at the off-site receiver locations are expected to range from 47.0 to 56.5 dBA L_{eq}. As shown in Table 4.13-14, the operational noise levels associated with the proposed Project would exceed the Riverside County daytime and nighttime exterior noise level standards at the nearest receiver locations. Although the Project's operational noise level increases would be less than significant, the Project's operational noise has the potential to combine with operational noise sources from other developments in the

local area, thereby exposing sensitive receptors to noise levels exceeding the County's noise standards; therefore, the Project's impacts due to operational-related noise would be cumulatively considerable.

❑ **Traffic-Related Noise Impacts**

The analysis of the Project traffic-related noise increases previously were provided in Table 4.13-18 and Table 4.13-19 for the EAC (2026) and Horizon Year (2045) scenarios. The EAC and Horizon Year scenarios account for traffic from ambient growth and cumulative developments. As shown in Table 4.13-18 and Table 4.13-19, Project-related traffic would not expose any sensitive receptors to traffic-related noise levels exceeding the County's thresholds of significance; thus, cumulatively-considerable traffic-related noise impacts would be less than significant.

D. Threshold d.

1. Construction-Related Impacts

❑ **On-Site Construction Vibration**

As previously shown in Table 4.13-20, at distances ranging from 72 to 322 feet from Project construction activities, construction vibration velocity levels are estimated to range from 0.005 to 0.043 in/sec PPV, which would be far below the continuous vibration threshold of 0.3 PPV (in/sec). Thus, even if Project construction-related vibration were to combine with vibration from cumulative developments, the Project's vibration levels still would not expose any sensitive receptors to vibration levels exceeding 0.3 PPV (in/sec). Thus, Project construction-related vibration impacts would be less than significant on a cumulatively-considerable basis.

❑ **Construction-Related Blasting Vibration**

As previously noted, without vibration controls and measures, blasting could exceed thresholds at the areas near existing residential homes surrounding the Project site, resulting in a significant direct impact. However, blasting activities represent an instantaneous noise and vibration source, and it is highly unlikely that Project blasting-related vibration levels would combine with vibration sources from other cumulative developments such that sensitive receptors would be exposed to vibration levels exceeding 0.3 PPV (in/sec). Accordingly, cumulatively-considerable vibration impacts associated with blasting activities would be less than significant.

❑ **Off-Site Roadway and Utility Improvements Vibration**

As previously indicated, the construction phase most likely to result in vibration impacts associated with off-site roadway and utility improvements would be grading/excavation activities. It is expected that the off-site construction activities would not take place at any one location for more than four days due to the nature of the linear construction activity. Construction-related vibration from this off-site work would, therefore, be relatively short-term and the vibration levels would be reduced as construction work moves linearly along the selected alignment and farther from sensitive uses. However, to minimize the potential vibration noise impacts from the Project-related off-site roadway and utility improvements, Urban Crossroads recommends imposing abatement measures. Accordingly, and in order to provide a conservative analysis of potential impacts due to off-site Project construction-related vibration, vibration impacts during off-site roadway and utility

improvements is evaluated as a potentially significant cumulatively-considerable impact for which mitigation would be required.

2. Operational-Related Impacts

Under long-term conditions, the Project would not include or require equipment or activities that would result in perceptible ground-borne vibration beyond the Project site. Caltrans has issued a publication entitled, "Transportation and Construction Vibration Guidance Manual," dated April 2020 (Caltrans, 2020). As noted by Caltrans:

> "B*ecause vehicles traveling on highway are supported on flexible suspension systems and pneumatic tires, these vehicles are not an efficient source of ground vibration. They can, however, impart vibration into the ground when they roll over pavement that is not smooth. Continuous traffic traveling on a smooth highway creates a fairly continuous but relatively low level of vibration. Where discontinuities exist in the pavement, heavy truck passages can be the primary source of localized, intermittent vibration peaks. These peaks typically last no more than a few seconds and often for only a fraction of a second. Because vibration drops off rapidly with distance, there is rarely a cumulative increase in ground vibration from the presence of multiple trucks.*" (Caltrans, 2020, p. 10)

All trucks generated by the Project would travel along County roadways that are regularly maintained to prevent discontinuous pavement (e.g., potholes). As such, and based on guidance from Caltrans, the Project's operational traffic-related vibration impacts would be less-than-significant on a cumulatively-considerable basis.

4.13.8 Significance of Impacts Before Mitigation

Threshold a.: Less-than-Significant Impact. The Project site is located approximately 1.7 miles southwest of the MARB/IPA and is located within compatibility zone C2. The Project's industrial and park land uses are considered compatibly with the ALUCP for this zone. Additionally, based on the noise level contours for the MARB/IPA, the Project site is located well outside of the 60 dBA CNEL noise level contour boundaries, indicating that the Project's industrial and park land uses would be exposed to "normally acceptable" noise levels below 55 dBA CNEL. As such, the Project would not expose people residing or working in the area to excessive noise levels from airport operations, and impacts would be less-than-significant.

Threshold b.: Less-than-Significant Impact. There are no private airstrips in the Project vicinity. The nearest airport facility is the Perris Valley Airport, a privately-owned public-use airport, located approximately 5.5 miles southeast of the Project site within the City of Perris. Additionally, the Project site is located well outside of the 55 dBA CNEL noise contour for the Perris Valley Airport, indicating that the Project site would be subject to noise levels of less than 55 dBA CNEL associated with the Perris Valley Airport. The Project's industrial land use is considered normally acceptable with unmitigated exterior noise levels below 75 dBA CNEL, while the Project's park use is considered normally acceptable with unmitigated exterior noise levels below 70 dBA CNEL. As such, both the warehouse building and park components of the Project would not be

exposed to excessive noise levels associated with the Perris Valley Airport, and impacts would therefore be less-than-significant.

Threshold c.: Significant Direct and Cumulatively-Considerable Impact. As shown in Table 4.13-8 and Table 4.13-9, the Project's on-site construction noise levels are expected to range from 46.2 to 66.0 dBA L_{eq} at the nearest receiver locations, which would not exceed the threshold of significance of 80 dBA L_{eq}; thus, on-site construction noise levels would be less than significant. Although it is expected that construction noise associated with off-site roadway and utility improvements would be less than significant, in order to provide a conservative analysis of potential construction-related noise impacts a significant impacts is identified for which mitigation would be required. As shown on Table 4.13-10, the noise levels associated with the nighttime concrete pour activities are estimated to range from 34.4 to 40.5 dBA L_{eq} and would not exceed the FTA 70 dBA L_{eq} nighttime residential noise level threshold; thus, the noise impacts due to Project construction-related nighttime concrete pour noise activity would be less than significant at all receiver locations with prior authorization for nighttime work from Riverside County. Additionally, as previously shown in Table 4.13-11, the closest residential receiver would experience noise levels of 78.5 dBA L_{max} over the course of blasting activities, which would not exceed the County's threshold of significance; thus, noise impacts from Project-related blasting activities during construction would be less than significant.

As shown in Table 4.13-12, the Project's daytime operational hourly noise levels at the off-site receiver locations are expected to range from 50.2 to 57.6 dBA L_{eq}, while Table 4.13-13 shows that nighttime operational noise levels are expected to range from 47.0 to 56.5 dBA L_{eq}. Although the Project's noise level increases would be less than significant as summarized in Table 4.13-15 and Table 4.13-16, because the Project operations would expose nearby sensitive receptors to operational-related noise levels exceeding 55 dBA Leq during the daytime and 45 dBA Leq during the nighttime, the Project's operational noise impacts represent a significant impact for which mitigation would be required. As shown on Table 4.13-17, Table 4.13-18, and Table 4.13-19, Project-related traffic noise would not exceed any of the identified significance thresholds under Existing, EAC (2026), or Horizon Year (2045) conditions; thus, Project-related traffic noise impacts would be less than significant.

Threshold d.: Significant Direct and Cumulatively-Considerable Impact. As shown in Table 4.13-20, at distances ranging from 72 to 322 feet from Project typical construction activities, construction vibration velocity levels are estimated to range from 0.005 to 0.043 in/sec PPV, and would not exceed the maximum acceptable continuous vibration threshold of 0.3 PPV (in/sec); thus, Project-related vibration impacts during typical construction activities would be less-than-significant. However, Project-related blasting activities have the potential to expose nearby structures and sensitive receptors to substantial blasting-related vibration levels in the absence of measures and controls; thus, vibration impacts associated with the Project's blasting activities would be significant prior to mitigation. Additionally, and although not anticipated, the Project's off-site construction activities related to roadway and infrastructure improvements have the potential to expose nearby sensitive receptors to excessive vibration levels, resulting in a significant impact. Under long-term operating conditions, all trucks generated by the Project would travel along County roadways that are regularly maintained to prevent discontinuous pavement (e.g., potholes); thus, and based on guidance from Caltrans, the Project's operational traffic-related vibration impacts would be less than significant.

4.13.9 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 noise. Although compliance with mandatory regulatory requirements does not technically meet CEQA's definition for mitigation, they are specified herein as requirements for the Project.

- All construction activities and haul truck deliveries shall adhere to Section 2.i of Riverside County Ordinance No. 847, which prohibits construction activities that make loud noise from occurring between 6:00 p.m. and 6:00 a.m. during the months of June through September, and between 6:00 p.m. and 7:00 a.m. during the months of October through May, and on Sundays and federal holidays. Exceptions to these time restrictions may be granted pursuant to Section 7 of Ordinance No. 847 (e.g., if needed to accommodate nighttime concrete pouring activities).

- All future implementing developments shall comply with Riverside County Board of Supervisors Policy F-3, *"Good Neighbor" Policy for Logistics and Warehouse/Distribution Uses*. Applicable measures related to noise, include, but are not necessarily limited to, the following:
  - Provision 2.5: Construction contractors shall locate or park all stationary construction equipment so that the emitted noise is directed away from sensitive receptors nearest the project site, to the extent practicable.
  - Provision 3.1: Warehouse/distribution facilities should be generally designed so that truck bays and loading docks are a minimum of 300 feet, measured from the property line of the sensitive receptor to the nearest dock door using a direct straight-line method. This distance may be reduced if the site design include berms or other similar features to appropriately shield and buffer the sensitive receptors from the active truck operations areas. Other setbacks appropriate to the site's zoning classification shall be incorporated in the design.
  - Provision 3.6: On-site speed bumps shall not be allowed except at security/entry gates. Truck loading bays and drive aisles shall be designed to minimize truck noise.
  - Provision 3.7: Dock doors shall be located where they are not readily visible from sensitive receptors or major roads. If it is necessary to site dock doors where they may be visible, a method to screen the dock doors shall be implemented. A combination of landscaping, berms, walls, and similar features shall be considered.
  - Provision 3.8: An additional "wing-wall" shall be installed perpendicular to the loading dock areas to further attenuate noise related to truck activities and also address aesthetics by screening the loading area when adjacent to sensitive receptors.
  - Provision 3.12: Facility construction shall comply with the hours of operation and exterior noise decibel levels as required by Riverside County Ordinance No. 847 ("Noise Ordinance").

- Provision 4.10: If a public address (PA) system is being used in conjunction with a warehouse/distribution facility operations, the PA system shall be oriented away from sensitive receptors and the volume set at a level not readily audible past the property line.
- Provision 4.11: Facility Operation shall comply with the exterior noise decibel levels as required by Ord. 847 (Noise Ordinance), which includes a maximum exterior decibel level of 55 dba (between 7:00 a.m. and 10:00 p.m.) and 45 dba (between 10:00 p.m. and 7:00 a.m.) as measured on adjacent occupied residences, or as modified by the most current version of Ordinance No. 847.

Mitigation

MM 4.13-1 To minimize the potential construction noise impacts from the off-site roadway and utility improvements, the Project shall implement the following construction noise abatement measures. Project grading and blasting contractors shall be required to ensure compliance with these requirements and shall permit periodic inspection of the construction site by County of Riverside staff or its designee to confirm compliance. The following requirements also shall be specified in bid documents issued to prospective construction contractors. Riverside County shall review all monitoring reports to ensure compliance.

a. Construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturers' standards.

b. All stationary construction equipment shall be placed in such a manner so that emitted noise is directed away from any sensitive receivers.

c. Construction equipment staging areas shall be located at the greatest feasible distance between the staging area and the nearest sensitive receivers.

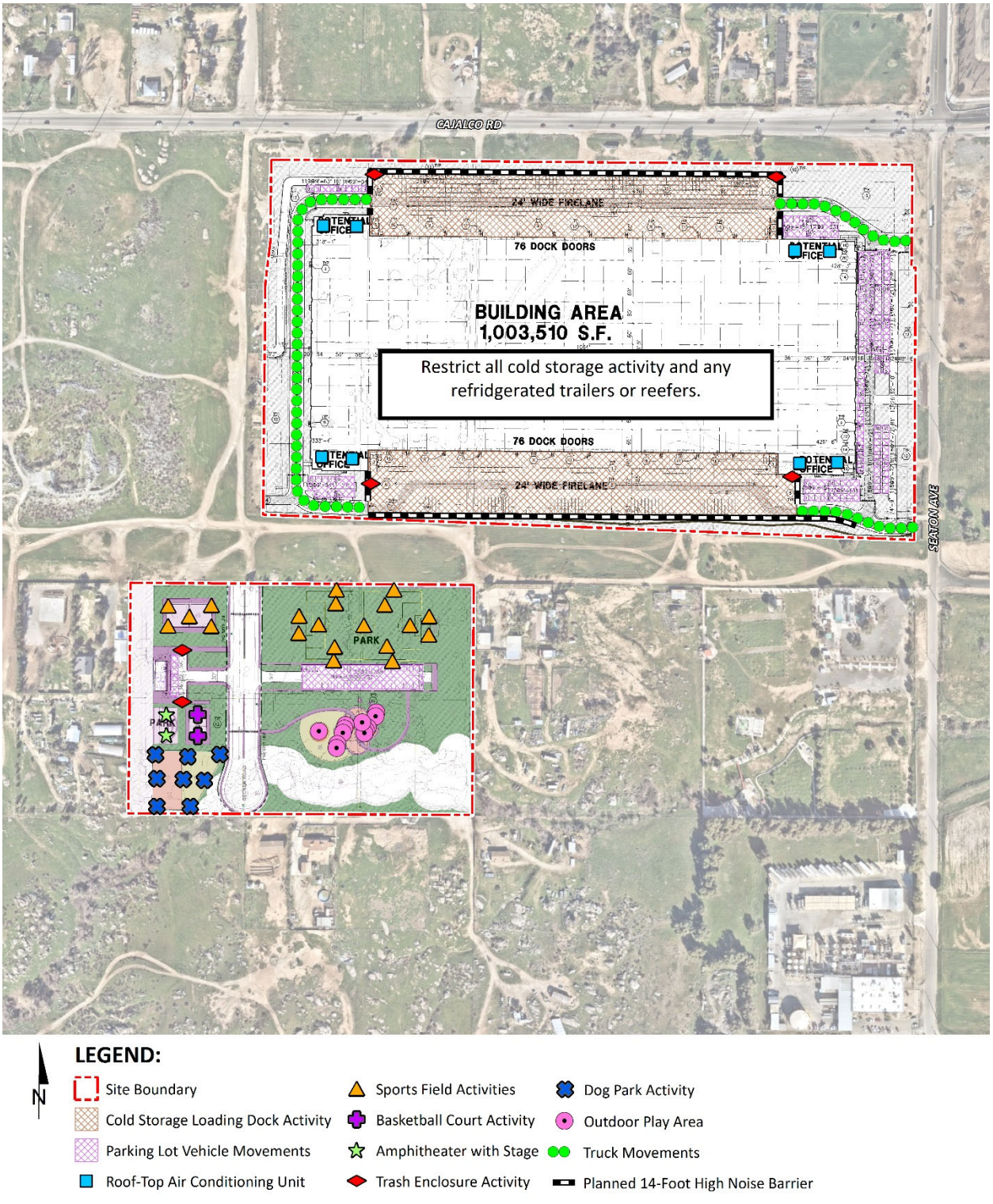
d. The construction contractor shall limit equipment and material deliveries to the same hours specified for construction equipment (between the hours of 6:00am to 6:00pm during the months of June through September and 7:00am to 6:00pm during the months of October through May).

e. Electrically powered air compressors and similar power tools shall be used, when feasible, in place of diesel equipment.

f. No music or electronically reinforced speech from construction workers shall be allowed within 500 feet of the property line of a residential use or sensitive receptor.

MM 4.13-2 Prior to issuance of building permits for the Project's proposed warehouse building, Riverside County shall review the building plans to ensure that the plans accommodate a 14-foot-high noise barriers (i.e., concrete or block walls) are constructed at the southern and northern edges of the truck courts to the south and north of the proposed building, as shown on Figure 4.13-10, *Operational Noise Mitigation Measures*, of the Project's EIR (SCH No. 2023060799). Prior to final building inspection, Riverside County shall ensure that the noise barriers have been constructed.

Figure 4.13-10 Operational Noise Mitigation Measures



(Urban Crossroads, 2024a, Exhibit 9-B)

MM 4.13-3 Prior to approval of any grading permits that require blasting activities and a blasting permit, the Project Applicant shall prepare and submit for County review and approval of a Blasting Noise and Vibration Monitoring and Abatement Plan ("Noise and Vibration Abatement Plan"). The required Noise and Vibration Abatement Plan shall include the name and qualifications of the person(s) responsible for monitoring and reporting blast vibrations. In addition, the Noise and Vibration Abatement Plan shall require a minimum of two portable seismographs for monitoring peak ground vibration and air-overpressure for each blast, with one seismograph being placed at the closest residential structure. The Noise and Vibration Abatement Plan also shall require that equipment and its use shall conform fully to the standards developed by the Vibration Section of the International Society of Explosive Engineers (ISEE). For all blasts, the Noise and Vibration Abatement Plan shall require monitoring of ground motion and air-overpressure at the nearest residential properties or other structure of concern. The Noise and Vibration Abatement Plan also shall specify a minimum trigger level for monitoring of 0.05 in/s for ground motion and 120 dB for air-overpressure, and shall specify a maximum noise level for air-blasts of 133 dB at any residence and shall restrict maximum ground vibration to the limits as outlined in the U.S. Bureau of Mines publication R18507. In the event that the air-blast limit or ground vibration limits are exceeded, blasting shall be suspended until the County has approved a revised blasting plan showing revisions to assure adequate noise and vibration attenuation. Additionally, the Noise and Vibration Abatement Plan shall require regular reporting of blasting and measurements to Riverside County, and shall include a copy of the instrument/software-generated blast monitoring report at each instrument location that includes measured peak particle velocity in inches per second, peak air-overpressure in linear-scale decibels, and vibration and air-overpressure event plots, with date and time of event recording. In addition, the Noise and Vibration Abatement Plan shall include the following requirements:

- Prior to commencement of any blasting, a pre-blast survey of the conditions of all existing property and aboveground utilities located within 300 feet of any potential blasting areas shall be conducted. The pre-blast survey shall be conducted by a third-party company with a minimum of five years of experience performing pre-blast and similar type surveys, and shall include a photographic record of all visible and accessible structures, facilities, utilities, or other improvements. The survey shall document the interior and exterior conditions of all residential property and associated structures located within 500 feet of blasting areas. If property owners refuse surveys, provide copies of certified-mail letters documenting attempts to provide the survey by a third-party professional survey company. The required surveys shall include a description of the interior and exterior condition of the various structures examined. Descriptions shall include the locations of any cracks, damage, or other existing defects and shall include information needed to identify and describe the defect, if any, and to evaluate the construction operations on the defect. Survey records shall include photos of all cracks and other damaged, weathered, or otherwise deteriorated structural conditions. If necessary, macro lenses and flash illumination shall be used to ensure defects are shown clearly in the photographs. Photos shall contain an accurate date stamp. No blasting shall occur prior to completion of surveys of surrounding residential properties. Surveys also shall be repeated at facilities or properties where damage concerns have been expressed by individual residents, property owners, or other

concerned parties. Details of any observed changes to surveyed structures and documenting photos shall be reported and submitted to Riverside County.

- Blasting only shall be allowed Monday through Friday only between the hours of 8:00 a.m. and 5:00 p.m.
- The required Noise and Vibration Plan shall outline controlled blasting techniques and procedures to control and monitor flyrock, airblast, and ground vibration.
  - Flyrock mitigation measures to be specified by the Noise and Vibration Plan may include soil cover, leaving alluvial materials in place over materials to be blasted, and/or blast mats. Crushed rock (i.e., 3/8") shall be used for stemming materials; drill cuttings are not acceptable. The stemming materials shall be tamped in-place.
  - The design of blasts shall be based on "scaled distance" criteria (i.e., defined as the distance in feet between a blast drill hole and the structure of concern, divided by the square root of the explosives loading per delay period in pounds-units are in feet per pound). The scaled distance chosen for the initial design shall be supported by statistical analysis indicating the resulting ground vibration will be less than the criteria set for the Project. The scaled distance used for production blasts may be modified based on the results of the test blast(s) but shall be conservative enough to produce vibration and airblast levels within the project specifications.
  - One or more test blasts shall be performed in an area outside of critical distance of residential structures or other improvements of concern (i.e., at least 500 feet away).
  - The required Noise and Vibration Plan shall include procedures regarding submittal of blast reports and record keeping for County records and monitoring.
  - The required Noise and Vibration Plan shall include measures and procedures to notify property owners that blasting will occur.
- If specified vibration limits are exceeded, blasting operations shall cease immediately and a revised blasting plan shall be submitted to the County. Blasting shall not resume until a revised blasting plan has been reviewed and the Contractor has expressed in writing the conditions that will be applied to further blasting work.

Project grading and blasting contractors shall be required to ensure compliance with the Noise and Vibration Abatement Plan requirements and shall permit periodic inspection of the construction site by County of Riverside staff or its designee to confirm compliance. The requirements of the Noise and Vibration Abatement Plan also shall be specified in bid documents issued to prospective construction contractors. Riverside County shall review all monitoring reports to ensure compliance with the Noise and Vibration Abatement Plan, and shall have the authority to stop all blasting activities on site if it is determined that blasting activities are not being conducted in conformance with Noise and Vibration Abatement Plan and/or the above-listed requirements.

MM 4.13-4 No portion of the proposed warehouse building shall include cold storage space, unless it can be demonstrated at the time of building permit application that sensitive receptors in the surrounding area no longer occur (e.g., if residential uses are redeveloped with non-sensitive receptors, such as warehouse uses). In such a case, an updated noise impact analysis shall be prepared demonstrating that daytime and nighttime operational-related noise would not expose any nearby sensitive receptors to noise levels exceeding the noise standards specified by Riverside County Ordinance No. 847 of 55 dBA Leq during daytime hours and 45 dBA Leq during nighttime hours. No building permit shall be issued for cold storage uses unless the resulting noise impact analysis demonstrates compliance with the County's noise standards as specified by Riverside County Ordinance No. 847.

4.13.10 SIGNIFICANCE OF IMPACTS AFTER MITIGATION

Threshold c: Less-than-Significant with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.13-1 would ensure that noise abatement measures are implemented during the construction of off-site roadway and infrastructure improvements. With the implementation of the construction noise abatement measures, the potential impacts from Project-related construction of off-site roadway and utility improvements would be reduced to less-than-significant levels. (Urban Crossroads, 2024a, pp. 67-68)

Implementation of Mitigation Measure MM 4.13-2 would ensure that minimum 14-foot-high barriers are constructed at the southern and northern edges of the truck courts to the south and north of the proposed warehouse building, respectively. Implementation of Mitigation Measure MM 4.13-4 would ensure that no cold storage uses are allowed within the proposed warehouse building unless sensitive receptors no longer occur in close proximity to the Project site and unless it can be demonstrated through a subsequent noise analysis that operation of cold storage uses would not expose nearby sensitive receptors to noise levels exceeding the noise limits specified by Riverside County Ordinance No. 847. Table 4.13-21, *Mitigated Daytime Operational Noise Levels*, and Table 4.13-22, *Mitigated Nighttime Operational Noise Levels*, which assume no cold storage uses, show the Project-related operational noise levels following implementation of Mitigation Measures MM 4.13-2 and MM 4.13-4. As shown in Table 4.13-23, *Mitigated Operational Noise Level Compliance*, with implementation of the required mitigation the Project's operational noise impacts at the nearest sensitive receptors would be reduced to below the daytime operational noise standard of 55 dBA L_{eq} and the nighttime operational noise standard of 45 dBA L_{eq}. Accordingly, with implementation of the required mitigation, the Project's operational noise impacts during the daytime and nighttime would be reduced to less-than-significant levels. (Urban Crossroads, 2024a, pp. 57, 61)

Threshold d: Less-than-Significant with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.13-3 would ensure that all blasting-related activities on site occur in conformance with an approved Noise and Vibration Abatement Plan, and would reduce potential vibration levels affecting nearby buildings and sensitive receptors to below a level of significance. Implementation of Mitigation Measure MM 4.13-1 would ensure that abatement measures are implemented during the construction of off-site roadway and infrastructure improvements. With the implementation of the construction noise abatement measures, the potential vibration impacts from Project-related construction of off-site roadway and utility improvements would be reduced to less-than-significant levels.

Table 4.13-21 Mitigated Daytime Operational Noise Levels

Noise Source[1]	Operational Noise Levels by Receiver Location (dBA Leq)											
	R1	R2	R3	R4	R5	R6	ON7	ON8	ON9	ON10	BIO11	BIO12
Cold Storage Loading Dock Activity	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Dry Goods Loading Dock Activity	37.1	41.6	39.6	41.6	34.6	34.6	36.9	40.8	41.6	40.4	37.5	33.9
Parking Lot Vehicle Movements	24.3	17.9	27.5	26.4	32.1	27.4	34.7	33.0	31.1	30.3	29.2	28.5
Roof-Top Air Conditioning Units	30.7	31.5	33.9	30.8	28.1	28.3	30.2	33.7	32.6	30.9	29.5	27.8
Trash Enclosure Activity	25.7	22.3	26.6	31.4	41.2	34.4	46.7	38.8	33.7	32.3	31.7	38.2
Truck Movements	34.1	34.1	41.1	31.5	31.3	30.0	34.1	37.3	34.1	31.9	30.1	29.8
Sports Field Activities	38.3	26.3	41.3	50.8	50.3	48.3	-[2]	-[2]	-[2]	-[2]	50.8	47.8
Basketball Court Activity	18.4	8.0	18.4	24.1	33.7	30.3	-[2]	-[2]	-[2]	-[2]	26.2	36.5
Dog Park Activity	18.8	9.2	19.2	24.4	34.2	32.5	-[2]	-[2]	-[2]	-[2]	26.9	51.9
Amphitheater with Stage	33.1	22.6	32.7	38.1	51.0	43.8	-[2]	-[2]	-[2]	-[2]	40.0	51.3
Outdoor Play Area	23.3	12.5	26.1	33.8	31.7	39.4	-[2]	-[2]	-[2]	-[2]	38.9	34.7
Total (All Noise Sources)	**42.7**	**42.9**	**46.2**	**51.7**	**54.1**	**50.5**	**47.7**	**44.7**	**43.5**	**42.2**	**51.7**	**55.7**

1 See Figure 4.13-9 for the noise source locations. CadnaA noise model calculations are included in Appendix 9.1 to the Project's NIA (*Technical Appendix L*).

2 On-site receiver locations are included to describe the noise levels from the warehouse building to Seaton Park. Noise source activities from Seaton Park are not included in the overall operational noise level totals. Seaton Park does not include nighttime receivers with park activities limited to the daytime hours.

(Urban Crossroads, 2024a, Table 9-5)

Table 4.13-22 Mitigated Nighttime Operational Noise Levels

Noise Source[1]	Operational Noise Levels by Receiver Location (dBA Leq)											
	R1	R2	R3	R4	R5	R6	ON7	ON8	ON9	ON10	BIO11	BIO12
Cold Storage Loading Dock Activity	0.0	0.0	0.0	0.0	0.0	0.0	-[2]	-[2]	-[2]	-[2]	0.0	0.0
Dry Goods Loading Dock Activity	37.1	41.6	39.6	41.6	34.6	34.6	-[2]	-[2]	-[2]	-[2]	37.5	33.9
Parking Lot Vehicle Movements	23.7	17.7	27.0	19.0	19.4	18.1	-[2]	-[2]	-[2]	-[2]	19.9	17.9
Roof-Top Air Conditioning Units	28.3	29.1	31.5	28.4	25.7	25.9	-[2]	-[2]	-[2]	-[2]	27.1	25.4
Trash Enclosure Activity	21.7	18.3	22.6	27.4	37.2	30.4	-[2]	-[2]	-[2]	-[2]	27.7	34.2
Truck Movements	34.1	34.1	41.1	31.5	31.3	30.0	-[2]	-[2]	-[2]	-[2]	30.1	29.8
Sports Field Activities	0.0	0.0	0.0	0.0	0.0	0.0	-[2]	-[2]	-[2]	-[2]	0.0	0.0
Basketball Court Activity	0.0	0.0	0.0	0.0	0.0	0.0	-[2]	-[2]	-[2]	-[2]	0.0	0.0
Dog Park Activity	0.0	0.0	0.0	0.0	0.0	0.0	-[2]	-[2]	-[2]	-[2]	0.0	0.0
Amphitheater with Stage	0.0	0.0	0.0	0.0	0.0	0.0	-[2]	-[2]	-[2]	-[2]	0.0	0.0
Outdoor Play Area	0.0	0.0	0.0	0.0	0.0	0.0	-[2]	-[2]	-[2]	-[2]	0.0	0.0
Total (All Noise Sources)	**39.4**	**42.5**	**43.8**	**42.4**	**40.0**	**37.4**	-[2]	-[2]	-[2]	-[3]	**38.9**	**38.1**

1 See Figure 4.13-9 for the noise source locations. CadnaA noise model calculations are included in Appendix 9.1 to the Project's NIA (*Technical Appendix L*).

2 On-site receiver locations are included to describe the noise levels from the warehouse building to Seaton Park. Noise source activities from Seaton Park are not included in the overall operational noise level totals. Seaton Park does not include nighttime receivers with park activities limited to the daytime hours.

(Urban Crossroads, 2024a, Table 9-6)

Table 4.13-23 Mitigated Operational Noise Level Compliance

Receiver Location[1]	Project Operational Noise Levels (dBA Leq)[2]		Noise Level Standards (dBA Leq)[3]		Noise Level Standards Exceeded?[4]	
	Daytime	Nighttime	Daytime	Nighttime	Daytime	Nighttime
R1	42.7	39.4	55	45	No	No
R2	42.9	42.5	55	45	No	No
R3	46.2	43.8	55	45	No	No
R4	51.7	42.4	55	45	No	No
R5	54.1	40.0	55	45	No	No
R6	50.5	37.4	55	45	No	No
ON7	47.7	-[5]	65	-[5]	No	No
ON8	44.7	-[5]	65	-[5]	No	No
ON9	43.5	-[5]	65	-[5]	No	No
ON10	42.2	-[5]	65	-[5]	No	No
BIO11	51.7	38.9	-[6]	-[6]	-[6]	-[6]
BIO12	55.7	38.1	-[6]	-[6]	-[6]	-[6]

[1] See Figure 4.13-5 for the receiver locations.
[2] Proposed Project unmitigated operational noise levels as shown on Tables 4.13-12 and 4.13-13.
[3] Exterior noise level standards, as shown on Table 4.13-4.
[4] Do the estimated Project operational noise source activities exceed the noise level standards?
[5] Seaton Park does not include nighttime receivers with park activities limited to the daytime hours.
[6] Project operational noise levels provided for informational purposes.
"Daytime" = 7:00 a.m. - 10:00 p.m.; "Nighttime" = 10:00 p.m. - 7:00 a.m.

(Urban Crossroads, 2024a, Table 9-7)

4.14 PALEONTOLOGICAL RESOURCES

The analysis in this Subsection is based in part on a Project-specific technical study entitled, "Paleontological Resource Assessment for the Cajalco & Seaton Warehouse and Park Project" (herein "PRA"), prepared by Chronicle Heritage, dated October 27, 2023, and appended to this EIR as *Technical Appendix M* (Chronicle Heritage, 2023). Refer to Section 7.0, *References*, for a complete list of reference sources.

4.14.1 EXISTING CONDITIONS

A. Paleontological Resources Definition

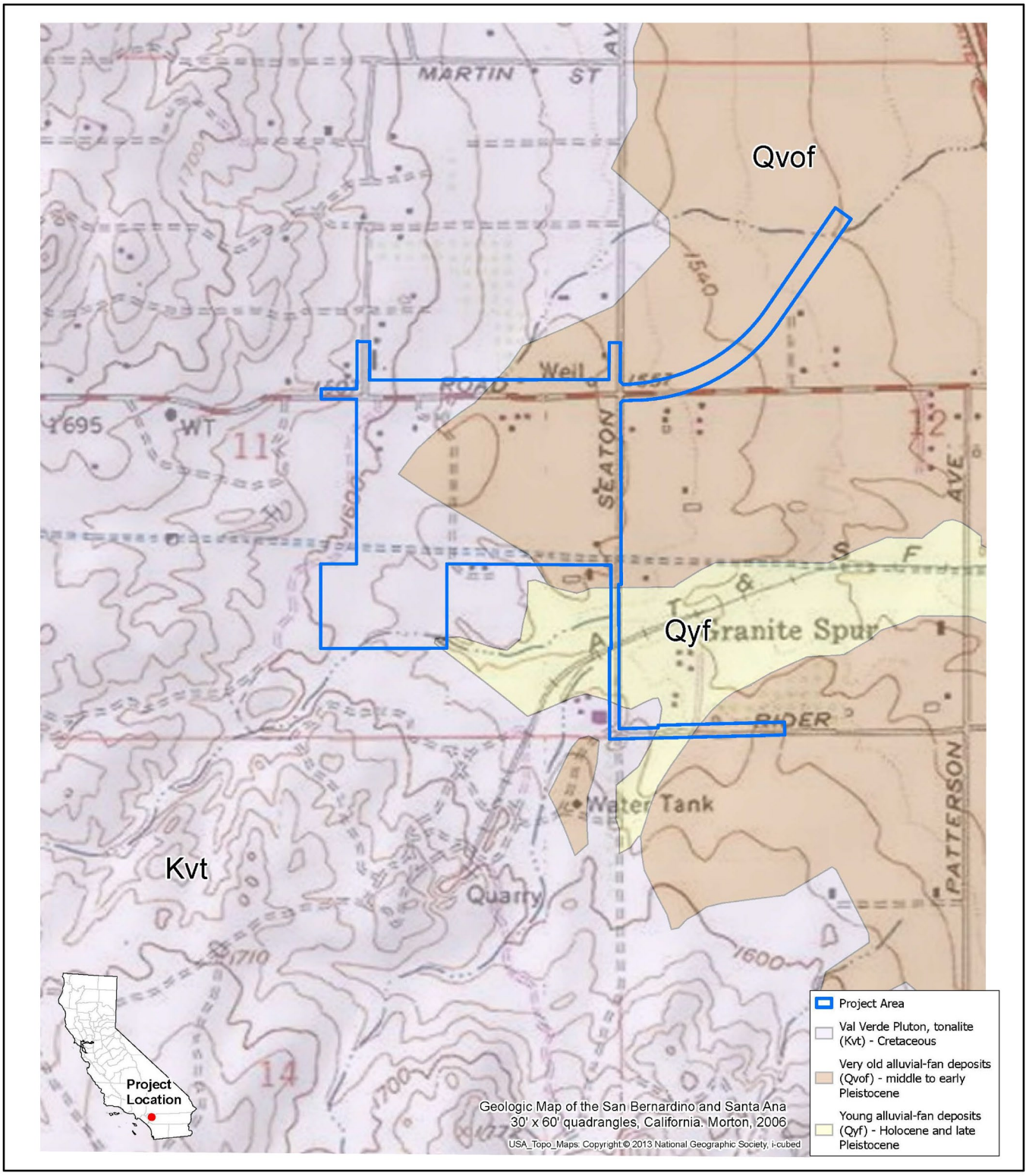
Paleontological resources are the remains of prehistoric life that have been preserved in geologic strata. These remains are called fossils and include bones, shells, teeth, and plant remains (including their impressions, casts, and molds) in the sedimentary matrix, as well as trace fossils such as footprints and burrows. Fossils are considered older than 5,000 years of age, but may include younger remains (subfossils) when viewed in the context of local extinction of the organism or habitat, for example. Paleontological resources (i.e., fossils) are considered nonrenewable scientific resources because, once destroyed, they cannot be replaced. As such, paleontological resources are afforded protection under various federal, State, and local laws and regulations. (Chronicle Heritage, 2023, p. 4)

B. Regional and Local Geology

The Project area is in the north-central portion of the Peninsular Ranges geomorphic province. A geomorphic province is a region of unique topography and geology distinguished from other regions based on its landforms and tectonic history. The Peninsular Ranges are a northwest–southeast oriented complex of blocks that extend 125 miles (mi) from the Transverse Ranges and Los Angeles Basin to the tip of Baja California. The Peninsular Ranges are bounded to the east by the Colorado Desert and range in width from 30 to 100 miles. Locally, the valley areas are underlain by alluvial sediments from the Pleistocene Epoch (2.6 million years ago [Ma] to 11,700 years ago) and the Holocene Epoch (11,700 years ago to present), reaching at least 1,000 ft deep. The alluvial sediments are sourced from the surrounding elevated basement rock composed of igneous and metamorphic rocks, sourced in the Project area predominantly from the Val Verde Pluton to the southwest. (Chronicle Heritage, 2023, p. 7)

The Project area is underlain by three geologic units: young alluvial fan deposits (Qyf) of the late Pleistocene and Holocene, very old alluvial fan deposits (Qvof) of the Pleistocene, and Gabbro of the Cretaceous Period (145–66 Ma). The geologic units in the Project area are depicted on Figure 4.14-1, *Geologic Units and Paleontological Sensitivity*, and are described below. (Chronicle Heritage, 2023, p. 7)

- Val Verde Pluton (Kvt)(Cretaceous): The Val Verde Pluton is a gray-weathering, massive to well-foliated, medium-to coarse-grained, granular biotite hornblende tonalite (Morton and Miller, 2006). This unit is exposed in the western portions of the Project area. Due to the high heat and pressure of formation, plutonic igneous rock has no sensitivity for paleontological resources. (Chronicle Heritage, 2023, p. 7)



Source(s): Paleo West (10-27-2023)

Figure 4.14-1

Not to Scale

Geologic Units and Paleontological Sensitivity

- Very Old Alluvial Fan Deposits (Qvof) (Middle–Early Pleistocene): Very old alluvial fan deposits are composed of moderately to well-consolidated silt, sand, gravel, and conglomerate also sourced from the Val Verde Pluton to the south. This unit is the most common unit in the Project area, occurring in the eastern portions of the offsite Project area and northern onsite Project area. Elsewhere in Riverside County, Pleistocene deposits are highly fossiliferous, having produced fossils from deer, mammoth, camel, horse, bison, badger, mole, rabbit, gray fox, and coyote. Qvof is assigned a high paleontological sensitivity. (Chronicle Heritage, 2023, p. 10)

- Young Alluvial Fan Deposits (Qyf) (Late Pleistocene–Holocene): Young alluvial fan deposits (Qyf) are composed of unconsolidated to moderately consolidated silt, sand, pebbly cobbly sand, and bouldery alluvial-fan deposits having slightly to moderately dissected surfaces. Locally, these fans are sourced from the Val Verde Pluton to the southwest and are typically fine-grained (silt and sand). The unit may be present in the far southeastern corner of the southern onsite Project area. Holocene deposits are too young to have accumulated or preserved significant biological material and are assigned low paleontological sensitivity as a result. (Chronicle Heritage, 2023, p. 10)

C. *Paleontological Resource Potential*

Absent specific agency guidelines, most professional paleontologists in California adhere to the guidelines set forth by the Society of Vertebrate Paleontology ("SVP"; 2010) to determine the course of paleontological mitigation for a given project. These guidelines establish protocols for the assessment of the paleontological resource potential of underlying geologic units and outline measures to mitigate adverse impacts that could result from project development. Using baseline information gathered during a paleontological resource assessment, the paleontological resource potential of geologic units (or members thereof) underlying a project area can be assigned to one of four categories defined by SVP. Although these standards were written specifically to protect vertebrate paleontological resources, all fields of paleontology have adopted the following guidelines. (Chronicle Heritage, 2023, p. 6)

- *High Potential (Sensitivity):* Rock units from which significant vertebrate or significant invertebrate fossils or significant suites of plant fossils have been recovered have a high potential for containing significant nonrenewable fossiliferous resources. These units include but are not limited to, sedimentary formations and some volcanic formations that contain significant nonrenewable paleontological resources anywhere within their geographical extent, and sedimentary rock units temporally or lithologically suitable for the preservation of fossils. Sensitivity comprises both (a) the potential for yielding abundant or significant vertebrate fossils or for yielding a few significant fossils, large or small, vertebrate, invertebrate, or botanical and (b) the importance of recovered evidence for new and significant taxonomic, phylogenetic, ecologic, or stratigraphic data. Areas which contain potentially datable organic remains older than recent, including deposits associated with nests or middens, and areas which may contain new vertebrate deposits, traces, or trackways are also classified as significant. (Chronicle Heritage, 2023, p. 6)

- *Low Potential (Sensitivity):* Sedimentary rock units that are potentially fossiliferous but have not yielded fossils in the past or contain common and widespread invertebrate fossils of well-documented and understood taphonomic, phylogenetic species, and habitat ecology are considered to have a low

potential for containing significant nonrenewable fossiliferous resources. Reports in the paleontological literature or field surveys by a qualified vertebrate paleontologist may allow a determination that some areas or units have a low potential for yielding significant fossils before the start of construction. Generally, these units will be poorly represented by specimens in institutional collections and will not require protection or salvage operations. However, as excavation for construction is underway, it is possible that significant and unanticipated paleontological resources might be encountered and require a change of classification from low to high potential and thus require monitoring and mitigation if the resources are found to be significant. (Chronicle Heritage, 2023, p. 6)

- *Undetermined Potential (Sensitivity):* Specific areas underlain by sedimentary rock units for which little information is available have undetermined fossiliferous potentials. Field surveys by a qualified vertebrate paleontologist to determine the rock units' potential are required before programs of impact mitigation for such areas can be developed. (Chronicle Heritage, 2023, p. 6)

- *No Potential:* Rock units of metamorphic or igneous origin are commonly classified as having no potential for containing significant paleontological resources. (Chronicle Heritage, 2023, p. 7)

D. Records Search Results

A paleontological records search was performed by the paleontological collections manager of the Western Science Center in Hemet in Riverside County, and is included as Attachment A of the Project's PRA (*Technical Appendix M*). The WSC records search did not produce any fossil localities from within the Project or within a one-mile radius of the Project site. Searches of online databases and other literature did not produce any additional fossil localities within 3 miles of the Project site. Pleistocene-age alluvial, fluvial, and lacustrine deposits have produced scientifically significant paleontological resources throughout southern California. East of the Project area, in the vicinity of Lakeview, a diverse assemblage of fossil resources included mammoth (*Mammuthus* sp.), sabre-toothed cat (*Smilodon* sp.), extinct horse (*Equus* sp.), bison (*Bison antiquus*), and numerous small mammals, reptiles, invertebrates, and plant remains. Southeast of the Project area, the largest known open-environment, nonasphaltic, late Pleistocene fossil assemblage has been documented in the Diamond and Domenigoni valleys, producing nearly 100,000 identifiable fossils representing over 105 vertebrate, invertebrate, and plant taxa. The vertebrate taxa recovered include reptiles such as frogs, turtles, and lizards; birds such as robins, swallows, jays, ravens, hawks, and ducks; small mammals such as rabbits, squirrels, mice, and weasel; and large mammals such as fox, bear, coyote, deer, bison, mammoths, mastodons, and ground sloths. The invertebrate taxa recovered include ostracods, snails, termites, slugs, beetles, and bivalves and plant taxa include diatoms, pollen, and wood debris. West of the Project area near Lake Mathews, remains of *Ustatochoerus* cf. *californicus* (ground dwelling herbivore) and camel have been recovered. (Chronicle Heritage, 2023, p. 10)

E. Findings

The Project's PRA uses the SVP system to assess paleontological sensitivity and the level of effort required to manage potential impacts to significant fossil resources. Using this system, the sensitivity of geologic units was determined by the relative abundance and risk of adverse impacts to vertebrate fossils and significant invertebrates and plants. (Chronicle Heritage, 2023, pp. 10-11)

Based on the literature review and museum records search results, and in accordance with the SVP sensitivity scale (described above), the Quaternary very old alluvial fan deposits (Qvof) in the Project area have high paleontological sensitivity because similar deposits have yielded significant fossils in the vicinity. The young alluvial fan deposits (Qyf) have a low paleontological sensitivity, and the Val Verde Pluton (Kvt) has no paleontological sensitivity. These sensitivity rankings are consistent with the paleontological sensitivity of the Project area as mapped by the County of Riverside as part of the County's 2015 comprehensive update to the General Plan, which shows high sensitivity in the areas mapped as Qvof and low sensitivity elsewhere. (Chronicle Heritage, 2023, p. 10 & 11)

Refer to Figure 4.14-1 (previously presented) for the geologic units in the Project area and their paleontological sensitivity ratings, in accordance with SVP standard guidelines. (Chronicle Heritage, 2023, p. 10 & 11)

F. Paleontological Sensitivity

A "paleontological sensitivity map and report" generated by the Riverside County Land Information System in October 2023, as shown on Figure 4.14-2, *Paleontological Sensitivity Map*, ranks the portion of the Project site where the warehouse building and the public park would be constructed as having a "low" potential (yellow shaded areas) to yield nonrenewable paleontological resources while the map ranks the off-site improvement areas of the Project site as having a "High B (Hb)" potential (green shaded areas) to yield nonrenewable paleontological resources. In accordance with the SVP sensitivity scale, the Quaternary very old alluvial fan deposits (Qvof) in the Project area have high paleontological sensitivity because similar deposits have yielded significant fossils in the vicinity. The young alluvial fan deposits (Qyf) have a low paleontological sensitivity and the Val Verde Pluton (Kvt) has no paleontological sensitivity.

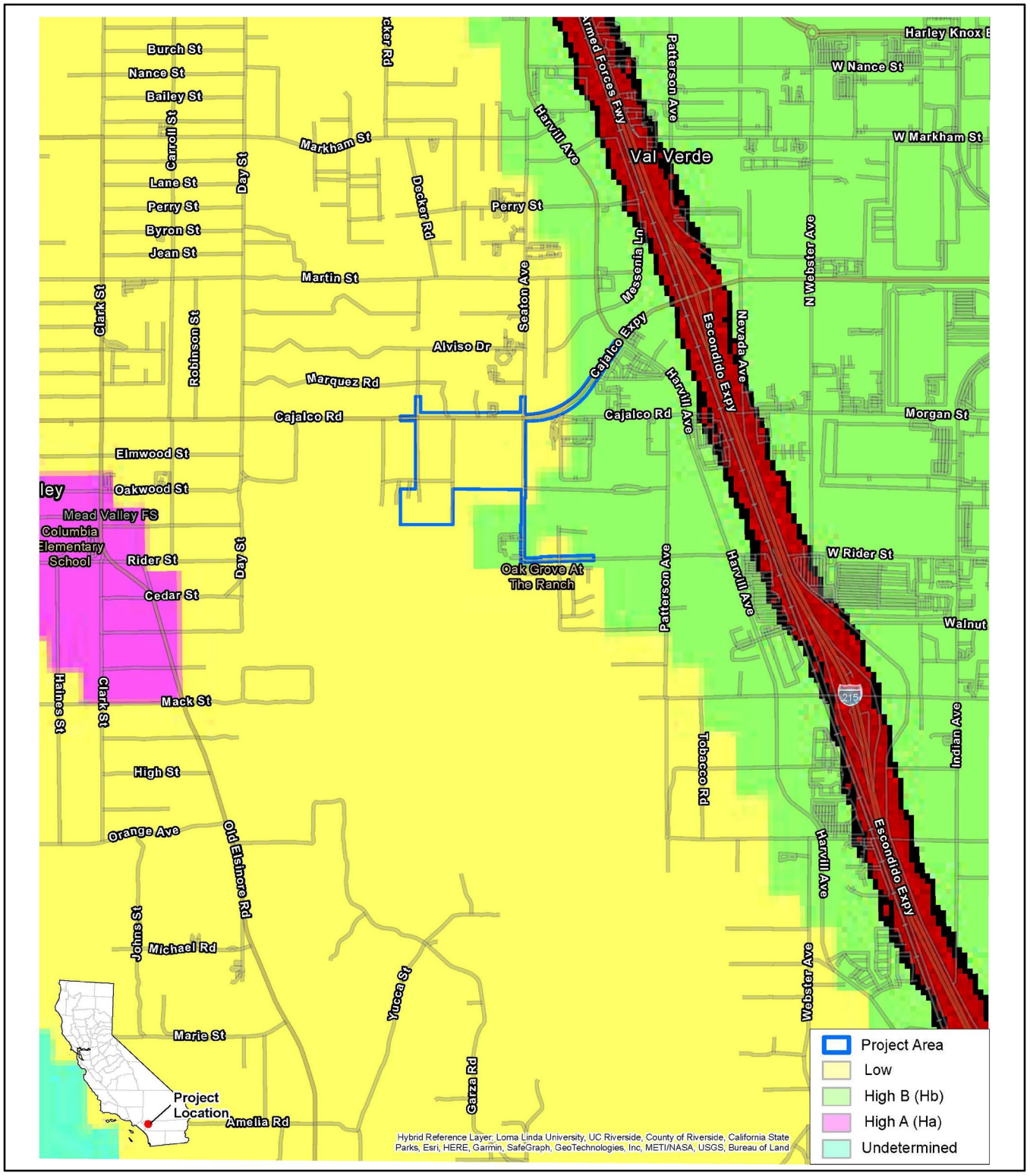
4.14.2 Applicable Environmental Regulations

The following is a brief description of the federal, State, and local environmental laws and related regulations related to paleontological resources.

A. Federal Regulations

1. Paleontological Resources Preservation Act (PRPA)

The Paleontological Resources Preservation Act (PRPA) was signed into law on March 30, 2009 (Public Law 111-11, Title VI, Subtitle D; 16 U.S.C. Sections (§) 470aaa - 470aaa-11). PRPA directs the Department of Agriculture (U.S. Forest Service) and the Department of the Interior (National Park Service, Bureau of Land Management, Bureau of Reclamation, and Fish and Wildlife Service) to implement comprehensive paleontological resource management programs. Section 6310 of PRPA specifically states, "As soon as practical after the date of enactment of this Act, the Secretary shall issue such regulations as are appropriate to carry out this subtitle, providing opportunities for public notice and comment." (NPS, 2023b)



Source(s): Paleo West (10-27-2023)

Figure 4.14-2

Not to Scale

Paleontological Sensitivity Map

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." (CCR, n.d.4)

2. California Public Resources Code (PRC)

Public Resources Code (PRC) § 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." (CCR, n.d.5)

PRC § 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 Planning Department Procedures

In order to ensure the review and protection of paleontological resources for projects subject to CEQA and not otherwise categorically exempt, the Riverside County Geologist performs an initial review of the County of Riverside's database and mapped information for the subject site. When existing information indicates that a site proposed for development has high paleontological sensitivity, a paleontological resource impact mitigation program (PRIMP) is required for the project. The PRIMP shall specify the steps to be taken to mitigate impacts to paleontological resources. If the site warrants protection, then an "Environmental Constraint" is placed on the approved map for the project, stating that: (Riverside County, 2015, pp. 4.9-26 and -27)

> "This site, as delineated on this [Environmental Constraint Sheet] map and as indicated in the county's General Plan, has been mapped as having a high potential for containing significant nonrenewable fossil material. The proposed project's potential to impact paleontological resources has been determined to be possible. Therefore, mitigation of this potential impact in the form of monitoring of all site earth-moving activities and collection/curation of all significant fossils unearthed is required unless proven unnecessary through comprehensive literature research and site inspection."

When existing information indicates that a site proposed for development has low paleontological sensitivity, no direct mitigation is required unless a fossil is encountered during site development. Should a fossil be encountered, the Riverside County Geologist must be notified, and a paleontologist must be retained by the project proponent. The paleontologist documents the extent and potential significance of the paleontological resources on the site and establishes appropriate mitigation measures for further site development. (Riverside County, 2015a, p. 4.9-27)

When existing information indicates that a site proposed for development has undetermined paleontological sensitivity, a report is filed with the Riverside County Geologist documenting the extent and potential significance of the paleontological resources on site and identifying mitigation measures for the fossil and for impacts to significant paleontological resources. (Riverside County, 2015a, p. 4.9-27)

4.14.3 Basis for Determining Significance

Section VII of Appendix G to the CEQA Guidelines addresses typical adverse effects on paleontological resources, and includes the following threshold question to evaluate the Project's impacts to paleontological resources (OPR, 2018a):

- Would the Project 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 CEQA Guidelines, and indicate significant impacts would occur if the Project or any Project-related component would:

a. Directly or indirectly destroy a unique paleontological resource, site, or unique geologic feature.

The significance threshold set forth in Riverside County's Environmental Assessment Checklist, as modified by the 2018 updates to the CEQA Guidelines, was used to evaluate the significance of the proposed Project's impacts on paleontological resources.

4.14.4 Methodology

To assess whether a particular area has the potential to contain significant fossil resources in the subsurface, it is necessary to review published geologic mapping to determine the geology and stratigraphy of the area. Geologic units are considered sensitive for paleontological resources if they are known to contain significant fossils anywhere in their extent. Therefore, a search of pertinent local and regional museum repositories for paleontological localities within and nearby the Project area is necessary to determine whether fossil localities have been previously discovered within a particular rock unit. For this Project, a records search was requested of the WSC collections. Records searches were also conducted of the online University of California Museum of Paleontology Collections, Paleobiology Database, FAUNMAP, and other published and unpublished geological and paleontological literature of the area. (Chronicle Heritage, 2023, p. 7)

4.14.5 Impact Analysis

Threshold a:	***Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?***

There are no unique geologic features on site. Although the Project site features rock outcroppings and small hill forms in the southern portions of the Project site proposed for park uses, these rock outcroppings do not comprise unique geologic features. As such, no impacts to unique geologic features would occur with Project implementation.

Based on the findings of the Project's PRA (*Technical Appendix M*), the Quaternary very old alluvial fan deposits (Qvof) in the Project area have high paleontological sensitivity because similar deposits have yielded significant fossils in the vicinity. The young alluvial fan deposits (Qyf) have a low paleontological sensitivity and the Val Verde Pluton (Kvt) has no paleontological sensitivity. These sensitivity rankings are consistent with the paleontological sensitivity of the Project area as mapped by the County of Riverside, which shows high sensitivity in the areas mapped as Qvof and low sensitivity elsewhere. Because of the presence of fossil localities in the vicinity, Project-related ground disturbance has the potential to impact paleontological resources throughout the Project area. This is evaluated as a significant impact for which mitigation would be required. (Chronicle Heritage, 2023, p. 11)

4.14.6 Cumulative Impact Analysis

This cumulative impact analysis considers development of the proposed Project in conjunction with other development projects and planned development in the vicinity of the Project site, including buildout of the Riverside County General Plan Land Use Plan and the general plans of cities throughout western Riverside County. This cumulative study area was selected for analysis because it encompasses a region in which geological conditions, and thus paleontological sensitivity, are similar to what occurs in the immediate vicinity of the Project site.

As indicated under the analysis of Threshold a., the Quaternary very old alluvial fan deposits (Qvof) in the Project area have high paleontological sensitivity because similar deposits have yielded significant fossils in the vicinity. The young alluvial fan deposits (Qyf) have a low paleontological sensitivity and the Val Verde Pluton (Kvt) has no paleontological sensitivity. Because of the presence of fossil localities in the vicinity, Project-related ground disturbance has the potential to impact paleontological resources throughout the Project area. Other developments within the region occurring on soils/geologic units with a "High" potential for containing paleontological resources also have the potential to impact subsurface unique paleontological resources during grading and excavation. Therefore, the Project's potential impacts to paleontological resources on site would be cumulatively considerable.

4.14.7 Significance of Impacts Before Mitigation

Threshold a.: Significant Direct and Cumulatively-Considerable Impact. The Project would not impact any known paleontological resources or unique geological features. However, the Project site is underlain by soils and geologic units with a "High" potential for containing unique paleontological resources. Thus, there is a potential for impacts to paleontological resources during Project grading and excavation. This is evaluated as a significant impact on both a direct and cumulatively-considerable basis.

4.14.8 County Regulations, Design Requirements, and Mitigation

Mitigation

MM 4.14-1 Prior to the issuance of grading permits affecting areas in the northern portions of the Project site (i.e., development within the northern 50.04 gross acres of the Project site proposed for development with warehouse uses) and prior to issuance of grading permits affecting off-site areas (i.e., planned improvements within Cajalco Road/Cajalco Expressway, Seaton Avenue, and Rider Street), the Project Applicant shall retain a qualified paleontologist approved by the

County to create and implement a Project-specific plan for monitoring site grading/earth-moving activities (Project Paleontologist). The Project Paleontologist retained shall review the approved development plan and grading plan and conduct any pre-construction work necessary to render appropriate monitoring and mitigation requirements as appropriate. These requirements shall be documented by the Project Paleontologist in a Paleontological Resource Impact Mitigation Program (PRIMP). This PRIMP shall be submitted to the County Geologist for approval prior to issuance of a grading permit. Information to be contained in the PRIMP, at a minimum and in addition to other industry standards and Society of Vertebrate Paleontology standards, is as follows:

- Prior to issuance of grading permits, a qualified vertebrate paleontologist ("Project Paleontologist") shall review the Project grading plans and geotechnical report data, with particular regard to location and depth of earth moving and the rock unit(s) being encountered. The review is for the purpose of assessing potential for fossil remains being encountered by earth moving. If previously undisturbed strata with potential for containing fossil remains will be encountered by earth moving, the following measures shall be implemented.

    - Museum Storage Agreement. The Western Science Center (WSC), Natural History Museum of Los Angeles County (LACM), San Diego Natural History Museum (SDNHM), San Bernardino County Museum (SBCM), or Riverside Municipal Museum (RMM) shall be the designated museum repository for any vertebrate, invertebrate, and plant fossil remains and associated specimen data and corresponding geologic and geographic site data that might be recovered from the site as a result of the PRIMP. Prior to any earth moving at the Project site, the Project Paleontologist shall develop a formal agreement with the museum regarding final disposition and permanent storage and maintenance of the fossil collection and associated data. The agreement shall cover, but not necessarily be limited to, museum requirements regarding: 1) level of treatment of the collection; 2) storage and maintenance fees, if any; 3) purchase of specimen storage cabinets and drawers, as well as specimen trays, vials, specimen data cards, and other curatorial supplies, if required.

    - Discovery Clause/Treatment Plan. As part of the PRIMP, the Project Paleontologist shall develop a discovery clause/treatment plan (DC/TP) to allow for the additional tasks (recovery, geologic mapping, fossiliferous rock sample processing, specimen preparation, identification, curation, cataloging, data entry, specimen storage, and maintenance by museum) and manpower required to treat a large or productive fossil occurrence that cannot be treated without diverting the monitor from routine monitoring. The DC/TP shall also include approved procedures and lines of communication to be followed by specific individuals if fossil remains are uncovered by earth moving, particularly when a paleontologic monitor is not present at the site. Names and telephone numbers of contact personnel shall be included in the lines of

communication. The preparation of the required PRIMPs for future grading permits would ensure compliance with these requirements.

- Pre-Construction Meeting. The Project Paleontologist or field supervisor, as well as a paleontologic construction monitor, shall attend a preconstruction meeting to explain the PRIMP to construction contractor and the developer's construction workers. The presentation shall summarize mitigation procedures to be employed by PRIMP personnel and shall detail procedures and lines of communication to be followed by specific Project personnel when fossil remains are found at the site.

  The Project Paleontologist or field supervisor shall inform the construction contractor and the developer's construction workers of the following items:

  1) Routine mitigation measures (primarily monitoring and test screening) to be employed by a monitor during earth moving.
  2) The potential for fossil remains being uncovered by earth moving in particular areas of the site and the need to implement specific actions and additional mitigation measures when a fossil occurrence is uncovered by earth moving.
  3) Functions and responsibilities of the monitor when fossil remains are uncovered by earth moving and can be recovered without diverting the monitor from monitoring (temporarily divert earth moving around fossil site until remains evaluated, recovered, and earth moving allowed to proceed through site by monitor; if approved by construction contractor, enlist assistance of earth-moving equipment and operator to expedite recovery of remains, obviate need for additional personnel, and reduce any potential construction delay).
  4) Functions and responsibilities of the monitor when a fossil occurrence is uncovered by earth moving and is sufficiently large or productive that it cannot be recovered without diverting the monitor from monitoring.
     4a) Flag the site.
     4b) Advise construction contractor to avoid fossil site until further notice.
     4c) Call the Project Paleontologist or field supervisor to site.
  5) Functions and responsibilities of the Project Paleontologist or field supervisor when notified by the monitor that a large or productive fossil occurrence has been uncovered by earth moving and cannot be recovered without diverting the monitor from monitoring. Evaluate occurrence to determine if recovery is warranted.
     5a) If recovery is warranted, notify construction contractor and the Project developer of necessity for implementing additional mitigation measures specified in DC/TP initiating increased level of monitoring, if not already in effect, in immediate vicinity of fossil site and assigning additional personnel to PRIMP.

5b) Within 24 hours, mobilize recovery crew to recover occurrence; supervise recovery of occurrence and its transport to laboratory facility or to location elsewhere at site approved by construction contractor for initial/field processing of a fossiliferous rock sample or to laboratory facility for preparation of a fossil specimen.

5c) If warranted and approved by construction contractor, enlist assistance of the earth-moving equipment and operator to expedite recovery of occurrence.

5d) To obviate need for additional personnel and reduce any potential construction delay, after recovery of occurrence, have construction contractor allow earth moving to proceed through fossil site.

5e) Notify Project developer of recovery (or of decision not to recover fossil occurrence, if appropriate) and of authorization for earth moving to proceed through fossil site.

6) Responsibilities of the construction contractor and earth-moving equipment operators if fossil remains are uncovered by earth moving, particularly if a monitor is not present at the site when the remains are encountered.

6a) Avoid disturbance of fossil site by earth moving.

6b) Notify monitor, the Project Paleontologist or the field supervisor and Project developer of the fossil occurrence.

6c) Avoidance of fossil site by earth-moving activities.

6d) Assist with equipment and operator to expedite recovery of occurrence.

If warranted, the Project Paleontologist or field supervisor and a monitor shall give a similar presentation to the earth-moving equipment operators at one of their earliest safety meetings. The operators shall be instructed on recognizing fossil remains in the field, informed of their responsibilities if they observe fossil remains when the monitor is not present at the site (avoid disturbance of occurrence by earth moving; have construction contractor call monitor to fossil site; expedite recovery of occurrence, if requested), and advised that unauthorized collecting of fossil remains is illegal.

- Monitoring Earth Moving. Earth moving shall be monitored by a paleontologic monitor only in those areas of the site where earth moving will disturb soils greater than 5 feet deep (monitoring will not be conducted in areas in which soils will be buried, but not disturbed) and where paleontological resources have the potential to occur. Monitoring shall not be implemented until earth moving has reached a depth of 5 feet below current grade. Monitoring shall consist of visually inspecting freshly exposed rock and debris for larger fossil remains and periodically dry test screening a small (25 pound) sample of rock and debris with a 20-mesh box screen for smaller vertebrate fossil remains. Monitoring shall be conducted on a full-time basis. However, if too few or no fossil remains are uncovered by earth moving in areas underlain by a particular rock unit,

monitoring can be reduced, generally, to half or quarter time or suspended once 50% of earth moving in the area underlain by the rock unit has been completed. Alternatively, if sufficient fossil remains are uncovered by earth moving, monitoring may be increased in areas underlain by the fossil-bearing rock unit, at least in the immediate vicinity of the fossil site.

- Large-Specimen Evaluation and Recovery Option.

  1) If a large fossil specimen is found as a result of monitoring earth moving and the specimen can be recovered without significantly diverting the monitor from monitoring, earth moving shall be temporarily diverted around the fossil site and the specimen shall be evaluated, and, if warranted, excavated, covered with a protective plaster-impregnated burlap jacket, if required, and recovered.

     If necessary, earth-moving equipment and an operator shall be enlisted to expedite recovery of the specimen and obviate the need for additional personnel, and 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.

     At the end of the day the monitor or (following his next site inspection) the field supervisor shall transport the fossil remains and associated data to a laboratory facility for further treatment. If appropriate, samples of fossil wood will be submitted for carbon-14 dating analysis.

  2) If a fossil specimen is found and is sufficiently large that it cannot be recovered without significantly diverting the monitor from monitoring, 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 the Project Paleontologist or field supervisor shall be called to the site. The grading contractor will notify the Project developer and Project Paleontologist of the occurrence and of the avoidance of the site. The Project Paleontologist or field supervisor in turn shall evaluate the specimen to determine if recovery is warranted.

     2a) If specimen recovery is not warranted, no further action will be taken to preserve the fossil site or remains, and the construction contractor will be allowed to have earth moving proceed through the site immediately.

     2b) If specimen 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, initiating full-time monitoring, if not already in effect, at least in the 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 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.

  1) 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.

2) 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 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 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, 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 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.

- 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.

4.14.9 Significance of Impacts After Mitigation

Threshold a.: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.14-1 would ensure that a PRIMP is prepared prior to issuance of any grading permits that have the potential to affect subsurface paleontological resources. Implementation of a PRIMP would ensure that paleontological resources, if uncovered during site grading activities, are appropriately treated, and would reduce the Project's direct and cumulatively-considerable impacts to paleontological resources to less-than-significant levels.

4.15 POPULATION AND HOUSING

The following analysis discloses existing population and housing data from Riverside County and assesses the potential for impacts on population and housing associated with implementation of the Project. The analysis in this Subsection 4.15 is based on information contained in the Riverside County General Plan (Riverside County, 2021a) and addresses population and housing projections and requirements from the Southern California Association of Governments (SCAG). Refer to Section 7.0, *References*, for a complete list of reference sources.

4.15.1 EXISTING CONDITIONS

A. Existing Site Conditions

As previously shown on EIR Figures 2-7 and 2-8, under existing conditions 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.). Additionally, under existing conditions the southern 14.93 acres of the Project site primarily consists of undeveloped lands, with exception of several rural residential structures constructed in the northwestern and southwestern portions of this portion of the site. (Group Delta, 2022, Table 3)

As indicated in Section 2.0 of this EIR, the Project site is located in the Mead Valley Area Plan (MVAP) of the Riverside County General Plan. As previously depicted on EIR Figure 2-4, 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.).

B. Population Projections

The Project site is located within the Mead Valley community of unincorporated Riverside County. According to SCAG's 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy ("Connect SoCal"), and as shown in Table 4.15-1, *SCAG Region Projected 2020-2050 Growth Forecast*, in 2020 the SCAG region had a population of approximately 18,830,000 persons. The population within the SCAG region is expected to increase to 20,909,000 persons by 2050, reflecting a 11.0% increase in population over the 30-year period. Generally, the forecast anticipates higher rates of household growth in counties with a historical job surplus, recognizing that, like at the regional scale, a county experiences practical limits to employment growth without being able to house the working population. Notably, Riverside County, which has historically provided space to house workers whose jobs are elsewhere, is expected to have a slightly higher rate of job growth than household growth. (SCAG, 2024, Demographics and Growth Forecast Technical Appendix)

Table 4.15-1 SCAG Region Projected 2020-2050 Growth Forecast

	2020	2025	2030	2035	2040	2045	2050
Population	18,830,000	19,068,000	19,476,000	19,946,000	20,346,000	20,684,000	20,909,000

(SCAG, 2024, Demographics and Growth Forecast Technical Appendix, Table 12)

4.15.2 Applicable Regulatory Requirements

The following is a brief description of the federal, State, and local environmental laws and related regulations governing environmental topics related to population and housing.

A. Federal Plans, Policies, and Regulations

1. Fair Housing Act

The federal Fair Housing Act protects people from discrimination when they are renting or buying a home, getting a mortgage, seeking housing assistance, or engaging in other housing-related activities. Additional protections apply to federally-assisted housing. (HUD, n.d.)

2. U.S. Census Bureau

The U.S. Census Bureau is the leading source of statistical information about the nation's people. Population statistics come from decennial censuses, which count the entire U.S. population every ten years, along with several other surveys. The American Community Survey (ACS) is an ongoing annual survey intended to help communities decide where to target services and resources. Demographic surveys measure income, poverty, education, health insurance coverage, housing quality, crime victimization, computer usage, and many other subjects. Economic surveys are conducted monthly, quarterly, and yearly, and cover selected sectors of the nation's economy. (USCB, n.d.)

B. State and Regional Plans, Policies, and Regulations

1. State Housing Law

The State law regulating residential occupancies is entitled the "State Housing Law" and is found in Division 13, Part 1.5 of the California Health and Safety Code (HSC), Sections (§§) 17910 to 17998.3 Regulations implementing the State Housing Law mandate statewide residential building standards for new construction, which are found in the California Code of Regulations, Title 24, also referred to as the California Green Building Standards Code (CalGreen). (CA Legislative Info, n.d.38)

2. Southern California Association of Governments (SCAG)

SCAG determines regional housing needs and the share of the regional needs to be addressed by Riverside County and its constituent cities. SCAG is a Joint Powers Agency and is the designated Council of Governments (COG), Regional Transportation Planning Agency (RTPA), and Metropolitan Planning Organization (MPO) for the six-county region of Los Angeles, Orange, Ventura, San Bernardino, Riverside, and Imperial counties. SCAG's Regional Comprehensive Plan and Guide (RCPG) and Regional Housing

Needs Assessment (RHNA) are tools for coordinating regional planning and housing development strategies in southern California. (SCAG, n.d.1)

3. Regional Housing Needs Assessment (RHNA)

State Housing Law (California Government Code Article 10.6, §§ 65580-65590) mandates that local governments, through COGs, identify existing and future housing needs in a RHNA. The RHNA provides recommendations and guidelines to identify housing needs within counties and cities. The County of Riverside addresses its RHNA allocation through its General Plan Housing Element. The RHNA prepared by SCAG projects the County's share of regional housing need for 2021-2029 as 40,647 housing units. It should be noted that in May 2024, Riverside County published a draft update to its 2021-2029 Housing Element; however, the May 2024 version of the Housing Element has yet to be approved by the State Department of Housing and Community Development (HCD). However, it should be noted that the draft update to the Housing Element does not change the County's RHNA obligations through 2029, which would remain at 40,647 housing units. (SCAG, n.d.2; Riverside County, 2024)

4. Senate Bill 330 (Housing Crisis Act of 2019) and Senate Bill 8 (2021)

On October 9, 2019, California Governor Gavin Newsom signed the Housing Crisis Act of 2019 (HCA) into law, commonly known as Senate Bill (SB) 330 (Chapter 654, Statutes of 2019) to respond to the California housing crisis. On September 16, 2021, Gov. Newsom also signed SB 8 (Chapter 161, Statutes of 2021), which is an extension of the HCA. The HCA aims to increase residential unit development, protect existing housing inventory, and expedite permit processing, and applies only to "affected cities" and "affected counties." Under this legislation, municipal and county agencies are restricted in ordinances and polices that can be applied to residential development. For example, State law now prohibits a local agency from disapproving, or conditioning approval in a manner that renders infeasible, a housing development project for very low, low-, or moderate-income households or an emergency shelter unless the local agency makes specified written findings based on a preponderance of the evidence in the record. SB 330 requires a local agency that proposes to disapprove a housing development project that complies with applicable, objective general plan and zoning standards and criteria that were in effect at the time the application was deemed to be complete, or to approve it on the condition that it be developed at a lower density, to base its decision upon written findings supported by substantial evidence on the record that specified conditions exist, and places the burden of proof on the local agency to that effect. (CA Legislative Info, n.d.28)

5. SCAG Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal)

SCAG is a JPA under California State law, established as an association of local governments and agencies that convene as a forum to address regional issues. In April 2024, SCAG's Regional Council adopted *Connect SoCal (2024-2050 Regional Transportation Plan/Sustainable Communities Strategy*). Connect SoCal is intended to create a plan for defining and solving regional problems including housing, traffic, water, air quality, and other regional challenges. Connect SoCal builds upon the elements of existing local general plans and provides a blueprint for where and how the southern California area will grow. (SCAG, 2024)

C. *Local Plans, Policies, and Regulations*

1. Riverside County General Plan Housing Element

The 2021-2029 Housing Element identifies and establishes policies intended to fulfill the housing needs of existing and future residents in Riverside County. It establishes policies that guide County decision-making and set 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 Riverside 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. It should be noted that in May 2024, Riverside County published a draft update to its 2021-2029 Housing Element; however, the May 2024 version of the Housing Element has yet to be approved by the State Department of Housing and Community Development (HCD). (Riverside County, 2021a, pp. H1 to H-3; Riverside County, 2024)

4.15.3 Basis for Determining Significance

Section XIV of Appendix G to the California Environmental Quality Act (CEQA) Guidelines addresses typical adverse effects due to population and housing, and includes the following threshold questions to evaluate the Project's impacts due to population and housing:

- Would the Project induce substantial unplanned population growth in an area, either directly (for example by proposing new homes and businesses) or indirectly (for example, through the extension of infrastructure)?

- Would the Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

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

a. *Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere;*

b. *Create a demand for additional housing, particularly housing affordable to households earning 80% or less of the County's median income; or*

c. *Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).*

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 population and housing.

4.15.4 Impact Analysis

Threshold a.: ***Would the Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?***

Under existing conditions, the Project site is occupied by 26 single-family residential structures and one commercial structure, with the remaining portions of the site consisting of vacant land (Group Delta, 2022, p. 5). According to information provided by the Project Applicant, only 13 of the existing single-family residential structures are potentially occupied, while the remaining 13 residential structures on site are dilapidated and not suitable for occupation. Implementation of the proposed Project would result in the elimination of all of the existing structures on site, including the 26 single-family homes of which 13 are considered occupiable. According to Table E-2 of Appendix E to the Riverside County General Plan, the average household size within the MVAP area is 3.79 persons per household (pph). Accordingly, and conservatively assuming that all 26 dwelling units on site are occupied (even though 13 of the buildings are not suitable for occupation), implementation of the proposed Project would be expected to displace approximately 99 people from the Project site (26 households x 3.79 persons/household = 98.54 persons). (Riverside County, 2021a, Appendix E, Table E-2)

According to the Riverside County General Plan Housing Element, the County's Regional Housing Needs Assessment (RHNA) obligation, as determined by the Southern California Association of Governments (SCAG), is 40,647 dwelling units between 2021 and 2029 (inclusive of both affordable and less-affordable units) (Riverside County, 2021a, Table H-1). In May 2024, Riverside County published a draft update to its 2021-2029 Housing Element, but the May 2024 version of the Housing Element has yet to be approved by HCD (Riverside County, 2024). However, it should be noted that the draft update to the Housing Element does not change the County's RHNA obligations through 2029, which would remain at 40,647 housing units. Additionally, because the draft update to the Housing Element is subject to approval by HCD, the analysis herein relies on the currently-adopted version of the County's Housing Element. With the elimination of the 26 single-family homes on site as conservatively evaluated herein, the total number of dwelling units that would need to be accommodated by the County in order to meet its RHNA obligations would increase to 40,673 dwelling units. However, the Housing Background Report that was prepared for the currently-adopted version of the Housing Element and included as *Technical Appendix P* to the General Plan indicates that as of April 2021, there were a total of 60,423 approved (but not constructed) housing units within the unincorporated portions of Riverside County, while the Housing Background Report also notes that the County has the capacity for up to 17,016 dwelling units that are not currently approved, including the potential for 1,462 new dwelling units within the Mead Valley community (Riverside County, 2021a, Appendix P, Tables P-32 and P-33). As such, it can be concluded that the availability of approved housing units and future housing development within unincorporated Riverside County and the Mead Valley area would more than compensate for the loss of 26 dwelling units that would result from Project implementation.

There is a potential that new housing development within unincorporated Riverside County and/or within the Mead Valley community could result in significant environmental effects. However, it should be noted that

the 60,423 approved dwelling units within the County were previously reviewed in conformance with CEQA in conjunction with prior approvals for these developments, and construction of these dwelling units would be subject to compliance with the mitigation measures that were identified in the respective CEQA-compliance documents to reduce impacts to the environment to the maximum feasible extent. While there is a potential that significant environmental effects could occur with the future development of up to 17,016 dwelling units that have not yet been approved by the County, including the 1,462 dwelling units that could be constructed within the Mead Valley community, it is not possible to identify environmental impacts that may be associated with such future development until site-specific applications for development are filed with Riverside County, which would include a specific proposal and design for the proposed new housing. In the absence of such site-specific design proposals, an analysis of potential future environmental effects associated with such development would be too speculative for evaluation in this EIR (State CEQA Guidelines § 15145). Environmental effects of such new housing and any associated mitigation would be identified through a future CEQA process required in association with any future proposals for new housing developments within the County.

In addition, although the Project would result in the elimination of 26 dwelling units from the Project site, of which only 13 of the 26 dwelling units are occupiable, the proposed Project would not be subject to the provisions of SB 330. SB 330 generally prohibits "Affected Cities" and "Affected Counties" from undertaking zone changes that would result in a reduction or elimination of residential density. However, based on a list of "Affected Counties" compiled by the California Department of Housing and Community Development (HCD), the only portions of unincorporated Riverside County that meet the definition of "Affected County" are the Bermuda Dunes and Coronita, and the Project site is not located within the Bermuda Dunes or Coronita portions of the County (HCD, n.d.). Accordingly, the proposed Project is not subject to the provisions of SB 330, and therefore the Project's anticipated reduction in residential density on site would not conflict with the provisions of SB 330.

Accordingly, based on the preceding analysis, while the Project would conservatively displace up to 99 persons from the Project site, potentially requiring the construction of replacement housing elsewhere, 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 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. Therefore, the Project would not result in or require construction of unplanned replacement housing units, and impacts would be less than significant.

Threshold b.: ***Would the Project create a demand for additional housing, particularly housing affordable to households earning 80% or less of the County's median income?***

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)." Under these zoning classifications, the minimum lot size within the northeast portion of the Project site is 0.5-acre, while the minimum lot size for the remaining portions of the site is 1.0 acre. As affordable housing is most often associated with higher residential densities,

it can be concluded that the Project site is not targeted for development with affordable housing by the General Plan or General Plan Housing Element.

Notwithstanding, implementation of the proposed Project would result in the demolition of approximately 26 single-family homes on site, and the construction and long-term operation of a 1,003,510 s.f. warehouse building and a 13.33-net-acre park. While it is anticipated that the park only would generate a nominal increase in the County's population, demolition of the existing 26 single-family structures would displace approximately 99 people from the Project site (26 households x 3.79 persons/household = 98.54 persons). (Riverside County, 2021a, Appendix E, Table E-2). Additionally, the development of 1,003,510 s.f. warehouse uses would generate approximately 974 new, recurring jobs (1,003,510 s.f. ÷ 1,030 s.f./employee = 974.3 employees) (Riverside County, 2021a, Appendix E, Table E-5). Thus, and assuming that all of the jobs that would be generated by the Project would represent new residents of the County, which for the reasons noted below would be a highly conservative assumption, the Project would generate a demand for approximately 257 new dwelling units within the County (974 persons ÷ 3.79 persons/household = 256.99 households). 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 (257 new dwelling units + 26 replacement dwelling units = 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 (Riverside County, 2021a, p. LU-27). 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 the 283 dwelling units noted above.

Furthermore, the Riverside County General Plan designates areas of the County in which lower-income housing can be accommodated to meet the County's RHNA obligations, and the analysis of Threshold a., above, demonstrates that with implementation of the Project the County still would be able to meet its 2021-2029 RHNA obligations. Specifically, as noted in the analysis of Threshold a., *Technical Appendix P* to the General Plan indicates that as of April 2021, there were a total of 60,423 approved (but not constructed) housing units within the unincorporated portions of Riverside County, while the Housing Background Report also notes that the County has the capacity for up to 17,016 dwelling units that are not currently approved, including the potential for 1,462 new dwelling units within the Mead Valley community (Riverside County, 2021a, Appendix P, Tables P-32 and P-33). The 60,423 dwelling units within the County that have been fully entitled and that were previously evaluated under CEQA 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.

As also noted under the analysis of Threshold a., while there is a potential that significant environmental effects could occur with the future development of up to 17,016 dwelling units that have not yet been approved by the

County, including the 1,462 dwelling units that could be constructed within the Mead Valley community, it is not possible to identify environmental impacts that may be associated with such future development until site-specific applications for development are filed with Riverside County, which would include a specific proposal and design for the proposed new housing. In the absence of such site-specific design proposals, an analysis of potential future environmental effects associated with such development would be too speculative for evaluation in this EIR (CEQA Guidelines § 15145). Environmental effects of such new housing and any associated mitigation would be identified through a future CEQA process required in association with any future proposals for new housing developments within the County.

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 significant requiring no mitigation.

Threshold c.: ***Would the Project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?***

Implementation of the proposed Project would result in the demolition of 26 existing single-family homes on site along with their associated out structures, and would result in the development of the Project site with a warehouse building containing 1,003,510 s.f. of floor area and a 13.33-net-acre public park. While it is anticipated that the park only would generate a nominal increase in the County's population, demolition of the existing 26 single-family structures would displace approximately 99 people from the Project site (26 households x 3.79 persons/household = 98.54 persons) (Riverside County, 2021a, Appendix E, Table E-2). In addition, the development of 1,003,510 s.f. warehouse uses would generate approximately 974 new, recurring jobs (1,003,510 s.f. ÷ 1,030 s.f./employee = 974.3 employees) (Riverside County, 2021a, Appendix E, Table E-5). Thus, in total, 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 (Riverside County, 2021a, p. LU-27). 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. Furthermore, the Project's proposed roadway and other infrastructure (e.g., water, sewer, etc.) improvements have been designed and sized to serve the proposed 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.

4.15.5 CUMULATIVE IMPACT ANALYSIS

For purposes of analysis, the cumulative study area for the issue of population and housing encompasses western Riverside County as well as the various cities within western Riverside County. This study area is appropriate because growth in the region is largely controlled by the Riverside County General Plan and the general plans of the various cities within the County.

As indicated under the analysis of Threshold a., implementation of the proposed Project would result in the demolition of 26 existing single-family homes on site, which would displace up to 99 persons and potentially could contribute to the need for new housing within the County. 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, the General Plan Housing Element and associated Housing Background Report note that there are 60,423 approved dwelling units within the County that were previously reviewed in conformance with CEQA in conjunction with prior approvals for these developments, as well as an additional 17,016 dwelling units that have not yet been approved by the County, including 1,462 dwelling units that could be constructed within the Mead Valley community. Thus, while the Project would result in the demolition of 26 existing single-family homes on site, and even when considered in the context of cumulative development, the approved 60,423 dwelling units would be more than adequate to off-set the Project's displacement of 26 existing dwelling units. Therefore, cumulatively-considerable physical impacts to the environment associated with the Project's demand for additional housing would be less than significant or would be reduced the maximum feasible extent with implementation of the mitigation measures identified in the previously-certified CEQA documents adopted in conjunction with the County's prior approvals for the 60,423 dwelling units that are described by the Housing Element and General Plan *Technical Appendix P*.

As discussed under the analysis of 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. Assuming that all of the jobs that would be generated by the Project would represent new residents of the County, and 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 the 283 dwelling units noted above. In addition, *Technical Appendix P* to the General Plan indicates that as of April 2021, there were a total of 60,423 approved (but not constructed) housing units within the unincorporated portions of Riverside County, while the Housing Background Report also notes that the County has the capacity for up to 17,016 dwelling units that are not currently approved, including the potential for 1,462 new dwelling units within the Mead Valley community (Riverside County, 2021a, Appendix P, Tables P-32 and P-33). Even when considered in the context of cumulative development, the 60,423 approved dwelling units within the County 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.

As indicated under the analysis of Threshold c., implementation of the proposed Project would result in the demolition of 26 existing single-family homes on site along with their associated out structures, and would result in the development of the Project site with a warehouse building containing 1,003,510 s.f. of floor area and a 13.33-net-acre public park. In total, the Project would result in an increase in the number of people on the Project site by approximately 875 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 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, even when considered in the context of cumulative development, 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. 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 induce substantial unplanned population growth in the area, either directly or indirectly, and cumulatively-considerable impacts would be less than significant.

4.15.6 Significance of Impacts Before Mitigation

Threshold a: Less-than-Significant Impact. The Project would demolish 26 existing dwelling units on site, of which only 13 are considered occupiable structures, and would conservatively 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 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: Less-than-Significant Impact. 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 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: Less-than-Significant Impact. 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 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

This Subsection 4.16 provides information on existing public services and service levels for fire protection, police protection, schools, libraries, and public health facilities, and evaluates impacts to the physical environment that may result from the demand the Project may have on such services.

4.16.1 EXISTING CONDITIONS

A. Fire Protection/Emergency Medical Services

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 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 Riverside County Fire Department Station 59 (Mead Valley), located at 21510 Pinewood Street, Perris, or approximately 2.0 roadway miles west of the Project site. The Project site also could be served by Riverside County Fire Department Station 90 (North Perris City), located at 333 Placentia Avenue, Perris, or approximately 3.7 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.

B. Sheriff Services

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 4.0 miles southeast of the Project site (Google Earth, 2024). 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.

Unincorporated Riverside County has set a minimum standard of 1.0 deputy per 1,000 residents. This standard was adopted as part of the "Commitment to Public Safety and Citizens' Option for Public Safety," by the Board of Supervisors on September 17, 1996. The Sheriff's Department has indicated that their desired staffing level is 1.2 deputies per 1,000 residents. Mitigation Measure 4.15.C of EIR No. 441, which was prepared for the

County's 2003 General Plan, establishes a standard of 1.5 sworn peace officers per 1,000 population (Riverside County, 2015a, p. 4.17-30).

C. Schools

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 (Google Earth, 2024). As of the 2017/2018 school year, 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.).

D. Libraries

The Project site is located within the Riverside County Public Library System (RCPLS) service area. The County of Riverside operates a system of 35 libraries and two book mobiles (one serving Coachella Valley and one serving western Riverside County) to serve unincorporated populations. In addition, the Riverside County Library System operates an automated network that currently deploys over 350 computer/terminal workstations in the library branches of the Riverside County Library System, Riverside Public Library, Moreno Valley Library, Murrieta Public Library, Murrieta Valley High School and College of the Desert. The network can also be accessed by Riverside County residents via the internet. The library system manages the library catalog of the 1.3 million items in the library system and the annual checkout of over 3.5 million books, audios, and videos. (Riverside County, 2015a, pp. 4.17-65 and 4.17-66)

The Riverside County library system does not maintain a specific numerical factor to analyze the needs created by new development. However, the American Library Association suggests that an appropriate service criterion would be availability of convenient library facilities and book reserves at a rate of 0.5 square foot of library space and 2.5 volumes per capita. The County's ability to support the needs of future growth is dependent upon its ability to secure sites for, construct and stock new libraries on a timely basis. As of 2015, there was no specific funding mechanism for expansion of library facilities. Based on 2010 reported registered borrowers (681,117) and the square footage of library facilities available (333,884), as of 2015 facilities provided approximately 0.49 square feet of space per registered borrower (not the Riverside County population as a whole). (Riverside County, 2015a, p. 4.17-66)

E. Health Services

Public health services in Riverside County are provided by the County Department of Public Health. However, most health services are provided by the private sector. The nearest medical facilities to the Project site offering hospital services are the Kindred Hospital Riverside, located at 2224 Medical Center Drive in the City of Perris, approximately 2.9 miles southeast of the Project site; and the Riverside County Regional Medical Center, located at 26520 Cactus Avenue in the city of Moreno Valley, approximately 6.4 miles northeast of the Project site (Google Earth, 2024).

4.16.2 Applicable Environmental Regulations

The following is a brief description of the federal, state, and local environmental laws and related regulations related to public services.

A. State Regulations

1. Fire Protection Services Regulations and Plans

- Public Resources Code (PRC) Sections (§§) 4290-4299

These sections establish minimum statewide fire safety provisions pertaining to roads for fire equipment access; signs identifying streets, roads, and buildings; minimum private water supply reserves for emergency fire use; and fire fuel breaks and greenbelts. With certain exceptions, all new construction after July 1, 1991, in potential wildland fire areas, is required to meet these statewide standards. The state requirements, however, do not supersede more restrictive local regulations. (CA Legislative Info, n.d.13)

As defined by CalFire, wildland areas defined as State Responsibility Areas (SRAs) may contain substantial wildfire risks and hazards. They consist of lands exclusive of cities, and federal lands regardless of ownership. The primary financial responsibility for preventing and suppressing fires within wildlands belongs to the State of California. However, it is not the State of California's responsibility to provide fire protection services to buildings or structures located within the wildlands unless CalFire has entered into a cooperative agreement with a local agency for those purposes pursuant to PRC § 4142. As such, wildland areas require disclosure of these fire hazards in real estate transactions, and owners of properties in wildland areas are subject to PRC § 4291 maintenance requirements. The law requires CalFire every five years (1991, 1996, 2001, etc.) to provide maps identifying the boundaries of lands classified as SRAs to the Riverside County Assessor. (CA Legislative Info, n.d.13)

- PRC §§ 4102 and 4127 - State Responsibility Areas (SRAs)

PRC § 4102 specifies that "State responsibility areas" means areas of the state in which the financial responsibility of preventing and suppressing fires has been determined by the [State Fire] Board pursuant to Section 4125, to be primarily the responsibility of the state." These areas may contain state or privately-owned forest, watershed, and rangeland. §§ 4126-4127 of the PRC further specify the standards that define what does and does not constitute an SRA. (CA Legislative Info, n.d.15)

- California Code of Regulations (CCR) Title 24, Parts 2 and 9 – Fire Codes

Part 2 of Title 24 of the CCR refers to the California Building Code which contains complete regulations and general construction building standards of State of California adopting agencies, including administrative, fire and life safety and field inspection provisions. Part 2 was updated in 2008 to reflect changes in the base document from the Uniform Building Code to the International Building Code. Part 9 refers to the California Fire Code, which contains other fire safety-related building standards. In particular, Chapter 7A, "Materials and Construction Methods for Exterior Wildfire Exposure," in the 2010 California Building Code addresses

fire safety standards for new construction and Section 701A.3.2 addresses "New Buildings Located in Any Fire Hazard Severity Zone." (CBSC, 2022)

❑ CCR Title 14 – Natural Resources

These regulations constitute the basic wildland fire protection standards of the California Board of Forestry. They were prepared and adopted to establish minimum wildfire protection standards in conjunction with building, construction, and development within SRAs. Among other things, Title 14 requires the design and construction of structures, subdivisions, and developments in an SRA provide for basic emergency access and perimeter wildfire protection measures (fire fuel modification zones, etc.). (CCR, n.d.2)

❑ California Government Code (CGC) §§ 51178-51179 – Very High Fire Hazard Severity Zones

CGC § 51178 specifies that the Director of CalFire, in cooperation with local fire authorities, must identify areas that are Very High Fire Hazard Severity Zones (VHFHSZs) in Local Responsibility Areas (LRAs), based on consistent statewide criteria and the expected severity of fire hazard. It further specifies that VHFHSZs "shall be based on fuel loading, slope, fire weather and other relevant factors," including areas subject to Santa Ana winds which are a "major cause of wildfire spread." § 51179 states that a local agency (such as a county) must also designate (and map) the VHFHSZs in its jurisdiction by ordinance. (See the discussion on Ordinance No. 787, below, regarding Riverside County's VHFHSZs). Other portions of the CGC outline when a local agency may use its discretion to exclude areas from VHFHSZ requirements or add areas not designated by the State of California to its VHFHSZ areas. (CA Legislative Info, n.d.16)

❑ CGC § 51182 – Defensible Space

Pursuant to this code, a person who "owns, leases, controls, operates or maintains an occupied dwelling or occupied structure in, upon or adjoining a mountainous area, forest-covered land, brush-covered land, grass-covered land or land that is covered with flammable material" in a very high fire hazard severity zone designated by the local agency pursuant to § 51179, shall at all times maintain a specified amount of "defensible space" to protect structures in high fire hazard areas. (CA Legislative Info, n.d.17)

❑ PRC § 4213 - Fire Prevention Fees

Pursuant to PRC § 4213, in July of 2011, the State of California began assessing an annual "Fire Prevention Fee" for all habitable structures within the State's Responsibility Area (SRA) to pay for fire prevention services. The SRA is the portion of the state where the State of California is financially responsible for the prevention and suppression of wildfires. The SRA does not include lands within incorporated city boundaries, Tribal or federally owned land. As a result of Assembly Bill (AB) 398, California Global Warming Solutions Act of 2006, the fire prevention fee was suspended as of July 1, 2017. (CCR, n.d.3)

2. School Services Regulations and Plans

❑ Assembly Bill (AB) 16

In 2002, AB 16 created the Critically Overcrowded School Facilities program, which supplements the new construction provisions within the School Facilities Program (SFP). The SFP provides State of California

funding assistance for new facility construction projects and modernization projects. The Critically Overcrowded School Facilities program allows school districts with critically overcrowded school facilities, as determined by the California Department of Education (CDE), to apply for new construction projects in advance of meeting all SFP new construction program requirements. Districts with SFP new construction eligibility and school sites included on a CDE list of source schools may apply. (CA Legislative Info, n.d.19)

❑ Leroy F. Greene School Facilities Act of 1998 (Senate Bill [SB] 50)

Senate Bill 50 (SB 50) was enacted by the State Legislature in 1998, which amended existing state law governing school fees. In particular, SB 50 amended prior CGC § 65995(a) to prohibit state or local agencies from imposing school impact mitigation fees, dedications, or other requirements in excess of those provided in the statute in connection with "any legislative or adjudicative act...by any state or local agency involving...the planning, use, or development of real property...." (CA Legislative Info, n.d.20)

The legislation also amended CGC § 65996(b) to prohibit local agencies from using the inadequacy of school facilities as a basis for denying or conditioning approvals of any "legislative or adjudicative act [involving] the planning, use or development of real property." Further, SB 50 established the base amount of allowable developer fees: $1.93 per square foot for residential construction and $0.31 per square foot for commercial. These base amounts are commonly called "Level 1 fees" and are the same caps that were in place at the time SB 50 was enacted. Level 1 fees are subject to inflation adjustment every two years. (CA Legislative Info, n.d.20)

In certain circumstances, for residential construction, school districts can impose fees that are higher than Level 1 fees. School districts can impose Level 2 fees, which are equal to 50% of land and construction costs if they: (1) prepare and adopt a school needs analysis for facilities; (2) are determined by the State Allocation Board to be eligible to impose these fees; and (3) meet at least two of the following four conditions: (CA Legislative Info, n.d.20)

- At least 30% of the district's students are on a multi-track year-round schedule.
- The district has placed on the ballot within the previous four years a local school bond that received at least 50% of the votes cast.
- The district has passed bonds equal to 30% of its bonding capacity.
- Or, at least 20% of the district's teaching stations are relocatable classrooms.

Additionally, if the State of California's bond funds are exhausted, a school district that is eligible to impose Level 2 fees is authorized to impose even higher fees. Commonly referred to as "Level 3 fees," these fees are equal to 100% of land and construction costs of new schools required as a result of new developments. (CA Legislative Info, n.d.20)

B. Local Regulations

1. Ordinance No. 787 - Fire Code Standards

This ordinance addresses implementation of the California Fire Code, based on the International Code Council. The codes prescribe performance characteristics and materials to be used to achieve acceptable levels of fire protection and include the wildland-urban interface (WUI) fire area building standards mentioned above. Collectively, the ordinance establishes the requirements and standards for fire hazard reduction regulations within Riverside County (including additions and deletions to the California Fire Code) to fully protect the health, safety and welfare of existing and future residents and workers of Riverside County. (Riverside County, 2015a, p. 4.13-49)

Among other things, this ordinance assures that structural and nonstructural architectural elements of the building do not: a) impede emergency egress for fire safety staffing/ personnel, equipment, and apparatus; nor b) hinder evacuation from fire, including potential blockage of stairways or fire doors. In addition, for the purposes of CFC implementation, the ordinance also adds a statement noting: "In accordance with Government Code sections 51175 through 51189, Very High Fire Hazard Severity Zones are designated as shown on a map titled Very High Fire Hazard Severity Zones, dated April 8, 2010, and retained on file at the office of the Fire Chief and supersedes other maps previously adopted by Riverside County designating high fire hazard areas." It also defines a "hazardous fire area" as: "Private or public land not designated as state or local fire hazard severity zone (FHSZ) which is covered with grass, grain, brush or forest and situated in a location that makes suppression difficult resulting in great damage. Such areas are designated on Hazardous Fire Area maps filed with the office of the Fire Chief." (Riverside County, 2015a, p. 4.13-49)

Included in Riverside County Ordinance No. 787 are the California Fire Code, Part 4, Appendix B, for establishing fire flow, duration and pressure requirements for fire flow. The requirements are based on building size, type, materials, purpose, location, proximity to other structures and the type of fire suppression systems installed. The various water districts in Riverside County are required to test fire protection capability for the various land uses per the flow requirements of the Fire Code. In addition, areas of Riverside County not served by water districts are required to meet similar requirements as outlined in PRC Sections 4290-4299. (Riverside County, 2015a, p. 4.13-49)

2. Riverside County Ordinance No. 659 (Establishing a Development Impact Fee Program)

Riverside County Ordinance No. 659 (Establishing a Development Impact Fee Program) requires that new development pay Development Impact Fees (DIF) to ensure that certain facility obligations are met in order to reasonably serve the subject development. 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, p. 4.2-26)

4.16.3 Basis for Determining Significance

Section XV of Appendix G to the State CEQA Guidelines addresses typical adverse effects to public services, and includes the following threshold question to evaluate the Project's impacts to public services:

- *Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental, impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:*
  - *Fire protection?*
  - *Police protection?*
  - *Schools?*
  - *Parks?*
  - *Other public facilities?*

Significance thresholds are set forth in Riverside County's Environmental Assessment Checklist, and have been updated to reflect the 2018 updates to Section XV of Appendix G to the State CEQA Guidelines (listed above). Accordingly, the following threshold questions are used to evaluate the Project's impacts to public services:

a. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection facilities?*

b. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered sheriff facilities or the need for new or physically altered sheriff facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for sheriff services?*

c. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities or the need for new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for school services?*

d. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities or the need for new or physically altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for library services?*

e. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered health care facilities or the need for new or physically altered health care facilities, the construction of which could cause significant environmental impacts, in order to*

maintain acceptable service ratios, response times or other performance objectives for health care services?

The significance thresholds set forth in Riverside County's Environmental Assessment Checklist, as modified/updated per the 2018 updates to the State CEQA Guidelines, were used to evaluate the significance of the proposed Project's impacts on public services.

4.16.4 IMPACT ANALYSIS

Threshold a.: ***Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection facilities?***

The Project would entail development of the 64.97-acre Project site with up to 1,003,510 s.f. of warehouse building area and a 13.33 net-acre park. The Project would generate approximately 974 employees (as discussed in EIR subsection3.6.2.A). A nominal number of employees also would be generated by the proposed public park site due to maintenance activities at the park. The Project also would result in the demolition of 26 existing single-family residential structures on site, which would be expected to displace approximately 99 people from the Project site. As such, the Project would result in a net increase of 875 persons on site as compared to existing conditions. Notwithstanding, the Project would place additional demand on the Riverside County Fire Department (RCFD), which provides fire protection services in the Project area. Implementation of the Project would cumulatively affect the Department's ability to service the planned population. The Project would require an "Urban-Category II" level of service as defined by the Riverside County Fire Protection Master Plan. This classification requires a fire station be within three roadway miles of the Project site, and a full first alarm assignment team operating on the scene within 15 minutes of dispatch. The fire station that would serve the Project is Station 59 (Mead Valley), which is located approximately 2.0 roadway miles west of the Project site. The Project also could be served by Station 90 (North Perris City), which is located approximately 3.7 roadway miles southeast of the Project site. (Google Earth, 2021) Thus, the Project site is located within 3.0 roadway miles of the nearest fire station, and a full first alarm assignment team could operate on site within 15 minutes of dispatch. Thus, the RCFD would be able to meet the Urban-Category II Land Use protection goals of the Fire Protection Master Plan for the Project.

As a condition of Project approval, the proposed Project would be required to conform to all mandatory local, State, and federal laws, ordinances, and standards relating to fire safety. Among other items, these requirements include conformance with Chapter 7A of the California Building Code, which requires that all buildings be constructed with fire retardant roofing material. The access routes in the local area would be required to be maintained throughout construction and buildout of the Project. Additionally, the Project would be subject to the fire code standards established as part of Riverside County Ordinance No. 787 (Fire Code Standards). The Project's proposed building is required by law to include fire sprinklers. Based on the building type, it is highly likely that the building would be equipped with an Early Suppression, Fast Response (ESFR) fire sprinkler system. ESFR systems incorporate high volume, high-pressure sprinkler heads to provide necessary fire protection. While most other sprinkler systems are intended to control the growth of a fire, an ESFR sprinkler

system is designed to suppress a fire. To suppress a fire does not necessarily mean that the system will extinguish the fire but rather it is meant to "knock" the fire back down to its original point of origin. ESFR systems provide buildings with a high margin of fire safety and also allow more time for emergency responders to reach a fire incident before a fire spreads from its point of origin.

Development of the proposed Project nonetheless would impact fire services by placing an additional demand on existing RCFD resources and personnel. As set forth by the Riverside County Fire Protection Master Plan, a new fire station and/or appropriate fire company is required for the development of 2,000 dwelling units or more, or for development of more than 3.0 million square feet of industrial or commercial uses. The Project proposes the development of a 1,003,510 s.f. warehouse building, which is well below the 3.0 million s.f. Riverside County Fire Protection Master Plan standard. Additionally, the Project does not propose the development of any dwelling units and in actuality would result in the demolition of the 26 existing dwelling units on the Project site. Accordingly, based on the Riverside County Fire Protection Master Plan standards, implementation of the Project would not directly result in the need for a new fire station in the local area. Moreover, the Riverside County Fire Department Station 59 was constructed in 2006 to serve the Project area and would be able to provide fire protection services to the Project site without the need for new or expanded fire protection facilities.

Additionally, the Project is required to adhere to Riverside County Ordinance No. 659, which requires payment of a Development Impact Fee (DIF) to assist the County in providing fire protection facilities, including fire stations. Payment of the DIF fee would ensure that funds are available for capital improvements, such as land/equipment purchases and fire station construction. Accordingly, Project-related impacts to fire protection services are evaluated as less than significant and no mitigation beyond payment of DIF fees would be required.

Threshold b.:	***Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered sheriff facilities or the need for new or physically altered sheriff facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for sheriff services?***

The Project would entail development of the 64.97-acre Project site with up to 1,003,510 s.f. of warehouse building area and a 13.33 net-acre park. The Project would generate approximately 974 employees (as discussed in EIR subsection 6.6.2.B). A nominal number of employees also would be generated by the proposed public park site due to maintenance activities at the park. The Project also would result in the demolition of 26 existing single-family residential structures on site, which would be expected to displace approximately 99 people from the Project site. As such, the Project would result in a net increase of 875 persons on site as compared to existing conditions.

Development of the property and the introduction of a new warehouse building and public park on site could result in an incremental increase in criminal activity such as burglaries, thefts, auto thefts, vandalism, etc. However, according to the RCSD, there is not a direct correlation between population growth, the number of crimes committed, and the number of RCSD personnel needed to respond to these increases. As the population and use of an area increases, however, additional financing of equipment and manpower needs are required to

meet the increased demand. The proposed Project would result in an increase in the cumulative demand for services from the RCSD, which provides police protection services to the Project site. Specifically, the Project would generate a demand for up to approximately two new sworn officers (875 net increase persons on site x 1.5 officers/1,000 population = 1.31 officers), based on the 1.5 per 1,000 population service standard (Riverside County, 2015a, Table 4.17-H). Staff necessary to support the additional deputy would include an appropriate level of civilian, investigation, and supervisory personnel. The proposed Project would not, however, in and of itself result in the need for new or expanded sheriff facilities to accommodate new personnel.

The Project is required to adhere to Riverside County Ordinance No. 659, which requires payment of a DIF to assist the County in providing sheriff protection services, including new or expanded facilities. Payment of the DIF fee would ensure that funds are available for capital improvements, such as land/equipment purchases and sheriff facilities construction. Accordingly, Project-related impacts to sheriff protection services are evaluated as less than significant and no mitigation beyond payment of DIF fees would be required.

Therefore, implementation of the Project would not result in the need for new or expanded sheriff facilities, and impacts would be less than significant. The Project's incremental demand for sheriff protection services also would be less than significant because the Project would be required to contribute DIF fees. Accordingly, a less-than-significant impact would occur with respect to sheriff protection services or facilities as a result of implementation of the proposed Project.

Threshold c.: ***Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities or the need for new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for school services?***

As previously indicated, The Project would entail development of the 64.97-acre Project site with up to 1,003,510 s.f. of warehouse building area and a 13.33 net-acre park. The Project would generate approximately 974 employees (as discussed in EIR subsection 6.6.2.B). A nominal number of employees also would be generated by the proposed public park site due to maintenance activities at the park. However, the Project's land uses would not directly generate a student population. The Project also would result in the demolition of 26 existing single-family residential structures on site, which would be expected to displace approximately 99 people from the Project site. As such, the Project would result in a net increase of 875 persons on site as compared to existing conditions.

Based on the Project's proposed warehouse and park uses, the Project would not result in a direct demand for new or expanded school services in the local area. Notwithstanding, the Project would employ residents currently living in or moving to the area, which could place additional demand on school facilities in the surrounding areas. Although the VVUSD may need to construct new school facilities to meet the growing demand within this portion of unincorporated Riverside County, there are no current publicly-available plans detailing where such facilities would be built. The Project would not directly cause or contribute to the need for new or expanded school facilities, and 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 a

new 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 payment of school impact fees as discussed below.

Although it is not possible to identify physical environmental effects that may result from new or expanded school facilities, the Project Applicant would be required to contribute fees to the VVUSD in accordance with Riverside County Ordinance No. 575. Pursuant to the Leroy F. Greene School Facilities Act of 1998, payment of school impact fees constitutes full and complete mitigation for Project-related impacts to school services. Although the Project would not result in a direct increase in demand for school services, mandatory payment of school impact fees still would be required and would ensure that the Project's impacts to school facilities and services would be less than significant. Accordingly, impacts would be less than significant and no mitigation beyond payment of fees would be required.

Threshold d.: ***Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities or the need for new or physically altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for library services?***

The Project would entail development of the Project site with a proposed 1,003,510 s.f. warehouse building, which would accommodate approximately 974 employees. The Project also includes construction of a public park. A nominal number of employees also would be generated by the proposed public park site due to maintenance activities at the park. The Project also would result in the demolition of 26 existing single-family residential structures on site, which would be expected to displace approximately 99 people from the Project site. As such, the Project would result in a net increase of 875 persons on site as compared to existing conditions. However, land uses proposed as part of the Project would not result in a direct increase in the County's population.

Although use of the internet has resulted in decreased demand being placed on library services nationwide, the County continues to maintain its standards for book titles and library square footage. Library services in Riverside County are provided by the RCPLS. Buildout of the Project would result in a net increase of 875 persons on site. Assuming that all of the jobs produced by the Project would consist of new residents within the County, in order to attain the RCPLS level of service standard of 2.5 titles-per-capita, the Project-generated net increase in persons on site would require an additional 2,188 titles (2.5 titles-per-capita x 875 persons on site = 2,188 titles). To attain the RCPLS standard of 0.5 s.f. of library space per capita, the Project would create the demand for 438 s.f. of additional library space (0.5 s.f. of library space per capita x 875 persons on site = 437.5 s.f.). However, these estimates are conservative in nature because the majority of jobs 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. Thus, the Project's impacts to the local library system likely would be substantially less than described above. (Riverside County, 2015a, Table 4.17-W)

The provision of additional library space would be addressed through the County's compliance with the adopted level of service standards. Additionally, mandatory compliance with Riverside County Ordinance No. 659 would require the payment of impact fees. These fees would provide funding for library books and library expansion projects. Although new library facilities may be under consideration by the RCPLS in the Project area, it is not possible to identify environmental impacts that may be associated with the development of any new library facilities until a specific proposal and design for the facility is prepared by the RCPLS. Accordingly, impacts due to the construction of new or expanded library facilities are too speculative for evaluation in this EIR (CEQA Guidelines, 14 CCR § 15145). Environmental effects of such library facilities and any associated mitigation would be identified through a future CEQA process required in association with any future proposals for new or expanded library facilities. Any mitigation measures required for new or expanded library facilities could be funded, in part, from property taxes, including increased property taxes resulting from buildout of the Project site. As such, Project impacts to library facilities and resources are evaluated as less than significant.

Threshold e.: ***Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered health care facilities or the need for new or physically altered health care facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for health care services?***

The nearest medical facility to the Project site is the Kindred Hospital Riverside, located at 2224 Medical Center Drive in the City of Perris, approximately 2.9 miles southeast of the Project site. The Project would result in a net increase of approximately 875 persons on site, the majority of which are anticipated to be existing County residents. Using a 1.9 hospital beds per 1,000 persons generation factor, and conservatively assuming the Project-generated net increase of persons on site would consist of new residents within the County, the Project would generate the need for approximately 2 new hospital beds (875 x 1.9 ÷ 1,000 = 1.66) (Riverside County, 2015a, Table 4.17-AA, p.4.17-79). However, as most of the future jobs on the Project site would be filled by existing County residents, the Project's conservatively estimated demand for health care services and hospital beds would not represent a new demand for such resources within the County.

The provision of private health care is largely based on economic factors and demand and is beyond the scope of analysis required for this EIR. However, EIR No. 521 concluded impacts associated with buildout of the Riverside County General Plan would be less than significant, and further notes that: "compliance with…existing General Plan policy and existing Mitigation Measures 4.15.7A and 4.15.7B from EIR No. 441, would further reduce or avoid the insignificant impacts…" (Riverside County, 2015a, p. 4.17-82). Mitigation Measure 4.15.7A requires the County to perform periodic medical needs assessments to evaluate the current medical demand and level of medical service provided within each area plan every three years. Mitigation Measure 4.15.7B requires the County to fund the new construction and/or expansion of existing medical facilities according to the level of demand for medical services based on the needs assessment required as part of Mitigation Measure 4.15.7A. Furthermore, mandatory compliance with County Ordinance No. 659 requires a DIF payment to the County that is partially allocated to public health services and facilities. While new or expanded health care facilities may ultimately be needed within the County due to the anticipated growth in

population, it is not possible to identify environmental impacts that may be associated with the development of any new health care facilities until a specific proposal and design for the facility is prepared. Accordingly, impacts due to the construction of new or expanded health care facilities are too speculative for evaluation in this EIR (CEQA Guidelines § 15145). As such, impacts to public medical facilities and resources associated with the proposed Project would be less than significant.

4.16.5 Cumulative Impact Analysis

The cumulative study area for public services encompasses the service area of the RCFD, RCSD, VVUSD, and/or RCPLS, and assumes full buildout of the general plans for jurisdictions within these service areas.

Although the proposed Project would be adequately served by fire protection services based on the proximity and response times estimated from nearby fire station facilities, the Project would nonetheless result in an incremental increase in requests for service, which would affect the fire department's ability to provide acceptable levels of service. These impacts include an increased number of emergency and public service calls due to the increased presence of structures, increased traffic volumes, and increased population. When considered in the context of on-going cumulative development throughout western Riverside County, such impacts would be cumulatively considerable. However, the proposed Project and all cumulative developments within unincorporated Riverside County would be required to contribute DIF fees pursuant to County Ordinance No. 659. Mandatory DIF fee contributions by the Project and cumulative developments would ensure that adequate funding is provided to the RCFD for the acquisition of additional facilities, equipment, and personnel. Accordingly, the proposed Project's impact to the RCFD is evaluated as less-than-cumulatively considerable.

Although the Project site would be adequately served by sheriff facilities, the increased population that would be generated by the Project, when considered in conjunction with other on-going development throughout western Riverside County, has the potential to adversely affect service response times. However, the proposed Project and all cumulative developments would be required to contribute DIF fees pursuant to County Ordinance No. 659, which would help to provide for adequate equipment and personnel in the Project area. Therefore, with mandatory payment of DIF fees, Project impacts to police protection services would be less-than-cumulatively considerable.

The proposed Project would entail development of the site with a warehouse building and a public park. The Project also proposes the demolition of 26 existing single-family residential structures on site, such that there would be no direct net increase in demand for school services as compared to existing conditions; therefore, the Project would not result in a direct demand for school services or new or expanded school facilities. Although the Project may indirectly result in an increase in the population within the VVUSD, the Project Applicant would be required to contribute fees in accordance with Riverside County Ordinance No. 575. Other cumulative developments, including both residential and non-residential developments, similarly would be required to contribute fees pursuant to Riverside County Ordinance No. 575, or similar ordinances within cities within the service area of these school districts. Pursuant to the Leroy F. Greene School Facilities Act of 1998, payment of school impact fees constitutes full and complete mitigation for Project-related impacts to school

services. As such, and with mandatory fee payment, the Project's impacts to school services and facilities would be less-than-cumulatively considerable.

The proposed Project would entail development of the site with a warehouse building and a public park. The Project also proposes the demolition of 26 existing single-family residential structures on site. Buildout of the Project would result in a net increase of 875 persons on site and thus would conservatively create a demand for 2,188 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. Thus, the Project's impacts to the local library system likely would be substantially less. Furthermore, 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 Riverside County. Accordingly, impacts due to the construction of new or expanded library facilities are too speculative for evaluation in this EIR (CEQA Guidelines § 15145). Environmental effects of such library facilities and associated mitigation would be identified through a future CEQA process required in association with any future proposals for new or expanded library facilities. However, the Project and all cumulative developments would contribute property taxes and would be required to contribute DIF fees to Riverside County pursuant to County Ordinance No. 659, which could be used for the purpose of acquiring book titles and/or additional library square footage. Any mitigation measures required for new or expanded library facilities also could be funded, in part, from property taxes allocated by Riverside County to such purposes. Therefore, because environmental impacts associated with new or expanded library facilities cannot be known at this time and would be determined in the future once Riverside County identifies a specific proposal for new or expanded library facilities, Project impacts to library services and facilities are evaluated as less than significant on a cumulatively-considerable basis.

The proposed Project, when considered in conjunction with on-going growth and development in western Riverside County, would cumulatively impact the ability of local medical facilities that provide health services. However, the Project and all cumulative developments would be required to comply with County Ordinance No. 659, which requires a DIF payment to the County that is partially allocated to public health services and facilities. With mandatory compliance with Ordinance No. 659, the Project's impacts to health services and facilities would be less than significant on a cumulative basis.

4.16.6 Significance of Impacts Before Mitigation

Threshold a: Less-than-Significant Impact. 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 fire protection 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 (State 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 Riverside County Fire Department would be reduced to less-than-significant levels..

Threshold b: Less-than-Significant Impact. 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.

Threshold c: Less-than-Significant Impact. 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 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: Less-than-Significant Impact. The Project would not directly generate a resident population; however, buildout of the Project would result in a net increase of 875 persons on site and thus would conservatively create a demand for 2,188 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.

Threshold e: Less-than-Significant Impact. 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 environment.

4.16.7 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 public services 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 following applicable Mitigation Measures identified by Riverside County EIR No. 441 related to public services:
  - EIR No. 441 Mitigation Measure 4.15.2A: The County shall require as a part of the development review process, proponents of new businesses, recreational, and commercial land uses such as shopping centers, health clubs, large hotels over 200 rooms, convention centers, and commercial recreational activities be required to provide on-site security.
  - EIR No. 441 Mitigation Measure 4.15.2D: The County shall require the development applicant to pay the County Sheriff's established development mitigation fee prior to issuance of a certificate of occupancy on any structure as they are developed. The fees are for the acquisition and construction of public facilities.

- As a condition of Project approval, the proposed Project would be required to conform to all mandatory local, State, and federal laws, ordinances, and standards relating to fire safety. Among other items, these requirements include conformance with the Uniform Building Code Section 1503, which requires that all buildings be constructed with fire retardant roofing material. Access routes in the Project area would be required to be maintained throughout construction and buildout of the proposed Project.

- The Project would be required to adhere to Riverside County Ordinance No. 659, which requires payment of a DIF to assist the County in providing for fire protection facilities, including fire stations. Payment of the DIF fee would ensure that funds are available for capital improvements, such as land/equipment purchases and fire station construction.

- The Project would be required to adhere to Riverside County Ordinance No. 659, which requires payment of a DIF fee to assist the County in providing for sheriff protection facilities, including sheriff stations. Payment of the DIF fee would ensure that funds are available for additional sheriff personnel as well as capital improvements, such as land/equipment purchases and sheriff station construction.

- The Project is required to comply with Riverside County Ordinance No. 575, which requires mandatory payment of school impact fees pursuant to Public Education Code § 17072.10-18.

- The Project would be required to adhere to Riverside County Ordinance No. 659, which requires payment of a DIF fee to assist the County in providing for library facilities. Payment of the DIF fee would ensure that funds are available for capital improvements, such as land/equipment purchases and library construction or expansion.

- The Project would be required to adhere to Riverside County Ordinance No. 659, which requires payment of a DIF fee to assist the County in providing for public health facilities. Payment of the DIF fee would ensure that funds are available for capital improvements, such as land/equipment purchases and health facility construction.

Mitigation

Impacts would be less-than-significant; therefore, no mitigation is required.

4.17 RECREATION

This Subsection 4.17 provides an overview of the existing parks and recreational facilities that exist within the Project site's vicinity and that could potentially be directly or indirectly physically affected by implementation of the proposed Project. The analysis herein is based in part on the Riverside County General Plan Multipurpose Open Space Element and Healthy Communities Element (Riverside County, 2021a).

4.17.1 EXISTING CONDITIONS

A. *Federal Parks*

The nearest federal park is the Joshua Tree National Park, located approximately 48.8 miles east of the Project site. There are no other federal parks in the Project vicinity. The San Bernardino National Forest also is located approximately 19.6 miles northeast of the Project site (Google Earth, 2024).

B. *State Parks*

The nearest State Park to the Project site is the Lake Perris State Recreation Area (LPSRA), located approximately 3.7 miles northeast of the Project site (Google Earth, 2024). The LPSRA provides recreational opportunities including fishing, water sports, bird watching, hiking, camping, and horseback riding (California State Parks, n.d.). There are no other State parks in the Project vicinity.

C. *Regional and Local Parks*

There are no regional or local parks within a two-mile radius of the Project site. The nearest local park to the Project site is Paragon Park, located approximately 2.6 miles southeast of the Project site. (Google Earth, 2024) Recreational facilities available at Paragon Park include a skate park, basketball court, children's playground, fitness court, sheltered picnic tables, and a green space for passive family play (City of Perris, n.d.).

D. *Regional Trails and Bikeway Systems*

The Mead Valley Area Plan (MVAP) identifies the County's long-term objectives for recreational trails and bikeways within the Mead Valley area. As shown on MVAP Figure 9, *Mead Valley Area Plan Trails and Bikeway System*, a Class II bike lane is planned along Cajalco Road, west of Harvill Avenue (Riverside County, 2021b, Figure 9).

4.17.2 APPLICABLE ENVIRONMENTAL REGULATIONS

The following is a brief description of the state and local environmental laws and related regulations related to recreation.

A. *State Regulations*

1. *Quimby Act, California Government Code Section (§) 66477*

The State of California's Quimby Act was established by the California Legislature for the purpose of preserving open space and providing park facilities for California's growing communities. The Quimby Act

allows local agencies to establish ordinances requiring residential subdivisions to provide land or "in-lieu-of" fees for park and recreation purposes. This State Act requires the dedication of land and/or imposes a requirement of fees for park and recreational purposes as a condition of approval of tentative tract map or parcel map. (CA Legislative Info, n.d.21)

B. Local Regulations

1. Riverside County Ordinance No. 460

Riverside County Ordinance No. 460, § 10.35 (Park and Recreation Fees and Dedications) implements the Quimby Act by establishing a requirement for dedication of three acres of parkland per 1,000 residents, or payment of a fee in lieu of such dedication. An exception exists in cases where a Community Parks and Recreation Plan, as approved by the Board of Supervisors, applies and has determined that the amount of existing neighborhood and community park area exceeds that limit, in which case the Board may determine that the public interest, convenience, health, welfare, and safety requires that a higher standard, not to exceed five acres of land per 1,000 persons residing within the County, shall be devoted to neighborhood and community park purposes.

4.17.3 Basis for Determining Significance

Section XVI of Appendix G to the State CEQA Guidelines addresses typical adverse effects to parks and recreation, and includes the following threshold questions to evaluate the Project's impacts to recreational resources:

- *Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?*

- *Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?*

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

a. *Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment;*
b. *Increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated;*
c. *Be located within a Community Service Area (CSA) or recreation and park district with a Community Parks and Recreation Plan (Quimby fees); or*
d. *Include the construction or expansion of a trail system.*

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 parks and recreation.

4.17.4 Impact Analysis

Threshold a: ***Would the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?***

As part of the Project, a public park is proposed on approximately 13.33 net acres in the southwest portion of the Project site along the eastern and western sides of Decker Road proposed. The public park would include play fields, hard surfaces sport courts, a playground, walking paths, dog parks, and other amenities. Although the Project would result in the construction of a public park on site, the park 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 proposed park that have not 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 park would be less than significant.

As part of the Project, roadway improvements to Cajalco Road, Seaton Avenue and Decker Road include pavement, curb-and-gutter, and sidewalks, and the installation of a 10-foot-wide decomposed granite (d.g.) trail along the Project site's frontage with Cajalco Road. The roadway, sidewalk, and trail improvements planned for 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 10-foot-wide d.g. trail, the sidewalks and d.g. trail 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 or the d.g. trail that have not 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 would be less than significant.

Threshold b: ***Would the Project include the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?***

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, a public park is proposed on approximately 13.33 net acres in the southwest portion of the Project site along the eastern and western sides of Decker Road. It is anticipated that to the extent that Project employees would utilize park facilities, Project employees would utilize the on-site park given its close proximity to the proposed warehouse building. Therefore, Project employees would not be expected to utilize

other local recreational facilities to the extent that physical deterioration would occur or be accelerated, and impacts would be less than significant.

Threshold c: ***Is the project located within a Community Service Area (CSA) or recreation and park district with a Community Parks and Recreation Plan (Quimby fees)?***

The Project site is not located within a County service area (RCIT, n.d.). In addition, according to the City of Perris Parks and Recreation Master Plan, the Project site is not located within a service area for existing community or neighborhood parks (Exhibits 3.1 and 3.2) nor is the Project site located within a service area for future and potential community or neighborhood parks (Exhibits 4.1 and 4.2) (City of Perris, 2005)

Furthermore, the provisions of Section 10.35 of Riverside County Ordinance No. 460, which addresses parkland dedication and in-lieu fees, are not applicable to the proposed Project as these requirements apply to residential subdivisions, and the Project does not include any proposed residential uses (Riverside County, n.d.2). Additionally, the Project would result in the demolition of 26 existing homes and one commercial structure on site, such that the direct demand for recreational facilities associated with the Project site would be reduced as compared to existing conditions. Therefore, the Project would not be subject to payment of in-lieu fees for recreational resources. 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.

Threshold d: ***Would the Project interfere with recreational trails that connect to regional and local trails or would the project split or eliminate an existing recreational trail?***

As shown on MVAP Figure 9, *Mead Valley Area Plan Trails and Bikeway System*, a Class II (on-street, striped) bike lane is planned along Cajalco Road, west of Harvill Avenue. However, 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 (Urban Crossroads, 2023g, p. 31). As such, no bike lane is proposed as part of the Project along the site's frontage with Cajalco Road.

Notwithstanding, as part of the Project roadway improvements would be constructed along Cajalco Road, Seaton Avenue, and Decker Road, and would include installation of pavement, curb-and-gutter, sidewalks, landscaped parkways, and a 10-foot-wide d.g. trail along the Project site's frontage with Cajalco Road. The proposed d.g. trail and the roadway improvements (i.e., sidewalks) planned for Cajalco Road, Seaton Avenue, and Decker Road could accommodate bicycles. Although the Project would result in the construction of roadway improvements such as a d.g. trail, sidewalks, and roadways that could accommodate bicycles, the d.g. trail, sidewalks, and roadways would occur in areas 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 and roadways that have not 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 would be less than significant.

4.17.5 Cumulative Impact Analysis

This cumulative impact analysis considers development of the proposed Project in conjunction with other development projects and planned development within two miles of the Project site. Although it is not anticipated that future Project employees would substantially utilize recreational facilities in the local area, this study area was selected because any use of local recreation facilities by future Project employees likely would occur in close proximity to the Project site.

As discussed under the analysis of Thresholds a. and d., cumulatively-considerable impacts associated with the construction of the proposed public park, d.g. trail, and pedestrian facilities on site have been evaluated throughout this EIR under the appropriate subject heading (e.g., air quality, biological resources, etc.). Where cumulatively-considerable impacts have been identified associated with Project implementation, mitigation measures have been identified to reduce construction-related impacts to the maximum feasible extent. There are no components of the planned park, d.g. trail, or pedestrian facilities on site that have not already been addressed and accounted for throughout this EIR for the Project site. Accordingly, cumulatively-considerable impacts due to the construction of the public park and pedestrian facilities would be less than significant.

The Project includes the construction of a warehouse building and a public park. Thus, the Project would not generate a population that would directly increase the use of existing neighborhood and regional parks or other recreational facilities. The Project also would result in the demolition of 26 existing homes and one commercial structure on site, such that the direct recreational demand for the Project site would be reduced as compared to existing conditions. Although there may be a nominal increase in the use of local recreation facilities from Project employees, Project employees are not expected to utilize local recreational facilities to the extent that physical deterioration would occur or be accelerated, even when considered in the context of cumulative developments in the area. 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; thus, the Project would not be expected to utilize other local recreational facilities to the extent that physical deterioration would occur or be accelerated. Although other cumulative developments in the local area that involve residential use and that do not accommodate adequate recreational facilities may result in physical deterioration of existing recreational facilities, the Project's contribution to such effects would be de minimis and would be less than significant on both a direct and cumulatively-considerable basis.

The Project site is not located within a County service area and is not located within a service area for existing community or neighborhood parks or within a service area for future and potential community or neighborhood parks. The Project also would not be subject to payment of Quimby fees or fees pursuant to Section 10.35 of Riverside County Ordinance No. 460 because the parkland dedication requirements of Ordinance No. 460 apply only to residential subdivisions. Accordingly, impacts due to a conflict with a CSA, due to Quimby fees, or due to a conflict with the park dedication requirements of Riverside County Ordinance No. 460 would be less-than-cumulatively considerable.

4.17.6 Significance of Impacts Before Mitigation

Thresholds a. Less-than-Significant Impact. 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.

Threshold b.: Less-than-Significant Impact. 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; 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.: Less-than-Significant Impact. 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.

Thresholds d. Less-than-Significant Impact. 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 (Urban Crossroads, 2023g, p. 31). 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 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.

4.17.7 Applicable Regulations, Design Requirements, and Mitigation

Impacts to recreation would be less than significant; thus, mitigation measures are not required.

4.18 TRANSPORTATION

The following analysis is based on a technical study prepared by Urban Crossroads, Inc. (herein, "Urban Crossroads"), entitled, "Cajalco and Seaton Warehouse Vehicle Miles Traveled (VMT) Analysis," dated December 1, 2022, and included as EIR *Technical Appendix N1* (Urban Crossroads, 2022). Additionally, and although not relied upon herein to evaluate the Project's impacts to the environment, the discussion within this Subsection also relies in part on a technical report prepared by Urban Crossroads, entitled, "Mead Valley Commerce Center Specific Plan (PPT220050) Traffic Analysis" (herein, "TA"), dated May 17, 2023, and included as EIR *Technical Appendix N2* (Urban Crossroads, 2023e). In addition, the Project Applicant initially anticipated that the proposed warehouse building would be occupied by 852,984 s.f. of high-cube fulfillment center warehouse uses (85% of the total warehouse building area) and 150,150 s.f. of high-cube cold storage warehouse uses (15% of the total warehouse building area. However, in order to reduce potential operational noise impacts to below a level of significance, Mitigation Measure MM 4.13-4 was identified in EIR Subsection 4.13, *Noise*, which prohibits cold storage uses unless certain criteria can be met. In order to account for the circumstance in which no high-cube cold storage warehouse uses would occupy the proposed building, a supplemental Trip Generation Assessment (herein, "TGA") was prepared by Urban Crossroads, entitled, "Mead Valley Commerce Center Supplemental Trip Generation Assessment," dated January 22, 2024, and included as EIR *Technical Appendix N4* (Urban Crossroads, 2024b). Refer to Section 7.0, *References*, for a complete list of reference sources.

On December 28, 2018, updates to the California Environmental Quality Act (CEQA) Guidelines were approved by the Office of Administrative Law (OAL). As part of the updates to the CEQA Guidelines, thresholds of significance for evaluation of impacts to transportation have changed. As required by SB 743, new Threshold b. of the CEQA Guidelines for Transportation requires an evaluation of impacts due to VMT, which replaced the Level of Service (LOS) criteria (i.e., automobile delay) that has been utilized in the past to evaluate potential effects to transportation under CEQA. Accordingly, although this Subsection evaluates the Project's potential effects to LOS and associated consistency with the LOS standards identified in the Riverside County General Plan and the general plans of cities within the Project's Study Area, it should be noted that pursuant to CEQA Guidelines Section 15064.3(a), "…a project's effect on automobile delay shall not constitute a significant environmental impact."

4.18.1 EXISTING CONDITIONS

A. Existing Project Site Traffic

Under existing conditions, the Project site contains 26 single-family residential homes and a commercial building. Although the site's existing land uses generate traffic under existing conditions, no credit has been taken for the site's existing traffic as part of the Project's TA (*Technical Appendix N2*).

B. Existing Vehicle Miles Traveled (VMT)

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 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)

C. *Definition of Level of Service (LOS)*

Traffic operations of roadway facilities are described using the term "Level of Service" (LOS). LOS is a qualitative description of traffic flow based on several factors such as speed, travel time, delay, and freedom to maneuver. Six levels are typically defined ranging from LOS A, representing completely free-flow conditions, to LOS F, representing breakdown in flow resulting in stop-and-go conditions. LOS E represents operations at or near capacity, an unstable level where vehicles are operating with the minimum spacing for maintaining uniform flow. (Urban Crossroads, 2023e, p. 21)

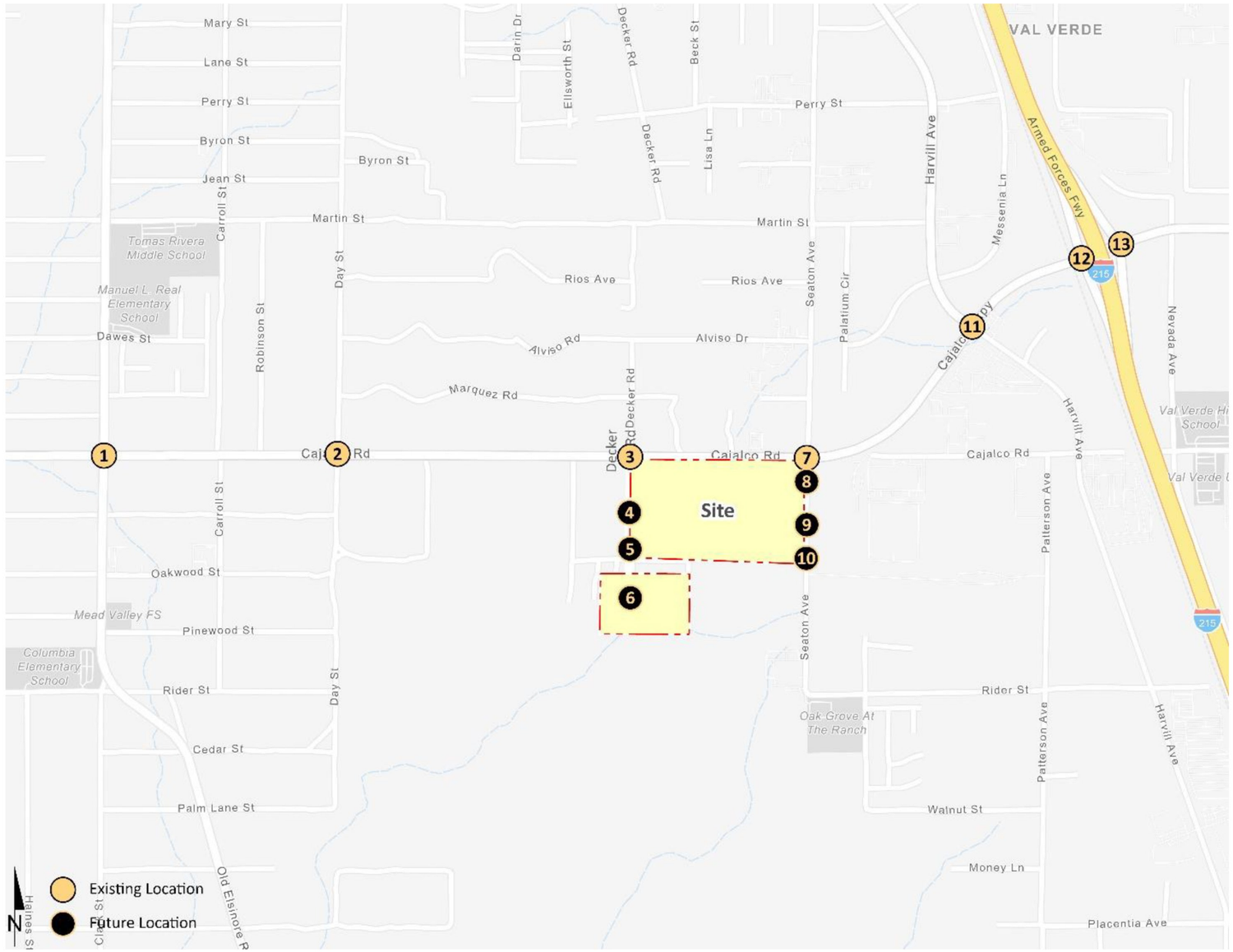
D. *Study Area Description*

Based on consultation with Riverside County staff, the study area for purposes of the Project's TA includes a total of 13 study area intersections. Figure 4.18-1, *Study Area Intersections*, shows the locations of the study area intersections relative to the Project site. Table 4.18-1, *Study Area Intersections*, provides a summary of the intersections evaluated as part of the Project's TA. The study area includes intersections where the Project is anticipated to contribute 50 or more peak hour trips per the County Guidelines. 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). (Urban Crossroads, 2023e, p. 6)

Table 4.18-1 Study Area Intersections

ID	Intersection	Jurisdiction	CMP?
1	Clark St. & Cajalco Rd.	County of Riverside	No
2	Day St. & Cajalco Rd.	County of Riverside	No
3	Decker Rd. & Cajalco Rd.	County of Riverside	No
4	Decker Rd. & Driveway 1	County of Riverside	No
5	Decker Rd. & Driveway 2	County of Riverside	No
6	Decker Rd. & Park Driveway	County of Riverside	No
7	Seaton Av. & Cajalco Rd.	County of Riverside	No
8	Seaton Av. & Driveway 3	County of Riverside	No
9	Seaton Av. & Driveway 4	County of Riverside	No
10	Seaton Av. & Driveway 5	County of Riverside	No
11	Harvill Av. & Cajalco Expressway	County of Riverside	No
12	I-215 SB Ramps & Ramona Exwy.	County, Perris, Caltrans	No
13	I-215 NB Ramps & Ramona Exwy.	County, Perris, Caltrans	No

(Urban Crossroads, 2023e, Table 1-1)



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

Figure 4.18-1

Not to Scale

Study Area Intersections

E. Existing Traffic Counts

Traffic counts within the Project's study area were collected by Urban Crossroads in February 2023 when local schools were in session and operating on normal bell schedules. Traffic counts were conducted between the hours of 7:00 to 9:00 AM and 4:00 to 6:00 PM. There were no observations made in the field that would indicate atypical traffic conditions on the count dates, such as construction activity or detour routes and nearby schools were in session and operating on normal schedules. The raw manual peak hour turning movement traffic count data sheets are included in Appendix 3.1 to the Project's TA (*Technical Appendix N2*), while the existing ADT, weekday AM, and weekday PM peak hour intersection volumes (in actual vehicles) are graphically depicted on Exhibit 3-7 of the Project's TA. (Urban Crossroads, 2023e, p. 35)

F. Area Conditions

Following is a summary of the Riverside County General Plan Circulation Network and a review of existing peak hour intersection operations, traffic signal warrant, and freeway facility operations analyses.

1. Riverside County General Plan Circulation Element

The Project site is located within Riverside County. The roadway classifications and planned (ultimate) roadway cross-sections of the major roadways within the study area, as identified in the Riverside County General Plan Circulation Element, are described in Subsection 3.2 of the Project's TA (*Technical Appendix N2*). Exhibit 3-2 of the TA shows the Riverside County General Plan Circulation Element and Exhibit 3-3 of the TA illustrates the Riverside County General Plan roadway cross-sections. As shown therein, 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. (Urban Crossroads, 2023e, p. 27)

2. Truck Routes

The County of Riverside's General Plan does not provide designated truck routes. Trucks are prohibited on certain County roadways through the Municipal Code through weight restrictions. Truck routes for the proposed Project have been determined based on discussions with County staff and take into consideration the approved truck routes within the adjacent City of Perris. These truck routes serve both the proposed Project and future cumulative development projects throughout the study area. Sensitive land uses have also been taken into consideration as part of determining the best routes for future trucks. (Urban Crossroads, 2023e, p. 31)

3. Bicycle and Pedestrian Facilities

The County of Riverside bike networks were previously shown on EIR Figure 2-10. As shown on EIR Figure 2-10, there is a planned Class II (on-street, striped) bike lane along Cajalco Road west of Harvill Avenue. However, 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. Exhibit 3-4 of the Project's TA (*Technical Appendix N2*) illustrates the existing crosswalks throughout the study area. As shown on TA

Exhibit 3-5, there are limited pedestrian facilities in place in the vicinity of the Project site. (Urban Crossroads, 2023e, p. 31)

4. Transit Service

The study area 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. The transit services are illustrated on Exhibit 3-6 of the Project's TA (*Technical Appendix N2*). Transit service is reviewed and updated by RTA periodically to address ridership, budget, and community demand needs. Changes in land use can affect these periodic adjustments which may lead to either enhanced or reduced service where appropriate. (Urban Crossroads, 2023e, p. 31)

5. Existing Conditions Analysis

Refer to Section 3 of the Project's TA (*Technical Appendix N2*) for a discussion of intersection operations, traffic signal warrants, and off-ramp queuing operations for existing conditions.

4.18.2 Applicable Regulatory Requirements

A. State Regulations

1. Assembly Bill 1358 (AB 1358) – Complete Streets Act

In September 2008, Governor Schwarzenegger signed into law Assembly Bill 1358 (AB 1358), the Complete Streets Act. AB 1358 requires that the legislative body of a city or county, upon any substantive revision of the circulation element of the general plan, modify the circulation element to plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways, defined to include motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation, in a manner that is suitable to the rural, suburban, or urban context of the general plan. By requiring new duties of local officials, AB 1358 imposes a State-mandated local program. AB 1358 required the Office of Planning and Research (OPR) to prepare or amend guidelines for a legislative body to accommodate the safe and convenient travel of users of streets, roads, and highways in a manner that is suitable to the rural, suburban, or urban context of the general plan, and in doing so to consider how appropriate accommodation varies depending on its transportation and land use context. AB 1358 authorized OPR, in developing these guidelines, to consult with leading transportation experts, including, but not limited to, bicycle transportation planners, pedestrian planners, public transportation planners, local air quality management districts, and disability and senior mobility planners. (CA Legislative Info, n.d.31)

2. Statewide Transportation Improvement Program (STIP)

The Statewide Transportation Improvement Program (STIP) is a multi-year capital improvement program of transportation projects on and off the State Highway System, funded with revenues from the Transportation Investment Fund and other funding sources. STIP programming generally occurs every two years. The programming cycle begins with the release of a proposed fund estimate in July of odd-numbered years, followed by California Transportation Commission (CTC) adoption of the fund estimate in August (odd years). The fund estimate serves to identify the amount of new funds available for the programming of transportation

projects. Once the fund estimate is adopted, Caltrans and the regional planning agencies prepare transportation improvement plans for submittal by December 15th (odd years). Caltrans prepares the Interregional Transportation Improvement Plan (ITIP) and regional agencies prepare Regional Transportation Improvement Plans (RTIPs). Public hearings are held in January (even years) in both northern and southern California. The STIP is adopted by the CTC by April (even years). (Caltrans, n.d.1)

3. Senate Bill 743 (SB 743)

Senate Bill 743 (SB 743, Steinberg, 2013), which was codified in Public Resources Code (PRC) Section (§) 21099, required changes to the implementing CEQA Guidelines regarding the analysis of transportation impacts. As one appellate court explained: "During the last 10 years, the Legislature has charted a course of long-term sustainability based on denser infill development, reduced reliance on individual vehicles and improved mass transit, all with the goal of reducing greenhouse gas emissions. Section 21099 is part of that strategy…" (*Covina Residents for Responsible Development v. City of Covina* (2018) 21 Cal.App.5th 712, 729.) Pursuant to § 21099, the criteria for determining the significance of transportation impacts must "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." (*Id*., subd. (b)(1); see generally, adopted CEQA Guidelines, § 15064.3, subd. (b) [Criteria for Analyzing Transportation Impacts].) To that end, in developing the criteria, OPR has proposed, and the California Natural Resources Agency (CRNA) has certified and adopted, changes to the CEQA Guidelines that identify VMT as the most appropriate metric to evaluate a project's transportation impacts. With the CRNA's certification and adoption of the changes to the CEQA Guidelines, automobile delay, as measured by LOS and other similar metrics, generally no longer constitutes a significant environmental effect under CEQA as of July 1, 2020. (PRC § 21099, subd. (b)(3).) (OPR, 2018b)

4. Senate Bill 325 (SB 325) - Transportation Development Act (TDA, Mills-Alquist-Deddeh Act)

The Mills-Alquist-Deddeh Act (SB 325) was enacted by the California Legislature to improve existing public transportation services and encourage regional transportation coordination. Known as the Transportation Development Act (TDA) of 1971, this law provides funding to be allocated to transit and non-transit related purposes that comply with regional transportation plans. TDA established two funding sources: the Local Transportation Fund (LTF), and the State Transit Assistance (STA) fund. Providing certain conditions are met, counties with a population under 500,000 (according to the 1970 federal census) may also use the LTF for local streets and roads, construction, and maintenance. The STA funding can only be used for transportation planning and mass transportation purposes. (Caltrans, n.d.2)

5. Road Repair and Accountability Act of 2017 (Senate Bill 1 (SB 1))

On April 28, 2017, Governor Brown signed Senate Bill 1 (SB 1) (Chapter 5, Statutes of 2017), known as the Road Repair and Accountability Act of 2017. SB 1 augments the base of the State Transit Assistance program essentially doubling the funding for this program. To provide for SB 1 reporting and transparency, transit agencies are asked to work with Caltrans to report on planned expenditures for these augmented funds. (Caltrans, n.d.2)

B. Regional Regulations

1. SCAG Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal)

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: 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 (SCAG, 2024). Connect SoCal is updated periodically to allow for the consideration and inclusion of new transportation strategies and methods.

The Goods Movement Technical Report of Connect SoCal 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 a document entitled, *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)

2. Riverside County Congestion Management Program (CMP)

The intent of a Congestion Management Program (CMP) is to more directly link land use, transportation, and air quality, thereby prompting reasonable growth management programs that will effectively utilize new transportation funds, alleviate traffic congestion and related deficiencies, and improve air quality. The Riverside County CMP became effective with the passage of Proposition 111 in 1990 and updated most

recently in 2011. The RCTC adopted the 2011 CMP for Riverside County in December 2011. There are no Study Area intersections identified as a Riverside County CMP facility. (Urban Crossroads, 2023e, p. 7)

3. Western Riverside Council of Governments Transportation Uniform Mitigation Fee

The Western Riverside Council of Governments (WRCOG) established a consolidated Transportation Uniform Mitigation Fee (TUMF) program for all of western Riverside County, which commenced in 2003. The establishment of TUMF was based on the desire to establish a single, uniform fee program to mitigate the cumulative impacts of new development on the western Riverside County sub-region's arterial highway system rather than having multiple and potentially uncoordinated fee programs across the region. WRCOG is responsible for establishing and updating TUMF payment rates, based on a TUMF Program Nexus Study, which is periodically updated to consider the impact of future development on the subregion's system of highways and arterial roads. The most recent Nexus Study update was approved by the WRCOG Executive Committee in July 2017. The updated Nexus Study continues to demonstrate the relationship between the TUMF fee levels and the cost of anticipated improvements to the Regional System of Highways and Arterials (RSHA) necessitated by new development throughout western Riverside County. (WRCOG, 2018a, p. 3)

C. Local Regulations

Ordinances specifically applicable to the circulation system are presented below (Riverside County, 2015a, p. 4.18-28):

- Ordinance No. 413 – Vehicle Parking: Ordinance No. 413 establishes regulations to vehicle parking on Riverside County roadways.

- Ordinance No. 452 – Speed Limits: Ordinance No. 452 pertains to prima facie speed limits on Riverside County roadways and establishes or amends prima facie speed limits on certain Riverside County roads.

- Ordinance No. 460 – Subdivision of Land: Ordinance No. 460, in conjunction with the Subdivision Map Act, establishes regulations for the division of land and describes procedures. The ordinance also includes the provisions for the establishment of Road and Bridge Benefit Districts and associated fees.

- Ordinance No. 461 – Road Improvement Standards and Specifications: Ordinance No. 461 adopts Road Improvement Standards and Specifications.

- Ordinance No. 499 – Encroachments in County Highways: Ordinance No. 499, subject to the control of the Board of Supervisors, delegates to the Riverside County Transportation Director the administration of the use of county highways, including county roads, for excavations and encroachments; construction, operation, and maintenance of utility facilities; planting, maintenance, and removal of trees; and the issuance, modification, and revocation of permits for such uses.

- Ordinance No. 500 – Permissible vehicle weight on highways, roads and bridges: Ordinance No. establishes weight prohibitions and reductions for vehicles travelling along County roadways.

- Ordinance No. 659 – Development Mitigation Fee for Residential Development (DIF Program): Ordinance No. 659 establishes a development impact fee (DIF) for the development of infrastructure, including County roadways and the installation of traffic signals.

- Ordinance No. 671 – Consolidated Fees for Land Use and Related Functions: Ordinance No. 671 establishes a consolidated fee program for land use and related functions. This is a deposit-based fee program and provides for unused fees to be refunded to the applicant.

- Ordinance No. 824 – Western Riverside County Transportation Uniform Mitigation Fee (TUMF) Program: Ordinance No. 824 establishes a TUMF program for western Riverside County. The fees are collected by Riverside County and administered by WRCOG to make roadway improvements in the WRCOG area. TUMF funds are intended for use solely for the engineering, construction, and right-of-way acquisition for regional facilities. TUMF funds may not be used to defray operational and maintenance expenses. Facilities eligible for TUMF are designated by WRCOG and updated periodically. They include streets, arterials, and road improvements as defined in the ordinance.

4.18.3 Basis for Determining Significance

A. *Thresholds of Significance*

Section XVII of Appendix G to the CEQA Guidelines addresses typical adverse effects related to transportation, and includes the following threshold questions to evaluate a project's impacts to transportation:

- Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

- Would the project conflict with or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?

- Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

- Would the project result in inadequate emergency access or access to nearby uses?

The following thresholds are derived from Riverside County's Environmental Assessment Checklist, which incorporate the current Appendix G thresholds pursuant to the 2018 changes to the CEQA Guidelines, in order to evaluate the significance of the proposed Project's impacts on transportation. The proposed Project would result in a significant impact to transportation if the Project or any Project-related component would:

a. *Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities;*

b. *Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b);*

c. *Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment);*

d. *Cause an effect upon, or a need for new or altered maintenance of roads;*

e. *Cause an effect upon circulation during the project's construction;*

f. *Result in inadequate emergency access or access to nearby uses; or*

g. *Include the construction or expansion of a bike system or bike lanes.*

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 transportation.

B. Thresholds of Significance for Vehicle Miles Travelled (VMT)

1. Screening Thresholds

The County's Guidelines describe that a project may be determined to have a less-than-significant impact and may be screened out of requiring a project level VMT analysis if it meets at least one of the County's VMT screening criteria. Projects that do not meet any of the screening criteria require a project-level VMT analysis. (Urban Crossroads, 2022, p. 1)

2. VMT Metric and Significance Threshold

As stated in the County Guidelines, for industrial land use projects that do not meet any of the screening criteria, the analysis should utilize the efficiency metric of VMT per employee. The measure for VMT threshold listed in the County Guidelines is existing Countywide average VMT per employee with the following significance threshold: (Urban Crossroads, 2022, p. 3)

> *"A project would result in a significant project generated VMT impact if its VMT exceeds the existing county-wide average Work VMT per employee." For the County of Riverside, the countywide average Work VMT per employee is* ***14.2 Work VMT per employee****."* (Urban Crossroads, 2022, p. 4)

3. VMT Modeling

The County Guidelines identifies the Riverside County Transportation Area Model (RIVTAM) as the appropriate tool for conducting VMT analysis for land development projects in the County of Riverside. RIVTAM is a useful tool to estimate VMT as it considers interaction between different land uses based on socio-economic data such as population, households, and employment. RIVTAM is a travel forecasting model that represents a sub-area (Riverside County) of the Southern California Association of Governments (SCAG) regional traffic model. RIVTAM was designed to provide a greater level of detail and sensitivity in the Riverside County area as compared to the regional SCAG model. (Urban Crossroads, 2022, p. 3)

4.18.1 IMPACT ANALYSIS

Threshold a: ***Would the Project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?***

This response provides an analysis of the Project's potential to result in a conflict with plans, programs, ordinances, or policies that address the circulation system, including transit, roadway, bicycle, and pedestrian facilities. A project that generally conforms with, and does not obstruct, applicable plans, programs, ordinances, and policies is considered to be consistent. The transportation plans, policies, programs, ordinances, and standards that are relevant to the Project are identified in the analysis below.

A. Project Consistency with Connect SoCal

As previously noted, in April 2024 SCAG published its 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), 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 previously was presented under the discussion and analysis of Threshold a. in EIR Subsection 4.11, *Land Use and Planning*. As indicated therein, the Project would not conflict with any Connect SoCal goals, and no impact would occur.

B. Project Consistency with Riverside County Congestion Management Program

The intent of a Congestion Management Program (CMP) is to more directly link land use, transportation, and air quality, thereby prompting reasonable growth management programs that will effectively utilize new transportation funds, alleviate traffic congestion and related deficiencies, and improve air quality. The County of Riverside CMP became effective with the passage of Proposition 111 in 1990 and most recently updated in 2019 as part of the Riverside County Long Range Transportation Study. The Riverside County Transportation Commission (RCTC) adopted the 2019 CMP for the County of Riverside in December 2019. None of the Project's study area intersections are identified as Riverside County CMP intersections. (Urban Crossroads, 2023e, p. 8)

C. Project Consistency with Riverside County General Plan and General Plan Circulation Element

EIR *Technical Appendix K* includes an analysis of the Project's consistency with the policies of the Riverside County General Plan, and demonstrates that the proposed Project would not conflict with any applicable General Plan policy, including policies contained within the General Plan Circulation Element. Additionally, all roadway improvements proposed as part of the Project (i.e., improvements along Cajalco Road, Seaton Avenue, and Decker Road) are consistent with the roadway cross-sections identified by the General Plan for

these roadways. As such, the Project has no potential to conflict with the circulation-related policies of the Riverside County General Plan, including policies related to transit, roadway, bicycle, and pedestrian facilities.

D. Project Consistency with Riverside County Transportation-Related Ordinances

The following provides a brief discussion of the applicability and Project consistency with Riverside County ordinances addressing the circulation system, which were previously described in subsection 4.18.2.C.

- Ordinance No. 413 – Vehicle Parking: Ordinance No. 413 establishes regulations to vehicle parking on Riverside County roadways. All parking required of the proposed Project would be accommodated on site, and no on-street parking is proposed. Accordingly, the Project has no potential to conflict with Ordinance No. 413.

- Ordinance No. 452 – Speed Limits: Ordinance No. 452 pertains to prima facie speed limits on Riverside County roadways and establishes or amends prima facie speed limits on certain Riverside County roads. All Project-related traffic would be required to adhere to posted speed limits within the Project area. Accordingly, the proposed Project has no potential to conflict with Ordinance No. 452.

- Ordinance No. 460 – Subdivision of Land: Ordinance No. 460, in conjunction with the Subdivision Map Act, establishes regulations for the division of land and describes procedures. No land subdivisions are proposed as part of the Project; thus, the Project has no potential to conflict with this ordinance.

- Ordinance No. 461 – Road Improvement Standards and Specifications: Ordinance No. 461 adopts Road Improvement Standards and Specifications. All roadway improvements proposed as part of the Project have been designed to meet the requirements of the Riverside County Road Improvement Standards and Specifications, including improvements along Cajalco Road, Seaton Avenue, and Decker Road. Accordingly, the proposed Project would not conflict with Ordinance No. 461.

- Ordinance No. 499 – Encroachments in County Highways: Ordinance No. 499 regulates of the use of county highways, including county roads, for excavations and encroachments; construction, operation, and maintenance of utility facilities; planting, maintenance, and removal of trees; and the issuance, modification, and revocation of permits for such uses. Any Project-related roadway improvements that encroach into County highways or roadways would be required to comply with the provisions of Ordinance No. 499; thus, the Project would not conflict with this ordinance.

- Ordinance No. 659 – Development Mitigation Fee for Residential Development (DIF Program): Ordinance No. 659 establishes a DIF for the development of infrastructure, including County roadways and the installation of traffic signals. The Project would be conditioned to contribute fees pursuant to Ordinance No. 659, and as such the Project has no potential to conflict with this ordinance.

- Ordinance No. 671 – Consolidated Fees for Land Use and Related Functions: Ordinance No. 671 establishes a consolidated fee program for land use and related functions. There are no components of the proposed Project that would conflict with Ordinance No. 671.

- Ordinance No. 748 – Mitigation of Traffic Congestion Through Signalization: Ordinance No. 748 establishes a fee program for the installation of traffic signals based on a priority list. The Project would be conditioned to pay appropriate fees pursuant to Ordinance No. 748. As such, the Project has no potential to conflict with this ordinance.

- Ordinance No. 824 – Western Riverside County Transportation Uniform Mitigation Fee (TUMF) Program: Ordinance No. 824 establishes a TUMF fee program for western Riverside County to fund roadway improvements in the Western Riverside Council of Governments (WRCOG) area. The Project would be conditioned by the County to require payment of appropriate TUMF fees; thus, the Project has no potential to conflict with Ordinance No. 824.

E. Project Consistency with WRCOG Active Transportation Plan

The Western Riverside Council of Governments (WRCOG) has published an Active Transportation Plan (ATP). The ATP aims to improve transportation choices within the subregion for the benefit of all residents, employees, and visitors by identifying regional facilities to provide more transportation options. The ATP provides a robust, non-motorized network throughout the WRCOG subregion that is meant as a guiding document for jurisdictions and stakeholders of how the identified projects can be implemented. The ATP is voluntary and is meant to serve as a resource in member agencies' pursuit of grant funding for active transportation. Provided in the ATP are detailed project-level summary sheets for facilities on the ATP's Regional Network. (WRCOG, 2018b)

The WRCOG ATP identifies Cajalco Road and Cajalco Expressway as being part of the East Corona-Lake Perris planned connection (ATP Project No. 5A), which would consist of an east-west regional facility connecting El Cerrito, unincorporated Riverside County, and Perris. This potential facility would provide 3.4 miles of Class IV separated bikeways along the Cajalco Expressway, 7.3 miles of Class II buffered bike lanes, and an additional 10 miles of bicycle facilities for a total of 19 miles. (WRCOG, 2018b, pp. 74-76)

The Project includes improvements to Cajalco Road along the Project site's frontage, which would accommodate bicycles. In addition, the Project has been designed to incorporate a 10-foot-wide curb-separated decomposed granite (d.g.) trail, which could accommodate both pedestrians and bicycles. Accordingly, improvements proposed as part of the Project would implement ATP Project No. 5A along the Project site's frontage with Cajalco Road, and as such the Project would not conflict with the WRCOG ATP East Corona-Lake Perris connection.

F. Conclusion

Based on the preceding analysis, the proposed Project would not conflict with any of the policies or requirements of Connect SoCal, the Riverside County CMP, the policies contained within the General Plan and General Plan Circulation Element, the WRCOG ATP, or with any Riverside County ordinances adopted

to address the issue of transportation. There are no other plans, policies, or programs applicable to the proposed Project. Accordingly, the proposed Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and impacts would be less than significant.

Threshold b: ***Would the Project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?***

As previously noted, changes to the CEQA Guidelines were adopted in December 2018, which require all lead agencies to adopt VMT as a replacement for automobile delay-based LOS as the measure for identifying transportation impacts for land use projects. This statewide mandate went into effect July 1, 2020, consistent with SB 743. To comply with SB 743 the County of Riverside adopted their *Transportation Analysis Guidelines for Level of Service Vehicle Miles Traveled* in December 2020 (herein, "County Guidelines"). The adopted County Guidelines have been utilized to conduct an analysis of the Project's impacts due to VMT. (Urban Crossroads, 2022, p. 1)

A. Screening Criteria

he County Guidelines describe that a project may be determined to have a less-than-significant impact and may be screened out of requiring a project level VMT analysis if it meets at least one of the County's VMT screening criteria. The applicability of the County's adopted VMT screening criteria previously is discussed below.

- Small Project Screening. The County Guidelines presume projects that generate fewer than 110 daily vehicle trips to have a less than significant impact absent substantial evidence to the contrary. In order to develop the traffic characteristics of the proposed project, trip-generation statistics published in the High Cube Warehouse Trip Generation Study (WSP, January 2019) and Institute of Transportation Engineers (ITE) Trip Generation Manual (11th Edition, 2021) were used to estimate the Project's trip generation. The Project's Trip Generation Rates and Trip Generation Summary are shown in Attachment B to the Project's VMT Analysis (*Technical Appendix N1*). Based on the calculated trip generation rates; the Project is expected to generate 2,278 trips per day, which would exceed the 110 daily vehicle trips threshold. Accordingly, the Project does not meet the Small Project Screening criteria. (Urban Crossroads, 2022, p. 2)

- High-Quality Transit Areas (HQTA) Screening. Projects located within a Transit Priority Area (TPA) (i.e., within ½ mile of an existing "major transit stop"[1] or an existing stop along a "high-quality transit corridor"[2]) may be presumed to have a less than significant impact absent substantial evidence to the

[1] Pub. Resources Code, § 21064.3 ("'Major transit stop' means a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.").
[2] Pub. Resources Code, § 21155 ("For purposes of this section, a high-quality transit corridor means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.").

contrary. The Project is not located in an HQTA area (see Attachment C to the Project's VMT Analysis, included as *Technical Appendix N1*). (Urban Crossroads, 2022, p. 2)

- Local Essential Services. The introduction of new Local Essential Services shorten non-discretionary trips by putting those goods and services closer to residents, resulting in an overall reduction in VMT. Local Essential Services include public facilities such as libraries, post offices, and local or community parks. In addition to the warehouse building, the Project will include two soccer fields that will provide public recreational use to the local community. While the Project's warehouse building does not meet the screening criteria for Local Essential Services, the Project's proposed park use does meet this criteria. (Urban Crossroads, 2022, p. 2)

- Map-Based Screening. The County Guidelines note that "residential and office projects that locate in areas with low VMT, and that incorporate similar features (i.e., density, mix of uses, transit accessibility), will tend to exhibit similarly low VMT." The County Guidelines also state that the use of map-based screening for low VMT generating areas is applicable for other employment uses such as the Project's warehouse component. Urban Crossroads has obtained a VMT data table from County Staff for all TAZs within Riverside County that provides VMT per capita and VMT per employee for the purposes of identifying low VMT areas. The data utilizes the sub-regional Riverside Transportation Analysis Model (RIVTAM) to measure baseline VMT performance for individual TAZ's and a comparison was made to the applicable impact threshold (e.g., VMT per employee for office or industrial land uses and VMT per capita for residential land uses). Utilizing the RIVTAM Model the parcel of the Project was identified. The Project resides in TAZ 3682, which is shown to generate 18.09 VMT per employee (Warehouse). The County threshold is 14.2 VMT per employee (Warehouse). As such, the Project's TAZ would not qualify for low VMT area/map-based screening. (Urban Crossroads, 2022, p. 3)

As noted in the preceding analysis, the Project's proposed park uses meet the Local Essential Service screening criteria as they provide public recreational use closer to home thereby shortening vehicle trips of community residents. However, the Project's proposed warehouse use would not meet any of the aforementioned screening criteria and therefore requires a Project-level VMT analysis. As such, because the Project's park use would screen out of detailed analysis pursuant to the County's Guidelines, the Project-specific analysis of potential VMT impacts provided below evaluates potential VMT impacts associated with the Project's warehouse use, only.

B. Project-Level VMT Analysis

1. Project Land Use Conversion

To evaluate Project Work VMT per employee, land use information such as building square footage must first be converted into a RIVTAM compatible dataset. The RIVTAM model utilizes socio-economic data (SED) (e.g., employment estimates) instead of land use information to estimate vehicle trips. Project employees are estimated by taking total building square footage divided by an appropriate employment factor based on standard employment factors outlined by the County of Riverside's General Plan. Table 4.18-2, *Employment Density Factors*, presents the estimated number of employees used to represent the proposed Project in

RIVTAM. Project employment information was then coded into RIVTAM in a traffic analysis zone (TAZ) to represent the Project. The RIVTAM model was then run inclusive of the Project's employment. (Urban Crossroads, 2022, p. 4)

Table 4.18-2 Employment Density Factors

Land Use	Quantity	Employment Factor	Project Employees
Warehouse	1,001,010 SF	1 employee per 1,030 SF	972

(Urban Crossroads, 2022, Table 2)

2. Project Work VMT Calculation

As stated previously, for industrial land uses the efficiency metric Work VMT per employee is used to evaluate potential impacts to VMT. Work VMT per employee is derived by dividing Project generated home-based work (HBW) VMT by the number of estimated Project employees. HBW VMT is obtained from the RIVTAM model using the Production/Attraction (PA) method for calculating VMT, which sums all weekday VMT generated by trips with at least one trip end in the study area (i.e., Project's TAZ). Productions are land use types that generate trips (residences), and attractions are land use types that attract trips (employment). Productions and attractions are converted from person trips to vehicle trips for the purposes of calculating VMT and are then multiplied by the distance skims to calculate VMT. Table 4.18-3, *Project Work VMT per Employee*, presents Project generated Work VMT from the RIVTAM model, along with the estimated number of Project employees, and the resulting Work VMT per employee. (Urban Crossroads, 2022, p. 4)

Table 4.18-3 Project Work VMT per Employee

	Project
Work VMT	16,915
Employees	972
Work VMT per Employee	17.4
County Threshold	14.2
Percent Above Threshold	+22.5%
Potentially Significant?	Yes

(Urban Crossroads, 2022, Table 3)

3. Significance of Project Impacts due to VMT

As shown in Table 4.18-3, 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. (Urban Crossroads, 2022, p. 5)

Threshold c: ***Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?***

All physical improvements planned as part of the Project would be in conformance with applicable Riverside County standards; thus, the Project has no potential to increase hazards due to a geometric design feature. The Project site is located in an area that generally contains rural residential, and open space land uses to the north, west, and south, with a mixture of rural residential, open space, commercial, and light industrial developments occurring to the east. Although the Project's proposed warehouse use has the potential to conflict with traffic from existing rural residential developments in the surrounding area, the Project has been designed such that all Project-related truck trips would be routed directly to the north via Seaton Avenue and to the east via Cajalco Road/Cajalco Expressway to access the I-215, and only three off-site residential driveways occur along these roadway segments under existing conditions (two along Seaton Avenue and one along Cajalco Road). Accordingly, because all Project-related truck traffic would be routed away from residential uses in the area, the Project's truck traffic would not increase hazards in the area due to incompatible use. Therefore, the Project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment), and impacts would be less than significant.

Threshold d: ***Would the Project cause an effect upon, or a need for new or altered maintenance of roads?***

Implementation of the proposed Project would generate traffic along local roadways, and therefore would incrementally increase the need for maintenance of local roadway facilities. 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.

Threshold e: ***Would the Project cause an effect upon circulation during the Project's construction?***

As part of the Project, improvements would be made to roadways abutting the Project site, including Cajalco Road, Seaton Avenue, and Decker Road. Decker Road exists as an unimproved roadway under existing conditions, while Seaton Avenue and Decker Road are partially improved under existing conditions. During construction of improvements to these roadways, there is a potential for the Project to cause a temporary effect on local circulation in thew area. This is conservatively evaluated as a potentially significant impact prior to mitigation.

Threshold f: ***Would the Project result in inadequate emergency access or access to nearby uses?***

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, and as noted under the discussion and analysis of Threshold e., during proposed 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 in the form of a traffic control plan for implementing developments.

Threshold g: ***Would the Project include the construction or expansion of a bike system or bike lanes?***

The County of Riverside bike networks were previously shown on EIR Figure 2-10. As shown on EIR Figure 2-10, there is a planned Class II (on-street, striped) bike lane along Cajalco Road west of Harvill Avenue. However, 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. (Urban Crossroads, 2023e, p. 31) In addition, no bike trails are planned as part of the Project's improvements to Decker Road or Seaton Avenue. 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, impacts associated with which 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 would be less than significant.

4.18.2 Cumulative Impact Analysis

This cumulative impact analysis considers development of the proposed Project in conjunction with other development projects and planned development that would occur with buildout of the Riverside County General Plan and the general plans of local jurisdictions within the County.

The analysis of Threshold a. demonstrates that the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Accordingly, the Project has no potential to result in cumulatively-considerable impacts due to a conflict with a program, plan, ordinance, or policy addressing the circulation system.

As indicated under the analysis of 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. As previously shown in Table 4.18-3, 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. As other projects within the cumulative study area also have the potential to result in significant impacts due to VMT, the Project's impacts due to VMT from the Project's warehouse use would be cumulatively considerable.

As indicated under the analysis of Threshold c., all physical improvements planned as part of the Project would be in conformance with applicable Riverside County standards. Other cumulative developments would similarly be required to demonstrate to Riverside County that no unsafe geometric design features would result. Additionally, 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. Accordingly, cumulatively-considerable impacts due to a geometric design feature or incompatible use would be less than significant.

Tax revenue generated by the Project and cumulative developments would offset any increased need for roadway maintenance as a result of new development within Riverside County. There are no components of the proposed Project or other cumulative developments within the Project vicinity 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, impacts would be less-than-cumulatively considerable.

As indicated under the analysis of Threshold e., construction activities associated with the Project only have the potential to affect circulation during proposed improvements along Cajalco Road, Seaton Avenue, and Decker Road. As other cumulative developments in the local area similarly could result in road closures or other adverse effects to circulation, the Project's potential near-term impacts during improvements to Cajalco Road, Seaton Avenue, and Decker Road would be cumulatively considerable.

As discussed under the analysis of 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 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. As other cumulative developments similarly could obstruct emergency access in the local area, Project impacts would be cumulatively considerable.

As discussed under the analysis of Threshold g., there are no planned bike trails along the Project site's frontages with Cajalco 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 cumulatively-considerable 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, cumulatively-considerable impacts associated with the construction of the proposed roadway improvements (which could accommodate bicycles) would be less than significant.

4.18.3 Significance of Impacts Before Mitigation

Threshold a: Less-than-Significant Impact. 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.: Significant Direct and Cumulatively-Considerable Impact. 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. As previously shown in Table 4.18-3, 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.

Threshold c.: Less-than-Significant Impact. 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.

Threshold d.: Less-than-Significant Impact. 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.

Threshold e.: Significant Direct and Cumulatively-Considerable Impact. 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 impact of the Project for which mitigation would be required.

Threshold f.: Significant Direct and Cumulatively-Considerable Impact. 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.

Threshold g.: Less-than-Significant Impact. There are no planned bike trails along the Project site's frontages with Cajalco 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.

4.18.4 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 Riverside County regulations and design requirements.

- Prior to issuance of building permits, the Project Applicant shall pay appropriate Development Impact Fee Program (DIF) fees at the rates then in effect in accordance with Riverside County Ordinance No. 659.

- Prior to final building inspection, the Project Applicant shall pay appropriate Western Riverside County Transportation Uniform Mitigation Fee Program Ordinance (TUMF) fees at the rates then in effect in accordance with Riverside County Ordinance No. 824.

- As required by provision 3.9 of Riverside County Board of Supervisors Policy F-3, *"Good Neighbor" Policy for Logistics and Warehouse/Distribution Uses*, Riverside County shall review future implementing discretionary applications (i.e., plot plans, conditional use permits, etc.) to ensure that, to the extent feasible, separate entries and exit points for trucks and vehicles have been accommodated for any future warehouse/distribution facilities in order to minimize vehicle/truck conflicts.

Mitigation

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:

- Implement local hiring programs.
- Mark preferred parking spaces for vanpools and carpools.
- Provide on-site secured bike parking facilities.
- Provide information on carpooling and vanpooling opportunities to employees.
- 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 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.

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.

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).

4.18.5 Significance of Impacts After Mitigation

Threshold b.: Significant and Unavoidable Direct and Cumulatively-Considerable Impact. In order to evaluate potential feasible mitigation measures that may serve to reduce the Project's significant and unavoidable VMT impacts, Urban Crossroads conducted a review of the California Air Pollution Control Officers Association (CAPCOA) *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity* ("Handbook"), dated December 2021. The Handbook is herein incorporated by reference pursuant to State CEQA Guidelines Section 15150, and is available for review on CAPCOA's web site[3]. The Handbook describes methods to quantify reductions in greenhouse gas emissions and reductions in VMT associated with transportation measures. A review of the Handbook's Transportation measures that are determined to be applicable to the Project was conducted for the Project by Urban Crossroads. The results of this analysis are documented in a technical memorandum titled, "Mead Valley Commerce Center Vehicle Miles Traveled (VMT) Mitigation Assessment" (herein, "VMT Mitigation Assessment"), dated December 4, 2023, and included as EIR *Technical Appendix N3* (Urban Crossroads, 2023f).

To determine which transportation measures should be considered from the Handbook, project type, scale, and locational context are identified as key factors for determining a measures applicability to a given project. The Handbook contains a factsheet for each measure that describes the measure, locational context, scale of application, implementation requirements and other considerations that should be reviewed to determine a

[3] The CAPCOA Handbook is available at the following web address: https://www.caleemod.com/documents/handbook/full_handbook.pdf.

measure's applicability. Provided below is a description of the factors considered for project type, scale, and locational context. (Urban Crossroads, 2023f, p. 1)

- **Project Type**: Project type is an important consideration when determining which measures are applicable for consideration. For example, measures associated with neighborhood design are not applicable to an office project, whereas trip reduction programs intended to reduce employee commute VMT would not be applicable to an apartment project. (Urban Crossroads, 2023f, p. 2)
- **Scale**: The Handbook identifies that measures can be applied at different scales or geographic levels; however, "some measures may only be applicable at the project-level, whereas others may be more appropriate within a broader planning context such as for a general plan or climate action plan." The geographic levels considered in the Handbook include Project/Site and Plan/Community. Project/Site applies to measures that can reduce VMT at the scale of an individual development project or employer. Plan/Community refers to measures that reduce VMT at the scale of a specific plan, general plan or climate action plan. Transportation measures can be quantified at either the Project/Site scale or the Plan/Community scale, but never both. (Urban Crossroads, 2023f, p. 2)
- **Locational Context**: The Handbook describes that locational context is "used to identify trip reduction measures within the transportation sector that are appropriate in certain types of neighborhoods differentiated by transportation characteristics and level of development (e.g., urban, rural, suburban)." More specifically, rural, suburban, and urban are defined as follows: (Urban Crossroads, 2023f, p. 2)
    - Rural: An area characterized by little development. Compared to urban and suburban areas, rural areas have a lower density of residences, higher numbers of single-family residences, and higher numbers of vehicle-dependent land use patterns. Where applicable, the Handbook provides three land use distinctions within the rural locational context category – R_a, R_b, and R_c. R_a refers to rural areas within a master-planned community. These rural areas often include a broad offering of amenities and services, which may be accessed by walking or other alternative forms of transportation. R_b refers to rural areas adjacent to a commuter rail station with convenient rail service to a major employment center. As the name implies, these rural areas have greater access to commuter rail as an alternative mode of transportation. R_c refers to rural areas with transit service and that are near jobs/services. (Urban Crossroads, 2023f, p. 2)
    - Suburban: An area characterized by dispersed, low-density, single-use, automobile-dependent land use patterns, usually outside of the central city. Also known as a suburb. (Urban Crossroads, 2023f, p. 2)
    - Urban: An area located within the central city with higher density land uses than in the suburbs. Often characterized by multi-family housing, tall office buildings and dense retail. (Urban Crossroads, 2023f, p. 2)

  Unincorporated Riverside County is often considered rural because it is characterized by open spaces, agricultural areas, and a lower population density compared to urban or suburban areas. Additional factors contributing to the perception of unincorporated Riverside County as rural include: (Urban Crossroads, 2023f, p. 2)

- Agriculture and Open Spaces: Much of unincorporated Riverside County consists of rural landscapes, including agricultural land, open spaces, and undeveloped areas. This contributes to a more rural character compared to densely populated urban or suburban areas. (Urban Crossroads, 2023f, p. 3)
- Lower Population Density: Rural areas typically have lower population density, with larger distances between homes and businesses. Unincorporated areas in Riverside County may have fewer residential developments and commercial establishments compared to urbanized cities. (Urban Crossroads, 2023f, p. 3)
- Nature and Wilderness: Some parts of unincorporated Riverside County may include natural reserves, parks, and wilderness areas. These features contribute to a rural ambiance and are often associated with less densely populated regions. (Urban Crossroads, 2023f, p. 3)

The Project is located within the Mead Valley area of unincorporated Riverside County that is characterized by open space, industrial uses located along the I-215 Freeway corridor, and low density residential development. The residential areas include both paved and unimproved roads that in many cases lack sidewalks, curbs, and gutters. The area at this time lacks a diverse mix of land uses, which tends to limit non-auto modes of transportation such as walking and biking. Additionally, high-quality transit options in the vicinity are extremely limited and most are not within a reasonable walking distance. It is for these reasons that the Project's locational context is determined to be characteristically rural as it is dominated by open space, lower density residential, and vehicle-dependent land use patterns. (Urban Crossroads, 2023f, p. 3)

As noted in the Handbook, measures related to Transportation "promote transit and alternative transportation, support use of alternatively fueled vehicles, or encourage land use planning practices that reduce vehicle trips and vehicle miles traveled (VMT). Measures within the transportation sector are separated into six subsectors: Land Use, Neighborhood Design, Parking or Road Pricing Management, Transit, Trip Reduction Programs, and Clean Vehicles and Fuels." The measures listed within the Trip Reduction Programs subsector that are focused on reducing employee commute VMT are most applicable to the Project's industrial land use. (Urban Crossroads, 2023f, p. 3)

Each factsheet within the Trip Reduction Programs subsector was reviewed to determine each measures applicability to the Project. Table 4.18-4, *CAPCOA Handbook Trip Reduction Programs Subsector*, provides a summary of each of the measures that were reviewed by Urban Crossroads for applicability to the proposed Project (i.e., Measures T-5 through T-13 and T-23) along with a determination of each measure's applicability to the Project. As indicated in Table 4.18-4, many of the measures in this subsector are not appliable in a rural context due to the limited availability of transit and other non-auto dependent travel modes. Measure T-11, *Provide Employer-Sponsored Vanpool*, is applicable in a rural context; however, as noted in the Handbook, "vanpool programs are more appropriate for the building occupant or tenant (i.e., employer) to implement and monitor than the building owner or developer." The quantification below assumes that a potential future tenant implements this measure using default values supplied by the Handbook's calculation factsheet. However, any VMT reductions are purely speculative, as the Project does not have a known tenant. (Urban Crossroads, 2023f, p. 3)

Table 4.18-4 CAPCOA Handbook Trip Reduction Programs Subsector

Subsector	Measure	Scale of Application	Applicable Locational Context	Applicability to Project
Trip Reduction Programs	**T-5 Implement Commute Trip Reduction Program (Voluntary)** This measure will implement a voluntary commute trip reduction (CTR) program with employers.	Project/ Site	Urban, Suburban	Not Applicable in Rural Context.
	T-6 Implement Commute Trip Reduction Program (Mandatory Implementation and Monitoring) This measure will implement a mandatory CTR program with employers. CTR programs discourage single-occupancy vehicle trips and encourage alternative modes of transportation such as carpooling, taking transit, walking, and biking, thereby reducing VMT and GHG emissions.	Project/ Site	Urban, Suburban	Not Applicable in Rural Context.
	T-7 Implement Commute Trip Reduction Marketing This measure will implement a marketing strategy to promote the project site employer's CTR program. Information sharing and marketing promote and educate employees about their travel choices to the employment location beyond driving such as carpooling, taking transit, walking, and biking, thereby reducing VMT and GHG emissions.	Project/ Site	Urban, Suburban	Not Applicable in Rural Context.
	T-8 Provide Ridesharing Program This measure will implement a ridesharing program and establish a permanent transportation management association with funding requirements for employers.	Project/ Site	Urban, Suburban	Not Applicable in Rural Context.
	T-9 Implement Subsidized or Discounted Transit Program This measure will provide subsidized or discounted, or free transit passes for employees and/or residents.	Project/ Site	Urban, Suburban	Not Applicable in Rural Context.
	T-10 Provide End-of-Trip Bicycle Facilities This measure will install and maintain end-of-trip facilities for employee use. End-of-trip facilities include bike parking, bike lockers, showers, and personal lockers.	Project/ Site	Urban, Suburban	Not Applicable in Rural Context.
	T-11 Provide Employer-Sponsored Vanpool This measure will implement an employer-sponsored vanpool service. Vanpooling is a flexible form of public transportation that provides groups of 5 to 15 people with a cost-effective and convenient rideshare option for commuting.	Project/ Site	Urban, Suburban, Rural	Reduction is not quantifiable nor enforceable due to a speculative building with an unknown employer.
	T-12 Price Workplace Parking This measure will price onsite parking at workplaces. Because free employee parking is a common benefit, charging employees to park onsite increases the cost of choosing to drive to work	Project/ Site	Urban, Suburban	Not Applicable in Rural Context.
	T-13 Implement Employee Parking Cash-Out This measure will require project employers to offer employee parking cash-out. Cash-out is when employers provide employees with a choice of forgoing their current subsidized/free parking for a cash payment equivalent to or greater than the cost of the parking space. This encourages employees to use other modes of travel instead of single occupancy vehicles.	Project/ Site	Urban, Suburban	Not Applicable in Rural Context.
	T-23 Provide Community-Based Travel Planning This measure will target residences in the plan/community with community-based travel planning (CBTP). CBTP is a residential-based approach to outreach that provides households with customized information, incentives, and support to encourage the use of transportation alternatives in place of single occupancy vehicles.	Plan/ Community	Urban, Suburban	Does not apply at the Project/Site scale. Not Applicable in Rural Context.

Source: Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity, California Air Pollution Control Officers Association (CAPCOA), December 2021.
Notes:
1. Per CAPCOA Handbook, the combined maximum for each subsector or total across subsectors is calculated as:
1 - ((1-A)*(1-B)*(1-C)*(1-D)...); where, A, B, C, and D... represent the percent reduction for individual measures or subsectors.

(Urban Crossroads, 2023f, Table A-1)

T-11: Provide Employer-Sponsored Vanpool: This measure would implement an employer-sponsored vanpool service. Vanpooling is a flexible form of public transportation that provides groups of 5 to 15 people with a cost-effective and convenient rideshare option for commuting. The mode shift from long-distance,

single-occupied vehicles to shared vehicles reduces overall commute VMT. Calculation variables are shown in Table 4.18-5, *VMT Reduction Calculation Variables*, which are used as inputs in calculating VMT reductions based on the following formula: (Urban Crossroads, 2023f, p. 4)

$$A = \frac{\left((1-B)\times C\right) + \left(B \times \frac{D}{E}\right)}{\left((1-B)\times C\right) + (B \times D)} \times -1$$

Table 4.18-5 VMT Reduction Calculation Variables

ID	Variable	Value	Unit	Source
A	Percent reduction in GHG emissions from Project/Site employee commute VMT	3.4-20.4	%	calculated
User Inputs				
	None			
Constants, Assumptions, and Available Defaults				
B	Percent Employees that participate in vanpool program	2.7	%	SANDAG 2019
C	Average length of one-way vehicle commute trip in region	18.62	miles per trip	FHWA 2017
D	Average length of one-way vanpool commute trip	42	miles per trip	SANDAG 2019
E	Average vanpool occupancy (including driver)	6.25	occupants	SANDAG 2019

(Urban Crossroads, 2023f, Table 1)

Based on the factors listed in Table 4.18-5 and using the above formula, if the Project's potential future tenant(s) implements Measure T-11, Provide Employer-Sponsored Vanpool, the Project can expect a 1.73% reduction to the Project's VMT impact. As noted previously, the implementation results are not guaranteed as a potential future tenant is currently unknown, and the CAPCOA Handbook clearly states that "[v]anpool programs are more appropriate for the building occupant or tenant (i.e., employer) to implement and monitor than the building owner or developer." Notwithstanding, Mitigation Measure MM 4.18-2 includes provisions intended to encourage future tenants of the Project's warehouse building to establish a vanpool program or to otherwise encourage vanpooling.

While the Project would accommodate alternative transportation modes such as the sidewalks, bicycle lanes, and bicycle racks that already are included in the Project's application materials, and while the Project would be subject to Mitigation Measures MM 4.18-2 and MM 4.18-3, only the potential vanpool program is quantifiable based on the CAPCOA Handbook. However, it cannot be assured that a vanpool program would be established by future tenants of the Project's warehouse building, nor can it be assured that such a vanpool program, if implemented, would be effective in reducing the Project's VMT impacts. Even if the vanpool program were successful, it only would reduce the Project's total Work VMT by 1.73%, reducing the Project's total Work VMT from 16,915 to 16,622 and reducing the work VMT per employee to 17.1, which still would exceed the County's threshold of 14.2 by 20.4%. (Urban Crossroads, 2023f, p. 4)

The future tenants of the Project's proposed warehouse building are unknown at this time. As such, the effectiveness of commute trip reduction measures such as those listed above cannot be guaranteed to reduce Project VMT to a level of less than significant. In addition to specific tenancy considerations, locational context is also a major factor relevant to the potential application and effectiveness of commute trip reduction measures. A project may only realize a quantifiable reduction in commute VMT under the most favorable circumstances and ideal local conditions when implementing trip reduction measures. In practical terms, ideal conditions are rarely realized due to variables such as locational context limitations (i.e., non-urban areas). Additionally, to achieve ideal conditions a project must achieve a significant degree of employee participation and maximum employee eligibility, which are not generally expected. This is more difficult to presume since future building tenants are not known at this time. Although the Project would be subject to compliance with Mitigation Measures MM 4.18-2 and MM 4.18-3, and although the Project would accommodate alternative transportation modes such as the sidewalks, bicycle lanes, and bicycle racks that already are included in the Project's application materials, the effectiveness of commute trip reduction measures, including 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, as even with implementation of a vanpool program the Project's Work VMT per employee by 20.4%. No additional feasible mitigation measures are available to measurably reduce the Project's VMT. Therefore, the Project's VMT impacts are considered significant and unavoidable. (Urban Crossroads, 2022, p. 5)

Threshold e.: Less-than-Significant Impact with Mitigation Incorporated. 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.: Less-than-Significant Impact with Mitigation Incorporated. 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.

4.19 TRIBAL 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 E* 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 E* 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)).

4.19.1 EXISTING CONDITIONS

Refer to EIR subsection 4.5.1 for a complete description of the cultural setting, existing site conditions, and the archaeological and historical resources assessment.

4.19.2 APPLICABLE REGULATORY REQUIREMENTS

The following is a brief description of the State environmental laws and related regulations addressing Tribal Cultural Resources (TCRs). Refer also to EIR subsection 4.5.2 for a complete description of federal, State, and local environmental laws and regulations governing the protection of archaeological and tribal cultural resources.

A. 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)

B. 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, 2017a)

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, 2017a)

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, 2017a)

§ 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, 2017a)

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, 2017a)

4.19.3 Basis for Determining Significance

Section XVIII of Appendix G to the State CEQA Guidelines addresses typical adverse effects on tribal cultural resources, and includes the following threshold question to evaluate the Project's impacts to tribal cultural resources (OPR, 2018a):

- Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
  - Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?
  - A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Significance thresholds are set forth in Riverside County's Environmental Assessment Checklist, as modified based on the 2018 updates to Section XVIII of Appendix G to the State CEQA Guidelines, and indicate significant impacts would occur if the Project or any Project-related component would:

a. *Cause a substantial adverse change in the significance of a Tribal Cultural Resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is*

   1. *Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k); or*
   2. *A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.*

4.19.4 IMPACT ANALYSIS

Threshold a: ***Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defines in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:***

1. ***Listed or eligible for listing in the California Register of Historical resources or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or;***
2. ***A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying for the criteria set forth in (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe;***

Changes in the California Environmental Quality Act, effective July 2015, require that the County address another category of cultural resources – tribal cultural resources. Tribal Cultural Resources (TCRs) are those resources with inherent tribal values that are difficult to identify through the same means as archaeological resources. These resources can be identified and understood through direct consultation with the tribes who attach tribal value to the resource. Tribal cultural resources may include Native American archaeological sites, but they may also include other types of resources such as a cultural landscape. Also relevant is the category termed "traditional cultural property" (TCP) which is typically associated with cultural resource management performed under federal auspices. "Traditional" in this context refers to those beliefs, customs, and practices of a living community of people that have been passed down through the generations, usually orally or through practice. The traditional cultural significance of a historic property, then, is significance derived from the role the property plays in a community's historically rooted beliefs, customs, and practices. A TCP can be defined, generally, as one that is eligible for inclusion in the National Register of Historic Places (NRHP) because of its association with cultural practices or beliefs of a living community that (a) are rooted in that community's history, and (b) are important in maintaining the continuing cultural identity of the community. A landscape can be a TCP and by extension a TCR, provided the cultural landscape meets the criteria and that the landscape is geographically defined in terms of the size and scope. The appropriate treatment of tribal cultural resources is determined through consultation with tribes.

In compliance with Assembly Bill 52 (AB52), notices regarding this Project were mailed to all requesting tribes on February 23, 2023. Consultation was requested by the Pechanga Band of Luiseño Indians (Pechanga), the Soboba Band of Luiseno Indians (Soboba), Rincon Band of Luiseno Indians (Rincon) and the Agua Caliente Band of Cahuilla Indians (Agua Caliente). The results of the consultation efforts are described below.

❑ Pechanga Band of Luiseño Indians

Pechanga requested to consult in an email dated March 24, 2023. In the letter, Pechanga stated that Project is within a TCP and contains additional TCRs, and the Tribe requested that all efforts be made to preserve

sensitive TCRs as early in the development process as possible. Project documents were provided to the tribe on June 26, 2023, October 09, 2023, and March 15, 2024. Each of these communications included an offer to meet to discuss the Project and any potential TCRs that may be within the project. From previous consultations, Riverside County Planning Department staff acknowledged that the Project is situated within a Tribal Cultural Resource landscape. That landscape has been described as follows:

> The Pechanga tribe recognize Qaxáalku Kwíimik as an important Traditional Cultural Property or in CEQA terms, a cultural landscape within Luiseño territory. The landscape spans approximately 5 miles north to south and 3.2 miles east to west with the area known as Penny Ranch / Motte Reserve (CA-RIV-114) in the center. The northern boundary encompasses Cajalco Road approximately where it meets the I-215, which roughly forms the eastern boundary. Highway 74 cuts through the southern portion of the TCP with Old Elsinore Road framing the western boundary.
>
> The Tribe considers this landscape to consist of village complexes with multiple domestic activity areas containing bedrock mortars and slicks, rock art in the form of pictographs and cupules, ceremonial areas, and other features that represent everyday activities of Tribal culture. A village complex often had a radius of several miles with the nuclear and extended families residing in villages and living areas separated anywhere from quarter of a mile to a half mile apart.
>
> The tribe believe that the Qaxáalku Kwíimik landscape is culturally significant, and it is Traditional Cultural Property or a cultural landscape. In the words of the tribes, "Village complexes and domestic activity areas such as the region of this TCP Qaxáalku Kwíimik are of cultural importance to the Tribe because many have already been destroyed and the remaining are quickly disappearing-slick by slick, site by site, without regard to how they fit into the larger regional picture. These places are the last remains of our ancestral communities; places where our people lived their daily lives, gathering and preparing food, conducting other domestic activities and conducting ceremonial observances. In order to preserve these village complexes, it is important to not disturb contributing features to these complex, as each site or feature is destroyed the integrity of the cultural resource and TCP is diminished.

Although the Project site is, in the opinion of the tribe, located within a Tribal Cultural Resource landscape, the cultural resources sites that were identified within the southern portions of the Project site were evaluated as part of a site-specific Phase I and Phase II Cultural Resources Assessments (CRAs), the results of which are presented in EIR *Technical Appendices E1* and *E2*, respectively. As discussed therein, and as summarized in more detail in EIR Subsection 4.4, *Cultural Resources*, 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 would be avoided and not impacted by implementation of the Project. The Phase II testing program that was conducted at sites CA-RIV-8681/P-33-016534 and CA-RIV-8683/H/P-33-016536 determined that 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. 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. Although these sites are not eligible for listing in the CRHR, the Project nonetheless would be subject to compliance with EIR Mitigation Measure MM 4.5-5, which requires the avoidance or relocation of the features located at Sites CA-RIV-8681/P-33-016534 and CA-RIV-8683/H/P-33-016536 during grading and improvements to the park site and further requires the implementation of controlled grading to avoid impacts to these resources, which would ensure that these resources are preserved to the maximum feasible extent.

- **Soboba Band of Luiseño Indians**

Soboba requested to consult in an emailed letter dated February 23, 2023. The letter stated that the Project area is considered sensitive by the people of Soboba, as there are existing sites in the surrounding areas. Project documents were provided to the tribe on June 26, 2023, October 09, 2023, and March 15, 2024. Each of these communications included an offer to meet to discuss the project and any potential TCRs that may be within the Project's impact limits. On April 3, 2024, a meeting was held between Riverside County and the tribe in which the proposed Project was discussed.

During consultation with the Soboba Band under AB 52, the tribe provided substantial information regarding a tribal cultural resource, which previously was determined eligible for listing. The tribe noted that appropriate mitigation for a TCR is different than mitigation for archeological resources. They noted that sites and features often determined insignificant when evaluated individually can often be contributing factors to the entire TCR/TCL when evaluated inclusively, and therefore require considerations for cumulative impacts. As such, the tribe indicated that the removal and/or destruction of bedrock milling features found on the southern portions of the Project site would result in a cumulatively-considerable impact, and requested efforts to be implemented for avoidance and preservation in place, or relocation of the resource in an area of open space when preservation in place has been determined infeasible after all considerable alternatives for avoidance have been exhausted.

In summary, Soboba recommended avoidance of all of the bedrock milling features and requested a site visit as well as a request for the applicant to take a closer look at their design to see if perhaps a redesign would allow for avoidance of some features.

As noted above under the discussion of consultation efforts with Pechanga, while it is recognized that the Project site forms a portion of a larger TCP, the results of the Project's Phase I and Phase II CRAs demonstrate that the resources that occur on the Project site do not meet CEQA's definition of significant archaeological resources based on the criteria listed in Section 15064.5 of the State CEQA Guidelines. Therefore, the resources that occur on site do not substantially contribute to the TCP or any tribal cultural landscapes. Although these sites are not eligible for listing in the CRHR, the Project nonetheless would be subject to compliance with EIR Mitigation Measure MM 4.5-5, which requires the avoidance or relocation of the features located at Sites CA-RIV-8681/P-33-016534 and CA-RIV-8683/H/P-33-016536 during grading and improvements to the park site and further requires the implementation of controlled grading to avoid impacts to these resources, which would ensure that these resources are preserved to the maximum feasible extent.

❑ Agua Caliente Band of Cahuilla Indians

Agua Caliente requested to consult in an emailed letter dated March 06, 2023. The letter stated that the Project area is not located within the boundaries of the Agua Caliente Band of Cahuilla Indians Reservation. However, it is within the Tribe's Traditional Use Area. Project documents were provided to the tribe on June 26, 2023, October 09, 2023, and March 15, 2024. On April 04, 2024, an emailed letter was received from the tribe. The letter stated that the disturbance of the two cultural sites would impact the overall integrity of the TCR landscape however the mitigation measures were found to be sufficient. Consultation was concluded the same day.

❑ Rincon Band of Luiseño Indians

Rincon requested to consult in an emailed letter dated March 10, 2023. Rincon stated that the Project is within their Traditional Use Area and that the band is culturally and traditionally affiliated with the Project area. Project documents were provided to the tribe on June 26, 2023, and October 09, 2023. Rincon responded in an emailed letter dated October 13, 2023. The letter stated that the Rincon Band has reviewed the provided documents and are concerned about the proposed impacts to tribal cultural resources and potential Traditional Cultural Properties and Landscapes. The Tribe indicated they would defer all further consultation to the Pechanga Band of Luiseño Indians and Soboba Band of Luiseño Indians as they are located closer to the Project site, and indicated support for all efforts to completely avoid cultural resources as preferred mitigation. Consultation was concluded the same day.

❑ Conclusion

In summary, the bedrock milling features found within the Project boundary in the southern portions of the Project site proposed for public park use are, in the tribes' view, contributing elements to an identified Tribal Cultural Resource landscape. However, the results of the Project's Phase I and Phase II CRAs demonstrate that the resources that occur on the Project site do not meet CEQA's definition of significant archaeological resources based on the criteria listed in Section 15064.5 of the State CEQA Guidelines. As such, the resources that occur on site do not substantially contribute to the TCP or any tribal cultural landscapes. Notwithstanding, the Project would be subject to compliance with EIR Mitigation Measure MM 4.5-5, which requires the avoidance or relocation of the features located at Sites CA-RIV-8681/P-33-016534 and CA-RIV-8683/H/P-33-016536 during grading and improvements at the park site and improvements to the park site and further requires the implementation of controlled grading to avoid impacts to these resources, thereby ensuring that these resources are preserved in open space to the maximum feasible extent. Accordingly, Project impacts to known Tribal Cultural Resources within the Project's impact limits would be less than significant requiring no mitigation beyond what already is required pursuant to EIR Mitigation Measure MM 4.5-5.

Although the Project's impacts to previously-identified TCRs would be less than significant, there is a potential for the Project site or off-site improvement areas to contain previously-unidentified surface or subsurface tribal cultural resources. Accordingly, 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.

4.19.5 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 indicated under the analysis of Threshold a., the consulting tribes have identified the potential for TCRs to be present on the Project site, and have indicated that the Project site forms a portion of a TCP. However, the results of the Project's Phase I and Phase II CRAs demonstrate that the resources that occur on the Project site do not meet CEQA's definition of significant archaeological resources based on the criteria listed in Section 15064.5 of the State CEQA Guidelines. As such, the resources that occur on site do not substantially contribute to the TCP or any tribal cultural landscapes. Although cumulatively-considerable impacts to TCRs would therefore be less than significant on a cumulatively-considerable basis, the Project would be subject to compliance with EIR Mitigation Measure MM 4.5-5, which requires the avoidance or relocation of the features located at Sites CA-RIV-8681/P-33-016534 and CA-RIV-8683/H/P-33-016536 during grading and improvements at the park site and improvements to the park site and further requires the implementation of controlled grading to avoid impacts to these resources. Compliance with Mitigation Measure MM 4.5-5 would ensure that these resources are preserved in open space to the maximum feasible extent. Accordingly, Project impacts to known TCRs within the Project's impact limits would be less than significant requiring no mitigation beyond what already is required pursuant to EIR Mitigation Measure MM 4.5-5. However, the Project has the potential to result in cumulatively-considerable impacts to a Tribal Cultural Resource due to the potential presence of previously-unidentified Tribal Cultural Resources that may be located beneath the ground surface of the Project site. 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 Tribal Cultural Resources that may be buried beneath the ground surface. As such, Project impacts to previously-undiscovered Tribal Cultural Resources would be cumulatively considerable prior to mitigation.

4.19.6 Significance of Impacts Before Mitigation

Threshold a: Significant Direct and Cumulatively-Considerable Impact. As a result of the County's consultation efforts with local Native American tribes, the bedrock milling features found within the Project boundary in the southern portions of the Project site proposed for public park use are, in the tribes' view, contributing elements to an identified Tribal Cultural Resource landscape. However, the results of the Project's Phase I and Phase II CRAs demonstrate that the resources that occur on the Project site do not meet CEQA's definition of significant archaeological resources based on the criteria listed in Section 15064.5 of the State CEQA Guidelines. As such, the resources that occur on site do not substantially contribute to the TCP or any tribal cultural landscapes. Notwithstanding, the Project would be subject to compliance with EIR Mitigation Measure MM 4.5-5, which requires the avoidance or relocation of the features located at Sites CA-RIV-8681/P-33-016534 and CA-RIV-8683/H/P-33-016536 during grading and improvements at the park site and further requires the implementation of controlled grading to avoid impacts to these resources, thereby ensuring that these resources are preserved in open space to the maximum feasible extent. Accordingly, Project impacts to known Tribal Cultural Resources within the Project's impact limits would be less than significant requiring no mitigation beyond what already is required pursuant to EIR Mitigation Measure MM 4.5-5. However, there

is a potential for the Project site or off-site improvement areas to contain previously-unidentified surface or subsurface tribal cultural resources. Accordingly, 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.

4.19.7 Mitigation

Mitigation Measures MM 4.5-1 through 4.5-9, included in EIR Subsection 4.5, *Cultural Resources*, shall apply. No additional mitigation measures are required.

4.19.8 Significance of Impacts After Mitigation

Threshold a.: Less-than-Significant with Mitigation Incorporated. 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 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

This Subsection 4.20 evaluates the Project's potential to result in impacts on existing utilities and service systems and/or impacts to the environment that could result from the Project's proposed utilities and service system improvements. The analysis is based in part upon the Eastern Municipal Water District (EMWD) 2020 Urban Water Management Plan (UWMP), dated July 1, 2021, which is herein incorporated by reference and is available for public review at the EMWD, 2270 Trumble Road, Perris, CA 92570 (EMWD, 2021a). In addition, the analysis in this Subsection is based in part on a Project-specific water supply assessment prepared by EMWD, entitled, "Water Supply Assessment Report, Hillwood – Mead Valley Commerce Center," dated March 15, 2023, and included as EIR *Technical Appendix O* (EMWD, 2023).

4.20.1 Existing Conditions

The Project site is located within the service boundaries of the EMWD for water and sewer service, Southern California Edison (SCE) for electricity, and the Southern California Gas Company (SoCal Gas) for natural gas, with numerous service providers for cable television and telephone services. Solid waste hauling service for the Project site is provided by Waste Management of the Inland Empire (WMIE).

A. Water Service and Supply

Water service to the Project area is provided by the EMWD. EMWD provides potable water, recycled water, and wastewater services to an area of approximately 558 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 888,000. EMWD is both a retail and wholesale agency. (EMWD, 2023, p. 3)

EMWD has a diverse portfolio of local and imported supplies. Local supplies include recycled water, potable groundwater, and desalinated groundwater. EMWD works diligently with other stakeholders to protect the quality and integrity of the groundwater basins. These efforts include recharging the basins with imported water and limiting native groundwater production when appropriate. EMWD has developed plans to expand groundwater recharge to improve reliability for its customers during normal and dry year demand periods. In addition to the production of potable groundwater, EMWD treats brackish groundwater at two locations, with a third desalter that came online during 2021. These local supplies help EMWD meet regional goals for supply reliability and help limit the impact of imported water shortages. In addition to local supplies, EMWD receives imported water from the Metropolitan Water District (MWD) in three forms: delivered directly as potable water, delivered to EMWD as raw water and then treated at EMWD's two local filtration plants, or delivered to EMWD as raw water for non-potable use and groundwater recharge. Approximately half of the water used in the EMWD service area is imported by MWD. EMWD has been able to maintain a balance of local and imported water even as new connections have been added. This has been accomplished through the implementation of local supply projects and increased water use efficiency. (EMWD, 2021a, p. 6-2)

Groundwater is pumped from the Hemet/San Jacinto and West San Jacinto areas of the San Jacinto Groundwater Basin. Groundwater in portions of the West San Jacinto Basin is high in salinity and requires desalination for potable use. EMWD owns and operates two desalination plants that convert brackish groundwater from the West San Jacinto Basin into potable water. EMWD also owns, operates, and maintains

its own recycled water system that consists of four Regional Water Reclamation Facilities and several storage ponds spread throughout EMWD's service area that are all connected through the recycled water system. EMWD's goal is to beneficially use 100 percent of the recycled water it produces. (EMWD, 2021a, p. 3-2)

Potable imported water is treated and delivered to EMWD directly from MWD's two large filtration plants. The Henry J. Mills (Mills) Water Treatment Plant treats water from Northern California and provides it to EMWD through two connection points located in the northeast portion of EMWD's service area. The Robert F. Skinner (Skinner) Water Treatment Plant treats a blend of Colorado River water and water from Northern California and provides it to EMWD through a connection point in the southwest portion of EMWD's service area. (EMWD, 2021a. p. 3-3)

EMWD owns and operates two microfiltration plants that filter raw imported water delivered through MWD, removing particulate contaminants to achieve potable water standards. The two treatment plants, the Perris Water Filtration Plant and the Hemet Water Filtration Plant, are located in Perris and Hemet, respectively. Raw water from MWD also is used for groundwater replenishment in the eastern part of the EMWD. EMWD and others can extract this water at a later date for beneficial uses. Untreated water from MWD used for agricultural purposes is delivered in the northeast for use by EMWD retail and wholesale accounts and in the south for Rancho California Water District (RCWD) agricultural accounts. (EMWD, 2021a. p. 3-3)

EMWD produces potable and brackish groundwater from the San Jacinto Groundwater Basin that underlies the EMWD service area. EMWD's groundwater wells pump primarily from the eastern portion of EMWD's service area, with the largest amount of production taking place around the cities of Hemet and San Jacinto. EMWD owns and operates two desalination plants in Sun City, the Menifee Desalter and the Perris I Desalter, which treat brackish groundwater through reverse osmosis to achieve potable water standards. (EMWD, 2021a. p. 3-3)

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 four RWRFs, the San Jacinto Valley RWRF, the Moreno Valley RWRF, the Temecula Valley RWRF, and the Perris Valley RWRF, are spread throughout EMWD's service area. A network of pipelines connects the four RWRFs, as well as several distribution storage ponds, to manage the delivery of recycled water. (EMWD, 2021a. p. 3-3)

EMWD's primary retail customers can be divided into residential, commercial, industrial, institutional, landscape and agricultural irrigation sectors. Although the residential sector is by far EMWD's largest customer segment, each market segment plays a role in the growth and development of EMWD's service area. EMWD wholesales water to seven different agencies. The demand from each agency differs based on its need each year. These demands can be unstable at times as these agencies use water from EMWD to supplement their system when their local facilities are inadequate or fail. EMWD will also provide backup for the North Perris Water System if an emergency should occur. Under the Hemet/San Jacinto Groundwater Management Area Water Management Plan (HSJ Management Plan), EMWD is responsible for providing water to recharge the groundwater basin. A portion of the water supplied will be State Water Project (SWP) water imported through MWD to meet the requirements of the Soboba Band of Luiseño Indians Water Settlement Agreement

and to improve the reliability of groundwater in the area. Individual agencies, including EMWD, will be able to extract their allotted amount of the recharged water from the basin. A portion of the water EMWD wholesales to Lake Hemet Municipal Water District (LHMWD) is raw water for agricultural uses. This water is needed especially when surface water is not available to LHMWD in dry years. Water use for the period from 2005 through 2020, as well as projected water demands for 2025 through 2045, are shown in Table 4.20-1, *EMWD Summary of Total System Water Demand*.

Table 4.20-1 EMWD Summary of Total System Water Demand

	Actual Water Use - AFY				Projected Water Use - AFY				
Category	**2005**	**2010**	**2015**	**2020**	**2025**	**2030**	**2035**	**2040**	**2045**
Retail	85,000	78,200	68,900	75,000	95,200	100,400	106,000	110,100	113,800
Wholesale	29,300	27,100	21,700	36,384	58,200	52,400	54,400	56,700	58,800
Other	47,300	36,600	55,200	50,700	51,400	58,000	56,200	61,900	66,600
Total	**161,600**	**141,900**	**145,800**	**162,084**	**204,800**	**210,800**	**216,600**	**228,700**	**239,200**

(EMWD, 2023, Table 9)

EMWD has developed a number of local supplies to offset imported water demand including recycled water, groundwater, and desalinated groundwater. EMWD's planned supply projects will increase supply reliability to mitigate against impacts to supply during dry and multi-dry years. EMWD also relies in part on imported water supplies. Table 4.20-2, *EMWD Projected Retail Water Supplies (AFY) – Average Year Hydrology*, and Table 4.20-3, *EMWD Projected Wholesale Water Supplies (*AFY), summarize EMWD's retail and wholesale projected supplies through 2045. (EMWD, 2021a, p. 6-23)

B. Sewer Service and Treatment

EMWD is responsible for all wastewater collection and treatment in its service area. There are five operational RWRFs located throughout the 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), as summarized in Table 4.20-4, *Wastewater Treatment Capacity*. (EMWD, n.d.)

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 site would be treated by the Moreno Valley RWRF, which has a daily capacity of 16.0 million gpd and typical daily flows of 11.5 million gpd. (EMWD, n.d.)

C. Stormwater Drainage

The Project site currently slopes downward at an approximately 1 percent to 8 percent grade to the east. The existing drainage pattern for the Project site and the general area is characterized by sheet flows that follow the slope to the east towards Seaton Avenue. Existing flows for the Project site sheet flow to Seaton Avenue

Table 4.20-2 EMWD Projected Retail Water Supplies (AFY) – Average Year Hydrology

Type	Source	2025	2030	2035	2040	2045
Imported	Metropolitan Water District	66,447	72,147	70,247	74,747	78,847
Groundwater	San Jacinto Groundwater Basin	18,753	18,753	18,753	18,753	18,753
Desalination	San Jacinto Groundwater Basin	13,400	13,400	13,400	13,400	13,400
Other	Purified Water Replenishment	4,000	4,000	12,000	12,000	12,000
Recycled Water	Regional Water Reclamation Facilities	39,230	44,920	42,200	47,500	51,800
	Totals:	**141,830**	**153,220**	**156,600**	**166,400**	**174,800**

1. Imported water total represents planned EMWD purchases, not the maximum volume of water available from MWD.
2. Groundwater total includes only 7,303 AFY of pumping from the adjudicated Hemet/San Jacinto Management Plan Area, which is EMWD's long term adjusted base production right. EMWD is also able to pump a portion of water recharged under the Soboba Settlement Agreement that is not used by the Soboba Tribe. EMWD is also able to carry over production rights into future years. As of the end of calendar year 2021, EMWD has accrued a carry-over credit balance of over 26,000 acre-feet.
3. Purified Water Replenishment is a planned indirect potable reuse project.
4. Recycled water supply total excludes volumes to be recharged under Purified Water Replenishment to avoid double counting as well as projected losses due to evaporation and incidental storage pond percolation.

(EMWD, 2023, Table 4)

Table 4.20-3 EMWD Projected Wholesale Water Supplies (AFY) – Average Year Hydrology

Type	Source	2025	2030	2035	2040	2045
Imported	Metropolitan Water District	50,700	44,900	46,900	49,200	51,300
Imported	Soboba Settlement Water	7,500	7,500	7,500	7,500	7,500
Recycled Water	Regional Water Reclamation Facilities	4,770	5,180	5,600	5,600	5,600
	Totals:	**62,970**	**57,580**	**60,000**	**62,300**	**64,400**

1. Imported water total represents planned EMWD purchases, not the maximum volume of water available from MWD.
2. Under the Soboba Settlement Agreement, MWD must provide an annual average of 7,500 AFY of recharge water, however, this water can be pre- or post-delivered based on supply availability and coordination between MWD and EMWD.
3. Due to the interconnected nature of EMWD's recycled water system, losses can be hard to allocate between retail and wholesale service – for simplicity, all recycled water losses are excluded from wholesale and shown in the retail table instead.

(EMWD, 2023, Table 5)

Table 4.20-4 Wastewater Treatment Capacity

Facility	Typical Daily Flows (gpd)	Current Capacity (gpd)	Planned Capacity (gpd)
Moreno Valley Regional Water Reclamation Facility[1]	11,500,000	16,000,000	18,000,000
Perris Valley Regional Water Reclamation Facility	15,500,000	22,000,000	100,000,000
San Jacinto Valley Regional Water Reclamation Facility	7,000,000	14,000,000	27,000,000
Sun City Regional Water Reclamation Facility	2,400,000	3,000,000	15,000,000+
Temecula Valley Regional Water Reclamation Facility	14,000,000	23,000,000	28,000,000
Totals:	**50,400,000**	**78,000,000**	**188,000,000+**

1. The EMWD has the ability to divert about 2,000,000 gpd from the Moreno Valley Regional Water Reclamation Facility to the Perris Valley Regional Water Reclamation Facility.

(EMWD, n.d.)

and eventually drain to storm drain Line E-9.1 of the Perris Valley Master Drainage Plan. (Webb, 2023, p. 1-1) Refer to EIR Subsection 4.10, *Hydrology and Water Quality*, for additional information regarding the site's existing drainage conditions.

D. Solid Waste Collection and Disposal

Solid waste collection and disposal is provided by the Riverside County Department of Waste Resources (RCDWR) through a franchise agreement with a private company, Waste Management Inc. of the Inland Empire (WMIE). Waste within the Project area is sent to transfer stations and landfills managed by the RCDWR and WMIE. Solid waste from the Project site would be taken to the Moreno Valley Transfer Station (MVTS) before being loaded into larger trucks and transferred to either the El Sobrante Landfill, Lamb Canyon Landfill, or the Badlands Landfill for disposal. The following is a description of these facilities:

- Moreno Valley Transfer Station. Solid waste generated within the Project area is collected by WMIE, with the bulk of recyclable waste and green waste delivered to the Moreno Valley Solid Waste Recycling and Transfer Station (MVTS) for processing. The facility is located at 17700 Indian Street in Moreno Valley. It is permitted for a 2,500 tons per day (tpd) operation. (RCDWR, 2023)

- El Sobrante Landfill. The El Sobrante Landfill is located east of Interstate 15 and Temescal Canyon Road to the south of the City of Corona and Cajalco Road at 10910 Dawson Canyon Road. The landfill is owned and operated by USA Waste of California, a subsidiary of Waste Management, Inc., and encompasses 1,322 acres, of which 645 acres are permitted for landfill operation. The El Sobrante Landfill has a total disposal capacity of approximately 209.9 million cubic yards and can receive up to 70,000 tons per week (tpw) of refuse. USA Waste must allot at least 28,000 tpw for County refuse. The landfill's permit allows a maximum of 16,054 tons per day (tpd) of waste to be accepted into the landfill, due to the limits on vehicle trips. If needed, 5,000 tpd must be reserved for County waste, leaving the maximum commitment of Non-County waste at 11,054 tpd. Per the 2022 Annual Report, the landfill had a remaining in-County disposal capacity of approximately 48.7 million tons. In 2023, the El Sobrante Landfill accepted a daily average of 10,341 tons with a period total of approximately 3,184,914 tons. The landfill is expected to reach capacity in approximately 2057. (RCDWR, 2023)

- Lamb Canyon Landfill. The Lamb Canyon Landfill is located between the City of Beaumont and City of San Jacinto at 16411 Lamb Canyon Road (State Route 79), south of Interstate 10 and north of Highway 74. The landfill is owned and operated by Riverside County. The landfill property encompasses approximately 1,189 acres, of which 703.4 acres encompass the current landfill permit area. Of the 703.4-acre landfill permit area, approximately 144.6 acres are permitted for waste disposal. The landfill is currently permitted to receive 5,000 tpd of MSW for disposal and 500 tpd for beneficial reuse. The site has an estimated total disposal capacity of approximately 21.1 million tons. As of January 1, 2024 (beginning of day), the landfill has a total remaining capacity of approximately 6.7 million tons. The current landfill remaining disposal capacity is estimated to last, at a minimum, until approximately 2032. From January 2023 to December 2023, the Lamb Canyon Landfill accepted a daily average of 2,049 tons with a period total of approximately 627,127 tons. Landfill expansion potential exists at the Lamb Canyon Landfill site. (RCDWR, 2023)

- Badlands Landfill. The Badlands Landfill is located northeast of the City of Moreno Valley at 31125 Ironwood Avenue and accessed from State Highway 60 at Theodore Avenue. The landfill is owned and operated by Riverside County. The existing landfill encompasses 1,168.3 acres, with a total disturbance area of 278 acres, of which 150 acres are for refuse disposal. Landfill expansion potential

exists at the Badlands Landfill site. Under the 2022 Solid Waste Facility Permit (SWFP), the permitted disturbance area increases from 278 acres to 811 acres, and the refuse disposal area increases from 150 acres to 409 (in multiple stages). The landfill is currently permitted to receive 5,000 tpd of MSW for disposal and 300 tpd for beneficial reuse. The site has an estimated total capacity of approximately 68.6 million tons. As of January 1, 2024 (beginning of day), the landfill had a total remaining disposal capacity of approximately 49.8 million tons. Under the 2022 SWFP, the landfill would have a remaining disposal capacity estimated to last, at a minimum, until approximately 2059. From January 2023 to December 2023, the Badlands Landfill accepted a daily average of 2,848 tons with a period total of approximately 874,450 tons. (RCDWR, 2023)

4.20.2 Applicable Regulatory Requirements

The following is a brief description of the federal, State, and local environmental laws and related regulations related to utilities and service systems.

A. Federal Regulations

1. Applicable Water Supply Regulations

- 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)

- Safe Drinking Water Act

The Safe Drinking Water Act (SDWA) was established to protect the quality of drinking water in the U.S. This law focuses on all waters actually or potentially designed for drinking use, whether from above ground or underground sources. The Act authorizes EPA to establish minimum standards to protect tap water and requires all owners or operators of public water systems to comply with these primary (health-related) standards. The 1996 amendments to SDWA require that EPA consider a detailed risk and cost assessment, and best available peer-reviewed science, when developing these standards. State governments, which can be approved to implement these rules for EPA, also encourage attainment of secondary standards (nuisance-related). Under the Act, EPA also establishes minimum standards for state programs to protect underground sources of drinking water from endangerment by underground injection of fluids. (EPA, 2023j)

2. Applicable Energy Conservation Regulations

❑ United States Department of Energy/Federal Energy Regulatory Commission

The United States Department of Energy (DOE) is the federal agency responsible for establishing policies regarding energy conservation, domestic energy production and infrastructure. The Federal Energy Regulatory Commission (FERC) is an independent federal agency, officially organized as part of the DOE which is responsible for regulating interstate transmission of natural gas, oil and electricity, reliability of the electric grid and approving of construction of interstate natural gas pipelines and storage facilities. The Energy Policy Act of 2005 has also granted FERC with additional responsibilities of overseeing the reliability of the nation's electricity transmission grid and supplementing state transmission siting efforts in national interest electric transmission corridors.

FERC has authority to oversee mandatory reliability standards governing the nation's electricity grid. FERC has established rules on certification of an Electric Reliability Organization (ERO) which establishes, approves and enforces mandatory electricity reliability standards. The North American Electric Reliability Corporation (NERC) has been certified as the nation's ERO by FERC to enforce reliability standards in all interconnected jurisdictions in North America. Although FERC regulates the bulk energy transmission and reliability throughout the United States, the areas outside of FERC's jurisdictional responsibility include state level regulations and retail electricity and natural gas sales to consumers which falls under the jurisdiction of state regulatory agencies.

The Federal Communications Commission (FCC) requires all new cellular tower construction to be approved by the state or local authority for the proposed site and comply with FCC rules involving environmental review. Additionally, the Telecommunications Act of 1996 requires construction of new cellular towers to comply with the local zoning authority. (FERC, n.d.)

B. State Regulations

1. Applicable Water Supply Regulations

❑ Water Conservation in Landscaping Act

The Water Conservation in Landscaping Act was established to ensure adequate water supplies are available for future uses. To promote the conservation and efficient use of water, the Act requires local agencies to adopt a water efficient landscape ordinance. When such an ordinance had not been adopted, a finding as to why (based on the climatic, geologic, or topographical conditions) such an ordinance is not necessary, must be adopted. In the absence of such an ordinance or findings, the policies and requirements contained in the "model" ordinance drafted by the State of California shall apply within the affected jurisdiction. (CA Legislative Info, n.d.8)

❑ Water Recycling in Landscaping Act

In 2000, Senate Bill 2095 (Water Recycling in Landscaping Act) was approved by Governor Davis requiring any local public or private entity that produces recycled water and determines that within 10 years it will provide recycled water within the boundaries of a local agency, to notify the local agency of that fact. In turn, local agencies are required to adopt and enforce within 180 days a specified recycled water ordinance, unless

the local agency adopted a recycled water ordinance or other regulation requiring the use of recycled water in its jurisdiction prior to January 1, 2001. (CA Legislative Info, n.d.7)

❑ Urban Water Management Planning Act

The Urban Water Management Planning Act (UWMP Act) was proposed and adopted to ensure that water planning is conducted at the local level, as the State of California recognized that two water agencies in the same region could have very different impacts from a drought. The UWMP Act requires water agencies to develop UWMPs over a 20-year planning horizon, and further required UWMPs to be updated every five years. UWMPs are exempt from compliance with CEQA. (DWR, 2016, p. 1-2)

The UWMPs provide a framework for long term water planning and inform the public of a supplier's plans for long-term resource planning that ensures adequate water supplies for existing and future demands. This part of the California Water Code (CWC) requires urban water suppliers to report, describe, and evaluate:

- Water deliveries and uses;
- Water supply sources;
- Efficient water uses;
- Demand management measures; and
- Water shortage contingency planning. (DWR, 2016, p. 1-3)

The UWMP Act has been modified over the years in response to the State's water shortages, droughts, and other factors. A significant amendment was made in 2009, after the drought of 2007-2009 and as a result of the governor's call for a statewide 20 percent reduction in urban water use by the year 2020. This was the Water Conservation Act of 2009, also known as SB X7-7. This Act required agencies to establish water use targets for 2015 and 2020 that would result in statewide savings of 20 percent by 2020. Beginning in 2016, retail water suppliers are required to comply with the water conservation requirements in SB X7-7 in order to be eligible for State water grants or loans. Retail water agencies are required to set targets and track progress toward decreasing daily per capita urban water use in their service area, which will assist the State in meeting its 20 percent reduction goal by 2020. (DWR, 2016, p. 1-2)

❑ Government Code § 66473.7(b)(2) (Senate Bill 221)

Under Senate Bill (SB) 221, approval by a city or county of certain residential subdivisions requires an affirmative written verification of sufficient water supply. SB 221 is intended as a 'fail safe' mechanism to ensure that collaboration on finding the needed water supplies to serve a new large subdivision occurs before construction begins. SB 221 requires the legislative body of a city or county or the advisory agency, to the extent that it is authorized by local ordinance to approve, conditionally approve, or disapprove a tentative map, must include as a condition in any tentative map that includes a subdivision a requirement that a sufficient water supply shall be available. Proof of the availability of a sufficient water supply must be requested by the subdivision applicant or local agency, at the discretion of the local agency, and id based on written verification from the applicable public water system within 90 days of a request. SB 221 does not apply to any residential project proposed for a site that is within an urbanized area and has been previously developed for urban uses, or where the immediate contiguous properties surrounding the residential project site are, or previously have

been, developed for urban uses, or housing projects that are exclusively for very low and low-income households. (DWR, 2003; CA Legislative Info, n.d.6)

❑ California Senate Bill 610

The CWC §§ 10910 through 10915 were amended by the enactment of SB 610 in 2002. SB 610 requires an assessment of whether available water supplies are sufficient to serve the demand generated by a proposed project, as well as the reasonably foreseeable cumulative demand in the region over the next 20 years under average normal year, single dry year, and multiple dry year conditions. Under SB 610, water assessments must be furnished to local governments for inclusion in any environmental documentation for certain projects (as defined in CWC § 10912 [a]) subject to CEQA. (DWR, 2003; CA Legislative Info, n.d.5) SB 610 provides specific guidance regarding how future supplies are to be calculated in the WSAs where an applicable UWMP has been prepared. Specifically, a WSA must identify existing water supply entitlements, water rights, or water service contracts held by the public water system, and prior years' actual water deliveries received by the public water system. In addition, the WSA must address water supplies over a 20-year period and consider normal, single-dry, and multiple-dry year conditions. In accordance with SB 610, projects for which a WSA must be prepared are those subject to CEQA that meet any of the following criteria:

(1) A proposed residential development of more than 500 dwelling units.
(2) A proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space.
(3) A proposed commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space.
(4) A proposed hotel or motel, or both, having more than 500 rooms.
(5) A proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area.
(6) A mixed-use project that includes one or more of the projects specified in this subdivision.
(7) A project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500-dwelling unit project. (DWR, 2003; CA Legislative Info, n.d.5)

The WSA must be approved by the public water supplier serving the project at a regular or special meeting and must be incorporated into the CEQA document. The lead agency must then make certain findings related to water supply based on the WSA.

In addition, under SB 610, a water supplier responsible for the preparation and periodic updating of an UWMP must describe the water supply projects and programs that may be undertaken to meet the total project water use of the service area. If groundwater is identified as a source of water available to the supplier, the following additional information must be included in the UWMP: (1) a groundwater management plan; (2) a description of the groundwater basin(s) to be used and the water use adjudication rights, if any; (3) a description and analysis of groundwater use in the past 5 years; and (4) a discussion of the sufficiency of the groundwater that is projected to be pumped by the supplier. (OPR, 2017c, p. 69)

Because the Project includes a 1,003,510 s.f. light industrial warehouse building that would generate approximately 974 employees, a water supply assessment was required and is included in EIR *Technical Appendix O*.

❑ California Water Code § 10610 et seq. (Senate Bill 901)

Signed into law on October 16, 1995, Senate Bill (SB) 901 required every urban water supplier to identify as part of its urban water management plan, the existing and planned sources of water available to the supplier over a prescribed 5-year period. The code requires the water service purveyor to assess the projected water demand associated with a proposed project under environmental review. Later provisions of SB 901 required compliance in the event that the proposed Project involved the adoption of a specific plan, amendment to, or revision of the land use element of a general plan or specific plan that would result in a net increase in the state population density. Upon completion of the water assessment, cities and counties may agree or disagree with the conclusions of the water service purveyors, but cannot approve projects in the face of documented water shortfalls without first making certain findings. (CA Legislative Info, n.d.4)

❑ Executive Order B-29-15

Executive Order (EO) B-29-15 ordered the State Water Resources Control Board (SWRCB) to impose restrictions to achieve a 25-percent reduction in potable urban water usage through February 28, 2016; directed the California Department of Water Resources (DWR) to lead a statewide initiative, in partnership with local agencies, to collectively replace 50 million square feet of lawns and ornamental turf with drought tolerant landscapes; and directed the California Energy Commission to implement a statewide appliance rebate program to provide monetary incentives for the replacement of inefficient household devices. (SWRCB, 2020)

❑ Executive Order B-37-16

Signed on May 9, 2016, EO B-37-16 established a new water use efficiency framework for California. The order bolstered the state's drought resilience and preparedness by establishing longer-term water conservation measures that include permanent monthly water use reporting, new urban water use targets, reducing system leaks and eliminating clearly wasteful practices, strengthening urban drought contingency plans, and improving agricultural water management and drought plans. (SWRCB, 2020)

❑ Executive Order B-40-17

Signed on April 7, 2017, EO B-40-17 ended the drought state of emergency in all California counties except Fresno, Kings, Tulare, and Tuolumne, where emergency drinking water projects will continue to help address diminished groundwater supplies. It maintains water reporting requirements and prohibitions on wasteful practices. The order was built on actions taken in Executive Order B-37-16, which remains in effect. In a related action, state agencies, including the DWR, released a plan to continue making water conservation a way of life. (SWRCB, 2020)

❑ Sustainable Groundwater Management Act (SGMA)

The Sustainable Groundwater Management Act (SGMA) established a new structure for managing California's groundwater resources at a local level by local agencies. SGMA required, by June 30, 2017, the formation of locally-controlled groundwater sustainability agencies (GSAs) in the State's high- and medium-

priority groundwater basins and subbasins (basins). A GSA is responsible for developing and implementing a groundwater sustainability plan (GSP) to meet the sustainability goal of the basin to ensure that it is operated within its sustainable yield, without causing undesirable results. The GSP Emergency Regulations for evaluating GSPs, the implementation of GSPs, and coordination agreements were adopted by DWR and approved by the California Water Commission on May 18, 2016. (DWR, n.d.)

❑ Senate Bill 606 (SB 606)

SB 606 would require an urban retail water supplier to calculate an urban water use objective no later than November 1, 2023, and by November 1 every year thereafter, and its actual urban water use by those same dates. The bill would require an urban retail water supplier to submit a report to the department for these purposes by those dates. SB 606 would authorize the board to issue information orders, written notices, and conservation orders to an urban retail water supplier that does not meet its urban water use objective, as specified. The bill would authorize the board to waive these requirements for a period of up to 5 years, as specified. SB 606 would impose civil liability for a violation of an order or regulation issued pursuant to these provisions, as specified. The bill would also authorize the board to issue a regulation or informational order requiring a wholesale water supplier, urban retail water supplier, or distributor of a public water supply to provide a monthly report relating to water production, water use, or water conservation. (SWRCB, n.d.)

❑ Assembly Bill 1668 (AB 1668)

AB 1668 requires the SWRCB, in coordination with the Department of Water Resources, to adopt long-term standards for the efficient use of water, as provided, and performance measures for commercial, industrial, and institutional water use on or before June 30, 2022. The bill, until January 1, 2025, establishes 55 gallons per capita daily as the standard for indoor residential water use. Beginning January 1, 2025, the bill establishes the greater of 52.5 gallons per capita daily or a standard recommended by the SWRCB and beginning January 1, 2030, the bill establishes the greater of 50 gallons per capita daily or a standard recommended by the SWRCB. AB 1668 imposes civil liability for a violation of an order or regulation issued pursuant to these provisions, as specified. (SWRCB, n.d.)

❑ California Plumbing Code

Title 24, Part 5 of the California Code of Regulations establishes the California Plumbing Code. The California Plumbing Code sets forth efficiency standards (i.e., maximum flow rates) for all new federally-regulated plumbing fittings and fixtures, including showerheads and lavatory faucets. The 2022 California Plumbing Code, which is based on the 2021 Uniform Plumbing Code, was published by the California Building Standards Commission on July 1, 2022 and will go into effect on January 1, 2023. (CBSC, 2022)

❑ California Code of Regulations (CCR) Title 20 and 24

Title 20 includes state and federal minimum efficiency requirements for energy and water use in regulated appliances. These appliances include, but are not limited to, water heaters, furnaces, heat pumps, air conditioners, refrigerators, pumps, lamps and ballasts, computers, spray sprinkler bodies and showerheads. Manufacturers are responsible for certifying regulated appliances to the California Energy Commission's Modernized Appliance Efficiency Database System. This serves as the manufacturer's claim that it has met all applicable requirements, including testing, and marking products. (Westlaw, n.d.1)

Title 24 of the California Code of Regulations is a broad set of requirements for energy conservation, green design, construction and maintenance, fire and life safety, and accessibility that apply to the structural, mechanical, electrical, and plumbing systems in a building. Title 24 was published by the California Building Standards Commission and applies to all buildings in California. Title 24 receives updates every three years with the latest revisions being in 2019. Title 24 energy compliance requirements apply to new construction and any new installations or retrofits in existing buildings. Older buildings do not have to upgrade their systems, but if they choose to renovate, their new systems must meet Title 24 standards. (CBCS, 2022)

❑ California Water Plan

The California Water Plan is the State's strategic plan for sustainably managing and developing water resources for current and future generations. Required by CWC § 10005(a), it presents the status and trends of California's water-dependent natural resources; water supplies; and agricultural, urban, and environmental water demands for a range of plausible future scenarios. The plan is updated every five years; provides a way for various groups to collaborate on findings and recommendations and make informed decisions regarding California's water future; can't mandate actions or authorize spending for specific actions; doesn't make project- or site-specific recommendations nor include environmental review or documentation as would be required by CEQA; and requires policy- and law-makers to take definitive steps to authorize the specific actions proposed in the plan and appropriate funding needed for their implementation.

California Water Plan Update 2018 (Update 2018) provides recommended actions, funding scenarios, and an investment strategy to bolster efforts by water and resource managers, planners, and decision-makers to overcome California's most pressing water resource challenges. It reaffirms State government's unique role and commitment to sustainable, equitable, long-term water resource management; it also introduces implementation tools to inform sound decision-making. The plan's broad and diverse portfolio of recommended actions address California's critical, systemic, and institutional challenges. (DWR, 2018)

❑ California Water Action Plan

The California Water Action Plan is a roadmap for the State's journey towards sustainable water management. The first California Water Action Plan was released in January 2014 under Governor Brown's administration and updated in 2016. The California Water Action Plan discusses the challenges to water in California: uncertain water supplies, water scarcity/drought, declining groundwater supplies, poor water quality, declining native fish species and loss of wildlife habitat, floods, supply disruptions, and population growth and climate change further increasing the severity of these risks. (CDFW, n.d.1)

2. Applicable Solid Waste Regulations

❑ California Solid Waste Integrated Waste Management Act (AB 939, 1989)

The Integrated Waste Management Act (IWMA) established an integrated waste management hierarchy to guide the California Integrated Waste Management Board (CIWMB) and local agencies in implementation, in order of priority: (1) source reduction, (2) recycling and composting, and (3) environmentally safe transformation and land disposal (it should be noted that the CIWMB no longer exists, and its duties have been assumed by CalRecycle). As part of the IWMA, the CIWMB was given a purpose to mandate the reduction

of disposed waste. (CalRecycle, n.d.1) The IWMA also required, among other items, each county to prepare, adopt, and submit to the Board an Integrated Waste Management Plan (IWMP) and each city or county plan to include an implementation schedule which shows diversion of 50 percent of all solid waste by January 1, 2000 through source reduction, recycling, and composting activities. (CalRecycle, n.d.1)

- ❑ Waste Reuse and Recycling Act (AB 1327)

The Waste Reuse and Recycling Act (WRRA) required the CIWMB to approve a model ordinance for adoption by any local government for the transfer, receipt, storage, and loading of recyclable materials in development projects by March 1, 1993. The WRRA also required local agencies to adopt a local ordinance by September 1, 1993 or allow the model ordinance to take effect. The WRRA requires all development projects that are commercial, industrial, institutional, or marina in nature and where solid waste is collected and loaded, to provide an adequate area for collecting and loading recyclable materials over the lifetime of the project. The area is required to be provided before building permits are issued. (CalRecycle, n.d.2)

- ❑ Mandatory Commercial Recycling Program (AB 341)

Assembly Bill (AB) 341 (Chapter 476, Statutes of 2011 [Chesbro, AB 341]) directed CalRecycle to develop and adopt regulations for mandatory commercial recycling. CalRecycle initiated formal rulemaking with a 45-day comment period beginning Oct. 28, 2011. The final regulation was approved by the Office of Administrative Law on May 7, 2012. AB-341 was designed to help meet California's recycling goal of 75% by the year 2020. AB 341 requires all commercial businesses and public entities that generate 4 cubic yards or more of waste per week to have a recycling program in place. In addition, multi-family apartments with five or more units are also required to form a recycling program. (CalRecycle, n.d.3)

- ❑ California Green Building Standards Code (CAL Green; Part 11 of Title 24, California Code of Regulations)

The current edition of CalGreen became effective January 1, 2020, and the next update will become effective on January 1, 2023. CALGreen is applicable to the planning, design, operation, construction, use, and occupancy of every newly constructed building or structure throughout the State of California (including residential structures and elementary schools). 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). § 5.408.3 of the CALGreen Code requires that 100 percent of trees, stumps, rocks, and associated vegetation and soils resulting from land clearing shall be reused or recycled. For a phased project, such material may be stockpiled on-site until the storage site is developed. Unless otherwise noted in the regulation, all newly constructed buildings in California are subject of the requirements of the CALGreen Code. (CBSC, 2022)

❑ Senate Bill 1374 (SB 1374)

Signed in 2002, the Construction and Demolition Waste Materials Diversion Requirements (SB 1374) were codified in Public Resources Code Section 42919. SB 1374 requires that jurisdictions include in their annual AB 939 report a summary of the progress made in diverting construction and demolition waste. The legislation also required that CalRecycle adopt a model ordinance for diverting 50 to 75 percent of all construction and demolition waste from landfills. The model ordinance was adopted by CalRecycle on March 16, 2004. (CA Legislative Info, n.d.3)

❑ Assembly Bill 1826 (AB 1826)

AB 1826 requires jurisdictions to implement an organic waste recycling program for businesses, including outreach, education, and monitoring of affected businesses. Additionally, each jurisdiction is to identify a multitude of information, including barriers to siting organic waste recycling facilities, as well as closed or abandoned sites that might be available for new organic waste recycling facilities. AB 1826 defines "organic waste" as food waste, green waste, landscape and pruning waste, non-hazardous wood waste, and food-soiled paper waste that is mixed in with food waste. It also defines a "business" as a commercial or public entity, including, but not limited to, a firm, partnership, proprietorship, joint stock company, corporation, or association that is organized as a for-profit or nonprofit entity, or a multifamily residential dwelling consisting of five or more units. As of January 1, 2017, businesses that generate 4 cubic yards or more of organic waste per week are subject to this requirement. Commencing January 1, 2019, businesses that generate 4 cubic yards or more of commercial solid waste per week also are required to arrange for organic waste recycling services. CalRecycle may reduce this triggering threshold for organics recycling to 2 cubic yards or more of commercial solid waste per week as of January 1, 2020. (CA Legislative Info, n.d.2)

❑ Zero Waste California

Zero Waste California is a state program launched by CalRecycle in 2002 to promote a new vision for the management of solid waste by maximizing existing recycling and reuse efforts, while ensuring that products are designed for the environment and have the potential to be repaired, reused, or recycled. The Zero Waste California program promotes the goals of market development, recycled product procurement, and research and development of new and sustainable technologies. (CalRecycle, n.d.4)

❑ Senate Bill 1383

The Senate Bill (SB) 1383 regulations to reduce organics waste disposal and went into effect on January 1, 2022. SB 1383 establishes methane emissions reduction targets in a Statewide effort to reduce emissions of short-lived climate pollutants caused by organics waste disposal SB 1383 requires that jurisdictions conduct education and outreach on organics recycling to all residents, businesses (including those that generate edible food that can be donated), haulers, solid waste facilities, and local food banks and other food recovery organizations. (CalRecycle, n.d.)

3. *Applicable Energy Conservation Regulations*

- ❑ California Energy Efficiency Standards for Residential and Nonresidential Buildings (24 CA. Code Regs. 6)

The Building Energy Efficiency Standards were first adopted in 1976 and have been updated periodically since then as directed by statute. In 1975 the Department of Housing and Community Development adopted rudimentary energy conservation standards under their State Housing Law authority that were a precursor to the first generation of the Standards. However, the Warren-Alquist Act was passed one year earlier with explicit direction to the Energy Commission (formally titled the State Energy Resources Conservation and Development Commission) to adopt and implement the Standards. The Energy Commission's statute created separate authority and specific direction regarding what the Standards are to address, what criteria are to be met in developing the Standards, and what implementation tools, aids, and technical assistance are to be provided. (CBSC, 2022)

The Standards contain energy and water efficiency requirements (and indoor air quality requirements) for newly constructed buildings, additions to existing buildings, and alterations to existing buildings. Public Resources Code (PRC) §§ 25402 subdivisions (a)-(b) and 25402.1 emphasize the importance of building design and construction flexibility by requiring the Energy Commission to establish performance standards, in the form of an "energy budget" in terms of the energy consumption per square foot of floor space. For this reason, the Standards include both a prescriptive option, allowing builders to comply by using methods known to be efficient, and a performance option, allowing builders complete freedom in their designs provided the building achieves the same overall efficiency as an equivalent building using the prescriptive option. Reference Appendices are adopted along with the Standards that contain data and other information that helps builders comply with the Standards. (CBSC, 2022)

The 2022 update to the Building Energy Efficiency Standards focuses on several key areas to improve the energy efficiency of newly constructed buildings and additions and alterations to existing buildings. The most significant efficiency improvements to the residential Standards include the introduction of photovoltaic into the prescriptive package, improvements for attics, walls, water heating, and lighting. The most significant efficiency improvements to the nonresidential Standards include alignment with the ASHRAE 90.1 2017 national standards. The 2022 Standards also include changes made throughout all of its sections to improve the clarity, consistency, and readability of the regulatory language. (CBSC, 2022)

PRC § 25402.1 also requires the Energy Commission to support the performance standards with compliance tools for builders and building designers. The Alternative Calculation Method (ACM) Approval Manual adopted by regulation as an appendix of the Standards establishes requirements for input, output, and calculational uniformity in the computer programs used to demonstrate compliance with the Standards. From this, the Energy Commission develops and makes publicly available free, public domain building modeling software in order to enable compliance based on modeling of building efficiency and performance. The ACM Approval Manual also includes provisions for private firms seeking to develop compliance software for approval by the Energy Commission, which further encourages flexibility and innovation. (CBSC, 2022)

❑ California Solar Rights and Solar Shade Control Acts

The Solar Rights Act sets parameters for establishing solar easements, prohibits ordinances and private covenants which restrict solar systems, and requires communities to consider passive solar and natural heating and cooling opportunities in new construction. This Act is applicable to all California cities and counties. California's solar access laws appear in the state's Civil, Government, Health and Safety, and PRCs. California PRC § 25980 sets forth the Solar Shade Control Act, which encourages the use of trees and other natural shading except in cases where the shading may interfere with the use of active and passive solar systems. (EPIC, 2014; EPIC, 2010)

❑ California Independent System Operator (ISO)

The California ISO is an independent public benefit corporation responsible for operating California's long-distance electric transmission lines. The California ISO is led by a five-member board appointment by the Governor and is also regulated by FERC. While transmission owners and private electric utilities own their lines, the California ISO operates the transmission system independently to ensure that electricity flows comply with federal operational standards. The California ISO analyzes current and future electrical demand and plans for any needed expansion or upgrade of the electric transmission system. (California ISO, n.d.)

❑ California Public Utilities Commission (CPUC)

The CPUC establishes policies and rules for electricity and natural gas rates provided by private utilities in California such as Southern California Edison (SCE) and Southern California Gas Company (SoCalGas). Public owned utilities such as the Los Angeles Department of Water and Power (LADWP) do not fall under the CPUCs jurisdiction. The Digital Infrastructure and Video Competition Act of 2006 (DIVCA) established the CPUC as the sole cable/video TV franchising authority in the State of California. DIVCA took effect January 1, 2007.

The CPUC is overseen by five commissioners appointed by the Governor and confirmed by the state Senate. The CPUC's responsibilities include regulating electric power procurement and generation, infrastructure oversight for electric transmission lines and natural gas pipelines and permitting of electrical transmission and substation facilities. (CPUC, n.d.)

❑ California Energy Commission (CEC)

The CEC is a planning agency which provides guidance on setting the state's energy policy. Responsibilities include forecasting electricity and natural gas demand, promoting and setting energy efficiency standards throughout the state, developing renewable energy resources and permitting thermal power plants 50 megawatts and larger. The CEC also has regulatory specific regulatory authority over publicly owned utilities to certify, monitor and verify eligible renewable energy resources procured. (CEC, n.d.1)

❑ Senate Bill 1389 (SB 1389)

Senate Bill (SB) 1389 (PRC §§ 25300–25323), adopted in 2002, requires the development of an integrated plan for electricity, natural gas, and transportation fuels. Under the bill, the CEC must adopt and transmit to the Governor and Legislature an Integrated Energy Policy Report every two years. In 2018, the CEC decided

to write the Integrated Energy Policy Report in two volumes. The Volume I, which was published on August 1, 2018, highlights the implementation of California's innovative policies and the role they have played in moving toward a clean energy economy. Volume II, which was adopted in February 2019, identifies several key energy issues and actions to address these issues and ensure the reliability of energy resources. (CA Legislative Info, n.d.1)

C. *Local Regulations*

1. *Riverside County Ordinances*

These regulations are already in effect in Riverside County and are not part of the project, GPA No. 960. Rather, these policies are considered to play a role in ensuring any potential environmental effects are avoided, reduced or minimized through their application on a case-by-case basis. The County of Riverside has existing programs in place that ensure applicable policies are imposed once a development proposal triggers a specific policy or policies. The need for specific policies is determined through subsequent site-specific CEQA analysis performed at the time of implementing project review. These measures are implemented, enforced and verified through their inclusion into project conditions of approval.

- Ordinance No. 457 - Building Codes and Fees: This ordinance specifies the various state and/or professional society building and construction standards by which all development approved within unincorporated Riverside County must comply. It includes specifications for use of the California Building Code, the Uniform Housing Code, the California Plumbing Code, the California Mechanical Code and the California Electrical Code, among others. Use of these codes ensures that any development or construction within Riverside County meets the necessary standards for suitability, durability, safety and so on. In terms of erosion, runoff, drainage, flood control and safety, the codes include requirements for the structural integrity of buildings and other facilities for withstanding precipitation, inundation and water flow. They also specify standards for grading, lot, roadway and drainage design to ensure that water flows (particularly runoff) are directed or channeled appropriately ways. The ordinance also imposes minimum standards for permanent erosion control and associated landscaping. It includes requirements for preparation of a Storm Water Pollution Prevention Plan (SWPPP) for construction sites, implementation of year-round best management practices (BMPs) on such sites and the monitoring and maintaining of the BMPs to ensure they continue to provide adequate stormwater flow / runoff protections, erosion protection and sediment controls, both during and after construction activities on a site. As a result, compliance with this ordinance, as required in standard Riverside County development conditions of approval, ensures adequate measures are in place to prevent adverse effects from construction and urban runoff, stormwater flows and water erosion on developed lands. (Riverside County, 2015a, p. 4.19-267)

- Ordinance No. 458 - Regulating Flood Hazard Areas and Implementing the National Flood Insurance Program: This ordinance was adopted pursuant to the requirements of the National Flood Insurance Program (Title 42, United States Code, Section 4001 et. seq., as amended) to protect the public's health, safety and welfare from flooding hazards. It does so by regulating development within flood hazard areas and establishing a variety of land use and construction standards for such development. The ordinance includes construction standards that apply to all new structures and substantial improvements to existing structures within Riverside County's mapped Special Flood Hazard Areas

and floodplains. Among other requirements, these types of construction are required to: use materials resistant to flood damage; use construction methods and practices that minimize flood damage; and have electrical, heating, ventilation, plumbing and air conditioning equipment and other service facilities designed and located to prevent water from entering or affecting them during flooding. (Riverside County, 2015a, p. 4.19-267)

Further, all subdivision proposals and other proposed new development, including manufactured home parks or subdivisions greater than 50 lots or 5 acres are required to design and construct all utilities and facilities, including sewer, gas, electrical, propane tanks and water systems so as to minimize or eliminate flood damage. It also requires provisions of adequate drainage and obtainment of all other required state and federal permits. All new and replacement water supply systems must be designed to minimize or eliminate infiltration of floodwaters into the systems. New and replacement sanitary sewage systems must also be designed to minimize or eliminate infiltration of floodwaters into the systems and discharges from the systems into flood waters and onsite waste disposal systems must be located to avoid impairment or causing contamination during flooding. These measures ensure that water and wastewater systems are adequately protected from flooding and would not contaminate or be contaminated by floodwaters. Thus, this ordinance serves to protect water supplies, water and wastewater facilities and water quality for both surface water and groundwater. (Riverside County, 2015a, p. 4.19-267)

- Ordinance No. 461 - Road Improvement Standards: While not addressing water resources directly, this ordinance does set forth standards for roads, bridges and other transportation-related facilities, including those aspects of hydrology, flood control and associated drainage functions. Because of their linear and impervious nature, paved roadways typically act as conduits for water flow, particularly stormwater (urban) runoff from developed areas. In addition, they often may function informally as barriers (dams, dikes or levees) to water flow or cause water channelization when constructed on raised beds or with tall curbs or crowns. Also, roadways often cross rivers, streams, drainages, floodplains and similar features. All crossings must be sufficiently engineered to withstand the potential impacts of flood flows. In total, this ordinance serves to mitigate potential flooding hazards to people, property and structures by ensuring that roads and associated improvements and features are designed, constructed and maintained in a manner appropriate to the water flow potential and flooding hazard. It also serves to place to prevent significant adverse impacts due to road construction, runoff and stormwater flows from roadways, as well as water erosion. (Riverside County, 2015a, pp. 4.19-267 and -268)

- Ordinance No. 592 – Regulating Sewer Use, Sewer Construction and Industrial Wastewater Discharges in County Service Areas: Ordinance No. 592 sets various standards for sewer use, construction and industrial wastewater discharges within Riverside County to protect both water quality and the infrastructure conveying and treating these wastewaters. Among other things, it establishes construction requirements for sewers, laterals, house connections and other sewerage facilities and for abandoned sewers, septic tanks and seepage pits in accordance with the Uniform Plumbing Code. It prohibits the discharge of rainwater, stormwater, groundwater, street drainage, subsurface drainage or yard drainage into any sewerage facility which is directly or indirectly connected to the sewerage

facilities of Riverside County. Rather, these discharges must be emptied into storm drainage systems, not sanitary sewer systems. (Riverside County, 2015a, p. 4.19-268)

It further protects Riverside County sewer systems and wastewater treatment facilities by prohibiting discharges (either directly or indirectly) to the county sewerage system of any of the following wastes: Gasoline, benzene, naphtha, solvent, fuel oil, flammable or explosive substances, hazardous amounts of toxic or poisonous substances, obstructive solids or viscous substances (including "asphalt, dead animals, ashes, sand, mud, straw, industrial process shavings, metal, glass, rags, feathers, tar, plastics, wood, whole blood, paunch manure, bones, hair and flesh, entrails, paper dishes, paper cups, milk containers or similar paper products, either whole or ground"), excessive concentrations of non-biodegradable oil, petroleum oil or refined petroleum products, dispersed biodegradable oils and fats, such as lard, tallow or vegetable oil in excessive concentrations that would tend to cause adverse effects on the sewerage system, excessively high concentrations of chemicals, such as cyanide, sulfides, acids, bases, chlorides, precipitates, dyes, plastics, metals, heavy metals, radioactive materials, etc., as well as "any substances that would interfere detrimentally with wastewater treatment processes, cause a public nuisance or cause any hazardous condition to occur in the sewerage system." (Riverside County, 2015a, p. 4.19-268)

In summary, this ordinance prohibits any discharges to any public sewer (which directly or indirectly connects to Riverside County's sewerage system) any wastes that may have an adverse or harmful effect on sewers, maintenance personnel, wastewater treatment plant personnel or equipment, treatment plant effluent quality, public or private property or may otherwise endanger the public, the local environment or create a public nuisance. As a result, this ordinance serves to protect water supplies, water and wastewater facilities and water quality for both surface water and groundwater. (Riverside County, 2015a, p. 4.19-268)

- Ordinance No. 617– Hazardous Substances (Regulating Underground Storage Tanks): Ordinance No. 617 implements Chapter 6.7 of the California Health and Safety Code, Sections 25280, et seq., which establishes and provides for a program for the prevention of contamination from improper storage of hazardous substances stored underground. It also ensures that newly installed underground tank systems meet appropriate construction standards and that existing underground tanks systems are properly maintained, monitored and inspected to protect health, property and the public. It also establishes and a Local Oversight Program for the unauthorized releases of petroleum and petroleum-related materials from leaking underground tank systems which require remedial action and requires remediation of unauthorized releases from underground tank systems to prevent long-term threats to the public health, water quality and the environment. (Riverside County, 2015a, p. 4.19-268)

- Ordinance No. 650 – Sewer Discharge in Unincorporated Territory: Ordinance No. 650 protects water quality, storm drains and surface waters by prohibiting the discharge or deposition of any sewage, sewage effluent or non-hazardous waste, treated or untreated, into any streams or bodies of water above or below the ground, within Riverside County. It also makes it "unlawful for any person to install or alter plumbing facilities or drainage systems for the discharge or deposit of any sewage, sewage effluent or nonhazardous waste from any dwelling, house or building" without a permit from the County of Riverside. It requires that sewage effluent must be disposed according to the minimum

standards of the most recent edition of the Uniform Plumbing Code and the sewage disposal requirements of the Riverside County Department of Environmental Health. Most importantly, it specifies that if sanitary drainage system (i.e., sewer) is not available, an 'Onsite Wastewater Treatment System' (OWTS) (an individual or community onsite wastewater treatment, pretreatment and dispersal system including, a conventional or alternative subsurface discharge) must be provided. The type of sewage facilities installed shall be determined on the basis of location, soil porosity, site slope and ground water level, and shall be designed to receive all sanitary sewage from the property. (Riverside County, 2015a, pp. 4.19-268 and -269)

It also includes a variety of standards related to OWTS, including: prohibition on surface drainage entering any part of the OWTS; requirements for setbacks between subsurface sewage disposal components (including septic tanks, distribution and leaching systems) and any water well; requirements that the OWTS function in a sanitary manner and not result in contamination, pollution or creation of a nuisance or endanger the safety of any domestic water supply or public health. OWTS are also subject to detailed plan review and approval, as well as pre-site and construction inspections by the County of Riverside. Thus, this ordinance serves to protect water supplies, water and wastewater facilities and water quality for both surface water and groundwater. (Riverside County, 2015a, p. 4.19-269)

- Ordinance No. 659 – Development Mitigation Fee for Residential Development (DIF Program): This ordinance sets a range of development impact fees to be used "in order to effectively implement the Riverside County General Plan, manage new residential, commercial and industrial development and reduce impacts caused by such development." It is intended to mitigate growth impacts (particularly those arising from population growth) on public facilities within Riverside County to ensure residents are not placed into conditions perilous to their health, safety, comfort or welfare. (Riverside County, 2015a, p. 4.19-269)

  The ordinance establishes the process for (and nexus to) the construction or acquisition of various types of public facilities, as well as the preservation of open space, wildlife and their associated habitats. The DIF program ensures that "all new development bear its fair share cost of providing the facilities, open space and habitat reasonably needed to serve that development." Hence the program applies to all new residential, commercial and industrial development, as well as to surface mining. Fees are assessed on the basis of regional location within Riverside County, land use type (per dwelling unit for residential units and per acre for all other uses) and the applicable categories of facilities to be provided. For transportation and flood control, fees are based on forecast development needs for the subsequent 20 years. (Riverside County, 2015a, p. 4.19-269)

  With respect to flood control facilities, the DIF program ensures fees are collected and expended to provide necessary facilities commensurate with the ongoing levels of development in specific areas not already subject to, or in addition to, Area Drainage Plan fees as under Ordinance No. 458. This ordinance provides mitigation for development impacts on flood control facilities and future needs for flood control by ensuring that funds are collected and utilized to provide needed facilities as development progresses within Riverside County. The provision of these facilities ensures new

development does not expose people, property or structures to undue risks from drainage or stormwater flows. (Riverside County, 2015a, p. 4.19-269)

- Ordinance No. 682 – Construction, Reconstruction, Abandonment and Destruction of Wells: Ordinance No. 682 establishes minimum standards for construction, reconstruction, abandonment and destruction of wells in order to protect underground water resources and provide safe water within Riverside County. This ordinance is enforced by the Riverside County Department of Environmental Health. It requires county permits for construction, reconstruction or decommissioning (destruction) of various types of water wells. It also sets standards for these activities pursuant to those "recommended in the Bulletins of the California Department of Water Resources." It contains prohibitions on placing wells where sources of pollution or contamination could contaminate or pollute the well water. It also requires wells be located "an adequate distance from all potential sources of contamination and pollution," including minimums of 50 feet from sewers, 100 feet from watertight septic tanks, sub-surface sewage leach line or leach fields and animal or fowl enclosures, 150 feet from cesspools or seepage pits, and 200 feet from any surface sewage disposal system discharging 2,000 gallons per day or more. Minimum distances from other sources of pollution or contamination shall be as determined by the Department upon investigation and analysis of the probable risks involved. It also sets a variety of water quality standards for water supply wells pursuant to the standards for constituents required in the California Code of Regulations, Title 22, "Domestic Water Quality and Monitoring." All individual domestic water wells must also be tested for and meet the nitrate, fluoride and TDS (or total filterable residue) standards in Title 22. Through these means, this ordinance serves to protect water supplies, as well as water quality, for groundwater. (Riverside County, 2015a, p. 4.19-270)

- Ordinance No. 754 - Stormwater/Urban Runoff Management and Discharge Controls: This ordinance protects the health, safety and general welfare of Riverside County residents by imposing restrictions to reduce pollutants in stormwater discharges to the maximum extent practicable, regulating illicit connections and discharges to the storm drain system and regulating non-stormwater discharges to the storm drain system. The intent of this ordinance is to protect and enhance the water quality of Riverside County watercourses, water bodies, groundwater and wetlands in a manner pursuant to and consistent with applicable requirements contained in the federal CWA and the CWC, as well as other applicable state and federal regulations. Among other things, the ordinance requires that all discharge to storm drain systems be confined to stormwater runoff discharged pursuant to a National Pollutant Discharge Elimination System (NPDES) permit or as otherwise authorized by the Santa Ana River, San Diego or Colorado River Basin Regional Water Quality Control Board or the State Water Resources Control Board in compliance with the Clean Water Act. This ordinance also establishes a variety of standards and BMPs associated with controlling stormwater runoff, including requirements to: (Riverside County, 2015a, p. 4.19-270)

    - Increase permeable areas (by leaving highly porous soil and low-lying areas undisturbed; by incorporating landscaping and open space into the project design; by using porous materials for or near driveways and walkways; and, by incorporating detention ponds and infiltration pits into the project design). (Riverside County, 2015a, p. 4.19-270)
    - Direct runoff to permeable areas (by orienting it away from impermeable areas and towards swales, berms, green strip filters, gravel beds or French drains; by installing rain-gutters oriented towards

permeable areas; by modifying the grade of the property to divert flow to permeable areas and minimize the amount of stormwater runoff leaving the property; and, by designing curbs, berms or other structures so they do not isolate permeable or landscaped areas). (Riverside County, 2015a, p. 4.19-270)

- Maximize stormwater storage for reuse (by using retention structures, subsurface areas, cisterns or other structures to store stormwater runoff for reuse or slow release). (Riverside County, 2015a, p. 4.19-270)

Although focusing on the pollution-control aspects of the NPDES program, in conjunction with Ordinance No.'s 457 and 460, this ordinance establishes a range of standards and permit requirements that collectively serve to ensure that flooding, stormwater flows and runoff are managed appropriately to protect water quality and water infrastructure and prevent risks to people, property, structures and facilities within Riverside County. By requiring specific standards for development and establishing a program for the approval, implementation and verification of such measures, this ordinance mitigates potential hazards that could arise from stormwater flows and runoff, including flooding and erosion, and its effects on water quality and water infrastructure. (Riverside County, 2015a, pp. 4.19-270 and -271)

- Ordinance No. 859 - Water-Efficient Landscape Requirements: Adopted in 2006, this ordinance outlines water-efficient landscape standards for development within Riverside County in order to implement requirements of the California Water Conservation in Landscaping Act of 2006 and the California Code of Regulations Title 23, Division 2, Chapter 2.7. It includes a number of measures designed to conserve water, including: provisions for water management practices and water waste prevention; establishment of a structure for planning, designing, installing, maintaining and managing water-efficient landscapes in new and rehabilitated projects; reducing water demands from landscapes without adversely affecting landscape quality or quantity; requirements for landscapes not exceeding a maximum water demand of 70% of its reference evapotranspiration (ETo) or any lower percentage required by state legislation; elimination of water waste from overspray and/or runoff; and, education of the public regarding the benefits of landscape water conservation. It includes a number of standards, including planting plan requirements, irrigation design plan requirements, soil management plan requirements, grading design plan requirements and landscape irrigation and maintenance measures. By conserving water, this ordinance protects existing water supplies (surface and groundwater). And by limiting water applications, it also helps minimize water runoff and water erosion in landscaped areas. (Riverside County, 2015a, pp. 4.19-271 and -272)

2. Riverside County Flood Control and Water Conservation District (RCFCWCD)

The RCFCWCD was created in 1945 by act of state legislature in order to protect the people, property and watersheds of Riverside County from damage or destruction from flood and stormwater, and to conserve, reclaim and save such waters for beneficial use. The District encompasses 2,700 miles of western Riverside County and extends easterly into the Coachella Valley to include the cities of Palm Springs, Cathedral City and Desert Hot Springs. (East of this, flood control functions are performed by the Coachella Valley Water District.) The RCFCWCD is governed by a board, comprised of Riverside County's Board of Supervisors. The

District also manages Riverside County's Master Drainage Plans and Area Drainage Plans. (Riverside County, 2015a, p. 4.19-272)

Functionally, the District provides a number of services, including: identification of flood hazards and problems; regulation of floodplains, regulation of drainage and development; planning for county watercourses and drainage planning; education for flood prevention and safety; construction of flood control structures and facilities; flood warning and early detection; and, maintenance and operation of county flood control structures. The District also provides certain non-tax supported functions, such as floodplain management, development review, NPDES compliance, etc., for the portions of the entire county. And unlike County of Riverside departments, the RCFCWCD has the authority to expend tax dollars within city boundaries as well as within unincorporated areas. (Riverside County, 2015a, p. 4.19-272)

4.20.3 Basis for Determining Significance

A. *Thresholds of Significance*

According to Section XIX of Appendix G to the State CEQA Guidelines, the proposed Project would result in a significant impact to utilities and service systems if the Project or any Project-related component would:

- *Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects;*
- *Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years;*
- *Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments;*
- *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; or*
- *Fail to comply with federal, state, and local management and reduction statutes and regulations related to solid waste.*

The following thresholds are derived from Riverside County's Environmental Assessment Checklist, as modified by the 2018 updates to Appendix G to the State CEQA Guidelines, in order to evaluate the significance of the proposed Project's impacts on utilities and service systems. The proposed Project would result in a significant impact to utilities and service systems if the Project or any Project-related component would:

a. *Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage systems, whereby the construction or relocation would cause significant environmental effects;*

b. Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years;

c. Require or result in the construction of new wastewater treatment facilities, including septic systems, or expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects;

d. Result in a determination by the wastewater treatment provider that serves or may service the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments;

e. 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;

f. Fail to comply with federal, state, and local management and reduction statutes and regulations related to solid wastes including the CIWMP (County Integrated Waste Management Plan);

g. Impact the following facilities requiring or resulting in the construction of new facilities or the expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects:

1. Electricity;

2. Natural gas;

3. Communications systems;

4. Street lighting;

5. Maintenance of public facilities, including roads; or

6. Other governmental services.

The significance thresholds set forth in Riverside County's Environmental Assessment Checklist, as modified/updated per the 2018 updates to the State CEQA Guidelines, were used to evaluate the significance of the proposed Project's impacts to utilities and service systems.

4.20.4 Impact Analysis

Threshold a.: ***Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage systems, whereby the construction or relocation would cause significant environmental effects?***

A. Water Service and Facilities

Under existing conditions, there is an existing 18-inch water line within Cajalco Road, which increases to a 21-inch water line east of Seaton Avenue. There also is an 8-inch water line within Seaton Avenue that increases to a 16-inch water line north of Cajalco Road. The proposed building would include a connection to the existing water line within Seaton Avenue at the northeast corner of the building. Two fire lines are

proposed, with the points of connection for the fire lines occurring at the northeast corner and at the southeast corner of the northern 44.66 net acres of the Project site, which would also connect to the existing water line within Seaton Avenue. 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. Impacts associated with the Project-related water facilities are inherent to the Project's construction phase, and impacts 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 improvements. As such, with the mitigation measures specified in this EIR, Project impacts due to water improvements would be less than significant.

B. Wastewater Facilities

Under existing conditions, there is a sewer line within Cajalco Road. Sewer service to the building would be provided by a connection to the existing sewer line within Cajalco Road at the northeast corner of the Project site. The Project 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. Impacts associated with the proposed sewer improvements are inherent to the Project's construction phase, and impacts 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 sewer improvements that have not already been addressed by this EIR. As such, with the mitigation measures specified in this EIR, Project impacts due to sewer improvements would be less than significant.

C. Wastewater Treatment

Wastewater generated by the Project would be conveyed to the Moreno Valley RWRF for treatment. As previously indicated, the Moreno Valley RWRF has a daily capacity of 16.0 million gallons per day (mgd) and typical daily flows of 11.5 mgd (EMWD, n.d.). As shown in Table 4.20-5, *Project-Related Wastewater Generation*, at buildout the Project is estimated to generate approximately 84,319 gpd of wastewater requiring treatment, based on the rates used in EIR No. 521, which was prepared in conjunction with Riverside County's 2015 General Plan Update. It should be noted that the 2015 General Plan Update wastewater generation factors were based on the 1997 Master Plan for the Vallecitos Water District (VWD). The Project's wastewater generation would represent approximately 1.9% of the current available treatment capacity at the Moreno Valley RWRF (84,319 gpd ÷ [16.0 mgd – 11.5 mgd] x 100 = 1.9%). 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. (Riverside County, 2015a, Table 4.19-BJ; VWD, 2018, Table 3-2)

Table 4.20-5 Project-Related Wastewater Generation

Land Use	Net Acreage	Generation Factors	Wastewater Generation (gpd)
Industrial	44.66 net acres	1,500 gpd/acre	66,990
Park (Recreational)	13.33 net acres	1,300 gpd/acre	17,329
Total:	**57.99 acres**	**--**	**84,319 gpd**

(Riverside County, 2015a, Table 4.19-BJ; VWD, 2018, Table 3-2)

D. Stormwater Drainage System

Runoff from the Project site would be conveyed throughout the site via proposed ribbon gutters and curbs and gutters. On-site runoff would then be captured by a network of drainage inlets provided at low points. Proposed private underground storm drains would convey captured flows towards an underground storage chamber before being pumped to a proposed biotreatment device (modular wetland system [MWS] units) for water quality treatment. Off-site flows from Decker Road, Cajalco Road, and Seaton Avenue would be collected via catch basins and conveyed to an on-site detention chamber for water quality treatment. All treated flows would then be conveyed off-site to the proposed 36-inch extension of Master Drainage Plan (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. The Project site also intercepts off-site flows along a small portion of the southern boundary. These off-site flows would enter a 0.8-acre landscape area on the Project site. Larger storm events for this area would 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 and 1-2) Impacts associated with the above-described drainage system improvements are inherent to the Project's construction phase, and impacts 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 storm drainage improvements. As such, with the mitigation measures specified in this EIR, Project impacts due to stormwater drainage improvements would be less than significant.

Threshold b.: ***Would the Project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?***

EMWD is responsible for supplying the region with its potable and non-potable water needs. On July 1, 2021, the EMWD Board of Directors adopted the 2020 UWMP. This plan provides information on EMWD's projected supplies and demands in five-year increments through the year 2045, and reports EMWD's progress on water use efficiency targets as defined in the Water Conservation Act of 2009. The 2020 UWMP shows that the majority of EMWD's existing and future planned demand is to be met through imported water delivered by MWD. Demand for EMWD shown in the 2020 UWMP is projected across the EMWD service area as a whole and is not project specific. The 2020 UWMP is herein incorporated by reference and is available for public review at EMWD, 2270 Trumble Road, Perris, California 92570.

To assess the ultimate effect of the Project's water demands and service needs, the EMWD has prepared a WSA for the Project (included as *Technical Appendix O* to this EIR), in accordance with Senate Bill 610 (SB 610) and Senate Bill 221 (SB 221) (EMWD, 2023). SB 610 requires the preparation of a water supply

assessment report for projects that propose to construct the equivalent of 500 or more residential dwelling units. SB 221 requires affirmative written verifications of sufficient water supply. Provided below is a summary of EMWD's water supplies and water demand projections based on the UWMP and the Project-specific WSA.

Population Projections

The population projections for EMWD's service area were updated in the 2020 UWMP using information obtained from the most recent regional transportation plan/sustainable communities strategy completed by the Southern California Association of Governments (SCAG). This study, known as Connect SoCal, forecasted regional growth through 2045, and was adopted by SCAG on September 3, 2020. The data available from Connect SoCal includes projections of population, households, and employment within each of SCAG's Traffic Analysis Zones, which closely resemble block groups in the United States Census. (EMWD, 2023, p. 4)

Consistent with the significant percentage of undeveloped land within EMWD's service area, growth is anticipated to continue throughout the 2020 UWMP's 25-year planning horizon, as shown in Table 4.20-6, *EMWD Service Area Projected Population*. Currently, approximately 40 percent of EMWD's service area is built out. As population and the associated water demands increase, EMWD will continue to proactively manage its water supply portfolio through the development of local resources in conjunction with additional imported water purchases from MWD as outlined in the 2020 UWMP. (EMWD, 2023, p. 4)

Table 4.20-6 EMWD Service Area Projected Population

Population Served	2020	2025	2030	2035	2040	2045
Retail	603,950	649,700	695,500	741,300	774,300	807,200
Wholesale	255,210	271,500	287,800	304,000	314,000	324,100
Total	**859,160**	**921,200**	**983,300**	**1,045,300**	**1,088,300**	**1,131,300**

(EMWD, 2023, Table 1)

Overview of EMWD Supplies

EMWD has four sources of water supply: imported water purchased from MWD, potable groundwater, desalinated brackish groundwater, and recycled water (EMWD, 2023, p. 4).

Approximately half of EMWD's retail demands are supplied through local water sources, which consists of potable groundwater, desalinated brackish groundwater, and recycled water. The remaining demands are supplied by a mix of raw and treated water purchased from MWD. EMWD treats most of its raw water for potable use at two water filtration plants, located in Perris and Hemet. A small quantity of raw water is supplied directly to agricultural customers. (EMWD, 2023, p. 4)

Over the past five years, EMWD's retail water supply portfolio averaged approximately 49 percent imported water, 10 percent groundwater, 6 percent desalinated brackish groundwater, and 35 percent recycled water. An annual breakdown of EMWD's retail water supplies over this five-year period is shown in Table 4.20-7, *EMWD Retail Water Supply Portfolio 2018-2022 (AFY)*. The proportions of local to imported water supplies

are impacted by EMWD's participation in MWD's cyclic storage program in 2019, where MWD offered an incentive for member agencies to voluntarily reduce local groundwater production and purchase additional imported water due to wet hydrologic conditions at the time. (EMWD, 2023, p. 5)

Table 4.20-7 EMWD Retail Water Supply Portfolio 2018-2022 (AFY)

Type	Source	2018	2019	2020	2021	2022
Imported – Treated[1]	Metropolitan Water District	42,419	41,167	44,726	44,870	37,208
Imported – EMWD Treated	Metropolitan Water District	18,288	18,969	17,584	18,028	24,380
Imported – Raw[2]	Metropolitan Water District	503	501	642	547	216
Groundwater[3],[4]	San Jacinto Groundwater Basin	13,605	8,044	14,410	14,945	12,369
Desalination	San Jacinto Groundwater Basin	7,544	7,433	7,310	7,653	10,850
Recycled Water[5]	Regional Water Reclamation Facilities	44,016	40,676	39,642	46,042	51,601
	Total	**126,375**	**116,790**	**124,314**	**132,085**	**136,624**

5. EMWD increased treated imported water purchases in 2019 to offset groundwater pumping reductions made as part of its participation in MWD's Cyclic Storage Program.
6. Raw water total does not include replenishment water recharged under the Soboba Settlement Agreement.
7. Groundwater totals may include raw, brackish groundwater used to augment recycled water system for agricultural use.
8. A portion of the San Jacinto Groundwater Basin is adjudicated under the Hemet-San Jacinto Watermaster. EMWD pumping in this portion is subject to an adjusted base production right. EMWD also receives pumping credits for a portion of any Soboba Settlement recharge water unused by the Soboba Tribe.
9. Recycled water total excludes discharge but includes system losses (such as storage pond evaporation and incidental recharge). Due to the interconnected nature of EMWD's recycled water system, it is difficult to split retail and wholesale losses, therefore all recycled water losses are reported with the retail portfolio.

(EMWD, 2023, Table 2)

EMWD imports raw and treated water from MWD to supplement the local water supplies of its wholesale agencies. In addition, EMWD has agreements to provide recycled water to some of its wholesale agencies. An annual breakdown of EMWD sales to wholesale agencies is shown in Table 4.20-8, *EMWD Wholesale Water Supply Portfolio 2018-2022 (AFY)*. Note that Table 4.20-8 only documents sources of water sold by EMWD on a wholesale basis and does not include local supplies (such as groundwater) available and used by EMWD's wholesale agencies to meet customer demands. (EMWD, 2023, p. 6)

Table 4.20-8 EMWD Wholesale Water Supply Portfolio 2018-2022 (AFY)

Type	Source	2018	2019	2020	2021	2022
Imported – Treated	Metropolitan Water District	14,672	11,070	15,008	13,081	15,389
Imported – Raw	Metropolitan Water District	14,385	11,293	14,909	12,798	18,949
Imported – Recharge (Raw)	Metropolitan Water District	4,783	20,730	6,647	0	0
Recycled Water	RWRFs	1,878	1,69	1,285	1,757	1,793
	Totals:	**35,718**	**44,712**	**37,849**	**27,636**	**36,131**

1. Table does not include local supply sources used by suppliers to which EMWD provides wholesale service.
2. Raw water is imported and recharged by EMWD, LHMWD, and the Cities of Hemet and San Jacinto for the Soboba Tribe under the Soboba Settlement Agreement, which requires a long-term average of 7,500 AFY to be recharged. MWD can pre-deliver recharge water. The annual volume of the 7,500 AFY requirement unused by the Soboba Tribe is credited to the agencies for use.
3. Due to the interconnected nature of EMWD's recycled water system, it is difficult to distinguish between retail and wholesale losses, therefore, all recycled water losses are reported in Table 2 of the Project's WSA (EIR *Technical Appendix O*).

(EMWD, 2023, Table 3)

As development increases the water demands within EMWD's service area, the EMWD anticipates that the majority of the new demands will be met through a combination of additional imported water from MWD and

the development of local supply projects, including increased production of potable groundwater, desalination of brackish groundwater, and use of recycled water. EMWD also plans to continue its efforts to enhance water use efficiency within its service area. Table 4.20-9, *EMWD Projected Retail Water Supplies – Average Year Hydrology*, and Table 4.20-10, *EMWD Projected Wholesale Water Supplies – Average Year Hydrology*, show EMWD's projected water supplies for both retail and wholesale service throughout the planning horizon set within EMWD's UWMP. Note that the estimates in Table 4.20-9 and Table 4.20-10 do not account for all potential new local supply projects that could potentially be developed by EMWD or by agencies to which EMWD provides wholesale service. (EMWD, 2023, p. 6)

Table 4.20-9 EMWD Projected Retail Water Supplies – Average Year Hydrology

Type	Source	2025	2030	2035	2040	2045
Imported	Metropolitan Water District	66,447	72,147	70,247	74,747	78,847
Groundwater	San Jacinto Groundwater Basin	18,753	18,753	18,753	18,753	18,753
Desalination	San Jacinto Groundwater Basin	13,400	13,400	13,400	13,400	13,400
Other	Purified Water Replenishment	4,000	4,000	12,000	12,000	12,000
Recycled Water	Regional Water Reclamation Facilities	39,230	44,920	42,200	47,500	51,800
	Totals:	**141,830**	**153,220**	**156,600**	**166,400**	**174,800**

1. Imported water total represents planned EMWD purchases, not the maximum volume of water available from MWD.
2. Groundwater total includes only 7,303 AFY of pumping from the adjudicated Hemet/San Jacinto Management Plan Area, which is EMWD's long term adjusted base production right. EMWD is also able to pump a portion of water recharged under the Soboba Settlement Agreement that is not used by the Soboba Tribe. EMWD is also able to carry over production rights into future years. As of the end of calendar year 2021, EMWD has accrued a carry-over credit balance of over 26,000 acre-feet.
3. Purified Water Replenishment is a planned indirect potable reuse project.
4. Recycled water supply total excludes volumes to be recharged under Purified Water Replenishment to avoid double counting as well as projected losses due to evaporation and incidental storage pond percolation.

(EMWD, 2023, Table 4)

Table 4.20-10 EMWD Projected Wholesale Water Supplies – Average Year Hydrology

Type	Source	2025	2030	2035	2040	2045
Imported	Metropolitan Water District	50,700	44,900	46,900	49,200	51,300
Imported	Soboba Settlement Water	7,500	7,500	7,500	7,500	7,500
Recycled Water	Regional Water Reclamation Facilities	4,770	5,180	5,600	5,600	5,600
	Total	**62,970**	**57,580**	**60,000**	**62,300**	**64,400**

1. Imported water total represents planned EMWD purchases, not the maximum volume of water available from MWD.
2. Under the Soboba Settlement Agreement, MWD must provide an annual average of 7,500 AFY of recharge water, however, this water can be pre- or post-delivered based on supply availability and coordination between MWD and EMWD.
3. Due to the interconnected nature of EMWD's recycled water system, losses can be hard to allocate between retail and wholesale service – for simplicity, all recycled water losses are excluded from wholesale and shown in the retail table instead.

(EMWD, 2023, Table 5)

EMWD relies on MWD to provide approximately half of its retail water supply. The northern portion of EMWD's service area is supplied by MWD's Mills Water Filtration Plant (WFP), while the southern portion of EMWD's service area is supplied by MWD's Skinner WFP. Untreated water from MWD is primarily treated at EMWD's Perris and Hemet WFPs with a small quantity that is delivered directly to agricultural customers. EMWD also imports water from MWD to supply wholesale customers. EMWD plans to supply new water demands through a combination of additional imported water purchases from MWD, as well as ongoing projects and programs expanding EMWD's local water supply portfolio. The 2020 MWD UWMP provides information about MWD's supply reliability and projected demands. MWD determined that it will be able to reliably supply projected member agency demands through 2045 even under historic single-dry and multiple-

dry years. Unprecedented shortages are addressed in the Water Shortage Contingency Analysis and Catastrophic Supply Interruption Planning portions of the 2020 MWD UWMP. (EMWD, 2023, p. 8)

As shown in Table 4.20-9, EMWD's projected retail water supplies from 2025 to 2045 would result in an increase in the amount of imported water by approximately 12,400 acre-feet per year (AFY), an increase in other water by approximately 8,000 acre-feet, and an increase of recycled water by approximately 12,570 AFY, with no change in the amount of water that would be extracted from groundwater resources or desalination of groundwater. As shown in Table 4.20-10, EMWD's projected wholesale water supplies from 2025 to 2045 would result in an increase in the amount of imported water from the Metropolitan Water District by approximately 600 acre-feet per year (AFY), and an increase of recycled water by approximately 830 AFY, with no change in the amount of imported water from the Soboba Settlement Water. A portion of the increased supplies would be used to serve the Project.

However, because EMWD would not require increased water supplies from groundwater sources or from desalination of groundwater resources through 2045, there would be no physical impacts to the environment resulting from increased groundwater extraction. It should be noted that EMWD currently has two Desalters (Perris and Menifee Desalters), and EMWD constructed the Perris II Desalter in 2022. In 2020, the Perris and Menifee Desalters treated a combined total of 9,050 acre-feet of brackish water, and the Perris II Desalter increased this capacity by approximately 6,000 AFY (EMWD, 2021b, p. 34; EMWD, 2022). Combined, the Perris, Perris II, and Menifee Desalters have adequate capacity to treat the anticipated 10,100 AFY anticipated by 2040. Thus, the Project's increased water demand from groundwater and desalinated water resources would not result in any significant environmental effects, as there would not be a need for expansion of EMWD's desalters.

The EMWD's anticipated increase of recycled water by approximately 12,570 AFY for retail water and 830 AFY for wholesale water would occur as a result of increased wastewater flows at the EMWD RWRFs. As indicated under the discussion and analysis of the Project's impacts to sewer capacity under Threshold a., above, the Project would not result in or require an expansion to any EMWD facilities in order to treat wastewater generated by the Project; therefore, the Project's incremental increase in demand for recycled water would not result in any new or increased significant impacts to the environment.

As previously noted, EMWD's projected water supplies from 2025 to 2045 would result in an increase in the amount of imported retail water by approximately 12,400 AFY and an increase in imported wholesale water by approximately 600 AFY. A portion of these increased imported supplies would be used to serve the proposed Project. According to the Metropolitan Water District of Southern California's (MWD) 2020 UWMP, MWD currently obtains imported water supplies from the Colorado River Aqueduct (CRA) and the State Water Project (SWP). However, the MWD UWMP includes a detailed discussion of planning strategies undertaken by the MWD to reduce its reliance on imported water supplies from these sources. Please refer to Section 4 of the MWD UWMP for a detailed descriptions of programs being undertaken by MWD to reduce the its reliance on imported water supply from the Colorado River and SWP. The MWD UWMP is herein incorporated by reference pursuant to CEQA Guidelines Section 15150, and is available for public review on

MWD's web site[1]. As shown in Table 4.20-11, *MWD Colorado River Supply Characterization (2021-2025)*, and Table 4.20-12, *MWD State Water Project (California Aqueduct) Supply Characterization (2021-2025)*, with implementation of MWD's programs, total deliveries of water from the Colorado River are expected to decrease from 1,250,000 AFY in 2021 to 1,122,000 AFY in 2025, while total deliveries from the SWP (Colorado River Aqueducts) are expected to decrease from 626,000 AFY in 2021 to 538,000 AFY in 2025. Accordingly, while the EMWD expects to increase its imported retail water by approximately 12,400 AFY and increase its imported wholesale water by approximately 600 AFY by 2045, the MWD is expected to reduce its imports of water from the Colorado River and via the SWP, meaning that the increase in EMWD's demand for imported water would be accommodated by water savings resulting from MWD's programs, as summarized in Table 4.20-11 and Table 4.20-12. As such, the Project's incremental demand for water, including water imported by EMWD from MWD, would not result in any new or increased impacts to the environment beyond what already occurs in association with MWD and EMWD facilities under existing conditions. Accordingly, impacts due to the Project's increased demand for water supply would be less than significant. (MWD, 2021, pp. 3-1 through 3-92)

EMWD Projected Demands

EMWD's primary retail customers for potable and raw water can be divided into residential, commercial, industrial, institutional, landscape, and agricultural sectors. The residential sector is EMWD's largest customer

[1] MWD's 2020 UWMP is available on-line at: at https://www.mwdh2o.com/media/21641/2020-urban-water-management-plan-june-2021.pdf.

Table 4.20-11 MWD Colorado River Supply Characterization (2021-2025)

Hydrology	2021	2022	2023	2024	2025
Current Programs					
Basic Apportionment – Priority 4	550,000	550,000	550,000	550,000	550,000
DCP Contribution Reduction[2]	0	0	0	0	0
IID/MWD Conservation Program	105,000	105,000	105,000	105,000	105,000
Priority 5 Apportionment (Surplus)	0	0	0	0	0
PVID Land Management, Crop Rotation, and Water Supply Program	42,000	64,000	130,000	130,000	130,000
Lower Colorado Water Supply Project	9,000	9,000	9,000	9,000	9,000
Bard Seasonal Fallowing Program	6,000	6,000	6,000	6,000	6,000
Lake Mead ICS Storage Program	400,000	400,000	400,000	100,000	100,000
Binational ICS	33,000	33,000	0	0	0
Forbearance for Present Perfected Rights	0	0	0	0	(2,000)
CVWD SWP/QSA Transfer Obligation	(50,000)	(50,000)	(50,000)	(50,000)	(50,000)
DWCV SWP Table A Obligation	(22,000)	(95,000)	(28,000)	(45,000)	(35,000)
DWCV Advance Delivery Account	22,000	95,000	28,000	45,000	35,000
SNWA Agreement Payback	0	0	0	0	0
IID Payback	(20,000)	(20,000)	(20,000)	(20,000)	(20,000)
Subtotal of Current Programs	***1,075,000***	***1,097,000***	***1,130,000***	***830,000***	***828,000***
Additional Colorado River Exchange Supplies					
Exchange with SDCWD	283,000	281,000	278,000	278,000	278,000
Exchange with United States	16,000	16,000	16,000	16,000	16,000
Subtotal of Additional Colorado River Supplies	***299,000***	***297,000***	***294,000***	***294,000***	***294,000***
Maximum CR Supply Capability[3]	**1,374,000**	**1,394,000**	**1,424,000**	**1,124,000**	**1,122,000**
Less CRA Capacity Constraint (amount above 1.25 MAF)	*(124,000)*	*(144,000)*	*(174,000)*	*0*	*0*
Subtotal of CR Core Supplies	**919,000**	**866,000**	**996,000**	**979,000**	**987,000**
Subtotal of CR Storage	**331,000**	**384,000**	**254,000**	**145,000**	**135,000**
Maximum Expected CRA Deliveries[4]	**1,250,000**	**1,250,000**	**1,250,000**	**1,124,000**	**1,122,000**

[1] Supply characterization for the Drought Risk Assessment is based on core supplies as defined in WSCP Appendix 4. Flexible and storage supplies from CR, SWP, and In-Region may be exercised as supply augmentation action to any potential core supply shortfall.
[2] DCP contribution beyond capacity of ICS accounts.
[3] Total amount of supplies available without taking into consideration CRA capacity constraint.
[4] The CRA delivery capacity is 1.25 MAF annually.

Note: Values based on repeat of 1988-1992 hydrologies.
(MWD, 2021, Table A.3-8)

Table 4.20-12 MWD State Water Project (California Aqueduct) Supply Characterization (2021-2025)

Hydrology	2021	2022	2023	2024	2025
Current Programs					
MWD Table A[2]	221,000	940,000	274,000	442,000	345,000
DWCV Table A	22,000	95,000	28,000	45,000	35,000
Article 21 Supplies	0	0	0	0	0
San Gabriel Valley MWD Exchange and Purchase	2,000	2,000	2,000	2,000	2,000
Subtotal of SWP Core Supplies	***245,000***	***1,037,000***	***304,000***	***489,000***	***382,000***
San Luis Carryover[3]	200,000	0	69,000	0	0
Yuba River Accord Purchase	14,000	11,000	14,000	11,000	14,000
Central Valley Storage and Transfers					
Semitropic Program	40,000	0	40,000	44,000	41,000
Arvin Edison Program[4]	0	0	0	0	0
Mojave Storage Program	0	0	0	0	0
Antelope Valley/East Kern Acquisition and Storage	27,000	0	27,000	0	11,000
Kern Delta Program	50,000	0	50,000	50,000	40,000
Transfers and Exchanges	50,000	50,000	50,000	50,000	50,000
Subtotal of SWP Flexible and Storage Programs	***381,000***	***61,000***	***250,000***	***155,000***	***156,000***
Programs Under Development					
San Bernardino Valley Water District Program	0	0	0	0	0
Subtotal of Proposed Programs	***0***	***0***	***0***	***0***	***0***
Maximum Supply Capability	**626,000**	**1,098,000**	**554,000**	**644,000**	**538,000**

[1] Supply characterization for the Drought Risk Assessment is based on core supplies as defined in WSCP Appendix 4. Flexible and storage supplies from CR, SWP, and In-Region may be exercised as supply augmentation action to any potential core supply shortfall.
[2] Includes Port Hueneme lease.
[3] Includes DWCV carryover.
[4] Take and put amounts limited due to water quality considerations.
Note: Values based on repeat of 1988-1992 hydrologies.
(MWD, 2021, Table A.3-8)

segment; however, each sector plays a role in the growth and development of EMWD's service area. The historic and projected customer water use by the various potable/raw retail customer types are shown in Table 4.20-13, *EMWD Retail Potable/Raw Water Use by Customer Type*.

Table 4.20-13 EMWD Retail Potable/Raw Water Use by Customer Type

Use Type	Actual Water Use - AFY				Projected Water Use - AFY				
	2005	2010	2015	2020	2025	2030	2035	2040	2045
Single Family	62,300	54,000	45,700	52,200	66,900	71,700	76,700	80,500	84,000
Multi-Family	5,500	6,100	5,800	6,500	8,500	9,100	9,700	10,200	10,600
Commercial	3,900	4,200	4,600	4,300	6,100	6,500	7,000	7,300	7,600
Industrial	400	400	300	600	600	600	700	700	700
Institutional	2,900	2,300	2,000	1,600	2,700	2,900	3,100	3,200	3,400
Landscape	7,500	8,900	7,700	8,200	8,400	7,600	6,800	6,200	5,500
Agricultural	2,500	2,300	2,800	1,600	2,000	2,000	2,000	2,000	2,000
Totals:	**85,000**	**78,200**	**68,900**	**75,000**	**95,200**	**100,400**	**106,000**	**110,100**	**113,800**

(EMWD, 2023, Table 6)

EMWD also provides wholesale water service to a number of sub-agencies, serves recycled water, and imports water for recharge purposes. These demands are shown in Table 4.20-14, *EMWD Wholesale Deliveries to Other Agencies*. (EMWD, 2023, p. 18)

Table 4.20-14 EMWD Wholesale Deliveries to Other Agencies

Supplier	Actual Deliveries - AFY				Projected Deliveries - AFY				
	2005	2010	2015	2020	2025	2030	2035	2040	2045
City of Hemet	100	0	0	0	0	0	0	0	0
City of Perris	1,900	1,700	1,500	1,685	1,800	1,900	2,100	2,200	2,300
City of San Jacinto	0	0	0	0	0	0	0	0	0
LHMWD	100	1,300	4,300	986	5,100	5,500	5,900	6,300	6,700
NWC	800	600	200	409	500	1,000	1,100	1,200	1,200
RCWD	26,300	21,900	15,000	25,028	42,300	35,200	36,200	37,500	38,800
WMWD (Murrieta)	100	1,600	700	1,809	1,000	1,300	1,600	2,000	2,300
Recharge (Soboba)	0	0	0	6,467	7,500	7,500	7,500	7,500	7,500
Total	**29,300**	**27,100**	**21,700**	**36,384**	**58,200**	**52,400**	**54,400**	**56,700**	**58,800**

1. The Cities of Hemet and San Jacinto plan to meet 100% of demands using local groundwater supplies, however, EMWD can deliver water to the cities during high demand periods or when city wells are undergoing maintenance.
2. Under the Soboba Settlement Agreement, MWD must provide an annual average of 7,500 AFY of water to be recharged in the Hemet/San Jacinto Management Plan Area by EMWD, LHMWD, and the Cities of Hemet and San Jacinto to fulfill the Soboba Tribe's water right. Actual deliveries will vary from year to year, and MWD has the option to pre-deliver water. Recharge water unused by the Soboba Tribe is proportioned between the four agencies.

(EMWD, 2023, Table 7)

Other water demands including recycled water use, recharge that occurred prior to or outside the scope of the Soboba Settlement Agreement, system losses, non-revenue water deliveries, and other, miscellaneous water usage are shown in Table 4.20-15, *EMWD Other and Non-Potable Water Usage*. Total demands on EMWD's water system previously were summarized in Table 4.20-1 (EMWD, 2023, p. 18)

Table 4.20-15 EMWD Other and Non-Potable Water Usage

Use Type	Actual Water Use - AFY				Projected Water Use - AFY				
	2005	2010	2015	2020	2025	2030	2035	2040	2045
Recycled[1],[2]	32,600	28,200	46,100	40,900	44,000	50,100	47,800	53,100	57,400
Recharge[3]	7,000	0	0	0	0	0	0	0	0
Other / Losses[4]	7,700	8,400	9,100	9,800	7,400	7,900	8,400	8,800	9,200
Total	**47,300**	**36,600**	**55,200**	**50,700**	**51,400**	**58,000**	**56,200**	**61,900**	**66,600**

1. Recycled water projections include recycled water that is delivered to sub-agencies but excludes the volume of recycled water that is planned to be recharged as part of EMWD's Purified Water Replenishment (indirect potable reuse) project to avoid double counting.
2. Recycled water supply may be supplemented by brackish groundwater or raw water during high demand months.
3. Volume of recharge water excludes water that is imported under the Soboba Settlement Agreement (shown in prior table).
4. Other/losses category includes unbilled, authorized consumption use as well as real and apparent losses in the potable system.

(EMWD, 2023, Table 8)

Project Water Demands

The Project would entail the construction and long-term operation of a 1,003,510 s.f. light industrial 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, for a total of 64.97 gross acres. In the EMWD 2020 UWMP, the demand projections for the parcels covering the Project site were estimated based on Light Industrial land use, with a total demand of 55.62 AFY. Based on the Project's proposed land uses (as described in detail in EIR Section 3.0, *Project Description*), the EMWD estimates that the Project's total water demand would be 67.20 AFY. Thus the proposed Project's water demand would exceed the 2020 UWMP forecasts for the site by approximately 11.58 AFY. However, EMWD has planned for this possibility by including a planning buffer in the 2020 UWMP and projecting future water use at lower levels of water efficiency

compared to present day water use. After accounting for the cumulative demands from the Project and other developments in EMWD's service area (including other WSAs), over 12,000 AFY of buffer remains. This buffer is expected to grow in the future due to factors such as ongoing water use efficiency legislation and potable water offsets from recycled water conversions. Accordingly, demands from new development in EMWD's service area, including the Project, ultimately fall within the levels of demand considered in the 2020 UWMP. (EMWD, 2023, p. 19)

Evaluation of Water Supply and Demand

EMWD's 2020 UWMP includes an evaluation of EMWD's water supply reliability under a range of potential hydrologic conditions. The results for normal year conditions are shown in Table 12 and Table 13 of the Project's WSA (*Technical Appendix O*) for EMWD's retail and wholesale service, respectively. The single dry year evaluation is documented in Table 14 and Table 15 of the WSA, and the results of the multiple dry year evaluation are shown in Table 16 and Table 17 of the WSA. The supply totals shown in the tables reflect EMWD's planned production and not EMWD's supply capacity. Under drought conditions, EMWD may increase local supply production, pump from stored water supplies, or purchase additional imported water from MWD if necessary. (EMWD, 2023, p. 20)

EMWD's 2020 UWMP discusses the supply reliability for EMWD during dry years. EMWD expects its local supplies to remain highly reliable and resilient, even under severe hydrologic conditions. Similarly, MWD's UWMP shows that MWD would have the ability to meet all of its member agencies' project supplemental demand through 2045, even under a repeat of historic drought scenarios. (EMWD, 2023, pp. 22-23)

EMWD maintains a Water Shortage Contingency Plan (WSCP) that aims to reduce demand during water shortage using significant penalties for wasteful water use. EMWD's WSCP details demand reductions for several stages of shortage through a 50 percent or greater reduction. Additional information about contingency planning is included in Chapter 8 of EMWD's 2020 UWMP. The WSCP was last updated on June 15, 2022, and is located in Title 5, Article 10 of the EMWD Administrative Code, which is available on EMWD's website (www.emwd.org). (EMWD, 2023, p. 23)

Water Supply Assessment

❑ Potable Water

From a facilities perspective, the Project may be conditioned to construct off-site and on-site water facilities needed to distribute water throughout the project area. Prior to construction, the developer should contact EMWD staff to establish development design conditions and determine if any revisions are required to the master plan. Figure 2 of the Project's WSA (*Technical Appendix O*) shows existing water facilities in relation to the Project. EMWD plans to supply new water demands in its service area, including the Project, through a combination of additional imported water purchases from MWD and the ongoing development of EMWD's local supply resources. (EMWD, 2023, p. 23)

❑ Recycled Water

EMWD policy recognizes recycled water as the preferred source of supply for all non-potable water demands, including irrigation of recreation areas, greenbelts, open space common areas, commercial landscaping, and

supply for aesthetic impoundment or other water features. According to EMWD's policies, the Project may be conditioned to construct a recycled water system separately from the potable water system. The system would need to be constructed to recycled water standards. The Project may also be conditioned to construct off-site recycled water facilities. EMWD would make a final determination on requirements for recycled water use and facilities during the development design conditions phase of the Project. Regardless, under existing conditions the Project area is not served by recycled water, and thus no recycled water facilities are anticipated with implementation of the Project. (EMWD, 2023, p. 23)

Conclusion

EMWD relies on MWD and local resources to meet the needs of its growing population. MWD demonstrated in the 2020 MWD UWMP that with the addition of all water supplies, existing and planned, MWD has the ability to meet all of its member agencies' projected supplemental demand through 2045, even under a repeat of historic multiple-year drought scenarios. (EMWD, 2023, p. 24)

In the event that the lead agency determines adequate water supply exists for the proposed Project, the developer of the proposed Project is required to meet with EMWD Development Services Staff to establish development design conditions. Based on the results of the Project's WSA (*Technical Appendix O*), the EMWD has determined that it has adequate water supplies to serve the proposed Project. The development design conditions would detail water, wastewater, and recycled water requirements to serve the Project. An agreement developed prior to construction would determine whether additional funding is required to reduce existing customer demand on imported supplies through the expansion of local resources or implementation of additional conservation programs. If required, the reduction of existing customer demand on imported water supplies would free up allocated imported water to be used to serve this Project under multiple dry year conditions. The amount of funding would be determined by EMWD (if required) and may take the form of a new component of connection fees or a separate charge. If there was a change in the circumstances detailed in the WSA, EMWD would address the changes in the development design conditions for the Project. Modifications at the development design conditions stage could reduce the amount of water available to serve the Project. (EMWD, 2023, p. 24)

Based on present information and the assurance that MWD 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. (EMWD, 2023, p. 24) 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.

Additionally, the Project's incremental increase in demand for water resources would not result in significant environmental effects. Specifically, because EMWD would not require increased water supplies from groundwater sources or desalination of groundwater through 2045, there would be no impacts to the environment resulting from increased groundwater extraction. Additionally, the anticipated increase of recycled water by approximately 12,570 AFY would occur as a result of increased wastewater flows at the EMWD RWRFs. As indicated under the discussion and analysis of the Project's impacts to sewer capacity under Threshold a., above, the Project would not result in or require an expansion to any EMWD facilities in

order to treat wastewater generated by the Project; therefore, the Project's incremental increase in demand for recycled water would not result in any new or increased significant impacts to the environment. Furthermore, while the EMWD expects to increase its imported retail water by 12,400 AFY and its imported wholesale water by 600 AFY by 2045, the MWD is expected to reduce its imports of water from the Colorado River and via the SWP, meaning that the increase in EMWD's demand for imported water would be accommodated by water savings resulting from MWD's programs, as summarized in Table 4.20-11 and Table 4.20-12. As such, the Project's incremental demand for water, including water imported by EMWD from MWD, would not result in any new or increased impacts to the environment beyond what already occurs in association with MWD and EMWD facilities under existing conditions. Accordingly, impacts to the environment due to the Project's increased demand for water supply would be less than significant.

Threshold c.: ***Would the Project require or result in the construction of new wastewater treatment facilities, including septic systems, or expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects?***

No septic systems are proposed as part of the Project. As discussed under the analysis of Threshold a., the Project would be provided sanitary sewer service by the EMWD, and no septic tanks are proposed as part of the Project. A description of proposed sewer improvements is provided in EIR subsection 3.5.2.G and are depicted on EIR Figure 3-12. As discussed therein, a sewer lateral would be constructed between the northeastern corner of the building and the existing sewer main within Cajalco Road. 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. A proposed sewer main also would be installed within Decker Road to provide sewer service for the proposed public park. Impacts associated with the Project's proposed sewer improvements are inherent to the Project's construction phase, and impacts 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 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.: ***Would the Project result in a determination by the wastewater treatment provider that serves or may service the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?***

As discussed under the analysis of Threshold a., wastewater generated by the Project would be conveyed to the Moreno Valley RWRF for treatment. As previously shown in Table 4.20-5, at buildout the Project is anticipated to generate approximately 92,415 gpd of wastewater requiring treatment. The Project's wastewater generation would represent approximately 2.1% of the current available treatment capacity at the Moreno Valley RWRF. Accordingly, the Project would not result in or require the expansion of the existing facilities at either the Moreno Valley RWRF, and impacts would therefore be less than significant.

Threshold e.: ***Would the Project 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?***

A. Construction Impacts

The Project would require the demolition of existing structures on site, which collectively comprise approximately 43,858 s.f. of building area. According to data available from the United States Environmental Protection Agency's (EPA) demolition waste generation factor of 50 pounds of construction waste per square foot of building area, the Project is anticipated to generate a total of 1,096 tons of demolition-related refuse [(43,858 s.f. x 50 lbs/s.f.) ÷ 2,000 lbs/ton = +/- 1,096 tons] (EPA, 2003, Table 2-3). Thus, over the 55 working days anticipated for demolition activities, the Project would generate an average of 19.9 tons of demolition debris per day (1,096 tons ÷ 55 days = 19.9 tons/day).

Solid waste also is anticipated to be generated by the Project's construction process, primarily consisting of discarded materials and packaging. Based on the size of the Project (i.e., 1,003,510 s.f. total building square footage) and the EPA's construction waste generation factor of 4.34 pounds (lbs.) per sf (lbs./s.f.) for non-residential uses, approximately 2,178 tons of waste is anticipated to be generated during the Project's construction phase ([1,003,510 s.f. x 4.34 lbs./s.f.] ÷ 2,000 lbs./ton]= +/- 2,178 tons) (EPA, 2003, p. 10). Thus, over the +/-385 days of Project-related construction activities (excluding demolition activities), it can be estimated that the Project would generate approximately 5.7 tons per day (tpd) of solid waste.

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 demolition activities would be disposed of at El Sobrante Landfill, Lamb Canyon Landfill, or Badlands Landfill. As described previously, the El Sobrante Landfill, Lamb Canyon Landfill, or Badlands Landfill receive below their maximum permitted daily tonnage; thus, the Project's construction waste is not anticipated to result in these landfills exceeding their maximum permitted daily disposal volume. Furthermore, these landfills are not anticipated to reach their total maximum capacities during the Project's construction period. The El Sobrante Landfill, Lamb Canyon Landfill, and Badlands Landfill have sufficient daily capacity to accept solid waste generated by the Project's construction phase. Thus, impacts to landfill capacity associated with near-term Project construction activities would be less than significant.

B. Long-Term Operational Impacts

Solid waste generated by the Project would be disposed of at either the El Sobrante Landfill, Lamb Canyon Landfill, or Badlands Landfill. As previously indicated, solid waste generated within the Project area is collected by WMIE, with the bulk of recyclable waste and green waste delivered to the MVTS for processing prior to being sent to one of the three regional landfills. The MVTS has a permitted capacity of 2,500 tpd. The El Sobrante Landfill is currently permitted to receive 16,054 tpd, while the average daily tonnage in 2022 was 10,646 tpd. The Lamb Canyon Landfill is permitted to receive 5,000 tpd, while data from 2022 shows that the Lamb Canyon Landfill received a daily average of approximately 1,969 tpd. The Badlands Landfill is permitted to receive 5,000 tpd, while in 2022 the Badlands Landfill received an average of 2,660 tpd. (RCDWR, 2023)

As shown in Table 4.20-16, *Project Solid Waste Generation*, buildout and occupancy of the Project is estimated to produce approximately 30.6 tpd of solid waste, or approximately 11,171 tons per year (tpy). Per the Riverside Countywide Integrated Waste Management Plan (CIWMP), which applies to the Project, up to 50% of its solid waste would need to be diverted from area landfills. In conformance with the CIWMP, the Project Applicant is required to work with future contract refuse haulers to implement recycling and waste reduction programs for solid wastes.

Table 4.20-16 Project Solid Waste Generation

Land Use	Demand Intensity Factor	Generation Factors	Total Solid Waste Generated (tpy)	Average Solid Waste per Day (tpd)
Industrial	1,003,510 s.f.	10.8 tons/1,000 s.f.	10,838 tpy	29.7 tpd
Park	748 Visitors/day[1]	244 Pounds/100 Visitors[2]	333 tpy	0.9 tpd
Totals:	**1,280,183 s.f.**	**--**	**11,171 tpy**	**30.6 tpd**

1. Park demand intensity factor is derived from Table 4-2 of the Project's Traffic Analysis (*Technical Appendix N2*), which anticipates a total of 748 two-way daily trips (or 374 vehicles per day) associated with the Project's park use. The demand intensity factor assumes each vehicle would contain an average of two passengers (resulting in 748 park visitors per day).
2. Generation factors for industrial uses are derived from Riverside County EIR No. 521, which was prepared for the County's 2015 update to the General Plan, while generation factors for the park use are derived from Table 15 of a publication produced by the Integrated Waste Management Board (IWMB) entitled, "Targeted Statewide Waste Characterization Study: Waste Disposal and Diversion Findings for Selected Industry Groups," dated June 2006, and available on-line at: https://www2.calrecycle.ca.gov/Publications/Download/787.

(Riverside County, 2015a, Table 4.17-N; Urban Crossroads, 2023g, Table 4-2; IWMB, 2006, Table 15)

Based on the daily capacity at the MVTS and the average daily tonnage received at area landfills in 2022, the Project's daily generation of solid waste would represent 1.2% of the daily capacity at the MVTS, 0.6% of the existing excess daily capacity at the El Sobrante Landfill, 1.0% of the existing daily excess capacity at the Lamb Canyon Landfill, and 1.3% of the existing daily excess capacity at the Badlands Landfill. Because the Project would generate a relatively small amount of solid waste per day as compared to the permitted daily capacities and average daily tonnage for the MVTS, El Sobrante Landfill, Lamb Canyon Landfill, and Badlands Landfill, it is anticipated that the MVTS and the regional landfill facilities would have sufficient daily capacity to accept solid waste generated by the Project. As such, because the MVTS and regional solid waste facilities would have adequate capacity to handle solid waste generated by the Project's construction and operational phases, impacts would be less than significant.

Threshold f.: ***Would the Project comply with federal, state, and local management and reduction statutes and regulations related to solid wastes including the CIWMP (County Integrated Waste Management Plan)?***

The proposed Project would be regulated by the Riverside Countywide Integrated Waste Management Plan (CIWMP) (RCDWR, 1996). The CIWMP outlines goals, policies, and programs Riverside County and its cities would implement to create an integrated and cost-effective waste management system that complies with the provisions of AB 939 and its diversion mandates. Additionally, AB 341 made a legislative declaration that it is the policy goal of the State that not less than 75% of solid waste generated be source reduced, recycled, or composted by the year 2020, although the California Department of Resources Recycling and Recovery may

not establish or enforce a diversion rate greater than the 50% as set forth by the CIWMP (per Public Resources Code § 41780.01[b]).

The proposed Project would be regulated by the RCDWR and would be required to comply with the CIWMP's requirement to divert up to 50% of its solid waste from area landfills. In conformance with the CIWMP, the Project Applicant is required to work with future contract refuse haulers to implement recycling and waste reduction programs for solid wastes. Implementation of a waste disposal strategy for the proposed Project would assist Riverside County in achieving the mandated goals of the IWMA by developing feasible waste programs that encourage source reduction, recycling, and composting. The RCDWR is specifically charged with the responsibility of implementing programs that ensure that unincorporated Riverside County achieves 50% diversion of solid waste from landfill disposal as well as monitoring and reporting unincorporated Riverside County's compliance with the CIWMP and AB 939. With mandatory compliance to AB 939, AB 341, and RCDWR's programs and policies, the Project would result in a less-than-significant impact due to a conflict with federal, State, and local management and reduction statutes and regulations related to solid wastes, including the CIWMP.

Threshold g.: ***Would the Project impact the following facilities requiring or resulting in the construction of new facilities or the expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects:***

1. Electricity;

2. Natural Gas;

3. Communications systems;

4. Street lighting;

5. Maintenance of public facilities, including roads; or

6. Other governmental services?

Electric service is currently available to the proposed Project site through Southern California Edison, although existing facilities would need to be expanded as necessary to provide service to the Project. However, the Project area already is served by existing electrical lines; therefore, the construction of electricity facilities as necessary to serve the proposed Project would occur within the areas already planned for impact by the Project or within existing, improved roadways. Therefore, the construction of electrical facilities necessary to serve the proposed Project would not result in any significant impacts to the environment that are not already addressed by this EIR. No additional mitigation would be required.

The proposed warehouse building would not be served with natural gas, and no natural gas lines are proposed for the public park site. Although Project-related cargo handling equipment on site would be fueled by natural gas, it is anticipated that natural gas canisters would be hauled and stored on site to fuel the cargo handling equipment. Thus, the Project would not include the installation of any natural gas lines, and as such the Project would not result in any impacts associated with the installation of natural gas infrastructure.
Due to long-range planning efforts by the energy purveyors, Project implementation is not anticipated to result in the need for the construction or expansion of off-site natural gas generation facilities. Any future need for

regional energy facilities related to cumulative growth in the service areas of SoCal Gas would be determined by the service agencies as part of their long-range growth projections. Accordingly, provision of natural gas supplies to the proposed Project site would not result in any significant environmental impacts not already addressed under relevant sections of this EIR.

Points of connection to telecommunication facilities would be resolved as the proposed Project and other projects planned for the area commence their utility design and interconnection plans. It is anticipated that any off-site construction of communication utility connections would occur within existing disturbed public rights-of-way. As such, the construction of communication utility connections is evaluated under the appropriate subject headings within this EIR. No environmental impacts would occur from the provision of these utilities, as all lines would be installed within the disturbance areas of existing roadway rights-of-way and/or on site within areas already planned for physical impacts as part of the Project.

The Project would require a number of drainage features on site, as described in detail under the analysis of Threshold a. The proposed drainage improvements would be located in on-site areas or within improved roadway ROWs. Impacts associated with the Project's proposed drainage improvements have been evaluated throughout this EIR, and mitigation is identified where necessary to reduce impacts to a level below significance. Therefore, the construction of stormwater drainage facilities needed to serve the Project would not result in any impacts to the environment beyond what is evaluated, disclosed, and mitigated by other sections of this EIR. Additional mitigation would not be required.

The Project would provide street lighting as required by Riverside County in accordance with Ordinance No. 461 (Roadway Standards) and Ordinance No. 460 (Subdivision of the Land). All physical environmental impacts associated with street lighting and maintenance would occur within the boundaries of the on- and off-site improvement areas, the impacts of which are described throughout this EIR. Therefore, no additional impacts to the environment would occur that are not already addressed by this EIR, and additional mitigation would not be required.

Implementation of the proposed Project would result in minor improvements to Seaton Avenue, Cajalco Road, and Decker Road. With exception of Decker Road, all of these roadways are improved under existing conditions; thus, the Project only would result in a nominal increase in the need for maintenance along these roadways. The segment of Decker Road between the southwest corner of the warehouse building site and Cajalco Road would be improved to its ultimate half-width standard as a Secondary Highway. The portion of Decker Road between the southwest corner of the warehouse building site and the southerly terminus of Decker Road would be improved to its full-width standard as a Secondary Highway. While Decker Road would be improved as part of the Project, maintenance of the public roadways abutting the Project site also would not result in any significant impacts to the environment. Impacts associated with the proposed improvements to these roadways already are evaluated in appropriate sections of this EIR, and any identified impacts have been mitigated to the maximum feasible extent. Maintenance of the major roadway facilities within the Project site would be funded through the Project developer's payment of Development Impact Fees (DIF) and future building owners' payment of property taxes. Therefore, the maintenance of roadways proposed by the Project would not result in any new impacts to the environment beyond that which is already disclosed and mitigated by this EIR, and a less-than-significant impact would occur.

No known other facilities would require off-site construction or maintenance as a result of the proposed Project.

Based on the foregoing analysis, 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.

4.20.5 Cumulative Impact Analysis

The cumulative study area used for the analysis of water and wastewater includes areas within EMWD's service area for water and wastewater services, and is based on the buildout of the Riverside County General Plan and the general plans of cities within EMWD service area. The cumulative study area for solid waste comprises western Riverside County, as all areas of western Riverside County are served by WMIE, and is based on the buildout of the Riverside County General Plan and the general plans of cities within western Riverside County. For the remaining issue areas, the cumulative impact analysis considers development of the Project in conjunction with other development projects and planned development in the vicinity of the Project site.

As discussed under the analysis of Threshold a., the Project would require a number of improvements related to water, wastewater treatment, and storm drainage systems, although such improvements are inherent to the Project's construction phase. Cumulatively-considerable impacts associated with Project construction activities have been evaluated throughout this EIR, and where necessary mitigation measures have been identified to reduce the Project's cumulatively-considerable effects to the maximum feasible extent. There are no components of the Project's proposed water, wastewater, or storm drainage systems that could result in impacts not already evaluated by other sections of this EIR. Accordingly, impacts associated with the construction of new or expanded water, wastewater treatment, and stormwater drainage systems would be less-than-cumulatively considerable.

The analysis of Threshold b., which is based on the Project-specific WSA (*Technical Appendix O*), demonstrates that the EMWD would have sufficient water supplies available to serve the Project as well as other reasonably foreseeable future development during normal, dry, and multiple dry years. Because the WSA evaluates the water demands of both the Project and other cumulative developments within EMWD's service area, the WSA demonstrates that cumulatively-considerable impacts to water supply would be less than significant. Furthermore, EMWD's 2020 UWMP accounts for the Project's water demands, and demonstrates that even with cumulative development the EMWD would have adequate water supplies to serve the Project and cumulative developments through 2045 during normal, dry, and multiple dry years. Other future projects within the service area of the EMWD would be required to evaluate effects on availability of water supplies and, if applicable to the type of development, prepare a WSA to ensure that significant cumulative effects are minimized or avoided. In addition, the Project and other cumulative developments within EMWD's service area would result in an increase in demand for potable water, which has the potential to cumulatively-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 cumulative increase in demand for potable water sources also would not result in significant cumulatively-considerable physical environmental effects.

As discussed under the analysis of Threshold c., the Project would require a number of improvements to provide sewer service to the Project site, although impacts associated with such improvements are inherent to the Project's construction phase. Cumulatively-considerable impacts associated with Project construction activities have been evaluated throughout this EIR, and where necessary mitigation measures have been identified to reduce the Project's cumulatively-considerable effects to the maximum feasible extent. There are no components of the Project's proposed wastewater improvements that would result in impacts not already evaluated by other sections of this EIR. Accordingly, impacts associated with the construction of new or expanded wastewater treatment conveyance facilities would be less-than-cumulatively considerable.

The Project's wastewater generation would represent approximately 1.9% of the current available 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. Although the Project and other cumulative developments ultimately would contribute to the need for expanded capacity at the Moreno Valley RWRF, impacts associated with such expansion would be subject to CEQA once plans for such expansion have been prepared by the EMWD. As no such plans are currently available, it would be speculative to evaluate potential cumulatively-considerable impacts associated with the proposed expansion (CEQA Guidelines § 15145). As such, Project impacts due to wastewater capacity would be less-than-cumulatively considerable.

As previously discussed in the analysis provided under Threshold e., solid waste generated by construction and operation of the Project would represent nominal proportions of the daily capacity at the MVTS and the daily disposal capacity at the El Sobrante Landfill, Lamb Canyon Landfill, and/or Badlands Landfill. The MVTS and area landfills are currently projected to remain open until as far into the future as 2057 (El Sobrante Landfill) and have sufficient daily capacity to handle solid waste generated by the Project and other cumulative developments both during construction and long-term operation. The Project would not directly result in the need for expanded solid waste disposal facilities, as the MVTS, El Sobrante Landfill, Lamb Canyon Landfill, and Badlands Landfill have sufficient existing capacity to handle solid waste generated by the Project. Rather, the Project's incremental contribution to solid waste generation may contribute to an ultimate need for expanding the solid waste disposal facilities that would serve the Project and/or the construction of additional solid waste disposal facilities. Moreover, it is possible that as other developments in the region are proposed, the RCDWR and/or WMIE may opt to construct new solid waste disposal facilities to serve those developments, and such facilities may or may not receive solid waste generated by the Project. Although the Project has the potential to cumulatively contribute to the demand for new or expanded solid waste disposal facilities, the construction of which could significantly impact the environment, it is too speculative for evaluation in the absence of a proposed expansion or development plan (CEQA Guidelines, 14 CCR § 15145). Therefore, the Project's cumulatively-considerable impacts to solid waste disposal facilities are evaluated as less than significant.

The Project would adhere to regulations set forth by local and State regulations (including AB 341 and AB 939) during both construction and long-term operations. Other cumulative developments also would be required to comply with such regulations. As such, the Project as well as other cumulative developments in the area would not result in cumulative impacts with respect to compliance with federal, State, and local statutes and regulations related to solid wastes. Impacts would be less-than-cumulatively considerable.

The Project and all cumulative developments would be regulated by the RCDWR and would be required to comply with the CIWMP's requirement to divert up to 50% of its solid waste from area landfills. As such, cumulatively-considerable impacts due to a conflict with the CIWMP would not occur.

Cumulative impacts associated with the provision of facilities for electricity, communications systems, stormwater drainage, street lighting, maintenance of facilities, construction of off-site sewer and water lines, and other governmental services are inherent to the Project's construction phase and have been evaluated throughout the appropriate issue areas in this EIR. In all cases, where cumulatively-considerable impacts associated with any Project component are identified, mitigation measures have been imposed to reduce such impacts to the maximum feasible extent. Accordingly, cumulatively-considerable impacts associated with the provision of utility facilities to serve the proposed Project would be less than significant.

4.20.6 Significance of Impacts Before Mitigation

Threshold a.: Less-than-Significant Impact. 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 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.: Less-than-Significant Impact. 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 (EMWD, 2023). 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.

Threshold c.: Less-than-Significant Impact. Impacts associated with the Project's proposed sewer improvements are inherent to the Project's construction phase, and impacts 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 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.: Less-than-Significant Impact. 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.

Threshold e.: Less-than-Significant Impact. 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.

Threshold f.: Less-than-Significant Impact. 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.

Threshold g.: Less-than-Significant Impact. 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.

4.20.7 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 the California IWMA of 1989 (AB 939) which mandates a reduction of disposed waste throughout California.

- The Project is required to comply with the provisions of the California Solid Waste Reuse and Recycling Act (AB 1327) which developed a model ordinance for adoption of recyclable materials in development projects. AB 1327 requires all development projects that are commercial, industrial, institutional, or marina in nature and where solid waste is collected and loaded, to provide an adequate area for collecting and loading recyclable materials over the lifetime of the project. The area is required to be provided before building permits are issued.

- The Project is required to comply with the provisions of the Mandatory Commercial Recycling Program (AB 341): AB 341 made a legislative declaration that it is the policy goal of the State that not less than 75% of solid waste generated be source reduced, recycled, or composted by the year 2020,

and required by the California Department of Resources, Recycling, and Recovery, by January 1, 2014, to provide a report to the Legislature that provides strategies to achieve that policy goal and also includes other specified information and recommendations.

- The Project would be subject to the following applicable standard conditions of approval imposed on the Project by the RCDWR:
  - Prior to issuance of a building permit, a Waste Recycling Plan (WRP) shall be submitted to the Riverside County Department of Waste Resources for approval. At a minimum, the WRP must identify the materials (i.e., cardboard, concrete, asphalt, wood, etc.) that will be generated by construction and development; the projected amounts; the measures/methods that will be taken to recycle, reuse, and/or reduce the amount of material; the facilities and/or haulers that will be utilized; and the targeted recycling or reduction rate. During Project construction, the Project site shall have, at a minimum, two bins: one for waste disposal and the other for the recycling of Construction and Demolition (C&D) materials. Additional bins are encouraged to be used for further source separation of C&D recyclable materials. Accurate record keeping (receipts) for recycling of C&D recyclable materials and solid waste disposal must be kept in order to demonstrate compliance with the WRP requirements.
  - Prior to final building inspection, evidence (i.e., receipts or other type of verification) to demonstrate Project compliance with the approved WRP shall be presented by the Project proponent to the Planning Division of the Riverside County Department of Waste Resources in order to clear the project for occupancy permits. Receipts must clearly identify the amount of waste disposed and Construction and Demolition (C&D) materials recycled.
  - Hazardous materials are not accepted at Riverside County landfills. In compliance with federal, State, and local regulations and ordinances, any hazardous waste generated in association with the Project shall be disposed of at a permitted Hazardous Waste disposal facility. Hazardous waste materials include, but are not limited to, paint, batteries, oil, asbestos, and solvents.

Mitigation

The mitigation measures identified throughout this EIR for Project-related construction impacts (e.g., air quality, biological resources, etc.) shall apply. Project impacts to utilities and service systems would be less than significant; therefore, no additional mitigation is required related to utilities and service system improvements proposed as part of the Project.

4.21 WILDFIRE

This section evaluates potential wildfire hazard impacts that may result from the implementation of the Project by identifying existing wildfire hazard conditions on the Project site and in the surrounding area; considering applicable regulatory requirements related to wildfire management; and determining whether the Project would cause or contribute to a significant wildfire hazard risk. The analysis is based, in part, on information from the Project-specific Fire Protection Plan titled *Fire Protection Plan Mead Valley Commerce Center Project* prepared by Dudek, dated ~~February~~ July 2024, and included as *Technical Appendix R* to this EIR (Dudek, 2024). Information in this section also was obtained from the California Department of Forestry and Fire Protection (CAL FIRE), California Building Standards Code, the County of Riverside Geographic Information System (GIS) and General Plan, and the County of Riverside 2023 Operational Area Multi-Jurisdictional Local Hazard Mitigation Plan (LHMP).

4.21.1 EXISTING CONDITIONS

A. *Existing Site Conditions*

The Project site is located in the unincorporated Mead Valley community of western Riverside County. The northern 50.04 gross acres of the Project site (proposed warehouse uses) are located south of Cajalco Road, west of Seaton Avenue, east of Decker Road, and north of an existing Metropolitan Water District (MWD) fee-owned parcel~~easement~~. The southern 14.93 gross acres of the Project site (proposed park site) are located both east and west of Decker Road and south of the MWD fee-owned parcel~~easement~~. Under existing conditions, the northern portions of the Project site include undeveloped land, multiple large-lot single-family residential homes with ancillary structures and outdoor storage, and a commercial structure (Craneology, Inc.). The southern portions 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 most recent known fire to affect the Project site was a small brush fire that occurred in the southeasterly portion of the southern 14.93 gross acres in July 2023.

As previously shown on EIR Figure 2-8, the northern portions of the Project site topographically slope gently toward the east at a gradient of less than ±2 percent. The southern portions of the Project site topographically slope toward the east at a gradient of up to ±5 percent. The Project site's vegetation consists of a mixture of Disturbed/Developed, Nonnative Grassland, Ornamental, Disturbed Southern Willow Scrub, and Disturbed Riversidian Sage Scrub, and there is a drainage feature that crosses the southern portion of the southerly 14.93 acres of the Project site.

B. *Fire History*

Fire history data provides information regarding fire spread, fire frequency, most vulnerable areas, and significant ignition sources, amongst others. In turn, this understanding of why fires occur in an area and how they typically spread can then be used for pre-planning and designing defensible communities. The fire history identified in the Project's FPP (*Technical Appendix R*) was based on data from the Fire and Resource Assessment Program (FRAP) database, which summarizes fire perimeter data dating to the late 1800s, but which is incomplete due to the fact that it only includes fires over 10 acres in size and has incomplete perimeter

data, especially for the first half of the 20th century. However, the data does provide a summary of recorded fires and can be used to show whether large fires have occurred in the Project area, which indicates whether they may be possible in the future. (Dudek, 2024, p. 24)

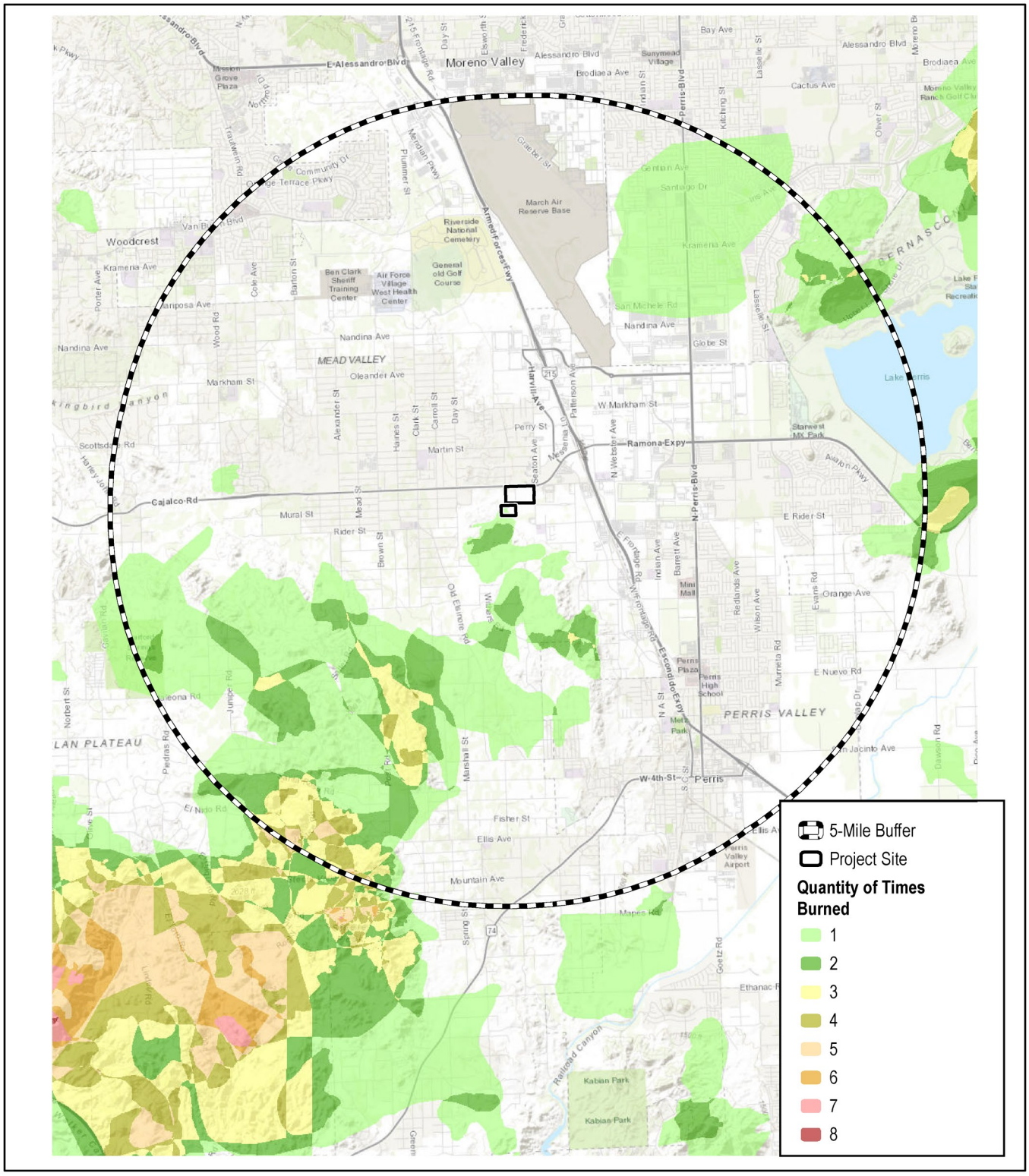
Figure 4.21-1, *Fire History Map,* presents a graphical view of the Project area's recorded fire history. As presented, there have been 52 fires recorded since the late 1800s by CALFire and the FRAP database in the vicinity of the Project Site, including the 1995 Seaton Fire which burned approximately 127 acres on-site. These fires burned within a 5-mile radius of the Project area. According to the Project's FPP (*Technical Appendix R*), the average interval between wildfires in the area (including areas up to approximately 5 miles from the Project site) was calculated to be every 1 to 2 years, with intervals ranging between 0 (multiple fires in the same year) to 11 years. Wildfires are anticipated to occur within 5 miles of the site at least every 11 years, with approximately one wildfire occurring every 1 to 2 years on average, as observed in the fire history record. Based on fire history, wildfire risk for the site is associated primarily with an onshore wind driven wildfire burning or spotting on-site from the south and southwest. (Dudek, 2024, pp. 24-25)

C. *Existing Vegetation and Fire Behavior*

Southern California landscapes include a diverse range of plant communities, including vast tracts of grasslands and shrublands, such as the grasslands and shrublands that occur adjacent to the Project site. Wildfire in Mediterranean-type ecosystems ultimately affects the structure and functions of vegetation communities and would continue to have a substantial and recurring role. Vegetation plays a significant role in fire behavior, and is an important component to the fire behavior models. A critical factor to consider is the dynamic nature of vegetation communities. Fire presence and absence at varying cycles or regimes disrupts plant succession, setting plant communities to an earlier state where less fuel is present for a period of time as the plant community begins its succession again. In summary, high frequency fires tend to convert shrublands to grasslands or maintain grasslands, while fire exclusion tends to convert grasslands to shrublands, over time. In general, biomass and associated fuel loading will increase over time, assuming that disturbance (fire, grazing, or grading) or fuel reduction efforts are not diligently implemented. (Dudek, 2024, p. 24 & 38)

The vegetation on the Project Site and off-site improvement areas consists of non-native grasslands and ornamental plants, disturbed Southern Willow Scrub, and disturbed Riversidian Sage Scrub and are described in Table 4.21-1, *Summary of the Cajalco Commerce Center Vegetation/Land Use Types*. These fuel types can produce flying embers that may affect the Project.

Under extreme Santa Ana conditions through the non-maintained grass/grass-shrub dominated fuels within and adjacent to the Project site can support low to moderate fire behavior, a high rate of spread, and spotting distances of approximately a quarter of a mile when supported by 14 mph sustained winds. When winds gust up to 50 mph, fire behavior can be heightened from low to extreme with high to very high rates of spread and spotting distances of up to over a mile. Even under conservative fire behavior numbers, a hand crew would be able to operate in post-treatment conditions even in the presence of 50 mph gusts and hose lays or aerial support would have heightened effectiveness. (Dudek, 2024, p. 36)



Source(s): Dudek (February 2024)

Figure 4.21-1

Not to Scale

Fire History Map

Table 4.21-1 Summary of the Cajalco Commerce Center Vegetation/Land Use Types

Vegetation/Land Use Type	Inside Criteria Cells (Acres)	Outside Criteria Cells (Acres)	Total (Acres)	Percent of Project Site (%)
Disturbed/Developed	39.54	10.74	50.28	60.00
Non-native Grasslands	26.60	1.77	28.37	33.86
Ornamental	0.39	0.73	1.12	1.34
Disturbed Southern Willow Scrub	0.21	0.00	0.21	0.25
Disturbed Riversidian Sage Scrub	3.80	0.00	3.80	4.54
Total	**70.54**	**13.24**	**83.78**	**100.0**

(Dudek, 2024, Table 1)

A worst-case fire under gusty Santa Ana winds and low fuel moistures is expected to have low fire behavior with low to moderate rates of spread and spotting distances up to half a mile when gusts occur. These are conservative approaches with the fie behavior of the planned irrigated landscaping likely being best represented by the FM8 fuel model which had low fire behavior and did not facilitate fire spread except for in the presence of gusts where the spread rate was still low. The reduced fire behavior of post development conditions not only directly reduce the hazard to the Project, but also enable enhanced suppression efforts by the Riverside County Fire Department (RCFD) to even further decrease the hazard. This is not taking into account the many other features of the project which will mitigate the ignition potential from radiant and convective heat or embers. (Dudek, 2024, pp. 36-37)

Fire behavior around the southern portions of the Project site is expected to be similar to that around the northern portions of the Project site due to the similarity of modeling inputs. Vegetation and topography is similar around both portions of the Project site and the climate is the same. However, the southern portions of the Project site would be directly adjacent to the open space area to the south. This means that the most expected fire scenario for that portion of the Project site, even more so than for the northern portions of the Project site, would be a fire driven by the prevailing on-shore wind and would be likely to occur during average weather conditions and fuel moistures, but could also occur during drier conditions which would result in heightened fire behavior. Flame lengths around the southern portions of the Project site could range from approximately 4 feet during average conditions up to approximately 9 feet during extreme conditions and 18 feet in the presence of 50 mph Santa Ana gusts. (Dudek, 2024, p. 38)

D. Climate

Throughout southern California, and specifically at the Project site, climate has a large influence on fire risk. The climate of Mead Valley in Riverside County is typical of a Mediterranean area, with warm, dry summers and cool, wet winters. Average high temperatures (average annuals) range from around 64° F in November and December and up to 90°F during the summer months. Precipitation has been averaging just over 10 inches and typically occurs between November and March. The average hourly wind speed ranges between 5 mph and 7 mph. The prevailing wind direction is an on-shore flow from the west. (Dudek, 2024, p. 21)

From a regional perspective, the fire risk in southern California can be divided into three distinct “seasons.” The first season, the most active season and covering the summer months, extends from late May to late

September. This is followed by an intense fall season characterized by fewer but larger fires. This season begins in late September and continues until early November. The remaining months, November to late May cover the mostly dormant, winter season. Large fires in the region consistently occur at the end of wet periods and the beginning of droughts. Fires can be a significant issue during summer and fall, before the rainy period, especially during dry Santa Ana wind events. Although Santa Ana events can occur anytime of the year, they generally occur during the autumn months, although the last few years have resulted in spring (April - May) and summer events. Santa Ana winds may gust up to 75 miles per hour (mph) or higher. This phenomenon markedly increases the wildfire danger and intensity in the Project area by drying out and preheating vegetation (fuel moisture of less than 5% for 1-hour fuels is possible) as well as accelerating oxygen supply, and thereby, making possible the burning of fuels that otherwise might not burn under cooler, moister conditions. (Dudek, 2024, p. 21)

The prevailing wind pattern is from the west (on-shore), but the presence of the Pacific Ocean causes a diurnal wind pattern known as the land/sea breeze system. During the day, winds are from the west–southwest (sea), and at night winds are from the northeast (land). The highest wind velocities are associated with downslope, canyon, and Santa Ana winds. (Dudek, 2024, p. 21)

E. Emergency Response and Service

The Project site is located within the jurisdictional response area of the RCFD, and the County also contracts with CAL FIRE to provide emergency services. Regionally, RCFD provides fire, emergency medical, and rescue services from 95 stations. The Department serves over 1.6 million residents throughout 20 cities and all unincorporated portions of Riverside County. The Project site lies within Battalion 1 response area. RCFD Fire Station 59 would provide the initial response to the Project site and RCFD Station 90 is within approximately 4 miles of the project site and would be available to provide a secondary response to the site, if needed. RCFD/CAL FIRE Station No. 59, located at 21510 Pinewood Street, Perris, California is the closest RCFD/CAL FIRE station and would provide initial response to the Project site. (Dudek, 2024, p. 42)

RCFD/CAL FIRE Station No. 59 is approximately 1.7 miles from the southernmost western entrance, Driveway 2, into the warehouse portion of the Project site off Decker Road and approximately 2.2 miles from the farthest portions of the warehouse portion of the Project site. Station 59 could respond to the southernmost western entrance to the northern portions of the Project site, which is within approximately 3 minutes and 32 seconds travel time, and to an incident within the farthest portion of northern portions of the Project site approximately 4 minutes 13 seconds travel time. Station 59 could respond to the southern portions of the Project site within approximately 3 minutes and 43 seconds of travel time. (Dudek, 2024, p. 45)

The RCFD/CAL FIRE Station 90 is the next closest station that could respond to the Project site. Station 90 is located approximately 3.1 miles from the southeastern entrance proposed for the northern portions of the Project site from Seaton Avenue and approximately 3.6 miles from the farthest portions of the Project site. Station 90 could respond to the northern portions of the Project site within approximately 5 minutes and 55 seconds travel time and to an incident within the farthest portions of the northern portions of the Project site within approximately 6 minutes 46 seconds travel time. Station 90 could respond to the southern portions of the Project site within approximately 7 minutes and 27 seconds of travel time. (Dudek, 2024, pp. 45-46)

The RCFD/CAL FIRE Station 1 is the third closest station that could respond to the Project site. Station 1 is located approximately 4.7 miles from the southeastern entrance into the northern portions of the Project site from Seaton Avenue and approximately 5.2 miles from the farthest portions of the northern portions of the Project site. Station 1 could respond to the southern driveway at the northern portions of the Project site within approximately 8 minutes and 38 seconds travel time and to an incident within the farthest portions of the northern portion of the project site within approximately 9 minutes 29 seconds travel time. Station 1 could respond to the southern portions of the Project site within approximately 10 minutes and 10 seconds of travel time. (Dudek, 2024, p. 46)

The RCFD/CAL FIRE Station 101 is the fourth closest station that could respond to the Project site. Station 101 is located approximately 4.8 miles from the southeastern entrance to the northern portions of the Project site from Seaton Avenue and approximately 5.3 miles from the farthest portions of the northern portions of the Project site. Station 101 could respond to the furthest driveway in the northern portions of the Project site within approximately 8 minutes and 49 seconds travel time and to an incident within the farthest portions of the northern portions of the Project site within approximately 9 minutes 40 seconds travel time. Station 101 could respond to the entrance to the southern portions of the Project site within approximately 10 minutes and 31 seconds of travel time. (Dudek, 2024, p. 46)

Emergency call volumes related to typical projects, such as new industrial developments, can be reliably estimated based on the historical per-capita call volume from a particular fire jurisdiction. The RCFD documented 183,893 total incidents for 2021 generated by a service area total population of approximately 1,674,024 persons in 20 cities and all unincorporated communities within Riverside County. The County's per capita annual call volume is approximately 110 calls per 1,000 persons. The resulting per capita call volume is 0.11. (Dudek, 2024, pp. 47-48)

F. Fire Hazard Classification

Areas designated as being subject to significant hazard in the State of California are mapped by the California Department of Forestry and Fire Protection (CAL FIRE) through its Fire and Resources Assessment Program (FRAP). These maps designate areas in California into fire hazard severity zones (FHSZ) based on a hazard scoring system using subjective criteria for fuels, fire history, terrain influences, housing density, potential for catastrophic losses. Lands under the responsibility of CAL FIRE for wildland fire protection are classified as State Responsibility Areas (SRA). SRA boundaries were adopted by the Board of Forestry and Fire Protection in January 2011, and updated on July 1, 2016. CAL FIRE designates areas into three Fire Hazard Severity Zones (FHSZs): Very High, High, and Moderate. Additionally, local fire protection agencies such as the Riverside County Fire Department are responsible for wildfire protection on lands within their jurisdiction that are classified as Local Responsibility Areas (LRA). The Project site is located in a LRA. Land located south of the Project site and generally corresponding with the east-west alignment of Rider Street extending from the southeast of the Project site, is located in a SRA. (CAL FIRE, 2023)

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, 2021)

4.21.2 Applicable Regulatory Requirements

The following is a brief description of the federal, State, and local environmental laws and related regulations related to wildfire hazards.

A. Federal Regulations

1. Federal Emergency Management Agency

In March 2003, the U.S. Federal Emergency Management Agency (FEMA) became part of the U.S. Department of Homeland Security. FEMA leads federal efforts to prepare the nation for hazards, including wildfire hazards, and manages the federal response and recovery efforts following any national incident. FEMA also undertakes proactive efforts to prepare for emergencies such as training of first responders and management of the U.S. Fire Administration.

2. Healthy Forests Restoration Act of 2003

The Healthy Forests Initiative directs the Departments of Agriculture and the Interior, and the Council on Environmental Quality, to improve regulatory processes to ensure more timely decisions, greater efficiency, and better results in reducing the risk of catastrophic wildland fires. On June 5, 2003, the Departments of Agriculture and the Interior adopted two categorical exclusions from documentation in an environmental assessment or environmental impact statement (EIS): an exclusion for hazardous-fuel reduction and another for rehabilitation of resources and infrastructure damaged by wildfire (68 FR 33814). (DOI, n.d.)

3. Disaster Mitigation Act of 2000

The Disaster Mitigation Act of 2000 (42 United States Code [U.S.C.] §5121) addresses the importance of pre-disaster infrastructure mitigation planning to reduce disaster losses across the United States and is aimed primarily at the control and streamlining of the administration of federal disaster relief and programs. Some of the major provisions of this Act include: a) funding pre-disaster mitigation activities; b) developing experimental multi-hazard maps to better understand risk; and c) establishing state and local government infrastructure mitigation planning requirements. The mitigation planning provisions outlined in this Act establish performance-based standards for mitigation plans and require states to have a public assistance program to develop county government plans (44 CFR Part 201). (CFR, 2000)

B. State Regulations

1. Public Resources Code (PRC) Sections 4290-4299

Public Resources Code Sections 4290-4299 establish minimum Statewide fire safety provisions pertaining to: roads for fire equipment access; signs identifying streets, roads, and buildings; minimum private water supply reserves for emergency fire use; and fire fuel breaks and greenbelts. With certain exceptions, all new

construction after July 1, 1991, in potential wildland fire areas, is required to meet these Statewide standards. The State requirements, however, do not supersede more restrictive local regulations. (CA Legislative Info, n.d.13)

As defined by the California Department of Forestry and Fire Protection (CalFire), wildland areas defined as State Responsibility Areas (SRAs) may contain substantial wildfire risks and hazards. They consist of lands exclusive of cities, and federal lands regardless of ownership. The primary financial responsibility for preventing and suppressing fires within wildlands belongs to the State of California. However, it is not the State of California's responsibility to provide fire protection services to buildings or structures located within the wildlands unless CalFire has entered into a cooperative agreement with a local agency for those purposes pursuant to PRC Section 4142. As such, wildland areas require disclosure of these fire hazards in real estate transactions, and owners of properties in wildland areas are subject to PRC Section 4291 maintenance requirements. The law requires CalFire every five years (1991, 1996, 2001, etc.) to provide maps identifying the boundaries of lands classified as SRAs to the Riverside County Assessor. (CA Legislative Info, n.d.13)

2. Public Resources Code Section 4213 – Fire Prevention Fees

Pursuant to PRC Section 4213, in July of 2011, the State of California began assessing an annual Fire Prevention Fee for all habitable structures within SRAs to pay for fire prevention services. SRAs are the portions of California where the State of California is financially responsible for the prevention and suppression of wildfires. The SRA does not include lands within incorporated city boundaries, tribal, or federally owned land. As of 2013, the fee is up to $150 per habitable structure (i.e., a building that can be occupied for residential use, which does not include incidental buildings such as detached garages, barns, outdoor bathrooms, sheds, etc.). (CA Legislative Info, n.d.14)

3. California Government Code (CGC) Sections 51178 and 51182

The Director of CalFire, in cooperation with local fire authorities, shall identify areas that are Very High Fire Hazard Severity Zones (VHFHSZ) in Local Responsibility Areas (LRAs), based on consistent Statewide criteria, and the expected severity of fire hazard. Per California Government Code (CGC) § 51178, a local agency may, at its discretion, exclude from the requirements of § 51182 an area within its jurisdiction that has been identified as a VHFHSZ, if it provides substantial evidence in the record that the requirements of § 51182 are not necessary for effective fire protection within the area. Alternatively, local agencies may include areas not identified as VHFHSZ by CalFire, following a finding supported by substantial evidence in the record that the requirements of § 51182 are necessary for effective fire protection within the new area. According to § 51182, such changes made by a local agency shall be final, and shall not be rebuttable by CalFire. (CA Legislative Info, n.d.16; CA Legislative Info, n.d.17)

4. California Code of Regulations (CCR) Title 14 – Natural Resources

California Code of Regulations (CCR) Title 14 constitutes the basic wildland fire protection standards of the California Board of Forestry. These regulations were prepared and adopted to establish minimum wildfire protection standards in conjunction with building, construction, and development within SRAs. Among other things, Title 14 requires that the design and construction of structures, subdivisions, and developments in an

SRA provide for basic emergency access and perimeter wildfire protection measures (fire fuel modification zones, etc.). (Westlaw, n.d.2)

5. CCR Title 24, Parts 2 and 9 – Fire Codes

Part 2 of Title 24 of the CCR refers to the California Building Code, which contains complete regulations and general construction building standards of State adopting agencies, including administrative, fire and life safety, and field inspection provisions. Part 2 was updated in 2019 to reflect changes in the base document from the Uniform Building Code to the 2018 International Building Code. Part 9 refers to the California Fire Code, which contains other fire safety-related building standards. In particular, Chapter 7A, "Materials and Construction Methods for Exterior Wildfire Exposure," in the 2010 California Building Code addresses fire safety standards for new construction. In addition, Section 701A.3.2, "New Buildings Located in Any Fire Hazard Severity Zone," states: (CBSC, 2022)

"*New buildings located in any Fire Hazard Severity Zone within State Responsibility Areas, any Local Agency Very-High Fire Hazard Severity Zone, or any Wildland-Urban Interface Fire Area designated by the enforcing agency for which an application for a building permit is submitted on or after January 1, 2008, shall comply with all sections of this chapter.*"

Additionally, Chapter 49 specifies fuel modification requirements for wildland-urban interface areas that are prone to fire hazards (CBSC, 2022).

C. Local Regulations

1. Riverside County Ordinance No. 787 – Fire Code Standards

Riverside County Ordinance No. 787 addresses implementation of the California Fire Code, based on the International Code Council. The codes prescribe performance characteristics and materials to be used to achieve acceptable levels of fire protection and include the Wildland-Urban Interface (WUI) fire area building standards mentioned above. Collectively, the ordinance establishes the requirements and standards for fire hazard reduction regulations within Riverside County (including additions and deletions to the California Fire Code) to fully protect the health, safety, and welfare of existing and future residents and workers of Riverside County. (Riverside County, n.d.4)

Among other things, this ordinance assures that structural and nonstructural architectural elements of the building do not: a) impede emergency egress for fire safety staffing/ personnel, equipment, and apparatus; nor b) hinder evacuation from fire, including potential blockage of stairways or fire doors. In addition, for the purposes of California Fire Code implementation, the ordinance also adds a statement noting: "In accordance with Government Code sections 51175 through 51189, Very High Fire Hazard Severity Zones are designated as shown on a map titled Very High Fire Hazard Severity Zones, dated April 8, 2010, and retained on file at the office of the Fire Chief and supersedes other maps previously adopted by Riverside County designating high fire hazard areas." It also defines a "hazardous fire area" as: "private or public land not designated as State or local fire hazard severity zone (FHSZ) which is covered with grass, grain, brush or forest and situated

in a location that makes suppression difficult resulting in great damage. Such areas are designated on Hazardous Fire Area maps filed with the office of the Fire Chief." (Riverside County, 2015a, p. 4.13-49)

2. Riverside County Ordinance No. 695 – Hazardous Vegetation

Hillsides throughout Riverside County are predominantly mapped as having a substantial fire risk; thus, much of Riverside County is subject to PRC Sections 4291-4299 and Riverside County Ordinance No. 695. This ordinance requires property owners in such areas to reduce fire danger through mowing and other fuel modification methods. This ordinance affects anyone who "owns, leases, controls, operates, or maintains any building or structure in, upon, or adjoining any mountainous area or forest-covered lands, brush-covered lands, or grass-covered lands or any land covered with flammable material." (Riverside County, 2015a, p. 4.13-50)

Among other measures, Ordinance No. 695 requires the abatement of "hazardous vegetation," which is defined in the ordinance as vegetation that is flammable and endangers the public safety by creating a fire hazard. The type of abatement can depend on the location, terrain, and vegetation present, but typically includes the mowing or discing (plowing up) of vegetation, such as seasonal and recurrent weeds, stubble, brush, dry leaves, and tumbleweeds. Abatement is generally required along roadways and habitable structures either on or adjacent to the property. (Riverside County, 2015a, pp. 4.13-50 to 4.13-51)

Prior to development, Riverside County requires a development within a high fire hazard area (SRA or Very High FHSZ Local Responsibility Area [LRA]) to design and implement fuel modification programs for the interface between developed and natural areas within and adjacent to the proposed project area. Such fuel modification plans shall be subject to approval by the Riverside County Fire Department (RCFD). The fuel modification programs shall be achieved through graduated transition from native vegetation to irrigated landscape. The program shall also establish parameters for the percent, age, extent, and nature of native plant removal necessary to achieve Riverside County fire prevention standards to protect human lives and property, while preserving as much natural habitat as practicable. (Riverside County, 2015a, p. 4.13-51)

3. 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, including wildfire. Regarding the topic of Wildland Fire, the LHMP recognizes that wildfire poses a significant risk to the people of California and their homes, and the most significant risk is predominantly associated with wildland-urban interface (WUI) areas. WUI is a general term that applies to development interspersed within or adjacent to landscapes that support wildland fire. The LHMP includes a set of fire hazard strategies (Strategies 4.1 through 4.26) recommended for implementation. (Riverside EMD, 2023)

❑ <u>Riverside County Operational Area Multi-Jurisdictional Local Hazard Mitigation Plan</u>

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)

4.21.3 Basis for Determining Significance

Section XX of Appendix G to the California Environmental Quality Act (CEQA) Guidelines identifies the following threshold questions for evaluating impacts due to wildfire (OPR, 2018a):

- If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

- If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risk, and thereby expose project occupants to pollutant concentrations for a wildfire or the uncontrolled spread of a wildfire?

- If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

- If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

The following thresholds are derived from Riverside County's Environmental Assessment Checklist, and are supplemented by the thresholds listed in Appendix G to the CEQA Guidelines, in order to evaluate the

significance of the proposed Project's impacts due to wildfires. The proposed Project would result in a significant impact due to wildfires if the Project or any Project-related component would:

a. *Substantially impair an adopted emergency response plan or emergency evacuation plan;*

b. *Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire;*

c. *Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment;*

d. *Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes; or*

e. *Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.*

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 due to wildfires.

4.21.4 Impact Analysis

Threshold a.: Would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?

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 including Cajalco Road, Seaton Avenue, and Decker Road. Furthermore, implementation of the Project has been determined by the Project's Traffic Impact Analysis (refer to *Technical Appendix N2*) to not cause or significantly contribute to traffic congestion that would adversely affect traffic operations in the local area. As part of the County's discretionary review process, Riverside County staff reviewed the Project's application materials to ensure that appropriate emergency ingress and egress would be available to and from the Project site inclusive of the individual warehouse and public park components of the Project and determined that the Project's design provides adequate ingress and egress for emergency vehicles. Moreover, the Project's implementation includes planned improvements to Cajalco Road, Seaton Avenue, and Decker Road, which would help improve access in the local area. For example, access to properties located south of the Project site would be improved by the Project's extension of Decker Road to the proposed park site. Furthermore, 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. 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 impacts would be less than significant.

Threshold b.: ***Due to slope, prevailing winds, and other factors, would the Project exacerbate wildfire risks, and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?***

Threshold e.: ***Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?***

The proposed Project would convert 50.04 gross acres to a warehouse development site and 14.93 gross acres to a proposed public park, in addition to on- and off-site roadway and infrastructure improvements. The southeast corner of the proposed warehouse site and the southern portions of the proposed public 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 public 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, 2021)

A worst-case fire under gusty Santa Ana winds and low fuel moistures is expected to have low fire behavior with low to moderate rates of spread and spotting distances up to half a mile when gusts occur. These are conservative approaches with the fire behavior of the planned irrigated landscaping likely being best represented by the FM8 fuel model which had low fire behavior and did not facilitate fire spread except for in the presence of gusts where the spread rate was still low. The reduced fire behavior of post development conditions not only directly reduce the hazard to the Project, but also enable enhanced suppression efforts by the RCFD to even further decrease the hazard. This is not taking into account the many other features of the Project which will mitigate the ignition potential from radiant and convective heat or embers. (Dudek, 2024, p. 36)

The Project is designed to provide appropriate setbacks from undeveloped areas containing natural vegetation that could expose the Project site to wildfire hazards. For example, based on the Project's conceptual site plan for the proposed warehouse, the proposed building has more than adequate on-site defensible space to limit fire hazards. This includes fuel maintenance and modification zones, which would consist of asphalt and concrete roadways, drive aisles, parking stalls, loading zones, and irrigated landscaping. Landscaping is proposed to consist of a variety of trees, shrubs, and groundcover. For the warehouse site, trees would be located along the site's frontages along Cajalco Road, Decker Road, and Seaton Avenue, within passenger vehicle parking areas, and around the proposed warehouse.

The fuel modification planned as part of the Project would be code-exceeding in its widths and characteristics. The irrigation would maintain high fuel moisture content for all plants and grass. This would lead to minimal fire behavior as modeled for post-project conditions. The landscaping of the park area would exceed fuel modification standards in characteristics and width in all areas except for the western side of the sole park structure that is planned to be constructed west of the western parking lot (i.e., the proposed recreation building). The western side of the recreation building would achieve up to 100 feet of on-site and off-site equivalent fuel modification. Furthermore, the park structure would be constructed of non-combustible CMU block. In addition, few combustible materials would be placed at the proposed public park site, and therefore would not exacerbate fire risks in the local area. (Dudek, 2024, pp. 65-66)

Embers can be generated by a structure fire and can be blown over the fuel modification into native fuels, but the inclusion of automatic sprinklers in every building (as discussed below) combined with the presence of staffed fire stations with fast response times significantly reduces the potential for a structure fire to reach a size that would produce significant impacts. The highest likelihood of vegetation ignitions would be related to roadways. The Project at buildout would reduce the overall risk of wildfire spreading off site with implementation of the fire safety requirements, defensible space, and vegetation management. (Dudek, 2024, p. 28) Therefore, the proposed Project would not exacerbate wildfire risks and would instead reduce the risk of wildfire spread in the local area.

Regarding the proposed building and its operations, the Riverside County Fire Department is responsible for ensuring compliance with all applicable provisions of the Fire Code during implementation of the Project. Construction drawings are required to be checked by the County's Building and Safety Department and Fire Department prior to the issuance of a building permit. The Fire Department is responsible for issuing permits for the building's fire protection system and permitted building occupancies. Field site inspections also are conducted by the Building and Safety Department and the Fire Department. Final inspections ae further conducted by the Building and Safety Department and the Fire Department prior to building occupancy. Inspections cover the fire alarm system, fire sprinkler system, egress-control devices, wiring, walls, commodities storage, and other items to ensure compliance with all fire protection requirements. (RCFD, n.d.)

Moreover, all structures of any occupancy type would be protected by an automatic, internal fire sprinkler system. Fire sprinklers systems shall be in accordance with RCFD, and National Fire Protection Association (NFPA) Standard 13 (as required by Section 903.2 of the California Fire Code [CFC]). Fire sprinkler plans for

each structure would be submitted and reviewed by RCFD for compliance with the applicable fire and life safety regulations, codes, and ordinances as well as the RCFD Technical Policies and Standards for fire protection systems. (Dudek, 2024, p. 61)

Long-term protection of the development and the surrounding area is dependent on the maintenance of fuel modification as even fire-safe designs can degrade over time. To alleviate this, future owners/occupants would be required to conduct regular assessments of the defensible space and to conduct maintenance involving the removal of dead and dying material and undesirable plants, as required by Riverside County Ordinance No. 695, *Requiring the Abatement of Hazardous Vegetation*. Thinning would also be conducted as required by Ordinance No. 695 to maintain plant spacing and fuel densities. This would keep the defensible space in a highly fire resistive condition free of accumulated flammable debris and plants.

For the reasons stated above, the Project has no reasonable potential to exacerbate wildfire risks and 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. Accordingly, impacts would be less than significant.

Threshold c.: ***Would the Project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?***

As noted above under the analysis of Thresholds b. and e., the Project has been designed to provide appropriate setbacks from undeveloped areas containing natural vegetation that could expose the Project site to wildfire hazard risk. For example, based on the Project's conceptual site plan, the proposed warehouse building and the proposed public park site's recreational building would have more than adequate on-site defensible space to limit fire hazards. This includes asphalt and concrete roadways, drive aisles, parking stalls, loading zones, and irrigated landscaping. Landscaping on the Project site and along frontage roadways would be irrigated and would consist of a variety of trees, shrubs, and groundcover. Trees on the warehouse site are proposed along the site's frontages along Cajalco Road, Decker Road, and Seaton Avenue, and within passenger vehicle parking areas, and around the proposed warehouse. A majority of the proposed public park site also would be irrigated and landscaped. These irrigated landscaped areas introduced on the Project site would provide buffers between off-site natural vegetation and on-site combustible materials and would serve to reduce flame height due to the lack of combustible material present and the higher live fuel moisture content present in the irrigated landscaping. The above-described fire abatement features are inherent to the Project's construction phase, and impacts associated with Project-related construction activities are evaluated under the appropriate subheadings within this EIR. Where significant impacts are identified, mitigation measures are identified to reduce impacts to below a level of significance. There are no environmental impacts associated with the above-described fuel management features that have not already been evaluated and addressed by this EIR. Moreover, and as discussed under the analysis of Thresholds b. and e., the project would not exacerbate fire risks in the local area, as the Projects proposed improvements would reduce the risk of wildfires in the local area as compared to existing conditions. Accordingly, the Project would not require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may

exacerbate fire risk or that may result in temporary or ongoing impacts to the environment not already addressed by this EIR, and impacts would therefore be less than significant.

Threshold d.: ***Would the Project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?***

Under existing and proposed conditions, the Project site exhibits little topographic variation, and development on the site as proposed with a warehouse building and a public park would not involve any use containing natural vegetation of 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 of downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Areas surrounding the Project site, particularly to the south, east and west of the proposed public park site and to the south, southwest, and southeast of the proposed warehouse site are identified as having a "Very High" susceptibility to wildfire hazards, and portions of the surrounding area contain hill forms and slopes (Google Earth, 2024). However, the Project site would be separated from these areas by the proposed improvements to Decker Road as well as by the proposed irrigated landscaping that would occur along the Project site boundaries as well as within passenger vehicle parking areas, and around the proposed warehouse building and public park site recreational building. Therefore, the Project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes, and impacts would be less than significant.

4.21.5 Cumulative Impact Analysis

The cumulative study area for the issue of wildfire includes areas within a five-mile radius of the Project site. This study area is appropriate for analysis because fire events located more than five miles from the Project site are unlikely to affect the Project, and any fires starting in the Project area likely would not affect lands located more than five miles away.

The Project site does not contain any emergency facilities nor does it serve as an emergency evacuation route, and the Project would not serve as an evacuation route under long-term conditions. During construction and at Project build-out, the proposed Project would be required to maintain adequate access for emergency vehicles. Other cumulative developments similarly would be required to accommodate emergency access and facilities. As such, cumulatively-considerable impacts would be less than significant.

As indicated under the analysis of Thresholds b. and e., the Project is designed to provide appropriate setbacks from undeveloped areas containing natural vegetation that could expose the Project site to wildfire hazards. There are no components of the proposed Project that would exacerbate wildland fire hazards in the local area, and the buffers accommodated by the Project between the proposed warehouse building and proposed public park site recreational building along the western boundary of the southern portion of the site would ensure the Project does not expose people or structures to a significant risk of loss, injury, or death involving wildland fire hazards. Other developments within the cumulative study area would similarly be required to address fire

hazards as appropriate and to provide measures to avoid or reduce the potential risk of wildfire in the region. As such, Project impacts due to wildfire hazards would be less-than-cumulatively considerable.

As discussed under the analysis of Threshold c., the Project is designed to include fuel management zones that would consist of asphalt and concrete roadways, drive aisles, parking stalls, loading zones, and irrigated landscaping. The Project's fire abatement features are inherent to the Project's construction phase, and impacts associated with Project-related construction activities are evaluated under the appropriate subheadings within this EIR. Where significant cumulatively- considerable impacts are identified, mitigation measures are identified to reduce impacts to below a level of significance. There are no cumulatively-considerable environmental impacts associated with the Project's fuel management features that have not already been evaluated and addressed by this EIR. Moreover, and as discussed under the analysis of Thresholds b. and e., the Project would not exacerbate fire risks in the local area, as the Project's proposed improvements would reduce the risk of wildfires in the local area as compared to existing conditions. Accordingly, the Project would not result in cumulatively-considerable impacts associated with the installation or maintenance of infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment, and cumulatively-considerable impacts would be less than significant.

Under existing and proposed conditions, the Project site exhibits little topographic variation, and development on site as proposed would not involve any uses containing natural vegetation or other features subject to wildland fire hazards. As such, the Project has no potential to cumulatively contribute to impacts associated with the exposure of people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Cumulatively-considerable impacts would not occur.

4.21.6 Significance of Impacts Before Mitigation

Threshold a.: Less-than-Significant Impact. 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.

Threshold b. and e.: Less-than-Significant Impact. 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.

Threshold c.: Less-than-Significant Impact. 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 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.: Less-than-Significant Impact. 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.

4.21.7 County Regulations, Design Requirements, and Mitigation

Significant impacts would not occur; therefore, mitigation measures are not required.

5.0 Other CEQA Considerations

5.1 Significant Environmental Effects Which Cannot Be Avoided if the Proposed Project is Implemented

The California Environmental Quality Act (CEQA) Guidelines require that an EIR disclose the significant environmental effects of a project which cannot be avoided if the proposed project is implemented (CEQA Guidelines § 15126[b]). As described in detail in Section 4.0 of this EIR, the proposed Project is anticipated to result in several impacts to the environment that cannot be reduced to below a level of significance after the implementation of relevant standard conditions of approval, compliance with applicable laws and regulations, and application of feasible mitigation measures. The significant environmental effects of the proposed Project that cannot be feasibly mitigated are as follows:

- Air Quality: Significant and Unavoidable Direct and Cumulatively-Considerable Impact. 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's proposed land uses and associated operational-source emissions are not reflected within the current 2022 AQMP regional emissions inventory for the SCAB. 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. Thus, Project's direct and cumulatively-considerable impacts due to a conflict with or obstruction of the SCAQMD 2022 AQMP would be significant and unavoidable. In addition, the Project's operational emissions of NO_X, which would exceed the SCAQMD regional threshold for this pollutant, would contribute to the non-attainment status of the SCAB for ozone (O_3). Project impacts due to operational emissions of NO_X represent a significant and unavoidable impact for which additional mitigation is not available.

- Transportation: Significant and Unavoidable Direct and Cumulatively-Considerable Impact. 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, 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. The future tenants of the Project's proposed warehouse building are unknown at this time. As such, the effectiveness of commute trip reduction measures cannot be guaranteed to reduce Project VMT to a level of less than significant. In addition to specific tenancy considerations, locational context is also a major factor relevant to the potential application and effectiveness of commute trip reduction measures. Additionally, to achieve ideal conditions a project must achieve a significant degree of employee participation and maximum employee eligibility, which are not generally expected. 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 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.

5.2 Significant Irreversible Environmental Impacts Which Would be Involved in the Proposed Action Should it be Implemented

The CEQA Guidelines require EIRs to address any significant irreversible environmental changes that would be involved in the proposed action should it be implemented (CEQA Guidelines § 15126.2(c)). An environmental change would fall into this category if: a) the project would involve a large commitment of non-renewable resources; b) the primary and secondary impacts of the project would generally commit future generations to similar uses; c) the project involves uses in which irreversible damage could result from any potential environmental accidents; or d) the proposed consumption of resources is not justified (e.g., the project results in the wasteful use of energy).

Determining whether the proposed Project may result in significant irreversible environmental changes requires a determination of whether key non-renewable resources would be degraded or destroyed in such a way that there would be little possibility of restoring them. Natural resources in the form of construction materials and energy resources would be used in the construction of the proposed Project, but development of the Project site as proposed would have no measurable adverse effect on the availability of such resources, including resources that may be non-renewable (e.g., fossil fuels). Construction and operation of the proposed Project would not involve the use of large sums or sources of non-renewable energy. Additionally, the Project is required by law to comply with the California Green Building Standards Code (CALGreen), compliance with which reduces a building operation's energy volume that is produced by fossil fuels. The Project would be subject to regulations to reduce the Project's reliance on non-renewable energy sources. The Project also would be subject to the Energy Independence and Security Act of 2007, which contains provisions designed to increase energy efficiency and availability of renewable energy. The Project also would be subject to California Energy Code, or Title 24, which contains measures to reduce natural gas and electrical demand, thus requiring less non-renewable energy resources. Although the Project would entail the long-term, on-going use of natural resources (i.e., water, electricity, natural gas, and fossil fuels), the analysis EIR Subsections 4.6, *Energy*, and 4.20, *Utilities and Service Systems*, demonstrate that the Project would avoid the inefficient, wasteful, and unnecessary consumption of energy during Project construction, operation, maintenance, and/or removal, and that the Project's demands for water, electricity, natural gas, and fossil fuels would not directly or cumulatively affect the availability of these resources. With mandatory compliance to the energy efficiency regulations and mitigation measures, the Project would not involve the use of large sums or sources of non-renewable energy.

EIR Subsection 4.9, *Hazards and Hazardous Materials*, provides an analysis of the proposed Project's potential to transport or handle hazardous materials which, if released into the environment, could result in irreversible damage. As concluded in the analysis, compliance with federal, State, and local regulation related to hazardous materials would be required of all contractors working on the property during the Project's construction and of all the future occupants of the Project's buildings. As such, construction and long-term operation of the proposed Project would not have the potential to cause significant irreversible damage to the environment, including damage that may result from upset or accident conditions.

5.3 GROWTH INDUCING IMPACTS OF THE PROPOSED PROJECT

CEQA requires a discussion of the ways in which the proposed Project would be growth inducing. The CEQA Guidelines identify a project as growth inducing if it would foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment (CEQA Guidelines § 15126.2(d)). New employees and new residential developments represent direct forms of growth. These direct forms of growth have a secondary effect of expanding the size of local markets and including additional economic activity in the area.

A project could indirectly induce growth at the local level by increasing the demand for additional goods and services associated with an increase in population or employment and thus reducing or removing the barriers to growth. This typically occurs in suburban or rural environments where population or employment growth results in increased demand for service and commodity markets responding to the new population of residents or employees. Economic growth would likely take place as a result of the proposed Project's operation as a light industrial development and park. The Project's construction- and operational-related employees would purchase goods and services in the region, but any secondary increase in employment associated with meeting these goods and services needs would be marginal, accommodated by existing goods and service providers, and highly unlikely to result in any new physical impacts to the environment. Therefore, while the Project would create economic opportunities by introducing new job opportunities to the Project site, this change would not induce substantial new growth in the region.

Under CEQA, growth inducement is not considered necessarily detrimental, beneficial, or of significance to the environment. Typically, growth-inducing potential of a project would be considered significant if it fosters growth or a concentration of population in excess of what is assumed in pertinent master plans, land use plans, or in projections made by regional planning agencies such as SCAG. Significant growth impacts also could occur if a project provides infrastructure or service capacity to accommodate growth beyond the levels currently permitted by local or regional plans and policies. In general, growth induced by a project is considered a significant impact if it directly or indirectly affects the ability of agencies to provide needed public services, or if it can be demonstrated that the potential growth significantly affects the environment in some other way.

Areas surrounding the Project site are primarily characterized by a mix of rural residential, undeveloped land, light industrial development, and commercial. Development of the Project site would include up to 1,003,510 square feet (s.f.) of light industrial/warehouse uses and a 13.33 net-acre park. Although there is undeveloped land around the Project site, it would be speculative to suggest that the undeveloped land would be developed with residential uses (consistent with its adopted General Plan land use designation) in response to the Project. Furthermore, roadway and utility improvements proposed as part of the Project have been designed to serve the proposed Project, and would not remove infrastructure-related obstacles to development of other off-site properties. Based on the analysis provided in EIR Subsection 4.20, *Utilities and Service Systems*, the Project would be adequately served by water service, sewer service, drainage facilities, and other utilities and service systems. Accordingly, the growth-inducing impacts of the Project would be less than significant. The Project is not expected to induce growth of land use changes on other parcels in the vicinity.

5.4 Effects Found Not to be Significant During the Initial Study Process

An Initial Study was not prepared and was not required for the Project. In accordance with CEQA requirements, this Project EIR evaluates all of the environmental topics contained in Appendix G to the CEQA Guidelines, as well as the supplemental topics and thresholds of significance included in Riverside County's Environmental Assessment Checklist.

6.0 ALTERNATIVES

CEQA Guidelines § 15126.6(a) describes the scope of analysis that is required when evaluating alternatives to proposed projects, as follows:

> *"An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selection of a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason."*

As discussed in Section 4.0 of this EIR, the Project would result in significant adverse environmental effects under two environmental issue areas that cannot be mitigated to below a level of significance after the implementation of Project design features, mandatory regulatory requirements, and feasible mitigation measures. The unavoidable significant impact is as follows:

- Air Quality: Significant and Unavoidable Direct and Cumulatively-Considerable Impact. 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. 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. Thus, Project's direct and cumulatively-considerable impacts due to a conflict with or obstruction of the SCAQMD 2022 AQMP would be significant and unavoidable. In addition, the Project's operational emissions of NO_X, which would exceed the SCAQMD regional threshold for this pollutant, would contribute to the non-attainment status of the SCAB for ozone (O_3). Project impacts due to operational emissions of NO_X represent a significant and unavoidable impact for which additional mitigation is not available.

- Transportation: Significant and Unavoidable Direct and Cumulatively-Considerable Impact. 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, 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. The future tenants of the Project's proposed warehouse building are unknown at this time. As such, the effectiveness of commute trip reduction measures cannot be guaranteed to reduce Project VMT to a level of less than significant. In addition to specific tenancy considerations, locational context is also a major factor relevant to the

potential application and effectiveness of commute trip reduction measures. Additionally, to achieve ideal conditions a project must achieve a significant degree of employee participation and maximum employee eligibility, which are not generally expected. 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 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.

6.1 Alternatives Under Consideration

CEQA Guidelines Section 15126.6(e) requires that an EIR include an alternative that describes what would reasonably be expected to occur on the Project site in the foreseeable future if the Project were not approved, based on current plans and consistent with available infrastructure and community services (i.e., "No Project" Alternative). For projects that include a revision to an existing land use plan, the "No Project" Alternative may be the continuation of the existing land use plan into the future. For projects other than a land use plan (for example, a development project on an identifiable property), the "No Project" Alternative is considered to be a circumstance under which the project does not proceed (CEQA Guidelines Section 15126(e)(3)(A-B)). Because the Project includes only a site-specific development proposal that is fully consistent with the site' adopted land use designations, this EIR evaluates a "No Additional Development Alternative (NADA)," which assumes that the Project site remains in its current condition consisting of 26 dwelling units and several ancillary structures interspersed with ruderal vegetation and undeveloped lands.

In compliance with CEQA Guidelines Section 15126.6(a), an EIR must describe "a range of reasonable alternatives to the project, or to the location of the project which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project." The EIR need not consider every conceivable alternative; rather it must consider a reasonable range of potentially feasible alternatives to the project, or to the location of the project, which would avoid or substantially lessen significant effects of the project, even if "these alternatives would impede to some degree the attainment of the project objectives, or would be more costly" (CEQA Guidelines Section 15126.6(b)).

The following scenarios are identified by Riverside County as potential alternatives to implementation of the proposed Project. The Small Project Alternative (SPA) is considered the Environmentally Superior Alternative pursuant to CEQA Guidelines § 15126.6 (refer also to subsection 6.3.6).

6.1.1 No Project No Additional Development Alternative

The No Project, No Additional Development Alternative (NADA) considers no development on the Project site beyond what occurs on the site under existing conditions. Under this Alternative, the northern 50.04 gross acres of the Project site would remain as 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 gross acres of the Project site would remain as a mixture of undeveloped land and multiple single-family homes with a variety of ancillary structures and outdoor storage. No improvements to the fronting segments of Cajalco Road, Seaton Avenue, or Decker Road would occur. No warehouse and no public park would be developed as proposed under the Project evaluated in this EIR. This alternative was selected by the Lead

Agency to compare the environmental effects of the proposed Project with an alternative that would leave the Project site in its existing condition.

6.1.2 No Project Existing Zoning Alternative

The No Project Existing Zoning Alternative (EZA) assumes development of the Project site in accordance with the site's existing zoning designations. As previously depicted on EIR Figures 2-4 and 2-5, approximately 4.7 acres in the northeastern portion of the Project site are designated by the Riverside County General Plan for "Community Development – Commercial Retail (CD-CR)" but this area is zoned for "Rural Residential, Minimum ½-Acre Lot Sizes (R-R-1/2)." Therefore, this area is assumed to be developed with nine, ½-acre residential lots, consistent with the site's existing R-R-1/2 zoning classification. 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 one-family dwellings and limited agricultural uses, with minimum one-acre lot sizes. Therefore, this area is assumed to be developed with 60 residential lots, for a total of 69 residential units. This alternative was selected by the Lead Agency to compare the environmental effects of the proposed Project with an alternative that would result in developing the Project site consistent with its by-right development rights in accordance with the property's existing zoning classifications.

6.1.3 Warehouse Only Alternative

The Warehouse Only Alternative (WOA) considers development of the northerly 44.66 net acre portion of the Project site with one light industrial warehouse building with a total building area of 1,003,510 square feet, as proposed under the Project evaluated in this EIR. The Project's proposed public park on approximately 13.33 net acres, south of the warehouse site would not be developed under this Alternative and that area would remain in its existing condition, which contains a mixture of undeveloped land and multiple single-family homes with a variety of ancillary structures and outdoor storage. In addition, under the WOA, there would be no extension of Decker Road to the southern portions of the Project site, and improvements to this roadway only would occur along the frontage with the northern 50.04 gross acres of the Project site.

6.1.4 Reduced Project Alternative

The Reduced Project Alternative (RPA) considers development of the northerly 44.66 net acre portion of the Project site with a warehouse building that is 30% smaller than the warehouse proposed under the Project and for analysis purposes is assumed to be 700,000 s.f. In addition, this Alternative considers developing a public park as proposed under the Project, but only on the west side of Decker Road on approximately 4.19 net acres. The remaining approximately 9.16 net acres to the east of Decker Road proposed for park uses as part of the Project would not be developed under this Alternative and that area would remain in its existing condition, which contains a mixture of undeveloped land and multiple single-family homes with a variety of ancillary structures and outdoor storage.

6.1.5 Small Project Alternative (SPA)

The Small Project Alternative (SPA) considers implementation of the Project as proposed, but with a warehouse building that is reduced in size such that it meets the definition of a "Small Project" as identified by Riverside County's, *Transportation Analysis Guidelines for Level of Service and Vehicle Miles Traveled* (December 2020; herein, "County Guidelines"). Step 2 in the County Guidelines for analyzing potential

impacts due to Vehicle Miles Traveled (VMT) provides criteria for certain project types that may be presumed to have a non-significant impact due to VMT. Figure 3 of the County Guidelines identifies seven general categories that are presumed to have a less-than-significant impact due to VMT, including the "Small Project" category, which the County Guidelines define as "…projects with low trip generation per existing CEQA exemptions or based on the County Greenhouse Gas Emissions Screening Tables, result[ing] in [the emission of less than or equal to the] 3,000 Metric Tons of Carbon Dioxide Equivalent ($MTCO_2e$) per year screening level threshold." The types of development identified as a "Small Project" by the County Guidelines include warehouse (unrefrigerated) buildings with a total building area less than or equal to 208,000 s.f. Accordingly, the SPA considers development of the northern 50.04 gross acres of the Project site with a proposed 208,000 s.f. unrefrigerated warehouse building. All other components of the SPA would be the same as the proposed Project, including the proposed public park, infrastructure, and roadway improvements. This alternative was selected by the Lead Agency in order to evaluate an alternative that would avoid the Project's significant and unavoidable impacts to transportation (i.e., due to Vehicle Miles Traveled [VMT]), which in turn also would reduce the Project's impacts due to air quality and greenhouse gas (GHG) emissions.

6.2 Alternatives Considered and Rejected

An EIR is required to identify any alternatives that were considered by the Lead Agency but were rejected as infeasible. Among the factors described by CEQA Guidelines Section 15126.6 in determining whether to exclude alternatives from detailed consideration in the EIR are: a) failure to meet most of the basic project objectives, b) infeasibility, or c) inability to avoid significant environmental impacts. With respect to the feasibility of potential alternatives to the Project, CEQA Guidelines Section 15126.6(f)(1) notes:

> *"Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries…and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site…"*

In determining an appropriate range of alternatives to be evaluated in this EIR, one alternative was initially considered and, for a variety of reasons, rejected. The alternative was rejected because either: 1) it could not accomplish the basic objectives of the Project, 2) it would not have resulted in a reduction of significant adverse environmental impacts, or 3) it was considered infeasible to construct or operate. A summary of the alternative that was considered but rejected is described below.

6.2.1 Alternative Sites

CEQA does not require that an analysis of alternative sites be included in an EIR. However, if the surrounding circumstances make it reasonable to consider an alternative site, then an alternative sites analysis should be considered and analyzed in the EIR. In making the decision to include or exclude an analysis of an alternative site, the "key question and first step in analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR" (CEQA Guidelines Section 15126.6(f)(2)).

The Project Applicant does not own or otherwise have control of any other properties in the Mead Valley community that are of similar size as the Project site and that are not already entitled for development with light industrial uses. Furthermore, and based on the analysis presented in EIR Section 4.0, *Environmental Analysis*, the proposed Project would result in significant and unavoidable impacts due to emissions of NO_X, consistency with the SCAQMD 2022 AQMP, and due to vehicle miles traveled (VMT). The Project's operational emissions of NO_X would be the same, even if the Project was in an alternative location. Accordingly, construction and operation of the Project at an alternative site location would not reduce the Project's significant and unavoidable emissions of NO_X under long-term operating conditions, and as such development of the Project at an alternative site location also would result in a significant and unavoidable impact due to a conflict with the SCAQMD 2022 AQMP. Given the Project site's close proximity to regional transportation corridors (i.e., I-215), development of the Project site at an alternative location could result in an increase in VMT if developed on a property located further from regional transportation facilities. As noted above, only locations that would avoid or substantially lessen a Project's significant environmental effects need to be considered in an EIR. Accordingly, because development of the Project site at an alternative site location would not reduce or avoid the Project's significant and unavoidable impacts due to operational emissions of NOx and VMT, a more detailed analysis of alternative site locations is not warranted.

6.3 ALTERNATIVE ANALYSIS

The discussion on the following pages compares the environmental impacts expected from each alternative considered by the Lead Agency relative to the impacts of the Project. A conclusion is provided for each topic as to whether the alternative results in one of the following: (1) reduction of elimination of the Project's impact, (2) a greater impact than would occur under the Project, (3) the same impact as the Project, or (4) a new impact in addition to the Project's impacts. Table 6-1, *Alternatives to the Project – Comparison of Environmental Impacts*, at the end of this Section compares the impacts of the alternatives against those of the Project and identifies the ability of the alternative to meet the basic objectives of the Project. As previously listed in EIR Section 3.0, the Project's basic objectives are:

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 diversify the mix of uses in the Mead Valley community of Riverside County to 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 uses that have 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.

6.3.1 No Project No Additional Development Alternative

The No Project, No Additional Development Alternative (NADA) considers no development on the Project site beyond what occurs on the site under existing conditions. Under this Alternative, the northern 50.04 gross acres of the Project site would remain as 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 gross acres of the Project site would remain as a mixture of undeveloped land and multiple single-family homes with a variety of ancillary structures and outdoor storage. No improvements to the fronting segments of Cajalco Road, Seaton Avenue, or Decker Road would occur. No warehouse and no public park would be developed as proposed under the Project evaluated in this EIR. This alternative was selected by the Lead Agency to compare the environmental effects of the proposed Project with an alternative that would leave the Project site in its existing condition.

A. Aesthetics

The NADA considers no development or disturbance on the Project site beyond which occurs under existing conditions. As such, the 64.97 gross acre site would remain in its existing conditions with single-family residences and associated ancillary structures interspersed with undeveloped areas containing ruderal vegetation. Thus, the Project's less-than-significant impacts to scenic vistas would be avoided under this alternative. The Project site is not visible from any officially-designated State or County scenic highway; however, I-15 is identified as a County Eligible scenic highway. Thus, with implementation of the NADA, impacts to eligible County scenic highways would be less than significant and would be reduced in comparison to the proposed Project. Although the Project is not expected to result in significant impacts due to the degradation of the existing visual character or quality of the site or its surroundings, implementation of the NADA would retain the site's existing visual character and impacts would be reduced in comparison to the Project. The NADA would not result in the introduction of any new sources of light or glare on site; thus, implementation of the NADA would result in a reduction of the Project's less-than-significant impacts due to conflicts with Ordinance No. 655 and a reduction in the Project's less-than-significant impacts due to light and glare. Additionally, under the NADA, there would be no nighttime construction activities, and as such this

alternative would avoid the Project's less-than-significant impacts (after mitigation) due to construction-related nighttime lighting.

B. Agriculture and Forestry Resources

Under the NADA, no new development would occur on site. Under existing conditions, the 64.97 gross acre Project site is classified by the FMMP as containing "Farmland of Local Importance" and "Other Land" and is not considered to comprise "Farmland." Additionally, a site-specific LESA Analysis was prepared demonstrating that the Project site has a relatively low value for agricultural production, indicating that the Project site does not contain any areas of important farmland types. Accordingly, impacts to FMMP-designated Farmland would not occur under either the Project or NADA, and the level of impact would be the same. 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. However, because the NADA would continue to include residential uses throughout the site, impacts due to a conflict with agricultural zoning would increase under the RPA, although such impacts would be less than significant with mandatory compliance with Riverside County Ordinance No. 625. Additionally, the Project site is not utilized for agricultural production, is not located within any agricultural preserves, and is not subject to a Williamson Act Contract; thus, the Project and the NADA would result in less-than-significant impacts due to a conflict with existing agricultural uses, and the level of impact would be similar. The Project site and surrounding areas are not zoned for 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)). As such, neither the Project nor the NADA would result in impacts to forestry resources, and impacts would be the same.

C. Air Quality

Under the NADA, there would be no new construction or development on the Project site. Because no new development or construction would take place, the NADA would have no potential to result in a conflict with the 2022 SCAQMD AQMP; thus, implementation of the NADA would avoid the Project's significant and unavoidable impacts due to a conflict with the 2022 SCAQMD AQMP. Because there would be no development under the NADA there would be no increase in emissions of criteria pollutants; thus, implementation of the NADA would avoid the Project's significant and unavoidable impacts due to operational-source NO_X emissions that would contribute to the region's non-attainment status for ozone (O_3). Although the proposed Project would result in less-than-significant impacts due to localized air quality emissions, including cancer and non-cancer health risks and CO "hot spots," because no new development would occur on site under the NADA, the NADA would result in reduced impacts due to localized air quality emissions. Implementation of the NADA also would avoid the Project's less-than-significant impacts due to odors.

D. Biological Resources

Under the NADA, there would be no new construction or development on the Project site. Because the Project site would be left in an undeveloped state in perpetuity, the NADA would completely avoid the Project's less-than-significant impacts (after mitigation) due to conflict with the MSHCP. Implementation of the NADA also would completely avoid the Project's less-than-significant impacts (after mitigation) to burrowing owl and

nesting birds. The NADA also would allow for increased wildlife movement in the local area as compared to the Project; thus, implementation of the NADA would avoid the Project's less-than-significant impacts to wildlife movement corridors. The NADA also would avoid the Project's less-than-significant impacts (after mitigation) to areas considered jurisdictional by the RWQCB and CDFW. Neither the Project nor the NADA would conflict with any other local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; thus, impacts would not occur under the NADA or the proposed Project, and the level of impact would be the same.

E. Cultural Resources

Under the NADA, there would be no new construction or development on the Project site. The NADA would avoid the Project's less-than-significant impacts (following mitigation) to previously undiscovered surface-level or subsurface historical and/or archaeological resources that may be encountered during grading. Additionally, because there would be no new grading on site, the NADA would avoid the Project's less-than-significant impacts (with mitigation) to buried human remains that may be uncovered during site grading activities. Thus, impacts to cultural resources would be reduced under the NADA in comparison to the Project.

F. Energy

Under the NADA, there would be no increase in demand from the Project site for energy resources. As such, the NADA would avoid the Project's less-than-significant impacts due to the wasteful, inefficient, or unnecessary consumption of energy resources. Neither the Project nor the NADA would conflict with a State or local plan for renewable energy or energy efficiency, although impacts would be reduced under the NADA in comparison to the Project because the NADA would not result in an increase in the use of energy resources as compared to existing conditions.

G. Geology and Soils

Under the NADA, there would be no new construction or development on the Project site. There are no known faults on or trending towards the Project site; thus, impacts associated with rupture of a known fault would be less than significant under the proposed Project and the NADA and the level of impact would be similar. However, because the NADA would continue to include residential structures, some of which may not have been constructed to modern standards for seismic safety, there is a potential for increased seismic-related impacts under the NADA as compared to the Project. Because no new development would occur, the NADA would result in reduced impacts as compared to the Project's less-than-significant impacts (with mitigation) due to landslide hazards, lateral spreading, collapse, and subsidence. There are no volcanos in the area, and the Project site is not adjacent to impounded bodies of water bodies of water susceptible to seiches or slopes and hillsides susceptible to instability; thus, no impacts would occur under the Project or NADA, and the level of impact would be similar. Because there would be no new development on site, the NADA would avoid the Project's less-than-significant impacts (after mitigation) due to cut or fill slopes higher than 10 feet. The NADA also would avoid the Project's less-than-significant impacts due to the removal of existing septic systems on the Project site. Neither the Project nor the NADA would require septic tanks or alternative wastewater disposal systems on unsuitable soils; thus, impacts would be less than significant and similar under the NADA and proposed Project. During construction of the proposed Project vegetative cover would be removed, increasing the potential for erosion as compared to the site's existing conditions; thus, the NADA would avoid the Project's less-than-significant erosion impacts during construction. However, for the

proposed Project under long-term conditions, the Project site's potential for erosion would be substantially reduced as compared to existing conditions due to the introduction of impervious surfaces and landscaped areas on site; thus, impacts under long-term conditions due to erosion would be increased under the NADA as compared to long-term operations associated with the Project. Lastly, the soils on-site are considered "non-expansive" soils; thus, impacts would be less than significant and would be similar under the NADA and the Project.

H. Greenhouse Gas Emissions

Under the NADA, there would be no new construction or development on the Project site. As such, there would be no increase in GHG emissions from the Project site under the NADA. Accordingly, the NADA would completely avoid the Project's less-than-significant impacts (with mitigation) due to GHG emissions. Similarly, the Project's less-than-significant impacts (with mitigation) due to a conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs also would be avoided with implementation of the NADA.

I. Hazards and Hazardous Materials

Under the NADA, there would be no new development on site. Although the Project would not create a significant hazard to the public or environment through the routine transport, use, or disposal of hazardous materials, because no new development would occur on site impacts would be reduced in comparison to the Project. Neither the Project nor the NADA would impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan; thus, impacts under the NADA and proposed Project would be less than significant and the level of impact would be similar. Because no new development would be constructed on site, the NADA would avoid the Project's less-than-significant impacts due to a conflict with the County's Local Hazard Mitigation Plan (LHMP). Although neither the Project nor the NADA would emit hazardous emissions, or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, impacts to nearby schools would be reduced in comparison to the Project's less-than-significant impacts because there would be no change in the site's existing conditions under the NADA. The Project site is not identified on any lists of hazardous materials sites compiled pursuant to Government Code Section 65962.5; thus, no impact would occur under the Project or NADA, and the level of impact would be similar. In addition, the NADA would not involve any new development on site, and therefore would result in reduced impacts as compared to the Project's less-than-significant impacts due to a conflict with the March Air Reserve Base (MARB) Airport Land Use Compatibility Plan (ALUCP).

J. Hydrology and Water Quality

Under the NADA, there would be no new development on site. The NADA would result in reduced impacts to water quality as compared to the Project's less-than-significant water quality impacts during construction activities. While the risk of erosion would increase during construction of the proposed Project, under long-term operating conditions the Project would result in the introduction of impervious surfaces and landscaped areas, while under the NADA large portions of the Project site would consist of undeveloped lands with relatively sparse ruderal vegetation. Due to the lack of impervious surfaces and stabilizing vegetation in portions of the Project site, long-term operational erosion impacts would be increased under the NADA. While the Project would result in less-than-significant impacts due to groundwater recharge, impacts to groundwater

recharge would be reduced under the NADA because there would be no new impervious surfaces on site. Although the Project would result in less-than-significant impacts to the site's existing drainage pattern, there would be no changes to the site's drainage patterns under the NADA and impacts therefore would be reduced in comparison to the proposed Project. With respect to stormwater drainage capacity and flood hazards, under existing conditions the Project site is tributary to Master Drainage Plan (MDP) Line E-9.1. Lateral E-9.1.1 is sized to accept only 45 cubic feet per second (cfs) from the Project site, while the site currently contributes peak flows of up to 120 cfs. Thus, implementation of the NADA would result in increased flood hazard potential downstream as compared to the proposed Project and increased impacts to storm drain capacity. Additionally, the Project site is located fully outside of mapped floodplains, and therefore impacts to existing flows within mapped floodplains would not occur under the Project or the NADA, and the level of impact would be the same. The Project site is not subject to inundation from tsunamis or seiches; thus, impacts would be less than significant and would be similar under the Project and NADA.

K. Land Use and Planning

The NADA generally would be consistent with the existing land use designations applied to the property by the Riverside County General Plan and MVAP, although the NADA would not be consistent with the "Community Development – Commercial Retail (CD-CR)" land use designation applied to the northeastern +/- 4.7 acres of the Project site. However, the NADA would be fully consistent with the site's adopted zoning classifications of "Rural Residential, Minimum ½-Acre Lot Sizes (R-R-1/2)" and "Light Agriculture (A-1-1)." With approval of the Project's General Plan Amendment (GPA) and Change of Zone (CZ), the Project would be fully consistent with the site's adopted land use designations and zoning classifications. Thus, impacts due to land use consistency would be less than significant under both the Project and NADA, and the level of impact would be similar. Both the Project and NADA would be required to comply with all applicable County ordinances and policies related to environmental protection, and neither the Project nor the NADA would conflict with the SCAG 2020-2045 RTP/SCS; thus, 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 significant under both the Project and NADA, and the level of impact would be similar. Additionally, neither the Project nor the NADA would disrupt or divide the physical arrangement of an established community; no impact would occur, and the level of impact would be similar.

L. Mineral Resources

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, no impacts to mineral resources would occur under the Project or the NADA, and the level of impact would be similar. Additionally, neither the Project nor the NADA would represent an incompatible land use located adjacent to a State classified or designated area or existing surface mine, and neither the NADA nor the Project would expose people or property to hazards from proposed, existing, or abandoned quarries or mines. No impacts would occur, and the level of impact would be similar.

M. Noise

The Project site is located outside of areas subject to public and private airport-related noise levels exceeding 60 dBA CNEL for the MARB and 55 dBA CNEL for the Perris Valley Airport; thus, impacts due to airport-related noise would be less than significant under both the Project and the NADA. The NADA would avoid the Project's less-than-significant impacts (after mitigation) due to construction-related noise impacts.

Additionally, the NADA would avoid the Project's less-than-significant impacts due to operational and traffic-related noise because there would be no new development and no increase in traffic generated by the site under the NADA. Additionally, the NADA would avoid the Project's less-than-significant impacts due to construction-related vibration, and also would avoid the Project's less-than-significant impacts due to operational-related vibration.

N. Paleontological Resources

Under the NADA, there would be no new construction or development on site. Therefore, the NADA would avoid the Project's less-than-significant construction-related impacts (after mitigation) to paleontological resources that may be buried beneath the site's surface.

O. Population and Housing

Under the Project, 26 existing dwelling units on site would be demolished, while none of the existing homes on site would be demolished under the NADA; thus, the NADA would avoid the Project's less-than-significant impacts due to the displacement of existing residents from the Project site. Although the Project would result in less-than-significant impacts due to substantial unplanned population growth, the NADA would not result in any new development on site; thus, impacts associated with population growth would be reduced under the NADA in comparison to the proposed Project.

P. Public Services

There would be no new development on site under the NADA; thus, the NADA would avoid the Project's less-than-significant impacts to fire protection, police protection, school services, library services, and health services.

Q. Recreation

The Project does not propose any residential uses or other land use that may generate a population that would increase the use of existing neighborhood and regional parks or other recreational facilities. However, the Project would result in the development of a 13.33 net acre park site, which would not be constructed under the NADA. Notwithstanding, the Project does not propose any residential uses or other land use that may generate a population that would increase the use of existing neighborhood and regional parks or other recreational facilities, while the Project site's existing residential population's demand for recreational resources presumably already is met by existing County facilities. Thus, the NADA would avoid the Project's less-than-significant impacts (after mitigation) due to proposed improvements to the 13.33-net-acre park site. Although the NADA would not result in any new development on site and thus would not generate any increase in demand for recreational resources, due to the proposed 13.33-net-acre park site, impacts to existing recreational facilities and resources would be less than significant under both the Project and NADA, and the level of impact would be similar.

R. Transportation

Under the NADA, there would be no new development on site and thus there would be no increase in traffic generated by the site. As such, the NADA would avoid the Project's significant and unavoidable impacts due to Vehicle Miles Traveled (VMT). Additionally, because the NADA would not require any transportation-

related improvements and would not result in any new development on site, the NADA would avoid the Project's less-than-significant hazard-related impacts due to a geometric design feature or due to incompatible uses. The NADA also would avoid the Project's less-than-significant impacts due to the need for new or altered maintenance of roads. The NADA would not involve a construction phase, and thus would avoid the Project's less-than-significant impacts (after mitigation) to circulation during construction activities on site. The NADA would not result in any impacts due to emergency access or access to nearby uses; thus, the NADA would avoid the Project's less-than-significant impacts (after mitigation) to emergency access during construction activities. No new bike lanes or trails would be constructed under the NADA; thus, the NADA would avoid the Project's less-than-significant impacts due to sidewalk/parkway construction.

S. Tribal Cultural Resources

There would be no new development on site under the NADA. Accordingly, the NADA would avoid the Project's less-than-significant impacts (after mitigation) to tribal cultural resources.

T. Utilities and Service Systems

Under the NADA, there would be no increased demand for water, wastewater treatment, or stormwater drainage; thus, the NADA would avoid the Project's less-than-significant impacts due to the construction of such facilities and due to the provision of water or wastewater treatment services. There would be no increase in demand for water resources under the NADA; thus, the NADA would avoid the Project's less-than-significant impacts to water supply. Additionally, the NADA would avoid the Project's less-than-significant impacts due to the construction of wastewater conveyance facilities on and off site and would avoid the Project's less-than-significant impacts to wastewater treatment capacity. There would be no increase in solid waste generated on site; thus, the NADA would avoid the Project's less-than-significant impacts due to solid waste treatment capacity. There are no components of the NADA or the proposed Project that would conflict with federal, State, and local management and reduction statutes and regulations related to solid wastes, including the County Integrated Waste Management Plan (CIWMP); thus, impacts would be less than significant, and the level of impact would be similar. The NADA also would avoid the Project's less-than-significant impacts (with mitigation) due to the construction of facilities for electricity, natural gas, communication systems, and street lighting, or due to increased roadway maintenance.

U. Wildfire

Under the NADA, there would be no new development on site. Although impacts due to wildfire would be less than significant under the proposed Project, the NADA would result in increased impacts due to wildfires in comparison to the Project because large portions of the Project site would consist of ruderal and flammable vegetation, whereas under the Project the majority of the Project site would be covered with impervious surfaces that are not subject to fire hazards, or otherwise would be covered by irrigated landscaping, with exception of the existing stream in the southeastern portion of the park site that would remain in its existing, natural condition. Thus, long-term impacts due to wildland fire hazards would be increased under the NADA as compared to the proposed Project.

V. Conclusion

Implementation of the NADA would result in no physical environmental impacts beyond those that have historically occurred on the property. Almost all effects of the proposed Project would be avoided or lessened by the selection of the NADA, although a few new impacts, such as long-term erosion impacts and fire hazards, would be increased under this alternative. Because this alternative would avoid most of the Project's impacts, it warrants consideration as the "environmentally superior alternative." However, pursuant to CEQA Guidelines § 15126.6(e)(2), if a no project alternative is identified as the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives. Accordingly, the Small Project Alternative (SPA) is identified as the environmentally superior alternative.

Implementation of the NADA would fail to meet any of the Project's objectives. The NADA would not 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. The NADA would not diversify the mix of uses in the Mead Valley community of Riverside County to support the growing goods movement supply chain. The NADA would fail to meet the Project's objective 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. The NADA also would fail to meet the Project's objective 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. Similarly, the NADA would not meet the Project's objective 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. As there would be no new development on site, the NADA would fail to meet the Project's objective 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. The NADA also would fail to meet the Project's objective to diversify the economy of western unincorporated Riverside County by developing a large property with employment-generating land uses with long-term economic viability. As no new development would occur on site, the NADA would not meet the Project's objective to develop uses that have architectural design and operational characteristics that are compatible with other existing and planned developments in the local area. Finally, and again because no new development would occur on site, the NADA would fail to meet the Project's objective to develop a property that has access to available infrastructure, including roads and utilities.

6.3.2 No Project Existing Zoning Alternative

The No Project Existing Zoning Alternative (EZA) assumes development of the Project site in accordance with the site's existing zoning designations. As previously depicted on EIR Figures 2-4 and 2-5, approximately 4.7 acres in the northeastern portion of the Project site are designated by the Riverside County General Plan for "Community Development – Commercial Retail (CD-CR)" but this area is zoned for "Rural Residential, Minimum ½-Acre Lot Sizes (R-R-1/2)." Therefore, this area is assumed to be developed with nine, ½-acre residential lots, consistent with the site's existing R-R-1/2 zoning classification. 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 one-family dwellings and limited agricultural uses, with minimum one-acre lot sizes. Therefore, this area

is assumed to be developed with 60 residential lots, for a total of 69 residential units. Under this alternative, the 26 existing dwelling units on the Project site would be demolished to accommodate the future redevelopment of the Project site with 69 dwelling units. This alternative was selected by the Lead Agency to compare the environmental effects of the proposed Project with an alternative that would result in developing the Project site consistent with its by-right development rights in accordance with the property's existing zoning classifications.

A. Aesthetics

Under the EZA, the existing 26 dwelling units on the Project site would be demolished and replaced with 69 dwelling units on minimum one-acre and 0.5-acre lot sizes, and the proposed public park in the southern portions of the Project site would not be constructed. Although the Project site is not visible from any officially-designated State or County scenic highways, due to the reduced intensification of development on site as compared to the Project, the EZA would result in reduced impacts to I-215, a County-eligible scenic highway, although such impacts would be less than significant under both the Project and EZA. Under the EZA, the visual characteristics of the Project site would be similar to existing housing developments in the local area, although the EZA still would result in a substantial change to the existing visual character of the site. Impacts visual character would be reduced under the EZA as compared to the Project, and impacts would less than significant under both the Project and EZA. Both the EZA and proposed Project would result in the elimination of existing rock outcroppings on portions of the Project site, and the level of impact would be similar and would be less than significant. Both the Project and EZA would be subject to compliance with Riverside County Ordinance No. 655, resulting in less-than-significant and similar levels of impacts to the Mt. Palomar Observatory. Similarly, both the Project and EZA would be subject to compliance with Riverside County Ordinance Nos. 655 and 915 related to lighting, which would ensure lighting impacts would be below a level of significance; however, no nighttime construction would occur under the EZA, and as such the EZA would avoid the Project's less-than-significant impacts (following mitigation) due to nighttime lighting during construction activities.

B. Agriculture and Forestry Resources

Based on the Project site's existing FMMP classifications of "Farmland of Local Importance" and "Other Lands," as well as the results of the Project's Land Evaluation and Site Assessment ("LESA"; EIR *Technical Appendix B*), the Project site does not contain any Farmland under existing conditions. Accordingly, implementation of the Project or EZA would result in less-than-significant impacts to Important Farmland types, and the level of impact would be the same. 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. Notwithstanding, the introduction of residential uses under the EZA would have an increased potential for incompatibility with future agricultural uses on surrounding parcels as compared to the Project, as warehouse uses are not associated with high levels of odor and noise complaints as is common with residential developments. Thus, impacts to surrounding agricultural zoning would be increased under the EZA, although impacts would be less than significant under both the Project and EZA with mandatory compliance with Riverside County Ordinance No. 625. Additionally, the Project site is not utilized for agricultural production, is not located within any agricultural preserves, and is not subject to a Williamson Act Contract; thus, the Project and the EZA would result in less-than-significant impacts due to a conflict with existing agricultural

uses, and the level of impact would be similar. The Project site and surrounding areas are not zoned for 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)). As such, neither the Project nor the EZA would result in impacts to forestry resources, and impacts would be the same.

C. *Air Quality*

Under the EZA, the Project site would be developed with up to 69 dwelling units instead of warehouse and park uses. Air quality emissions during construction would be reduced under the EZA in comparison to the Project because there would be less intensive construction activities occurring on site. Based on an assumption of approximately 9.43 vehicular trips per dwelling unit[1], the EZA would result in a net increase of approximately 651 daily vehicle trips. By comparison, the Project would generate up to 2,886 two-way vehicular trips per day, including 438 truck trips that would not occur under the EZA. As the majority of the Project's emissions would be due to vehicular sources, and due to the relatively low levels of traffic associated with the EZA, the EZA would avoid the Project's significant and unavoidable impacts due to operational emissions of NO_X. Additionally, the EZA would avoid the Project's significant and unavoidable impact due to a conflict with the 2022 SCAQMD AQMP, as the EZA would be fully consistent with the growth assumptions used in the AQMP and the EZA would not result in any violations of SCAQMD's air quality standards. Because the EZA would not be associated with large numbers of heavy truck trips, the EZA also would avoid the Project's less-than-significant localized air quality impacts, including the Project's less-than-significant impacts due to cancer and non-cancer related health risks. Although both the EZA and proposed Project would be associated with the storage of refuse, impacts due to odors would be reduced under the EZA in comparison to the Project due to the elimination of heavy truck trips, which produce odors associated with diesel exhaust.

D. *Biological Resources*

Implementation of the EZA would result in grading to a majority of the Project site, including areas in the southeastern corner of the southern portions of the Project site that include an existing stream that would not be impacted by Project development. As with the Project, impacts due to a conflict with the SKR HCP would be less than significant with payment of fees, while mitigation measures would be required to ensure consistency with applicable provisions of the MSHCP. Although impacts due to a conflict with the MSHCP would be less than significant under both the Project and the EZA following mitigation, the EZA would result in increased impacts relative to the MSHCP due to impacts to the stream in the southeast corner of the park site. Both the Project and EZA would result in similar impacts to nesting birds/raptors, and such impacts would be reduced to less-than-significant levels with mitigation. Although impacts to wildlife movement corridors would be less than significant under both the Project and EZA, the EZA would result in slightly increased impacts to wildlife movement due to impacts to the stream in the southeastern corner of the Project site that would be preserved as open space as part of the Project. Implementation of the EZA would result in impacts to approximately 0.21-acre of disturbed southern willow scrub in the southeastern portion of the Project site,

[1] Institute of Transportation Engineers (ITE), Trip Generation Manual, Eleventh Edition, 2021. The daily trip generation rate of 9.43 trips per unit is based on the ITE trip generation rate for single-family detached housing.

which is considered a sensitive natural community; thus, impacts to sensitive natural communities would be increased under the EZA as compared to the Project, although such impacts would be mitigated to a level below significance under the EZA. Due to impacts to the stream in the southeast corner of the Project site, the EZA would result in increased impacts to areas considered jurisdictional by the RWQCB and CDFW, although as with the Project such impacts would be reduced to less-than-significant levels with mitigation. Neither the Project nor the EZA would result in impacts due to a conflict with local policies or ordinances protecting biological resources, and the level of impact would be similar.

E. Cultural Resources

Implementation of the EZA would result in grading to a majority of the Project site, including areas in the southeastern corner of the southern portions of the Project site that include rock outcroppings and an existing stream that would not be impacted by Project development. As such, the EZA would result in increased impacts to historical and archaeological resources that may exist beneath the site's surface as compared to the Project, although as with the Project these impacts would be reduced to less-than-significant levels with mitigation. Both the Project and EZA would be subject to compliance with State laws with respect to human remains; thus, impacts to human remains would be less than significant under the EZA and proposed Project, but impacts would slightly increase under the EZA due to increased areas that would be subject to grading and disturbance in the southern portions of the Project site.

F. Energy

Energy consumed during construction of the EZA would be reduced in comparison to the proposed Project, but would result in similar less-than-significant impacts due to the wasteful, inefficient, or unnecessary consumption of energy resources. Under long-term operating conditions, the level of energy demands associated with the EZA would be reduced in comparison to the proposed Project, although the use of natural gas would increase under the EZA as compared to the proposed Project as the Project's proposed warehouse building would not utilize natural gas while the EZA's proposed residential uses would utilize natural gas. Additionally, the EZA would result in an increase of approximately 651 daily vehicle trips. By comparison, the Project would generate up to 2,886 vehicular trips per day, including 438 truck trips that would not occur under the EZA. As such, the transportation-related energy demands associated with the EZA would be substantially reduced in comparison to the Project. Neither the Project nor the NPA would result in the inefficient, wasteful, or unnecessary consumption of energy and impacts would be less than significant, although the level of impact would be reduced under the EZA due to the reduced intensification of development on site as compared to the proposed Project. Additionally, both the Project and NPA would be required to comply with adopted State and local plans related to energy conservation; thus, impacts would be less than significant and the level of impact would be similar.

G. Geology and Soils

Under the EZA, the Project site would be developed with 69 single-family dwelling units. There are no known faults on or trending towards the Project site; thus, impacts associated with rupture of a known fault would be less than significant under the proposed Project and the EZA, although the level of impact would be reduced under the EZA because fewer people would occupy the Project site. Likewise, the EZA would reduce the Project's less-than-significant impacts (with mitigation) associated with seismic groundshaking because fewer people would be exposed to seismic-related hazards. Because development on site would be less intense as

compared to the Project, the EZA would result in reduced impacts as compared to the Project's less-than-significant impacts (with mitigation) due to landslide hazards, lateral spreading, collapse, and subsidence. There are no volcanos in the area, and the Project site is not adjacent to impounded bodies of water bodies of water susceptible to seiches or slopes and hillsides susceptible to instability; thus, no impacts would occur under the Project or EZA, and the level of impact would be similar. Because there would be reduced development on site, the EZA likely would avoid the Project's less-than-significant impacts (after mitigation) due to cut or fill slopes higher than 10 feet. Both the EZA and Project would result in the elimination of existing septic systems on site; however, the removal of the existing septic systems would occur in conformance with all applicable regulations, and as such impacts would be less than significant and the level of impact would be similar. Neither the Project nor the EZA would require septic tanks or alternative wastewater disposal systems on unsuitable soils; thus, impacts would be less than significant and similar under the EZA and proposed Project. During construction of the proposed Project and EZA vegetative cover would be removed, increasing the potential for erosion as compared to the site's existing conditions; thus, the EZA would result in similar less-than-significant erosion impacts during construction. Under long-term conditions with implementation of the Project, the Project site's potential for erosion would be substantially reduced as compared to existing conditions due to the introduction of impervious surfaces and landscaped areas on site. By comparison, under the EZA there would be large portions of individual residential lots that would not be covered with irrigated landscaping or impervious surfaces; thus, the potential for long-term erosion would increase under the EZA as compared to the Project, although impacts would be less than significant under both the EZA and Project. Lastly, the soils on-site are considered "non-expansive" soils; thus, impacts due to expansive soils would be less than significant and would be similar under the EZA and the Project.

H. Greenhouse Gas Emissions

Under the EZA, the Project site would be developed with up to 69 dwelling units instead of warehouse and park uses. Based on an assumption of approximately 9.43 vehicular trips per dwelling unit, the EZA would result in approximately 651 daily vehicle trips. By comparison, the Project would generate up to 2,886 two-way vehicular trips per day, including 438 two-way truck trips that would not occur under the EZA. As the majority of the Project's emissions are due to vehicular sources, and due to the relatively low levels of traffic associated with the EZA, the EZA would avoid the Project's less-than-significant impacts (after mitigation) due to GHG emissions, as it is expected that the development of 69 homes on site would not exceed the Riverside County Climate Action Plan (CAP) screening threshold of 3,000 $MTCO_2e$. Both the Project and EZA would be subject to all applicable federal, State, and local regulations related to GHG emissions, resulting in less-than-significant and similar levels of impact.

I. Hazards and Hazardous Materials

Under the EZA, the Project site would be developed with up to 69 dwelling units instead of warehouse and park uses. Although the Project would not create a significant hazard to the public or environment through the routine transport, use, or disposal of hazardous materials, impacts would be reduced under the EZA as development under the EZA would be less intense than what is proposed as part of the Project. Neither the Project nor the EZA would impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan; thus, impacts under the EZA and proposed Project would be less than significant and the level of impact would be similar. Neither the Project nor the EZA would conflict with the County's Local Hazard Mitigation Plan (LHMP); impacts would be less than significant, and the level

of impact would be similar. Although neither the Project nor the EZA would emit hazardous emissions, or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, impacts to nearby schools would be reduced in comparison to the Project's less-than-significant impacts due to the less intense development that would occur under the EZA. The Project site is not identified on any lists of hazardous materials sites compiled pursuant to Government Code Section 65962.5; thus, no impact would occur under the Project or EZA, and the level of impact would be similar. In addition, the Project site is located within Compatibility Zone C2 of the MARB ALUCP, which requires residential development to occur at densities of less than 6.0 dwelling units per acre (du/ac) with a maximum of 500 people on any single acre, while the EZA would result in 69 dwelling units on approximately 58.19 net acres resulting in a net density of 1.2 du/ac; thus, both the Project and EZA would be consistent with the MARB ALUCP, resulting in similar less-than-significant impacts. There are no private airstrips in the local area; thus, no hazards-related impacts due to private airstrips would occur under the Project or EZA, and the level of impact would be similar.

J. Hydrology and Water Quality

Under the EZA, the Project site would be developed with up to 69 dwelling units instead of warehouse and park uses. The EZA would result in similar levels of impact to water quality as compared to the Project's less-than-significant water quality impacts during construction activities. While the risk of erosion would increase during construction of the proposed Project and EZA as compared to existing conditions, under long-term operating conditions the Project would result in the introduction of impervious surfaces and landscaped areas, while the EZA would result in the development of 69 dwelling units on large lots that would not necessarily be fully irrigated and landscaped or covered in impervious surfaces; thus, long-term operational erosion impacts would be increased under the EZA in comparison to the Project, although such impacts still would be less than significant. While the Project would result in less-than-significant impacts due to groundwater recharge, impacts to groundwater recharge would be reduced under the EZA because there would be fewer areas of impervious surfaces on site. Although the Project would result in less-than-significant impacts to the site's existing drainage pattern, there would be fewer changes to the site's drainage patterns under the EZA and impacts therefore would be reduced in comparison to the proposed Project. Both the Project and EZA would be required to attenuate the rate of runoff from the Project site in order to ensure runoff does not exceed the capacity of existing or planned drainage systems, or cause or contribute to erosion hazards downstream. Thus, impacts due to increased rates of runoff leading to exceedances of storm drain capacity and/or resulting in increased flood hazards would be less than significant under both the Project and EZA, and the level of impact would be similar. Additionally, the Project site is located fully outside of mapped floodplains, and therefore impacts to existing flows within mapped floodplains would not occur under the Project or the EZA, and the level of impact would be the same. The Project site is not subject to inundation from tsunamis or seiches; thus, no impact would occur and the level of impact would be similar under the Project and EZA.

K. Land Use and Planning

Both the Project and EZA would be subject to compliance with all applicable land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect. However, the EZA would be fully consistent with the site's adopted zoning classifications and would not require a General Plan Amendment; thus, impacts due to a conflict with the General Plan Land Use Map would be reduced under the EZA, although impacts would be less than significant under the Project with approval of the Project's GPA

and CZ. Both the Project and EZA also would fully comply with Connect SoCal; impacts would be less than significant and the level of impact would be similar. Neither the Project nor the EZA would physically divide an established community; thus, impacts would be less than significant under both the Project and EZA, and the level of impact would be similar.

L. Mineral Resources

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, no impacts to mineral resources would occur under the Project or the EZA, and the level of impact would be similar. Additionally, neither the Project nor the EZA would represent an incompatible land use located adjacent to a State classified or designated area or existing surface mine, and neither the EZA nor the Project would expose people or property to hazards from proposed, existing, or abandoned quarries or mines. No impacts would occur, and the level of impact would be similar.

M. Noise

Based on the noise level contours for the MARB/IPA, the Project site is located well outside of the 60 dBA CNEL noise level contour boundaries; thus, impacts due to airport-related noise would be less than significant under both the Project and EZA, although impacts would slightly increase under the EZA because residential uses are more sensitive to noise issues as compared to warehouse uses. Under the EZA, the Project site would be developed with up to 69 dwelling units instead of warehouse and park uses. Noise levels during construction activities would be similar between the Project and EZA, although such noise levels likely would occur over a shorter duration as compared to the Project; however, because the EZA would not require nighttime construction activities, nighttime construction-related noise impacts would be reduced under the EZA as compared to the Project. Under long-term operations, the EZA would produce noise levels typical of residential uses, while the Project would be operated as a warehouse facility with a public park site; thus, long-term operational noise levels would be reduced under the EZA as compared to the Project's less-than-significant impacts, and mitigation would not be required under the EZA to reduce the Project's nighttime operational noise impacts to less-than-significant levels. Based on an assumption of approximately 9.43 two-way vehicular trips per dwelling unit, the EZA would result in approximately 651 daily vehicle trips. By comparison, the Project would generate up to 2,886 two-way vehicular trips per day, including 438 two-way truck trips that would not occur under the EZA. Thus, the EZA would result in a substantial reduction to the Project's less-than-significant off-site traffic-related noise impacts under long-term operational conditions. Vibration impacts during construction under the Project and EZA would be less than significant and similar, while the Project's less-than-significant long-term operational-related vibration impacts would be reduced under the EZA due to the reduction in the number of vehicle trips and because residential uses do not generate heavy truck trips.

N. Paleontological Resources

Implementation of the EZA would result in grading to a majority of the Project site, including areas in the southeastern portion of the southern portions of the Project site that include rock outcroppings and an existing stream and that would not be impacted by Project development. As such, the EZA would result in increased impacts to subsurface paleontological resources as compared to the Project, although similar to the Project mitigation would be required to reduce these impacts to less-than-significant levels.

O. Population and Housing

Under both the Project and EZA, the existing 26 dwelling units on site would be demolished. However, under the EZA these dwelling units would be replaced with 69 dwelling units on site, whereas the Project would not result in any residential construction on site. Accordingly, impacts due to the displacement of people or housing would be reduced under the EZA in comparison to the Project, although impacts would be less than significant under both the Project and EZA. Similarly, while the Project's proposed warehouse use would generate a demand for up to 283 dwelling units (conservatively assuming all Project employees would consist of new residents within the County), due to the construction of 69 dwelling units on site impacts due to the creation of demand for additional housing, including affordable housing, would be reduced under the EZA in comparison to the proposed Project. Under the Project, and accounting for the site's existing 26 dwelling units, there would be net increase in population on site by approximately 875 persons, whereas under the EZA there would only be a net increase of approximately 163 persons. Additionally, development under the EZA would be fully consistent with the site's existing zoning classifications. As such, impacts due to unplanned population growth would be reduced under the EZA in comparison to the Project, although impacts would be less than significant under both the Project and EZA.

P. Public Services

Because the southern portions of the Project site would not be improved with park uses under the EZA, these areas would continue to contain ruderal vegetation that is subject to wildfires, along with residential structures that also are subject to fire hazards. Accordingly, impacts to fire protection services would slightly increase under the EZA in comparison to the Project, although such impacts would be reduced to less-than-significant levels with payment of mandatory Development Impact Fees (DIF). The EZA would result in a reduction in the intensity of development on site, as the EZA would generate a population of approximately 163 people while the Project would generate approximately 974 employees. As such, impacts to sheriff services and health services would be reduced under the EZA in comparison to the Project, although impacts would be less than significant under both the Project and EZA with payment of mandatory Development Impact Fees (DIF) in accordance with Riverside County Ordinance No. 659. The Project would not involve any residential development and is not anticipated to increase the County's residential population, whereas the EZA would involve the construction of up to 69 dwelling units; thus, impacts to recreational, health care, and library facilities would be increased under the EZA as compared to the Project, although impacts would be less than significant with payment of DIF fees. Additionally, the EZA would result in up to 69 residential dwelling units while the Project does not involve any residential uses; thus, impacts to school services would be increased under the EZA as compared to the Project, although impacts would be reduced to less-than-significant levels under the EZA with mandatory payment of school impact fees pursuant to Senate Bill 50 (SB 50). Due to the reduction in the site's population under the EZA, the EZA also would result in reduced impacts to health services as compared to the Project's less-than-significant impacts.

Q. Recreation

The Project does not entail any residential uses while the EZA would involve up to 69 dwelling units and would generate approximately 163 future residents. Thus, while the Project would not result in a direct increase in demand for recreational resources, the EZA would generate a demand for approximately 0.8-acre of parkland, based on the County's standard of 5.0 acres per 1,000 persons. The Project would include a park on approximately 13.33 net acres, while no parks would be developed on site under the EZA. Although

impacts to parkland facilities would be less than significant under both the Project and the EZA, impacts under the EZA would be slightly increased due to the introduction of residential uses on site and because no park would be constructed on site under the EZA. Under the EZA, there would be no construction of recreational facilities on site; thus, the EZA would avoid the Project's less-than-significant impacts (after mitigation) due to on-site construction of recreation facilities.

R. Transportation

Neither the Project nor the EZA would conflict with Connect SoCal, the Riverside County CMP, the Riverside County General Plan and General Pan Circulation Element, or any Riverside County ordinances adopted to address transportation. Thus, impacts due to a conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities would be less than significant under both the EZA and Project, and the level of impact would be similar. Based on the Screening Criteria for Development Projects included in Riverside County's *Transportation Analysis Guidelines for Level of Service and Vehicle Miles Traveled* (December 2020), residential projects consisting of fewer than 110 single-family dwelling units are considered "Small Projects" that would not have the potential to result in significant impacts related to VMT. Accordingly, implementation of the EZA, which would include only up to 69 dwelling units, would avoid the Project's significant and unavoidable impacts due to VMT. All physical transportation-related improvements that would occur under the Project and EZA would occur in full conformance with applicable Riverside County standards; however, the EZA would result in reduced impacts due to traffic from incompatible land uses as the EZA would not be associated with heavy truck trips. Although impacts due to incompatible land uses would be less than significant under both the Project and EZA, impacts would be reduced under the EZA as compared to the Project because the residential uses under the EZA would be more compatible with rural residential uses that characterize areas to the west and north of the Project site. Due to the reduction in the amount of traffic that would be generated on site under the EZA as compared to the Project, the EZA would result in reduced impacts due to the need for maintenance of roadways, although impacts due to roadway maintenance would be less than significant under both the Project and EZA. Both the Project and EZA would have similar potential to affect circulation during construction of roadway improvements, although impacts would be reduced to less-than-significant levels with implementation of mitigation measures, resulting in similar less-than-significant impacts. Similarly, impacts to emergency access in the local area would be less than significant under the Project and EZA under long-term conditions, although both the Project and EZA would result in near-term construction-related impacts during the construction of roadway improvements. With mitigation, impacts to emergency access during construction would be reduced to less-than-significant levels under both the Project and EZA, and the level of impact would be similar. The EZA also would fail to construct a community trail segment along the Project site's frontage with Cajalco Road, although roadway improvements that could accommodate bicycles would be similar under the Project and EZA, impacts for which have been evaluated throughout this EIR under the appropriate subject areas; thus, impacts due to bicycle facility construction would be less than significant with implementation of the mitigation measures identified throughout this EIR, and the level of impact would be similar.

S. Tribal Cultural Resources

Under the EZA, it is anticipated that more areas of the Project site would be subject to grading activities, as the EZA would include development in the southeastern corner of the Project site that is planned to remain undisturbed as part of the Project. As such, the EZA would result in an increase in potential impacts to tribal

cultural resources that may be present below the surface of the Project site, although as with the Project impacts would be reduced to less-than-significant levels with the implementation of mitigation measures.

T. Utilities and Service Systems

The level of development intensity on site would be substantially reduced under the EZA in comparison to the proposed Project. Both the Project and EZA would require the construction of water, wastewater, storm water drainage, electric power, natural gas, and telecommunication facilities, although it is anticipated that facilities that would be constructed under the EZA would be less extensive as compared to the Project (e.g., smaller pipe sizes, etc.). Impacts associated with the provision of such facilities would be mitigated to less-than-significant levels with implementation of mitigation measures, although the level of impact would be slightly reduced under the EZA due to the reduction in development intensity on site. The EMWD determined that it has sufficient water resources to accommodate development proposed as part of the Project, while the EZA is fully consistent with the growth assumptions used by EMWD for long-term planning efforts. Thus, because EMWD would be able to provide potable water to both the Project and the EZA, impacts to water supply would be less than significant, although impacts would be reduced under the EZA as compared to the Project as the EZA would generate a demand for less water than the proposed Project. Similarly, EMWD would have adequate capacity to treat wastewater generated by either the Project or the EZA, although the amount of wastewater generated under the EZA would be substantially reduced as compared to the Project; thus, impacts due to wastewater treatment capacity would be less than significant under both the Project and EZA, although the level of impact would be reduced under the EZA in comparison to the Project. Both the Project and EZA would be subject to the County's solid waste regulations, and neither the Project nor the EZA would result in the generation of solid waste that could adversely affect landfill capacity. Impacts associated with solid waste would be less than significant, although the level of impact would be reduced under the EZA as the EZA would generate less solid waste requiring disposal as compared to the Project.

U. Wildfire

Under the EZA, the Project site would be developed with 69 residential dwelling units on minimum ½-acre and one-acre lots. It is anticipated that large portions of individual residential lots would not include irrigated landscaping. By comparison, the Project would fully cover the northern 44.66 net acres of the Project site with impervious surfaces and irrigated landscaped areas, and would improve the southern 13.33 net acres as a park site that includes irrigated landscaping. Under the Project, the only portion of the Project site that would continue to contain wildland fuels would be in the southeastern portion of the proposed park site, where the existing drainage and associated vegetation would be preserved. Due to the lack of impervious surfaces or irrigated landscaping that would occur on large portions of the Project site under the EZA, the EZA would result in increased impacts due to wildland fire hazards as compared to the Project, although it is anticipated that wildland fire hazard impacts under the EZA would be reduced to less-than-significant levels with either mitigation measures or design measures incorporating appropriate fuel modification zones. Neither the Project nor the EZA would conflict with adopted emergency evacuation plans, including the County's LHMP; impacts would be less than significant, and the level of impact would be similar.

V. Conclusion

As compared to the proposed Project, the EZA would have increased impacts under the issue areas of agriculture/forestry resources, biological resources, cultural resources, geology/soils (long-term erosion

hazards), hydrology/water quality (long-term erosion hazards), noise (airport-related noise), paleontological resources, public services (fire protection services, recreational facilities, libraries, and school capacity), recreation, tribal cultural resources, and wildfire. In comparison to the Project, the EZA would result in similar impacts to mineral resources. Implementation of the EZA would result in reduced impacts in comparison to the Project under the issue areas of aesthetics, air quality, energy, geology/soils (except long-term erosion hazards), greenhouse gas emissions, hazards/hazardous materials, hydrology/water quality (except long-term erosion hazards), land use/planning, noise (except airport-related noise), population/housing, public services (sheriff services), transportation, utilities/service systems.

The EZA generally would fail to meet most of the Project's objectives. No parkland development would occur on site under the EZA while the EZA would increase the site's residential population and associated demand for recreational resources; thus, the EZA would fail to meet the Project's objective 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. Development of 69 residential dwelling units under the EZA also would fail to meet the Project's objective to diversify the mix of uses in the Mead Valley community of Riverside County to support the growing goods movement supply chain. Due to the lack of supply chain uses included as part of the EZA, the EZA would fail to meet the Project's objective 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. As no job-producing uses would occur under the EZA, the EZA would fail to meet the Project's objective 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. The EZA also would fail to meet the Project's objective 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. As no job-producing land uses would occur on site under the EZA, the EZA also would fail to meet the Project's objective 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. Similarly, the EZA would fail to meet the Project's objective to diversify the economy of western unincorporated Riverside County by developing a large property with employment-generating land uses with long-term economic viability. Because the EZA would entail development of the Project site with residential uses at similar densities of existing residential uses in the local area, the EZA would meet the Project's objective to develop uses that have architectural design and operational characteristics that are compatible with other existing and planned developments in the local area. As infrastructure is readily available in the immediate areas surrounding the Project site, the EZA would meet the Project's objective to develop a property that has access to available infrastructure, including roads and utilities.

6.3.3 Warehouse Only Alternative

The Warehouse Only Alternative (WOA) considers development of the northerly 44.66 net acre portion of the Project site with one light industrial warehouse building with a total building area of 1,003,510 square feet, as proposed under the Project evaluated in this EIR. The Project's proposed public park on approximately 13.33 net acres south of the warehouse site would not be developed under this Alternative and that area would remain in its existing condition, which contains a mixture of undeveloped land and multiple single-family homes with a variety of ancillary structures and outdoor storage. In addition, under the WOA, there would be no extension

of Decker Road to the southern portions of the Project site, and improvements to this roadway only would occur along the frontage with the northern 50.04 gross acres of the Project site. All impacts associated with development of the northern 50.04 acres of the Project site would be identical between the Project and WOA; thus, the focus of analysis in this subsection is on changes to impacts within the southern 14.93 gross acres of the Project site that would result from leaving this portion of the Project site in its existing condition with single-family residences and associated ancillary structures and outdoor storage areas.

A. Aesthetics

Under the WOA, the northern portions of the Project site would be developed warehouse uses in the same manner as proposed under the Project, while no parkland development or roadway improvements would occur in the southern 14.93 gross acres of the Project site. There are no officially-designated scenic highway corridors within the Project's viewshed, although the Project site would be intermittently visible from nearby segments of I-215, a County-eligible scenic highway. Impacts to views from I-215 would be slightly increased under the WOA as compared to the Project, as the southern portion of the Project site would continue to be occupied by several single-family homes and associated ancillary structures, whereas under the Project this area would be improved as a public park. However, because no development would occur in the southern 13.33 net acres of the Project site under the WOA, the WOA would result in reduced impacts to scenic resources because the WOA would not result in the elimination of any of the rock outcroppings that occur in the southern portions of the Project site, as this portion of the Project site would be left in its existing condition. Although the WOA would not result in any changes within the southern portions of the Project site, improvement of this portion of the Project site with a public park would improve the visual characteristics of this portion of the Project site as compared to existing conditions; thus, impacts due to the degradation of the existing visual character or quality of public views would be slightly increased under the WOA as compared to the Project. Both the Project and WOA would be subject to compliance with Riverside County Ordinance Nos. 655 and 915, which would ensure that lighting impacts would remain below a level of significance; however, because no new lighting elements would be introduced into the southern portions of the Project site under the WOA, impacts due to lighting would be slightly decreased under the WOA in comparison to the Project.

B. Agriculture and Forestry Resources

Based on the Project site's existing FMMP classifications of "Farmland of Local Importance" and "Other Lands," as well as the results of the Project's LESA Analysis, the Project site does not contain any Farmland under existing conditions. Accordingly, implementation of the Project or WOA would result in less-than-significant impacts to Important Farmland types, and the level of impact would be the same. Although there are numerous parcels surrounding the Project site that 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. However, because the southern portions of the Project site would continue to contain residential uses under the WOA, and because residential uses are more sensitive to noise and odor issues associated with agricultural uses, the WOA would result in increased, but still less-than-significant impacts due to a conflict with surrounding agricultural zoning. Additionally, the Project site is not utilized for agricultural production, is not located within any agricultural preserves, and is not subject to a Williamson Act Contract; thus, the Project and the WOA would result in less-than-significant impacts due to a conflict with existing agricultural uses, and the level of impact would be similar to the proposed Project. The Project site

and surrounding areas are not zoned for 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)). As such, neither the Project nor the WOA would result in impacts to forestry resources, and impacts would be the same.

C. *Air Quality*

Under the WOA, the northern portions of the Project site would be developed in a similar manner as proposed under the proposed Project, while the southern 14.93 gross acres of the Project site would not be developed with park uses and instead would remain in its existing condition with several existing residential uses and associated ancillary structures. During construction activities, the WOA would generate fewer overall air quality emissions as compared to the Project because there would be no construction activities within the southern portions of the Project site; thus, construction-related air quality impacts would be reduced under the WOA as compared to the Project, although construction-related impacts would be less than significant under both the Project and WOA. Under long-term operating conditions, approximately 74.1% of the traffic that would be generated under the Project would be associated with warehouse uses, while the public park use proposed as part of the Project would generate approximately 25.9% of the proposed Project's total traffic volumes. The proposed public park use is anticipated to generate approximately 748 daily vehicular trips, whereas the +/- five existing residential uses in the southern portions of the Project site generate only approximately 47 vehicle trips per day (five dwelling units x 9.43 trips/dwelling unit[1] = 47.2 trips). As the majority of air quality emissions are associated with vehicular traffic, the WOA would result in reduced impacts due to a cumulatively-considerable net increase of criteria pollutants for which the region is non-attainment as compared to the Project, although as with the Project the WOA still would result in significant and unavoidable impacts due to emissions of NO_X, an ozone precursor. Similarly, although the WOA would result in reduced emissions of NO_X due to reduced traffic associated with the southern portions of the Project site, the WOA nonetheless would result in significant impacts due to a conflict with the SCAQMD 2022 AQMP. Both the Project and the WOA would result in less-than-significant localized air quality impacts, although localized air quality impacts would be slightly reduced under the WOA in comparison to the Project because no new development would occur in the southern portions of the Project site and because the WOA would generate less traffic within the southern portions of the Project site as compared to the Project. During construction activities, the Project's less-than-significant odor impacts would be slightly reduced as there would be no construction activities in the southern portions of the Project site. However, under long-term operating conditions, because the majority of the Project's less-than-significant operational-related odor impacts would be associated with heavy trucks, and because residential and park uses are not associated with the generation of substantial odors, impacts due to odors would be similar under the Project and WOA under long-term operating conditions.

D. *Biological Resources*

Under the WOA, development within the northern 50.04 gross acres of the Project site would be the same as would occur under the Project; however, there would be no construction or development activities within the southern 14.93 gross acres of the Project site and the off-site portions of Decker Road to the south of the warehouse building site would not be improved under the WOA. Neither the Project nor the WOA would result in impacts due to a conflict with the SKR HCP. However, the WOA would avoid impacts to 0.054-acre of MSHCP riverine areas in the southern portions of the Project site and the WOA would have no potential to

conflict with the MSHCP Urban/Wildlife Interface Guidelines (UWIG) because the northern portions of the Project site are not located in close proximity to potential future MSHCP-conserved lands. In addition, the WOA would result in reduced impacts to the burrowing owl because the southern portions of the Project site would not be developed. Thus, impacts due to a conflict with the MSHCP would be reduced under the WOA, although impacts would be less than significant under both the Project and WOA with the implementation of mitigation measures. Both the Project and the WOA would result in significant but mitigable impacts to nesting birds and raptors; however, the level of impact would be reduced under the WOA because no development would occur within the southern 14.93 acres of the Project site. Although impacts to wildlife movement corridors would be less than significant under both the Project and WOA, the WOA would have reduced impacts to wildlife movement because no new development would occur on the southern 14.93 acres of the Project site. Neither the Project nor the WOA would result in impacts to sensitive natural communities, and as such impacts would be less than significant and the level of impact would be similar. Implementation of the WOA would completely avoid the Project's impacts to 0.053-acre of RWQCB jurisdiction and 0.054-acre of CDFW jurisdiction within the southern portions of the Project site; thus, impacts to jurisdictional waters would be avoided under the WOA requiring no mitigation. Neither the Project nor the WOA would result in impacts due to a conflict with local policies or ordinances protecting biological resources, and the level of impact would be similar.

E. Cultural Resources

Under the WOA, development within the northern 50.04 gross acres of the Project site would be the same as would occur under the Project; however, there would be no construction or development activities within the southern 14.93 gross acres of the Project site and the off-site portions of Decker Road to the south of the warehouse building site would not be improved under the WOA. Accordingly, and due to the reduced areas of grading required for the WOA, the WOA would result in reduced impacts to subsurface historical and archaeological resources in comparison to the Project, although both the Project and WOA would require mitigation measures to reduce potential impacts to less-than-significant levels. Both the Project and WOA would be subject to compliance with State law regarding the discovery of humans remains; however, potential impacts to human remains would be reduced under the WOA in comparison to the Project due to the reduction in areas subject to grading and development under the WOA.

F. Energy

Energy consumption during construction and long-term operating conditions would be identical for the northern 50.04 gross acres of the Project site with implementation of either the WOA or the proposed Project. However, with implementation of the WOA, there would be no new construction or development within the southern 14.93 gross acres of the Project site. As such, energy impacts during construction activities in the southern portions of the Project site would be completely avoided under the WOA. Under long-term operating conditions, the park use proposed as part of the Project would generate approximately 748 daily vehicular trips, while the existing +/- five dwelling units in the southern portions of the Project site would generate only approximately 47 vehicle trips per day (five dwelling units x 9.43 trips/dwelling unit = 47.2 trips). Accordingly, the total amount of vehicle fuel consumed during long-term operations would be reduced under the WOA as compared to the Project. The proposed park site in the southern portions of the Project site would include lighting that would produce a demand for electricity, and the demand for electricity associated with park uses would be similar to the existing five dwelling units in the southern portions of the Project site. Assuming the

park would include natural gas for barbeque areas, the demand for natural gas in the southern portions of the Project site would be similar between the Project and WOA. Neither the Project nor the WOA would result in the inefficient, wasteful, or unnecessary consumption of energy and impacts would be less than significant, although the level of impact would be reduced under the WOA due to the reduced intensification of development in the southern portions of the Project site as compared to the proposed Project. Additionally, both the Project and WOA would be required to comply with adopted State and local plans related to energy conservation; thus, impacts would be less than significant and the level of impact would be similar.

G. Geology and Soils

Under the WOA, there would be no new development within the southern 14.93 gross acres of the Project site, while development in the northern 50.04 gross acres of the Project site would be the same under the Project and WOA. Accordingly, impacts due to geology and soil conditions in the northern 50.04 gross acres of the Project site would be identical between the WOA and proposed Project, and impacts would be less than significant under both the WOA and proposed Project with the implementation of mitigation measures requiring compliance with future geotechnical studies required as part of grading and building permits. Under the WOA, the southern portions of the Project site would continue to be occupied by residential structures and associated ancillary buildings and outdoor storage areas, whereas under the proposed Project the only structure that would be constructed in the southern portions of the Project site would be a small +/- 3,000 s.f. recreation building with restrooms. Accordingly, impacts due to seismic hazards, landslide hazards, lateral spreading, collapse, and subsidence would be slightly increased under the WOA in comparison to the Project. There are no volcanos in the area, and the Project site is not adjacent to impounded bodies of water bodies of water susceptible to seiches or slopes and hillsides susceptible to instability; thus, no impacts would occur under the Project or WOA, and the level of impact would be similar. Neither the Project nor the WOA would require slopes greater than 10 feet in height within the southern portions of the Project site; thus, impacts would not occur in the southern portions of the Project site under the WOA or proposed Project, and the level of impact would be the same. Both the WOA and Project would result in the elimination of existing septic systems on site; however, existing septic systems in the southern portions of the Project site would not be removed under the WOA. Notwithstanding, the Project would remove all septic tanks on site in conformance with all applicable regulations, and as such impacts would be less than significant under the proposed Project, and the level of impact would be similar. Neither the Project nor the WOA would require septic tanks or alternative wastewater disposal systems on unsuitable soils; thus, impacts would be less than significant and similar under the WOA and proposed Project. Construction-related erosion hazards would be slightly reduced under the WOA in comparison to the Project since there would be no new ground-disturbing activities within the southern portions of the Project site. However, under long-term operating conditions, the Project would improve the southern portions of the Project site to include large areas of irrigated landscaping along with hardscape features such as walking paths and parking areas, while under the WOA the southern portions of the site would continue to be partially developed with large areas containing limited vegetative cover. As such, long-term erosion impacts would be increased under the WOA as compared to the Project, although as with the Project such impacts would be less than significant. Lastly, the soils on-site are considered “non-expansive” soils; thus, impacts would be less than significant and would be similar under the WOA and the Project.

H. Greenhouse Gas Emissions

Under the WOA, the northern portions of the Project site would be developed in a manner identical to the proposed Project; thus, impacts due to GHG emissions in the northern portions of the Project site would be similar under the Project and WOA, and such impacts would be reduced to less-than-significant levels with the implementation of mitigation measures. There would be no construction activities in the southern portions of the Project site under the WOA; thus, the WOA would result in reduced emissions of construction-related GHGs as compared to the Project. However, under long-term operating conditions, the majority of GHG emissions would be associated with vehicular traffic under both the WOA and proposed Project. The proposed public park use is anticipated to generate approximately 748 daily vehicular trips, whereas the +/- five existing residential uses in the southern portions of the Project site generate only approximately 47 vehicle trips per day (five dwelling units x 9.43 trips/dwelling unit[1] = 47.2 trips). As such, long-term operational GHG impacts in the southern portions of the Project site would be reduced under the WOA as compared to the proposed Project. Both the Project and WOA would be subject to all applicable federal, State, and local regulations related to GHG emissions, resulting in less-than-significant and similar levels of impact.

I. Hazards and Hazardous Materials

Under the WOA, the northern portions of the Project site would be developed with warehouse uses in a manner identical to what is proposed as part of the Project. Thus, construction and long-term operational impacts to hazards and hazardous materials would be the same within this portion of the Project site under the Project and WOA, and such impacts would be less than significant with mandatory compliance with applicable federal, State, and local regulations and requirements. As residential and park uses are not associated with the transport or storage of hazardous materials, impacts due to the creation of a significant hazard to the public or environment through the routine transport, use, or disposal of hazardous materials would be less than significant for the southern portions of the Project site under both the Project and the WOA, and the level of impact would be similar. Neither the Project nor the WOA would impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan; thus, impacts under the WOA and proposed Project would be less than significant and the level of impact would be similar. Neither the Project nor the WOA would conflict with the County's Local Hazard Mitigation Plan (LHMP); impacts would be less than significant, and the level of impact would be similar. Neither the Project nor the WOA would 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 to nearby schools would be similar and less than significant under both the Project and WOA. The Project site is not identified on any lists of hazardous materials sites compiled pursuant to Government Code Section 65962.5; thus, no impact would occur under the Project or WOA, and the level of impact would be similar. In addition, the Project site is located within Compatibility Zone C2 of the MARB ALUCP, which requires residential development to occur at densities of less than 6.0 dwelling units per acre (du/ac) with a maximum of 500 people on any single acre, while the WOA would retain the existing +/- five dwelling units in the southern portion of the Project site. Thus, both the Project and the WOA would be fully consistent with the MARB ALUCP, resulting in similar less-than-significant impacts. There are no private airstrips in the local area; thus, no hazards-related impacts due to private airstrips would occur under the Project or WOA, and the level of impact would be similar.

J. Hydrology and Water Quality

Under the WOA, the northern portions of the Project site would be developed with warehouse uses in a manner identical to what is proposed as part of the Project, while the southern portions of the Project site would remain in its existing condition with approximately five residential structures and several ancillary buildings. Thus, impacts to hydrology and water quality associated with the northern portions of the Project site would be identical between the WOA and proposed Project, and such impacts would be less than significant. However, because no new development would occur in the southern portions of the Project site, the WOA would result in reduced construction-related water quality impacts as compared to the Project's less-than-significant impacts to water quality. Under long-term operating conditions, the Project would result in the introduction of impervious surfaces and large areas of irrigated landscaping, while under the WOA the southern portions of the Project site would continue to consist of scattered residential and ancillary buildings interspersed with soils that only partially are covered by stabilizing vegetation. Thus, long-term erosion hazards would increase under the WOA as compared to the Project, although such impacts would be less than significant. With respect to groundwater recharge, under both the Project and WOA the southern portions of the Project site would continue to contain large areas of pervious surfaces; thus, groundwater recharge impacts would be similar under both the Project and WOA, and such impacts would be less than significant. Although the Project would result in less-than-significant impacts to the site's existing drainage pattern, there would be no changes to the site's drainage patterns under the WOA within the southern portions of the Project site and impacts therefore would be reduced in comparison to the proposed Project. Under the WOA, there would be no improvements to the existing drainage conditions within the southern portions of the Project site. Under existing conditions, approximately 1,203 acres of off-site areas are tributary to the southern portions of the Project site, and the overall Project site generates approximately 120 cfs which exceeds the existing 14.84 cfs of available capacity within MDP Line E-9.1. As there would be no new detention of storm flows from the southern portions of the Project site, including flows from the off-site 1,203 acres that are tributary to the southern portions of the Project site, the WOA would result in increased impacts due to exceeding the capacity of existing or planned drainage systems and due to potential flooding hazards downstream. Additionally, the Project site is located fully outside of mapped floodplains, and therefore impacts to existing flows within mapped floodplains would not occur under the Project or the WOA, and the level of impact would be the same. The Project site is not subject to inundation from tsunamis or seiches; thus, no impact would occur and the level of impact would be similar under the Project and WOA.

K. Land Use and Planning

Both the Project and WOA would be subject to compliance with all applicable land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect. Both the Project and the WOA would require a General Plan Amendment (GPA) and Change of Zone (CZ) to accommodate the proposed warehouse use, although a GPA would not be needed in the southern portions of the Project site under the WOA; thus, impacts due to consistency with an applicable land use plan would be slightly reduced under the WOA as compared to the Project, although impacts would be less than significant under both the Project and WOA with approval of the Project's proposed GPA. Both the Project and WOA also would fully comply with Connect SoCal; impacts would be less than significant and the level of impact would be similar. Neither the Project nor the WOA would physically divide an established community; thus, impacts would be less than significant under both the Project and WOA, and the level of impact would be similar.

L. Mineral Resources

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, no impacts to mineral resources would occur under the Project or the WOA, and the level of impact would be similar. Additionally, neither the Project nor the WOA would represent an incompatible land use located adjacent to a State classified or designated area or existing surface mine, and neither the WOA nor the Project would expose people or property to hazards from proposed, existing, or abandoned quarries or mines. No impacts would occur, and the level of impact would be similar.

M. Noise

Under the WOA, the northern portions of the Project site would be developed with warehouse uses in a manner similar to the proposed Project; thus, noise-related impacts associated with construction and long-term operational activities within the northern 50.04 gross acres of the Project site would be identical between the WOA and proposed Project, and such impacts would be reduced to less-than-significant levels with the implementation of mitigation measures. The Project would improve the southern portions of the Project site with park uses, while under the WOA this portion of the Project site would remain in its existing condition with +/- five residential dwelling units and associated ancillary buildings and outdoor storage areas. Thus, construction-related noise impacts would be completely avoided within the southern portions of the Project site under the WOA, although construction-related noise impacts in the southern portions of the Project site would be less than significant under both the Project and WOA. Under long-term operating conditions, the park use proposed in the southern portions of the Project site would generate more noise than the existing +/- five existing residential dwelling units that occur in this portion of the Project site; thus, long-term operational noise impacts would be decreased under the WOA as compared to the Project, although impacts would be less than significant under both the Project and the WOA. With respect to traffic-related noise, the proposed public park use is anticipated to generate approximately 748 daily vehicular trips, whereas the +/- five existing residential uses in the southern portions of the Project site generate only approximately 47 vehicle trips per day (five dwelling units x 9.43 trips/dwelling unit[1] = 47.2 trips). As such, the WOA would result in reduced long-term traffic-related noise impacts in comparison to development of the southern portions of the Project site with park uses, although impacts due to traffic-related noise would be less than significant under both the Project and WOA. Vibration impacts during construction under the Project and WOA would be less than significant and slightly reduced under the WOA because no construction activities would occur in the southern portions of the Project site, while the Project's less-than-significant long-term operational-related vibration impacts would be slightly reduced under the EZA due to the reduction in amount of traffic generated by the southern portions of the Project site under the WOA as compared to the Project.

N. Paleontological Resources

Under the WOA, there would be no construction activities within the southern portions of the Project site, while grading and development within the northern portions of the Project site would be identical to what is proposed as part of the Project. Thus, impacts to paleontological resources within the northern portions of the Project site would be similar and would be reduced to less-than-significant levels with implementation of mitigation measures. For the southern portions of the Project site, because no grading or ground-disturbing activities would occur under the WOA, the WOA would avoid the Project's less-than-significant impacts (with mitigation) to paleontological resources within this portion of the Project site.

O. Population and Housing

Under both the Project and WOA, the existing dwelling units in the northern portions of the Project site would be demolished, while the existing +/- five residential structures within the southern portions of the Project site that would be demolished as part of the Project would not be demolished under the WOA. Accordingly, impacts due to the displacement of people or housing would be reduced under the WOA in comparison to the Project, although impacts would be less than significant under both the Project and WOA. Similarly, while the Project's proposed warehouse use would generate a demand for up to 283 dwelling units (when conservatively assuming all of the Project's employees would consist of new residents within the County), the WOA would generate a demand for five fewer dwelling units because the existing five dwelling units in the southern portions of the Project site would not be demolished under the WOA; thus, impacts due to the demand for additional housing, including affordable housing, would be slightly reduced under the WOA in comparison to the proposed Project. Under the proposed Project and the WOA, the northern portions of the Project site would be developed with warehouse uses, which represents an intensification of development on site as compared to the site's adopted General Plan land use designations and zoning classifications. Impacts due to unplanned growth in the northern portions of the Project site would be less than significant under both the Project and WOA, and the level of impact would be similar. Under the WOA, there would be no change in the existing land uses within the southern portions of the Project site, while under the Project this area would be developed as a public park. As park uses accommodate existing and planned developments and do not generate a residential population, impacts due to unplanned population growth would be similar for the southern portions of the Project site under the Project and WOA, and such impacts would be less than significant.

P. Public Services

Under the WOA, the northern portions of the Project site would be developed with warehouse uses in a manner similar to the proposed Project; thus, impacts to public services for the northern portions of the Project site would be identical under both the Project and WOA, and both the Project and WOA would result in less-than-significant impacts to public services with mandatory payment of DIF fees and school impact fees. For the southern portions of the Project site, no new development would occur under the WOA while this area would be developed as a public park as part of the Project. Although the park use could generate higher numbers of people on site as compared to the existing residential uses, the park proposed as part of the Project only would include a single small (+/- 3,000 s.f.) recreational building with restrooms, while under the WOA the southern portions of the Project site would continue to contain +/- five dwelling units and numerous ancillary structures and outdoor storage areas. Thus, impacts to fire protection services would slightly increase under the WOA as compared to the Project, although such impacts would be less than significant under both the Project and WOA. Due to the increase in the number of people in the southern portions of the Project site under the Project as compared to the existing +/- five dwelling units that would be retained on site under the WOA, the WOA would result in slightly reduced impacts to sheriff protection services, although impacts to sheriff services would be less than significant under both the Project and WOA. With respect to school uses, the Project would not directly generate a residential population requiring school services, while under the WOA there would be +/- five residential dwelling units; thus, impacts to school services would be slightly increased under the WOA as compared to the Project, although because these dwelling units already produce a demand for school services under existing conditions impacts to schools would be less than significant under the WOA. With respect to parkland, the WOA would not accommodate a 13.33 net acre park as is proposed under the Project for the

southern portions of the Project site, and the WOA would continue to include up to +/- five dwelling units that generate a demand for recreational facilities; thus impacts to recreational facilities would be slightly increased under the WOA as compared to the proposed Project, although such impacts would be less than significant. Similarly, because the WOA would continue to accommodate +/- five dwelling units on site and because no dwelling units would be accommodated under the Project, the WOA would result in slightly increased impacts to library services, although such impacts would be less than significant. Due to the increase in population associated with the park site under the Project as compared to the existing residential uses in the southern portions of the Project site, the WOA would result in reduced impacts to health care services, although such impacts would be less than significant under both the Project and WOA.

Q. *Recreation*

Under the WOA, there would be no construction of recreational facilities within the southern portions of the Project site; as such, the WOA would avoid the Project's less-than-significant impacts (with mitigation) due to parkland development on site. However, because the WOA would not accommodate the proposed public park, and because the WOA would continue to include up to +/- five dwelling units that generate a demand for recreational facilities, impacts to existing recreational facilities would be slightly increased under the WOA as compared to the proposed Project, although such impacts would be less than significant. Impacts due to construction of recreational facilities (i.e., sidewalks) within and abutting the northern portion of the Project site would be similar to the proposed Project, and impacts would be reduced to less-than-significant levels with implementation of the mitigation measures presented throughout this EIR for construction-related impacts.

R. *Transportation*

Neither the Project nor the WOA would conflict with Connect SoCal, the Riverside County CMP, the Riverside County General Plan and General Pan Circulation Element, or any Riverside County ordinances adopted to address transportation. Thus, impacts due to a conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities would be less than significant under both the WOA and Project, and the level of impact would be similar. While development of park uses in the southern portions of the Project site under the proposed Project and the existing dwelling units within the southern portions of the Project site would not result in significant impacts due to VMT, both the Project and WOA would result in similar significant and unavoidable impacts due to projected VMT associated with the warehouse uses. As with the proposed Project, development within the northern portions of the Project site would result in significant and unavoidable impacts due to VMT that cannot be reduced to less-than-significant levels through mitigation. All physical improvements that would occur under the Project and WOA would occur in full conformance with applicable Riverside County standards; thus, impacts due to hazardous design or geometric features associated with transportation improvements would be less than significant under both the Project and WOA and the level of impact would be similar. Additionally, the Project's less-than-significant impacts due to incompatible uses that could result in potential traffic conflicts also would occur under the WOA, and the level of impact would be similar. Due to the slight reduction in the amount of traffic that would be generated on site under the WOA as compared to the Project (i.e., due to reduced traffic generated by the southern portions of the Project site under the WOA), the WOA would result in slightly reduced impacts due to the need for maintenance of roadways, although impacts due to roadway maintenance would be less than significant under both the Project and WOA. Both the Project and WOA would have similar potential to affect circulation during construction of roadway improvements, although impacts would be reduced to less-

than-significant levels with implementation of mitigation measures, resulting in similar less-than-significant impacts. Similarly, impacts to emergency access in the local area would be less than significant under the Project and WOA under long-term conditions, although both the Project and WOA would result in near-term construction-related impacts during the construction of roadway improvements. With mitigation, impacts to emergency access during construction would be reduced to less-than-significant levels under both the Project and WOA, and the level of impact would be similar. As with the proposed Project, the WOA would include the construction of a community trail along the Project site's frontage with Cajalco Road, and roadway improvements that could accommodate bicycles would be similar under the Project and WOA. Impacts associated with the construction of trails, sidewalks, and roadways have been evaluated throughout this EIR under the appropriate subject areas; thus, impacts due to bicycle facility construction would be less than significant with implementation of the mitigation measures identified throughout this EIR, and the level of impact would be similar.

S. Tribal Cultural Resources

Under the WOA, grading within the northern portions of the Project site would be similar to the proposed Project, and would result in similar significant but mitigable impacts to subsurface tribal cultural resources that may be encountered during grading activities. However, no grading or ground-disturbing activities would occur in the southern portions of the Project site under the WOA, while the Project would require grading within this area to accommodate the proposed park use; thus, the Project's less-than-significant impacts (following mitigation) to subsurface tribal cultural resources in the southern portions of the Project site would be completely avoided under the WOA.

T. Utilities and Service Systems

Under the WOA, the northern portions of the Project site would be developed in a manner identical to the proposed Project; accordingly, impacts to utilities and service systems would be the same for the northern portions of the Project site, and such impacts would be less than significant. For the southern portions of the Project site, there would be no new development under the WOA, while under the Project this portion of the Project site would be developed with public park uses. Thus, under the WOA the Project's less-than-significant impacts due to the construction or relocation of new or expanded water, wastewater treatment, or storm water drainage systems would be completely avoided under the WOA for the southern portions of the Project site. With respect to water supply, because no new development would occur in the southern portions of the Project site the WOA would avoid the Project's demand for approximately 33,000 gallons per day (gpd) for irrigation at the park site and restrooms; thus, impacts to water supply would be reduced under the WOA in comparison to the proposed Project, although impacts would be less than significant under both the Project and WOA. Under the WOA, the existing residential uses in the southern portions of the Project site would continue to be served by the existing septic systems, while under the Project new sewer lines and restrooms would be constructed to serve the proposed park use; thus, impacts due to the construction or expansion of wastewater treatment facilities would be reduced under the WOA as compared to the Project, although such impacts would be less than significant under both the Project and WOA. Similarly, because wastewater in the southern portions of the Project site already is accommodated by existing septic systems, implementation of the WOA would result in reduced impacts in comparison to the Project's less-than-significant impacts to wastewater treatment capacity. Impacts to solid waste would be similar under both the Project and WOA, and such impacts would be less than significant. Under the WOA, there would be no new development in the southern portions

of the Project site; thus, the WOA would avoid the Project's less-than-significant impacts due to the construction or expansion of facilities for electricity, natural gas, communication systems, street lighting, roadway maintenance, parkland maintenance, and other government services.

U. Wildfire

Under the WOA, the northern portions of the Project site would be developed in a manner identical to the proposed Project; accordingly, impacts due to wildfire hazards in the northern portions of the Project site would be the same under the Project and WOA, and such impacts would be less than significant. For the southern portions of the Project site, under the WOA these areas would be left in their existing conditions, with approximately five existing residential dwelling units and numerous ancillary buildings and outdoor storage areas that are interspersed with ruderal vegetation that is subject to wildland fire hazards. Under the Project, the southern portions of the Project site would be improved with irrigated landscaping, and the only structure proposed within the park site is a small (+/- 3,000 s.f.) recreation building that includes restrooms. Accordingly, impacts due to wildfire-related hazards would increased under the WOA as compared to the Project, although such impacts would be less than significant under both the Project and WOA.

V. Conclusion

As compared to the proposed Project, implementation of the WOA would result in increased impacts under the issue areas of aesthetics (impacts to views and to visual character and quality), agriculture/forestry resources, geology/soils (geologic hazards and long-term erosion hazards), hydrology/water quality (long-term erosion hazards and stormwater drainage facility capacity), public services (fire protection, school, recreational, and library services), recreation, and wildfire. The WOA would result in similar impacts in comparison to the proposed Project under the issue areas of hazards/hazardous materials, mineral resources, and transportation (except roadway maintenance). The WOA would result in reduced impacts in comparison to the proposed Project under the issue areas of aesthetics (impacts to rock outcroppings in the southern portions of the Project site), air quality, biological resources, cultural resources, energy, geology/soils (construction-related erosion hazards), greenhouse gas emissions, hydrology/water quality (construction-related water quality impacts, groundwater recharge, and changes to existing drainage patterns), land use/planning, noise, paleontological resources, population/housing, public services (sheriff protection services and health care services), transportation (roadway maintenance), tribal cultural resources, and utilities/service systems.

The WOA generally would meet most, but not all, of the Project's objectives. The WOA would fail to meet the Project's objective 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. The WOA would meet the Project's objectives to diversify the mix of uses in the Mead Valley community of Riverside County to support the growing goods movement supply chain and 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. The WOA also would meet the Project's objective 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. Additionally, the WOA would meet the Project's objective 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, and also would meet the Project's objective 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. The WOA also would meet the Project's objectives to diversify the economy of western unincorporated Riverside County by developing a large property with employment-generating land uses with long-term economic viability, and to develop uses that have architectural design and operational characteristics that are compatible with other existing and planned developments in the local area. Additionally, the WOA would meet the Project's objective to develop a property that has access to available infrastructure, including roads and utilities, although slightly less effectively than the proposed Project since no development would occur in the southern portions of the Project site under the WOA, which has access to available infrastructure under existing conditions.

6.3.4 Reduced Project Alternative

The Reduced Project Alternative (RPA) considers development of the northerly 44.66 net acre portion of the Project site with a warehouse building that is 30% smaller than the warehouse proposed under the Project and for analysis purposes is assumed to be 700,000 s.f. In addition, this Alternative considers developing a public park as proposed under the Project, but only on the west side of Decker Road on approximately 4.19 net acres, although no recreation building or restrooms would be constructed within the park site under the RPA. The remaining approximately 9.16 net acres to the east of Decker Road proposed for park uses as part of the Project would not be developed under this Alternative and that area would remain in its existing condition, which contains a mixture of undeveloped land and multiple single-family homes with a variety of ancillary structures and outdoor storage. Improvements to Decker Road would be similar under the proposed Project and RPA, except that there would be only one parking lot extending from the west side of the southern portions of Decker Road.

A. Aesthetics

Under the RPA, the northern portions of the Project site would be developed warehouse uses in the same manner as proposed under the Project, although the building would be reduced in size by approximately 30% as compared to the Project. For the southern portions of the Project site, under the RPA the 4.19 net acres west of Decker Road would be improved as a public park, while the eastern 9.16 net acres would remain in its existing condition. There are no officially-designated scenic highway corridors within the Project's viewshed, although the Project site would be intermittently visible from nearby segments of I-215, a County-eligible scenic highway. Although the RPA would result in a reduction in the size of the proposed warehouse building, portions of the southern portions of the Project site would continue to be occupied by several single-family homes and associated ancillary structures and outdoor storage areas, whereas under the Project this area would be improved as a public park. Thus, impacts to views from I-215 would be similar under the Project and RPA (with reduced impacts on the northern portions of the Project site under the RPA and increased impacts in the southeastern portions of the site under the RPA), and as with the Project such impacts would be less than significant. Because no development would occur in the southeastern 9.16 net acres of the Project site under the RPA, the RPA would result in reduced impacts to scenic resources because the RPA would not impact the existing rock outcroppings that occur in the southern portions of the Project site. Although the RPA would not result in any changes within the southeastern 9.16 net acres of the Project site, improvement of this portion of the Project site with a public park would improve the visual characteristics of this portion of the Project site as

compared to existing conditions; thus, impacts due to the degradation of the existing visual character or quality of public views would be increased under the RPA as compared to the Project. Both the Project and RPA would be subject to compliance with Riverside County Ordinance Nos. 655 and 915, which would ensure that lighting impacts would remain below a level of significance; however, because fewer lighting elements would be introduced into the southern portions of the Project site under the RPA, impacts due to lighting would be slightly decreased under the RPA in comparison to the Project.

B. *Agriculture and Forestry Resources*

Based on the Project site's existing FMMP classifications of "Farmland of Local Importance" and "Other Lands," as well as the results of the Project's LESA Analysis, the Project site does not contain any Farmland under existing conditions. Accordingly, implementation of the Project or RPA would result in less-than-significant impacts to Important Farmland types, and the level of impact would be the same. Although there are numerous parcels surrounding the Project site that are zoned for A-1-1 uses, including lands that abut the Project site's boundary, the Project site and the surrounding properties that are zoned for A-1-1 uses are not currently being used for agricultural production. However, because the southeastern portions of the Project site would continue to contain residential uses under the RPA, and because residential uses are more sensitive to noise and odor issues associated with agricultural uses, the RPA would result in increased, but still less-than-significant impacts due to a conflict with surrounding agricultural zoning. Additionally, the Project site is not utilized for agricultural production, is not located within any agricultural preserves, and is not subject to a Williamson Act Contract; thus, the Project and the RPA would result in less-than-significant impacts due to a conflict with existing agricultural uses, and the level of impact would be similar to the proposed project. The Project site and surrounding areas are not zoned for 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)). As such, neither the Project nor the RPA would result in impacts to forestry resources, and impacts would be the same.

C. *Air Quality*

Under the RPA, there would be a reduction in the amount of warehouse building area by approximately 30% as compared to the proposed Project, and the proposed public park improvements would be reduced by approximately 9.16 acres. Accordingly, construction-related impacts to air quality associated with the RPA would be reduced in comparison to the proposed Project, although such impacts would be less than significant under both the Project and RPA. Additionally, due to the reduction in the amount of warehouse building area, the RPA would avoid the Project's significant and unavoidable impact due to emissions of NO_X, a precursor to ozone. Likewise, because the RPA would avoid the Project's unavoidable impacts due to operational emissions of NO_X, the RPA would result in reduced impacts due to a conflict with the SCAQMD 2022 AQMP; however, because the northern portions of the Project site still would require a GPA and CZ to allow for warehouse uses, the RPA would not be consistent with the growth assumptions used as inputs to the AQMP. Accordingly, both the Project and the RPA would result in significant and unavoidable impacts due to a conflict with the AQMP, although impacts would be reduced in comparison to the proposed Project due to the reduction in warehouse building area. Although the Project would result in less-than-significant impacts due to localized air quality emissions, including impacts related to cancer and non-cancer related health risks, impacts to localized air quality would be reduced under the RPA due to the reduction in the amount of warehouse building area by 30%. With implementation of the RPA, odor impacts would be slightly decreased in comparison to

the Project during both construction and long-term operation, as construction activities would occur over a shorter period of time and because the RPA would result int eh generation approximately 30% fewer heavy truck trips.

D. Biological Resources

Under the RPA, grading activities within the northern 50.04 gross acres of the Project site and within the southwestern 4.19 net acres that would be developed with park uses under the RPA would be the same as would occur under the Project; however, there would be no construction or development activities within the southeastern 9.16 net acres of the Project site. Neither the Project nor the RPA would have the potential to conflict with the SKR HCP; thus, impacts would be less than significant under both the Project and RPA and the level of impact would be similar. However, due to the reduction in areas subject to physical impact, the RPA would avoid the Project's impacts to 0.054-acre of MSHCP riverine areas, and would result in reduced impacts in comparison to the Project due to a conflict with the MSHCP UWIG and due to impacts to burrowing owls. While impacts due to a conflict with the MSHCP would be less than significant under both the Project and RPA with the implementation of mitigation measures, impacts would be reduced under the RPA in comparison to the proposed Project. Both the Project and the RPA would result in potentially significant but mitigable impacts to nesting birds and raptors, although the level of impact would be reduced under the RPA due to the reduction in areas planned for development. Although neither the Project nor the RPA would result in impacts to wildlife movement corridors, impacts would be reduced under the RPA in comparison to the Project because no development would occur within the southeastern 9.16 acres of the Project site. Neither the Project nor the RPA would result in impacts to sensitive natural communities, and the level of impact would be similar. Implementation of the RPA would avoid the Project's impacts to 0.053-acre of RWQCB jurisdiction and 0.054-acre of CDFW jurisdiction; thus, the RPA would result in reduced impacts to jurisdictional areas as compared to the Project, and the RPA would require no mitigation. Neither the Project nor the RPA would result in impacts due to a conflict with local policies or ordinances protecting biological resources, and the level of impact would be similar.

E. Cultural Resources

Under the RPA, grading activities within the northern 50.04 gross acres of the Project site and within the southwestern 4.19 net acres that would be developed with park uses under the RPA would be the same as would occur under the Project; however, there would be no construction or development activities within the southeastern 9.16 net acres of the Project site. Accordingly, and due to the reduced areas of grading required for the RPA, the RPA would result in reduced impacts to subsurface historical and archaeological resources in comparison to the Project, although both the Project and RPA would require mitigation measures to reduce potential impacts to less-than-significant levels. Both the Project and RPA would be subject to compliance with State law regarding the discovery of humans remains; however, potential impacts to human remains would be reduced under the RPA in comparison to the Project due to the reduction in areas requiring grading and development under the RPA.

F. Energy

Construction activities associated with the RPA would be less intense than required for the proposed Project; thus, the RPA would result in reduced impacts associated with construction-related energy consumption, although neither the RPA nor the Project would result in the inefficient, wasteful, or unnecessary consumption

of energy and impacts would be less than significant. Under long-term operating conditions, the RPA would include less warehouse building area by approximately 30% and less park area by approximately 9.16 net acres. As such, under long-term operating conditions the RPA would result in reduced demand for energy resources, although neither the Project nor the RPA would result in the inefficient, wasteful, or unnecessary consumption of energy and impacts would be less than significant. Additionally, both the Project and RPA would be required to comply with adopted State and local plans related to energy conservation; thus, impacts would be less than significant and the level of impact would be similar.

G. Geology and Soils

Under the RPA, there would be no new grading or development within the southeastern 9.16 net acres of the Project site, while the northern 50.04 gross acres of the Project site still would be fully disturbed as part of grading activities along with the 4.19 net acres that would be improved as a public park. Accordingly, grading-related impacts due to geology and soil conditions in the northern 50.04 gross acres of the Project site would be identical between the RPA and proposed Project, and impacts would be less than significant under both the RPA and proposed Project with the implementation of mitigation measures requiring compliance with future geotechnical studies to be prepared in conjunction with future grading and building permits. Under the RPA, the southeastern portions of the Project site would continue to be occupied by residential structures and associated ancillary buildings, whereas under the proposed Project the only structure that would be constructed in the southern portions of the Project site would be a small +/- 3,000 s.f. recreation building with restrooms. Accordingly, impacts due to seismic hazards, landslide hazards, lateral spreading, collapse, and subsidence would be slightly increased under the RPA in comparison to the Project for the southern portions of the Project site, although such impacts would be less than significant. There are no volcanos in the area, and the Project site is not adjacent to impounded bodies of water bodies of water susceptible to seiches or slopes and hillsides susceptible to instability; thus, no impacts from volcanos or seiches would occur under the Project or RPA, and the level of impact would be similar. Neither the Project nor the RPA would require slopes greater than 10 feet in height within the southern portions of the Project site; thus, impacts would not occur in the southern portions of the Project site under the RPA or proposed Project, and the level of impact would be the same. In addition, due to the reduction in the size of the proposed warehouse building under the RPA, it is anticipated that there would be fewer slopes required, thereby reducing impacts due to slopes taller than 10 feet in height in the northern portions of the Project site, although impacts associated with slopes would be less than significant under the Project and RPA with mitigation requiring compliance with a future site-specific geotechnical evaluation. Both the RPA and Project would result in the elimination of existing septic systems on site; however, existing septic systems in the southeastern portions of the Project site would not be removed under the RPA. Notwithstanding, the Project would remove all septic tanks on site in conformance with all applicable regulations, and as such impacts would be less than significant under the proposed Project, and the level of impact would be similar. Neither the Project nor the RPA would require septic tanks or alternative wastewater disposal systems on unsuitable soils; thus, impacts would be less than significant and similar under the RPA and proposed Project. Construction-related erosion hazards would be slightly reduced under the RPA in comparison to the Project since there would be no new ground-disturbing activities within the southeastern portions of the Project site. However, under long-term operating conditions, the Project would improve the southeastern portions of the Project site to include large areas of irrigated landscaping along with hardscape features such as walking paths and parking areas, while under the RPA the southeastern portions of the site would continue to be partially developed with large areas containing limited vegetative cover. As such, long-term erosion impacts would be increased under the RPA as compared to the Project, although as with the

Project such impacts would be less than significant. Lastly, the soils on-site are considered "non-expansive" soils; thus, impacts would be less than significant and would be similar under the RPA and the Project.

H. Greenhouse Gas Emissions

Construction activities associated with the RPA would be less intense than under the proposed Project. Additionally, the RPA would result in the development of less park area and would reduce the size of the proposed warehouse building by approximately 30%. Accordingly, the RPA would result in a substantial reduction in the level of GHG emissions emitted by the Project site as compared to the proposed Project. However, as with the proposed Project, the RPA would require mitigation requiring compliance with the County's CAP to reduce impacts to less-than-significant levels. Both the Project and RPA would be subject to all applicable federal, State, and local regulations related to GHG emissions, resulting in less-than-significant and similar levels of impact.

I. Hazards and Hazardous Materials

Under the RPA, the northern portions of the Project site would be developed with warehouse uses in a manner identical to what is proposed as part of the Project, although the building would be reduced in size by approximately 30%. Thus, construction and long-term operational impacts to hazards and hazardous materials would be slightly reduced within this portion of the Project site under the RPA in comparison to the Project, although such impacts would be less than significant under both the Project and RPA with mandatory compliance with applicable federal, State, and local regulations and requirements. As residential and park uses are not associated with the transport or storage of hazardous materials, impacts due to the creation of a significant hazard to the public or environment through the routine transport, use, or disposal of hazardous materials would be less than significant for the southern portions of the Project site under both the Project and the RPA, and the level of impact would be similar. Neither the Project nor the RPA would impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan; thus, impacts under the RPA and proposed Project would be less than significant and the level of impact would be similar. Neither the Project nor the RPA would conflict with the County's Local Hazard Mitigation Plan (LHMP); impacts would be less than significant, and the level of impact would be similar. Neither the Project nor the RPA would 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 to nearby schools would be similar and less than significant under both the Project and RPA. The Project site is not identified on any lists of hazardous materials sites compiled pursuant to Government Code Section 65962.5; thus, no impact would occur under the Project or RPA, and the level of impact would be similar. In addition, the Project site is located within Compatibility Zone C2 of the MARB ALUCP, which requires residential development to occur at densities of less than 6.0 dwelling units per acre (du/ac) with a maximum of 500 people on any single acre, while the RPA would retain the existing dwelling units in the southeastern portion of the Project site. Thus, both the Project and the RPA would be fully consistent with the MARB ALUCP, resulting in similar less-than-significant impacts. There are no private airstrips in the local area; thus, no hazards-related impacts due to private airstrips would occur under the Project or RPA, and the level of impact would be similar.

J. Hydrology and Water Quality

Under the RPA, the northern portions of the Project site would be developed with warehouse uses in a manner identical to what is proposed as part of the Project, with exception of a reduction in the size of the proposed warehouse building by approximately 30%. Grading activities and required drainage improvements within the northern portions of the Project site would be similar under both the Project and RPA, as both the RPA and Project would result in a similar amount of impervious surfaces and would be required to attenuate flows generated on and tributary to the northern portions of the Project site. Thus, impacts to hydrology and water quality associated with the northern portions of the Project site would be identical between the RPA and proposed Project, and such impacts would be less than significant. With respect to the southern portions of the Project site, under the RPA the southwestern portion of the Project site would be developed with park uses, while the southeastern portions of the Project site would remain in its existing condition with residential structures and several ancillary buildings. Accordingly, because less development would occur in the southern portions of the Project site, the RPA would result in reduced construction-related water quality impacts as compared to the Project's less-than-significant impacts to water quality. Under long-term operating conditions, the Project would result in the introduction of impervious surfaces and large areas of irrigated landscaping, including within the southwestern portions of the Project site would be developed with park uses, while under the RPA the southeastern portions of the Project site would continue to consist of scattered residential buildings and ancillary buildings/outdoor storage areas interspersed with soils that only partially are covered by stabilizing vegetation. Thus, long-term erosion hazards would increase under the RPA as compared to the Project, although such impacts would be less than significant. With respect to groundwater recharge, under both the Project and RPA the southern portions of the Project site would continue to contain large areas of pervious surfaces; thus, groundwater recharge impacts would be similar under both the Project and RPA, and such impacts would be less than significant. For the northern portions of the Project site, because similar areas of impervious surfaces would occur under the Project and RPA, impacts to groundwater recharge would be similar and would be less than significant. Although the Project would result in less-than-significant impacts to the site's existing drainage pattern, there would be fewer changes to the site's drainage patterns under the RPA within the southeastern portions of the Project site and impacts therefore would be reduced in comparison to the proposed Project. Under the RPA, the southwestern portions of the site that would be developed with park uses receive runoff from approximately 1,203 acres of off-site areas, and the existing peak runoff from the Project site (120 cfs) exceeds the existing 14.84 cfs of available capacity within MDP Line E-9.1. As such, both the Project and the RPA would be required to attenuate flows such that the capacity of MDP Line E-9.1 is not exceeded; thus, impacts to stormwater drainage capacity would be less than significant under both the Project and RPA, and the level of impact would be similar. Additionally, the Project site is located fully outside of mapped floodplains, and therefore impacts to existing flows within mapped floodplains would not occur under the Project or the RPA, and the level of impact would be the same. The Project site is not subject to inundation from tsunamis or seiches; thus, no impact would occur and the level of impact would be similar under the Project and RPA.

K. Land Use and Planning

Both the Project and RPA would be subject to compliance with all applicable land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect. Both the Project and the RPA would require a General Plan Amendment (GPA) and Change of Zone (CZ) to accommodate the proposed warehouse use, although a CZ would not be needed in the southeastern portions of the Project site

under the RPA; thus, impacts due to consistency with an applicable land use plan would be slightly reduced under the RPA as compared to the Project, although impacts would be less than significant under both the Project and RPA with approval of the proposed GPA and ZC. Both the Project and RPA also would fully comply with Connect SoCal; impacts would be less than significant and the level of impact would be similar. Neither the Project nor the RPA would physically divide an established community; thus, impacts would be less than significant under both the Project and RPA, and the level of impact would be similar.

L. Mineral Resources

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, no impacts to mineral resources would occur under the Project or the RPA, and the level of impact would be similar. Additionally, neither the Project nor the RPA would represent an incompatible land use located adjacent to a State classified or designated area or existing surface mine, and neither the RPA nor the Project would expose people or property to hazards from proposed, existing, or abandoned quarries or mines. No impacts would occur, and the level of impact would be similar.

M. Noise

Based on the noise level contours for the MARB/IPA, the Project site is located well outside of the 60 dBA CNEL noise level contour boundaries; thus, impacts due to airport-related noise would be less than significant under both the Project and RPA, although impacts would slightly increase under the RPA because residential uses, which would continue to occur in the southeastern portions of the Project site, are more sensitive to noise issues as compared to park uses. Under the RPA, the northern portions of the Project site would be developed similar to what is proposed under the Project, except that the building would be approximately 30% smaller. Improvements within the southwestern portion of the Project site would be similar to the Project, while no construction activities would occur within the southeastern portions of the Project site. Accordingly, implementation of the RPA would result in reduced construction-related noise impacts as compared to the Project, although construction-related noise impacts would be less than significant under both the Project and RPA. Under long-term operating conditions, because the RPA would include less warehouse building area and a smaller park site, the RPA would result in reduced operational noise impacts, although both the Project and RPA would require mitigation to reduce warehouse-related noise impacts to less-than-significant levels. Due to the reduction in the size of the proposed warehouse building and park, the RPA would result in less overall traffic; thus, the RPA would result in reduced traffic-related noise impacts in comparison to the Project, although such impacts would be less than significant under both the Project and RPA. While grading in the northern and southwestern portions of the Project site is anticipated to be similar under the Project and RPA, there would be no grading in the southeastern portions of the Project site under the RPA; thus, the RPA would result in reduced construction-related vibration impacts in comparison to the Project, although construction-related vibration impacts would be less than significant under both the Project and RPA. Under long-term operational conditions, the RPA would result in the generation of fewer heavy trucks by approximately 30%; thus, long-term operational vibration impacts would be reduced under the RPA, although long-term operational vibration impacts would be less than significant under both the Project and RPA.

N. Paleontological Resources

Under the RPA, the northern 50.04 gross acres of the Project site would require grading similar to what is proposed for the Project, while grading would be limited in the southern portions of the Project site to the

southwestern 4.19 net acres of the Project site leaving the remaining 9.16 acres in the southeastern portion of the Project site undisturbed. Accordingly, implementation of the RPA would result in a reduction in potential impacts to subsurface paleontological resources, although both the Project and RPA would require mitigation to reduce potential impacts to paleontological resources to less-than-significant levels.

O. Population and Housing

Under both the Project and RPA, the majority of the existing dwelling units on site would be demolished, with exception of the existing residential dwelling units and associated ancillary buildings and outdoor storage areas in the southeastern 9.16 net acres of the Project site. Thus, impacts due to the displacement of existing housing would be reduced under the RPA as compared to the Project, although impacts under the Project and RPA would be less than significant. Due to the reduction in the size of the proposed warehouse building by 30%, and because the RPA would retain the existing dwelling units in the southeastern portion of the Project site, the RPA would result in reduced impacts due to the creation of demand for additional housing, including affordable housing; however, impacts due to the demand for additional housing would be less than significant under both the Project and RPA. Due to the reduction in the size of the proposed warehouse building by 30%, the RPA would result in reduced impacts in comparison to the proposed Project with respect to unplanned population growth inducement; however, impacts due to growth inducement would be less than significant under both the Project and RPA.

P. Public Services

Under the RPA, the northern portions of the Project site would be developed with warehouse uses but with approximately 30% less building area. In the southern portions of the Project site, the southwestern 4.19 net acres would be developed with park uses, while the southeastern 9.16 net acres would continue to include several residential buildings and ancillary structures. In comparison to the proposed Project, due to the reduction in the size of the proposed warehouse building, the RPA would result in reduced demands for fire protection services, although impacts to fire protection services would be less than significant under both the Project and RPA. In the southwestern portions of the Project site, impacts to fire protection services associated with the proposed park use would be similar between the Project and RPA, and such impacts would be less than significant. Impacts to fire protection services in the southeastern portions of the Project site would be slightly increased in comparison to the Project, as under the RPA the southeastern portions of the Project site would contain more structures and large areas of ruderal vegetation that are subject to wildland fire hazards. With respect to sheriff protection services, the RPA would involve less warehouse building area and less parkland; thus, impacts to sheriff protection services would be reduced under the RPA in comparison to the Project, although such impacts would be less than significant under both the Project and RPA. With respect to library and school services, the Project would not include any residential uses, while the RPA would continue to include several residential structures in the southeastern portions of the Project site; thus, impacts to library and school services would slightly increase under the RPA in comparison to the Project, although impacts would be less than significant under both the Project and RPA with mandatory payment of school impact fees and DIF fees. Due to the reduction in the size of the proposed warehouse building under the RPA, the RPA would result in reduced impacts to health care services as compared to the Project, although as with the Project such impacts would be less than significant with mandatory payment of DIF fees.

Q. *Recreation*

Under the RPA, there would be no new development in the southeastern portions of the Project site, which would continue to include several residential structures. No residential uses are proposed under the Project; thus, the RPA would result in a slight increase in impacts to existing parkland due to new or increased deterioration, although impacts would be less than significant under both the Project and RPA. With respect to environmental impacts associated with the construction or expansion of recreational facilities, the RPA would involve less parkland development; thus, impacts due to park construction would be reduced under the RPA in comparison to the Project, although both the Project and RPA would be subject to mitigation measures to ensure impacts are reduced to less-than-significant levels.

R. *Transportation*

Neither the Project nor the RPA would conflict with Connect SoCal, the Riverside County CMP, the Riverside County General Plan and General Pan Circulation Element, or any Riverside County ordinances adopted to address transportation. Thus, impacts due to a conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities would be less than significant under both the RPA and Project, and the level of impact would be similar. Based on the Screening Criteria for Development Projects included in Riverside County's *Transportation Analysis Guidelines for Level of Service and Vehicle Miles Traveled* (December 2020), residential projects consisting of fewer than 110 single-family dwelling units and park uses are considered "Small Projects" that would not have the potential to result in significant impacts related to VMT. Thus, VMT impacts associated with the southern portions of the Project site, portions of which would be developed with park uses under the RPA with the remaining portions continuing to contain residential uses and ancillary structures, would be similar and less than significant under the Project and RPA. However, even though the RPA would include approximately 30% less building area as compared to the Project, the RPA nonetheless would result in significant and unavoidable impacts due to VMT, although the level of impact, in terms of total VMT, would be reduced under the RPA in comparison to the proposed Project. Due to the reduction in the amount of traffic that would be generated on site under the RPA as compared to the Project, the RPA would result in reduced impacts due to the need for maintenance of roadways, although impacts due to roadway maintenance would be less than significant under both the Project and RPA. Both the Project and RPA would have similar potential to affect circulation during construction of roadway improvements, although impacts would be reduced to less-than-significant levels with implementation of mitigation measures, resulting in similar less-than-significant impacts. Similarly, impacts to emergency access in the local area would be less than significant under the Project and RPA under long-term conditions, although both the Project and RPA would result in near-term construction-related impacts during the construction of roadway improvements. With mitigation, impacts to emergency access during construction would be reduced to less-than-significant levels under both the Project and RPA, and the level of impact would be similar. As with the Project, the RPA would accommodate a community trail along the Project site's frontage with Cajalco Road, and roadway improvements that would be included as part of the RPA and that could accommodate bicycles would be similar under the Project and RPA. Impacts associated with the construction of the community trail, sidewalks, and roadway improvements have been evaluated throughout this EIR under the appropriate subject areas; thus, impacts due to bicycle facility construction would be less than significant with implementation of the mitigation measures identified throughout this EIR, and the level of impact would be similar.

S. *Tribal Cultural Resources*

Under the RPA, grading within the northern portions of the Project site and in the southwestern portions of the Project site would be similar to the proposed Project, and would result in significant but mitigable impacts to subsurface tribal cultural resources that may be encountered during grading activities. However, no grading or ground-disturbing activities would occur in the southeastern portions of the Project site under the RPA, while the Project would require grading within this area to accommodate the proposed park use; thus, the Project's less-than-significant impacts (following mitigation) to subsurface tribal cultural resources in the southeastern portions of the Project site would be avoided under the RPA.

T. *Utilities and Service Systems*

Under the RPA, the northern portions of the Project site would be developed in a manner similar to the proposed Project, but with 30% less warehouse building area. The southwestern portions of the Project site would be developed with park uses, while the southeastern portions of the Project site would remain undisturbed and would continue to include several residential structures and ancillary buildings with outdoor storage areas. Thus, under the RPA the Project's less-than-significant impacts due to the construction or relocation of new or expanded water, wastewater treatment, or storm water drainage systems would be slightly reduced for the southeastern portions of the Project site, while the size of proposed facilities in the northern portions of the Project site would be slightly reduced due to the smaller size proposed for the warehouse building. With respect to water supply, due to the reduction in the size of the warehouse building by approximately 30% and due to the reduction in the size of the park, the RPA would result in reduced impacts to water supply; however, impacts to water supply would be less than significant under both the Project and RPA. Under the RPA, the existing residential uses in the southeastern portions of the Project site would continue to be served by the existing septic systems, while no sewer improvements are proposed in this portion of the Project site; thus, impacts due to the construction or expansion of wastewater treatment facilities would be similar under the RPA as compared to the Project, and such impacts would be less than significant under both the Project and RPA. Similarly, because wastewater in the southeastern portions of the Project site already is accommodated by existing septic systems, implementation of the RPA would result in reduced impacts in comparison to the Project's less-than-significant impacts to wastewater treatment capacity. Impacts to solid waste would be slightly reduced under the RPA, although such impacts would be less than significant under both the Project and RPA. Under the RPA, there would be no new development in the southeastern portions of the Project site; thus, the RPA would reduce the Project's less-than-significant impacts due to the construction or expansion of facilities for electricity, natural gas, communication systems, street lighting, roadway maintenance, parkland maintenance, and other government services.

U. *Wildfire*

Under the RPA, the northern portions of the Project site would be developed in a manner similar to the proposed Project, but with approximately 30% less building area. Park improvements in the southwestern portion of the Project site would be similar under the Project and RPA and would include irrigated landscaping and hardscape areas, although no parkland development would occur in the southeastern portions of the Project site under the RPA, as these areas would continue to include several residential structures and associated ancillary buildings that are interspersed with undeveloped areas and ruderal vegetation. Accordingly, impacts due to wildfire hazards in the northern and southwestern portions of the Project site would be the same under the Project and RPA, and such impacts would be less than significant. For the southeastern portions of the

Project site, there would continue to be residential structures and ancillary buildings/outdoor storage areas interspersed with ruderal vegetation that is susceptible to wildfire hazards. Accordingly, impacts due to wildfire hazards would be increased in the southeastern portions of the Project site with implementation of the RPA, although wildfire hazards would be less than significant under both the Project and RPA.

V. Conclusion

As compared to the proposed Project, implementation of the RPA would result in increased impacts under the issue areas of aesthetics (impacts to views and to visual character and quality), agriculture/forestry resources, geology/soils (geologic hazards and long-term erosion hazards), hydrology/water quality (long-term erosion), public services (fire protection), recreation, and wildfire. The RPA would result in similar impacts in comparison to the proposed Project under the issue area of mineral resources. The RPA would result in reduced impacts in comparison to the proposed Project under the issue areas of aesthetics (all except visual character), air quality, biological resources, cultural resources, energy, geology/soils (except geologic hazards and long-term erosion), greenhouse gas emissions, hazards/hazardous materials, hydrology/water quality (except long-term erosion), land use/planning, noise, paleontological resources, population/housing, public services (except fire protection), transportation, tribal cultural resources, and utilities/service systems.

The RPA generally would meet the Project's objectives, although to a lesser extent due to the reduction in the size of the proposed warehouse building and public park uses. The RPA would be less effective than the proposed Project in serving 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, as the park would be reduced in size by approximately 9.16 acres. Due to the reduction in the size of the proposed warehouse building, the RPA would be less effective than the proposed Project in meeting the Project's objectives to diversify the mix of uses in the Mead Valley community of Riverside County to support the growing goods movement supply chain; 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; 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; 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; 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; and to diversify the economy of western unincorporated Riverside County by developing a large property with employment-generating land uses with long-term economic viability. The RPA would meet the Project's objective to develop uses that have architectural design and operational characteristics that are compatible with other existing and planned developments in the local area. The RPA also would meet the Project's objective to develop a property that has access to available infrastructure, including roads and utilities.

6.3.5 Small Project Alternative (SPA)

The Small Project Alternative (SPA) considers implementation of the Project as proposed, but with a warehouse building that is reduced in size such that it meets the definition of a "Small Project" as identified by Riverside County's *Transportation Analysis Guidelines for Level of Service and Vehicle Miles Traveled*

(December 2020; herein, "County Guidelines"). Step 2 in the County Guidelines for analyzing potential impacts due to Vehicle Miles Traveled (VMT) provides criteria for certain project types that may be presumed to have a non-significant impact due to VMT. Figure 3 of the County Guidelines identifies seven general categories that are presumed to have a less-than-significant impact due to VMT, including the "Small Project" category, which the County Guidelines define as "…projects with low trip generation per existing CEQA exemptions or based on the County Greenhouse Gas Emissions Screening Tables, result[ing] in [the emission of less than or equal to the] 3,000 Metric Tons of Carbon Dioxide Equivalent ($MTCO_2e$) per year screening level threshold." The types of development identified as a "Small Project" by the County Guidelines include warehouse (unrefrigerated) buildings with a total building area less than or equal to 208,000 s.f. Accordingly, the SPA considers development of the northern 50.04 gross acres of the Project site with a proposed 208,000 s.f. unrefrigerated warehouse building. All other components of the SPA would be the same as the proposed Project, including the proposed public park, infrastructure, and roadway improvements. This alternative was selected by the Lead Agency in order to evaluate an alternative that would avoid the Project's significant and unavoidable impacts to transportation (i.e., due to Vehicle Miles Traveled [VMT]), which in turn also would reduce the Project's impacts due to air quality and greenhouse gas (GHG) emissions.

A. Aesthetics

Under the SPA, the northern portions of the Project site would be developed warehouse uses in the same manner as proposed under the Project, although the building would be reduced in size by approximately 79.3% as compared to the Project. The southern portions of the Project site would be improved as a public park, similar to the proposed Project. There are no officially-designated scenic highway corridors within the Project's viewshed, although the Project site would be intermittently visible from nearby segments of I-215, a County-eligible scenic highway. The SPA would result in a substantial reduction in the size of the proposed warehouse building with a public park in the southern 14.93 gross acres of the Project site; thus, impacts to views from I-215 would be reduced under the SPA in comparison to the Project due to the reduced size of the proposed warehouse building, although such impacts would be less than significant under both the Project and SPA. Impacts to scenic resources, namely the existing rock outcroppings in the southern portions of the Project site, would be similar under the Project and SPA, and such impacts would be less than significant and the level of impact would be the same. Impacts due to the degradation of the existing visual character or quality of public views would be reduced under the SPA as compared to the Project due to the reduction in the size of the proposed warehouse building. Both the Project and SPA would be subject to compliance with Riverside County Ordinance Nos. 655 and 915, which would ensure that lighting impacts would remain below a level of significance; thus, impacts due to light and glare would be less than significant under the Project and SPA, although the level of impact would be slightly reduced under the SPA due to the reduction in the size of the proposed warehouse building and the attendant reduction in the amount of lighting needed for the building.

B. Agriculture and Forestry Resources

Based on the Project site's existing FMMP classifications of "Farmland of Local Importance" and "Other Lands," as well as the results of the Project's LESA Analysis, the Project site does not contain any Farmland under existing conditions. Accordingly, implementation of the Project or SPA would result in less-than-significant impacts to Important Farmland types, and the level of impact would be the same. Although there are numerous parcels surrounding the Project site that are zoned for A-1-1 uses, including lands that abut the Project site's boundary, the Project site and the surrounding properties that are zoned for A-1-1 uses are not

currently being used for agricultural production. The SPA would result in similar less-than-significant impacts due to a conflict with surrounding agricultural zoning as compared to the Project. Additionally, the Project site is not utilized for agricultural production, is not located within any agricultural preserves, and is not subject to a Williamson Act Contract; thus, the Project and the SPA would result in less-than-significant impacts due to a conflict with existing agricultural uses, and the level of impact would be similar to the proposed project. The Project site and surrounding areas are not zoned for 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)). As such, neither the Project nor the SPA would result in impacts to forestry resources, and impacts would be the same.

C. *Air Quality*

Under the SPA, there would be a reduction in the amount of warehouse building area by approximately 79.3% as compared to the proposed Project, while the proposed public park improvements would be the same as proposed for the Project. Accordingly, due to the reduction in the size of the proposed warehouse building, construction-related impacts to air quality associated with the SPA would be reduced in comparison to the proposed Project, although such impacts would be less than significant under both the Project and SPA. Additionally, due to the reduction in the amount of warehouse building area, the SPA would avoid the Project's significant and unavoidable impact due to emissions of NO_X, a precursor to ozone. Likewise, because the SPA would avoid the Project's unavoidable impacts due to operational emissions of NO_X, the SPA would result in reduced impacts due to a conflict with the SCAQMD 2022 AQMP; however, because the northern portions of the Project site still would require a GPA and CZ to allow for warehouse uses, the SPA would not be consistent with the growth assumptions used as inputs to the AQMP. Accordingly, both the Project and the SPA would result in significant and unavoidable impacts due to a conflict with the AQMP, although impacts would be reduced in comparison to the proposed Project due to the reduction in warehouse building area. Although the Project would result in less-than-significant impacts due to localized air quality emissions, including impacts related to cancer and non-cancer related health risks, impacts to localized air quality would be substantially reduced under the SPA due to the reduction in the amount of warehouse building area by 79.3%. With implementation of the SPA, odor impacts would be slightly decreased in comparison to the Project during both construction and long-term operation, as construction activities would occur over a shorter period of time and because the SPA would result in the generation approximately 79.3% fewer heavy truck trips.

D. *Biological Resources*

Under the SPA, grading activities at the Project site would be identical to the proposed Project. Neither the Project nor the SPA would have the potential to conflict with the SKR HCP; thus, impacts would be less than significant under both the Project and SPA and the level of impact would be similar. Both the Project and SPA would result in significant but mitigable impacts to 0.054-acre of MSHCP riverine areas, and impacts due to a potential conflict with the MSHCP UWIG and due to impacts to burrowing owls would be the same under the Project and SPA. Impacts due to a conflict with the MSHCP would be less than significant under both the Project and SPA with the implementation of mitigation measures, and the level of impact would be the same. Both the Project and the SPA would result in potentially significant but mitigable impacts to nesting birds and raptors, and the level of impact would be the same. Neither the Project nor the SPA would result in impacts to wildlife movement corridors, and the level of impact would be the same under the Project and SPA. Neither the Project nor the SPA would result in impacts to sensitive natural communities, and the level of impact would

be similar. Both the Project and the SPA would result in impacts to 0.053-acre of RWQCB jurisdiction and 0.054-acre of CDFW jurisdiction; thus, impacts to jurisdictional drainages would be the same under the Project and SPA and such impacts would be mitigated to below a level of significance.

E. Cultural Resources

Grading activities under the SPA and the proposed Project would be the same. As such, the Project and the SPA would result in the same potential impacts to subsurface historical and archaeological resources, and implementation of the mitigation measures identified in EIR Subsection 4.5 would reduce these impacts to below a level of significance. Both the Project and SPA would be subject to compliance with State law regarding the discovery of humans remains; thus, impacts to human remains would be less than significant under the Project and SPA, and the level of impact would be the same.

F. Energy

Construction activities associated with the SPA would be less intense than required for the proposed Project due to the reduction in the size of the proposed warehouse building; thus, the SPA would result in reduced impacts associated with construction-related energy consumption, although neither the SPA nor the Project would result in the inefficient, wasteful, or unnecessary consumption of energy and impacts would be less than significant. Under long-term operating conditions, the SPA would include less warehouse building area by approximately 79.3%. As such, under long-term operating conditions the SPA would result in reduced demand for energy resources, although neither the Project nor the SPA would result in the inefficient, wasteful, or unnecessary consumption of energy and impacts would be less than significant. Additionally, both the Project and SPA would be required to comply with adopted State and local plans related to energy conservation; thus, impacts would be less than significant and the level of impact would be similar.

G. Geology and Soils

Under the SPA, areas subject to grading and development would be the same as proposed for the Project, with the exception of a reduction in the size of the proposed warehouse building. Accordingly, grading-related impacts due to geology and soil conditions would be identical between the SPA and proposed Project, and impacts would be less than significant under both the SPA and proposed Project with the implementation of mitigation measures requiring compliance with future geotechnical studies to be prepared in conjunction with future grading and building permits. Impacts due to seismic hazards, landslide hazards, lateral spreading, collapse, and subsidence would be slightly reduced under the SPA in comparison to the Project due to the reduction in the size of the proposed warehouse building, although such impacts would be less than significant. There are no volcanos in the area, and the Project site is not adjacent to impounded bodies of water bodies of water susceptible to seiches or slopes and hillsides susceptible to instability; thus, no impacts from volcanos or seiches would occur under the Project or SPA, and the level of impact would be similar. Neither the Project nor the SPA would require slopes greater than 10 feet in height within the southern portions of the Project site; thus, impacts would not occur in the southern portions of the Project site under the SPA or proposed Project, and the level of impact would be the same. In addition, due to the reduction in the size of the proposed warehouse building under the SPA, it is anticipated that there would be fewer slopes required, thereby reducing impacts due to slopes taller than 10 feet in height in the northern portions of the Project site, although impacts associated with slopes would be less than significant under the Project and SPA with mitigation requiring compliance with a future site-specific geotechnical evaluation. Both the SPA and Project would result in the

elimination of existing septic systems on site; however, existing septic systems in the southeastern portions of the Project site would not be removed under the SPA. Notwithstanding, the Project would remove all septic tanks on site in conformance with all applicable regulations, and as such impacts would be less than significant under the proposed Project, and the level of impact would be similar. Neither the Project nor the SPA would require septic tanks or alternative wastewater disposal systems on unsuitable soils; thus, impacts would be less than significant and similar under the SPA and proposed Project. Construction- and operational-related erosion hazards would be similar between the Project and the SPA, and such impacts would be less than significant with mandatory compliance with the applicable NPDES permit. Lastly, the soils on-site are considered "non-expansive" soils; thus, impacts would be less than significant and would be similar under the SPA and the Project.

H. Greenhouse Gas Emissions

Construction activities associated with the SPA would be less intense than under the proposed Project due to the reduction in the size of the proposed warehouse building by approximately 79.3%. Accordingly, and assuming that GHG emissions associated with the proposed warehouse building would be reduced by approximately 79.3% as compared to the proposed Project, the SPA would result in the emissions of GHGs that would be less than the 3,000 $MTCO_2e$/yr screening threshold identified by the Riverside County Climate Action Plan (CAP). As such, the SPA would result in less-than-significant impacts due to GHGs, and the SPA would not be subject to compliance with the CAP Screening Tables, as is required for projects that exceed the 3,000 $MTCO_2e$/yr screening threshold. Thus, while GHG emission impacts associated with the Project would be less than significant with mandatory compliance with the CAP Screening Tables, because the SPA would result in emissions of GHGs that are below the CAP screening threshold, impacts to GHGs would be substantially reduced under the SPA as compared to the Project. Both the Project and SPA would be subject to all applicable federal, State, and local regulations related to GHG emissions, resulting in less-than-significant and similar levels of impact.

I. Hazards and Hazardous Materials

Under the SPA, the northern portions of the Project site would be developed with warehouse uses in a manner identical to what is proposed as part of the Project, although the building would be reduced in size by approximately 79.3%. Thus, construction and long-term operational impacts to hazards and hazardous materials would be slightly reduced within this portion of the Project site under the SPA in comparison to the Project, although such impacts would be less than significant under both the Project and SPA with mandatory compliance with applicable federal, State, and local regulations and requirements. As park uses are not associated with the transport or storage of hazardous materials, impacts due to the creation of a significant hazard to the public or environment through the routine transport, use, or disposal of hazardous materials would be less than significant for the southern portions of the Project site under both the Project and the SPA, and the level of impact would be similar. Neither the Project nor the SPA would impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan; thus, impacts under the SPA and proposed Project would be less than significant and the level of impact would be similar. Neither the Project nor the SPA would conflict with the County's Local Hazard Mitigation Plan (LHMP); impacts would be less than significant, and the level of impact would be similar. Neither the Project nor the SPA would 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 to nearby schools would be

similar and less than significant under both the Project and SPA. The Project site is not identified on any lists of hazardous materials sites compiled pursuant to Government Code Section 65962.5; thus, no impact would occur under the Project or SPA, and the level of impact would be similar. In addition, the Project site is located within Compatibility Zone C2 of the MARB ALUCP, which requires residential development to occur at densities of less than 6.0 dwelling units per acre (du/ac) with a maximum of 500 people on any single acre; thus, both the Project and the SPA would be fully consistent with the MARB ALUCP, resulting in similar less-than-significant impacts. There are no private airstrips in the local area; thus, no hazards-related impacts due to private airstrips would occur under the Project or SPA, and the level of impact would be similar.

J. Hydrology and Water Quality

Under the SPA, the northern portions of the Project site would be developed with warehouse uses in a manner identical to what is proposed as part of the Project, with exception of a reduction in the size of the proposed warehouse building by approximately 79.3%. Grading activities and required drainage improvements within the northern portions of the Project site would be similar under both the Project and SPA, as both the SPA and Project would result in a similar amount of impervious surfaces and would be required to attenuate flows generated on and tributary to the northern portions of the Project site. Thus, impacts to hydrology and water quality associated with the northern portions of the Project site would be identical between the SPA and proposed Project, and such impacts would be less than significant. As improvements in the southern portions of the Project site would be identical between the Project and SPA, the SPA would result in similar less-than-significant construction-related water quality impacts as compared to the Project. Under long-term operating conditions, both the Project and SPA would result in the introduction of impervious surfaces and large areas of irrigated landscaping, including within the southern portions of the Project site would be developed with park uses. Thus, long-term erosion hazards under the SPA would be similar to the Project, and such impacts would be less than significant. With respect to groundwater recharge, under both the Project and SPA the southern portions of the Project site would continue to contain large areas of pervious surfaces; thus, groundwater recharge impacts would be similar under both the Project and SPA, and such impacts would be less than significant. For the northern portions of the Project site, because similar areas of impervious surfaces would occur under the Project and SPA, impacts to groundwater recharge would be similar and would be less than significant. Although the Project would result in less-than-significant impacts to the site's existing drainage pattern, there would be fewer changes to the site's drainage patterns under the SPA due to a reduction in the amount of grading that would be required in the northern portions of the Project site; thus, impacts to existing drainage patterns would be reduced in comparison to the proposed Project, although such impacts would be less than significant under both the Project and SPA. Under the SPA, the southern portions of the site that would be developed with park uses receive runoff from approximately 1,203 acres of off-site areas, and the existing peak runoff from the Project site (120 cfs) exceeds the existing 14.84 cfs of available capacity within MDP Line E-9.1. As such, both the Project and the SPA would be required to attenuate flows such that the capacity of MDP Line E-9.1 is not exceeded; thus, impacts to stormwater drainage capacity would be less than significant under both the Project and SPA, and the level of impact would be similar. Additionally, the Project site is located fully outside of mapped floodplains, and therefore impacts to existing flows within mapped floodplains would not occur under the Project or the SPA, and the level of impact would be the same. The Project site is not subject to inundation from tsunamis or seiches; thus, no impact would occur and the level of impact would be similar under the Project and SPA.

K. Land Use and Planning

Both the Project and SPA would be subject to compliance with all applicable land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect. Both the Project and the SPA would require a General Plan Amendment (GPA) and Change of Zone (CZ) to accommodate the proposed warehouse use, although a CZ would not be needed in the southern portions of the Project site under the SPA; thus, impacts due to consistency with an applicable land use plan would be similar under the SPA as compared to the Project, and impacts would be less than significant under both the Project and SPA with approval of the proposed GPA and ZC. Both the Project and SPA also would fully comply with Connect SoCal; impacts would be less than significant and the level of impact would be similar. Neither the Project nor the SPA would physically divide an established community; thus, impacts would be less than significant under both the Project and SPA, and the level of impact would be similar.

L. Mineral Resources

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, no impacts to mineral resources would occur under the Project or the SPA, and the level of impact would be similar. Additionally, neither the Project nor the SPA would represent an incompatible land use located adjacent to a State classified or designated area or existing surface mine, and neither the SPA nor the Project would expose people or property to hazards from proposed, existing, or abandoned quarries or mines. No impacts would occur, and the level of impact would be similar.

M. Noise

Based on the noise level contours for the MARB/IPA, the Project site is located well outside of the 60 dBA CNEL noise level contour boundaries; thus, impacts due to airport-related noise would be less than significant under both the Project and SPA, and the level of impact would be similar. Under the SPA, the northern portions of the Project site would be developed similar to what is proposed under the Project, except that the building would be approximately 79.3% smaller. Improvements within the southern portion of the Project site would be similar to the Project. Accordingly, and primarily due to the reduced size of the warehouse building, implementation of the SPA would result in reduced construction-related noise impacts as compared to the Project, although construction-related noise impacts would be less than significant under both the Project and SPA. Under long-term operating conditions, because the SPA would include less warehouse building area, the SPA would result in reduced operational noise impacts, although both the Project and SPA would require mitigation to reduce warehouse-related noise impacts to less-than-significant levels. Due to the reduction in the size of the proposed warehouse building, the SPA would result in less overall traffic; thus, the SPA would result in reduced traffic-related noise impacts in comparison to the Project, although such impacts would be less than significant under both the Project and SPA. Grading in the northern and southern portions of the Project site would be similar under the Project and SPA; thus, the SPA would result in similar construction-related vibration impacts in comparison to the Project, and construction-related vibration impacts would be less than significant under both the Project and SPA. Under long-term operational conditions, the SPA would result in the generation of fewer heavy trucks by approximately 79.3%; thus, long-term operational vibration impacts would be reduced under the SPA, although long-term operational vibration impacts would be less than significant under both the Project and SPA.

N. Paleontological Resources

Under the SPA, the Project site would require grading similar to what is proposed for the Project. Accordingly, implementation of the SPA would result in similar potential impacts to subsurface paleontological resources as compared to the Project, and both the Project and SPA would require mitigation to reduce potential impacts to paleontological resources to less-than-significant levels.

O. Population and Housing

Under both the Project and SPA, the existing dwelling units on site would be demolished. Thus, impacts due to the displacement of existing housing would be the same under the Project and the SPA, although such impacts would be less than significant due to the availability of undeveloped residential lands within the region. Due to the reduction in the size of the proposed warehouse building by 79.3%, the SPA would result in reduced impacts due to the creation of demand for additional housing, including affordable housing; however, impacts due to the demand for additional housing would be less than significant under both the Project and SPA. Due to the reduction in the size of the proposed warehouse building by 79.3%, the SPA would result in reduced impacts in comparison to the proposed Project with respect to unplanned population growth inducement; however, impacts due to growth inducement would be less than significant under both the Project and SPA.

P. Public Services

Under the SPA, the northern portions of the Project site would be developed with warehouse uses but with approximately 79.3% less building area, while development of a public park uses in the southern portions of the Project site would be the same as the Project. In comparison to the proposed Project, due to the reduction in the size of the proposed warehouse building, the SPA would result in reduced demands for fire protection services, although impacts to fire protection services would be less than significant under both the Project and SPA. In the southern portions of the Project site, impacts to fire protection services associated with the proposed park use would be similar between the Project and SPA, and such impacts would be less than significant. With respect to sheriff protection services, the SPA would involve less warehouse building area and fewer employees as compared to the Project; thus, impacts to sheriff protection services would be reduced under the SPA in comparison to the Project, although such impacts would be less than significant under both the Project and SPA. With respect to library and school services, neither the Project nor the SPA would include residential uses; thus, impacts to library and school services would similar under the SPA in comparison to the Project, and such impacts would be less than significant under both the Project and SPA with mandatory payment of school impact fees and DIF fees. Due to the reduction in the size of the proposed warehouse building under the SPA, the SPA would result in reduced impacts to health care services as compared to the Project, although as with the Project such impacts would be less than significant with mandatory payment of DIF fees.

Q. Recreation

Under the SPA, the southern 14.93 gross acres of the Project site would be developed as a public park in a manner similar to what is proposed as part of the Project. No residential uses are proposed under the Project or the SPA; thus, the Project and SPA would result in similar less-than-impacts to existing parkland due to new or increased deterioration. With respect to environmental impacts associated with the construction or expansion of recreational facilities, the SPA would involve the same level parkland development; thus, impacts

due to park construction would be the same under the SPA in comparison to the Project, although both the Project and SPA would be subject to mitigation measures to ensure impacts are reduced to less-than-significant levels.

R. Transportation

Neither the Project nor the SPA would conflict with Connect SoCal, the Riverside County CMP, the Riverside County General Plan and General Pan Circulation Element, or any Riverside County ordinances adopted to address transportation. Thus, impacts due to a conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities would be less than significant under both the SPA and Project, and the level of impact would be similar. Based on the Screening Criteria for Development Projects included in Riverside County's *Transportation Analysis Guidelines for Level of Service and Vehicle Miles Traveled* (December 2020), unrefrigerated warehouse buildings with building area that is less than or equal to 208,000 s.f. are considered to comprise "Small Projects" that are presumed to have a less-than-significant impact due to Vehicle Miles Traveled (VMT), while the proposed park use is considered a "Local Essential Service" that also is presumed to have a less-than-significant impact due to VMT. Accordingly, implementation of the SPA would avoid the Project's significant and unavoidable impacts due to VMT. Due to the reduction in the amount of traffic that would be generated on site under the SPA as compared to the Project, the SPA would result in reduced impacts due to the need for maintenance of roadways, although impacts due to roadway maintenance would be less than significant under both the Project and SPA. Both the Project and SPA would have similar potential to affect circulation during construction of roadway improvements, although impacts would be reduced to less-than-significant levels with implementation of mitigation measures, resulting in similar less-than-significant impacts. Similarly, impacts to emergency access in the local area would be less than significant under the Project and SPA under long-term conditions, although both the Project and SPA would result in near-term construction-related impacts during the construction of roadway improvements. With mitigation, impacts to emergency access during construction would be reduced to less-than-significant levels under both the Project and SPA, and the level of impact would be similar. As with the Project, the SPA would accommodate a community trail along the Project site's frontage with Cajalco Road, and roadway improvements that would be included as part of the SPA and that could accommodate bicycles would be similar under the Project and SPA. Impacts associated with the construction of the community trail, sidewalks, and roadway improvements have been evaluated throughout this EIR under the appropriate subject areas; thus, impacts due to bicycle facility construction would be less than significant with implementation of the mitigation measures identified throughout this EIR, and the level of impact would be similar.

S. Tribal Cultural Resources

Under the SPA, areas subject to grading would be similar under the Project and SPA. As such, in comparison to the Project the SPA would result in similar significant but mitigable impacts to subsurface tribal cultural resources that may be encountered during grading activities.

T. Utilities and Service Systems

Under the SPA, the northern portions of the Project site would be developed in a manner similar to the proposed Project, but with 79.3% less warehouse building area. The southern portions of the Project site would be developed with park uses, similar to what is proposed as part of the Project. Thus, under the SPA the Project's

less-than-significant impacts due to the construction or relocation of new or expanded water, wastewater treatment, or storm water drainage systems would be slightly reduced northern portions of the Project site due to the smaller size proposed for the warehouse building. With respect to water supply, due to the reduction in the size of the warehouse building by approximately 79.3%, the SPA would result in reduced impacts to water supply; however, impacts to water supply would be less than significant under both the Project and SPA. Under the Project and SPA, no septic systems on site would be retained, as all of the land uses proposed as part of the Project and SPA would be served by a sanitary sewer system. Although the size of the required sewer lines would be slightly reduced under the SPA, physical impacts to the environment associated with the installation of sewer lines would be similar under the Project and SPA, and such impacts would be less than significant with implementation of the mitigation measures identified by this EIR. However, due to the reduction in the size of the warehouse building by 79.3%, the SPA would result in reduced impacts to wastewater treatment capacity, although impacts to wastewater treatment capacity would be less than significant under both the Project and SPA. Impacts to solid waste would be slightly reduced under the SPA due to the reduction in the size of the warehouse building, although such impacts would be less than significant under both the Project and SPA. Under the SPA, there would be similar less-than-significant impacts due to the construction or expansion of facilities for electricity, natural gas, communication systems, street lighting, roadway maintenance, parkland maintenance, and other government services.

U. Wildfire

Under the SPA, the northern portions of the Project site would be developed in a manner similar to the proposed Project, but with approximately 79.3% less building area. Park improvements in the southern portion of the Project site would be similar under the Project and SPA and would include irrigated landscaping and hardscape areas. Accordingly, impacts due to wildfire hazards in the northern and southern portions of the Project site would be similar under the Project and SPA, and such impacts would be less than significant.

V. Conclusion

As compared to the proposed Project, implementation of the SPA would not result in any increased impacts under any issue area. The SPA would result in similar impacts in comparison to the proposed Project under the issue area of agriculture/forestry resources, biological resources, cultural resources, geology/soils, hazards/hazardous materials, hydrology/water quality, land use/planning, mineral resources, paleontological resources, recreation, tribal cultural resources, and wildfire. The SPA would result in reduced impacts in comparison to the proposed Project under the issue areas of aesthetics, air quality, energy, GHG emissions, noise, population/housing, public services, transportation, and utilities/service systems.

The SPA generally would meet the Project's objectives, although to a lesser extent due to the reduction in the size of the proposed warehouse building by 79.3%. The SPA would meet the Project's objective 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. Due to the reduction in the size of the proposed warehouse building, the SPA would be less effective than the proposed Project in meeting the Project's objectives to diversify the mix of uses in the Mead Valley community of Riverside County to support the growing goods movement supply chain; 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; 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; 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; 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; and to diversify the economy of western unincorporated Riverside County by developing a large property with employment-generating land uses with long-term economic viability. The SPA would meet the Project's objective to develop uses that have architectural design and operational characteristics that are compatible with other existing and planned developments in the local area. The SPA also would meet the Project's objective to develop a property that has access to available infrastructure, including roads and utilities.

6.3.6 Environmentally Superior Alternative

State CEQA Guidelines § 15126.6 requires the identification of the environmentally superior alternative. As discussed herein, implementation of the NADA would result in no physical environmental impacts beyond those that have already occurred on the property. Because the NADA would avoid all of the Project's impacts, it warrants consideration as the "environmentally superior alternative." However, pursuant to State CEQA Guidelines § 15126.6(e)(2), if a no project alternative is identified as the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives. Accordingly, the SPA, as discussed above in subsection 6.3.5, is identified as the Environmentally Superior Alternative pursuant to State CEQA Guidelines § 15126.6, as the SPA would result in the largest reduction in Project impacts, and would avoid the Project's significant and unavoidable impacts due to NO_X emissions and VMT.

6.3.7 Comparison of Environmental Impacts and Ability to Active Project Objectives

Table 6-1, *Alternatives to the Project – Comparison of Environmental Impacts*, provides a summary of the comparison of environmental effects between the Project and each of the Project's alternatives evaluated herein, and also includes a summary of the degree to which each of the Project's alternatives would achieve the Project's basic objectives.

Table 6-1 Alternatives to the Project – Comparison of Environmental Impacts

Environmental Topic/ Project Objective	Proposed Project Significance of Impacts After Mitigation	Level of Impact Compared to the Proposed Project/Compliance with Project Objectives				
		NADA	EZA	WOA	RPA	SPA
Aesthetics	Less than Significant	Reduced	Reduced	Increased (Visual Character) Decreased (All But Visual Character)	Increased (Visual Character) Decreased (All But Visual Character)	Reduced
Agriculture and Forestry Resources	Less than Significant	Reduced	Increased	Increased	Increased	Similar
Air Quality	Significant and Unavoidable Direct and Cumulatively-Considerable Impact	Reduced to Less-than-Significant Levels	Reduced	Reduced	Reduced	Reduced to Less-than-Significant Levels
Biological Resources	Less than Significant	Reduced	Increased	Reduced	Reduced	Similar
Cultural Resources	Less than Significant	Reduced	Increased	Reduced	Reduced	Similar
Energy	Less than Significant	Reduced	Reduced	Reduced	Reduced	Reduced
Geology and Soils	Less than Significant	Reduced	Increased (Long-Term Erosion) Decreased (All Except Long-Term Erosion)	Increased (Geologic Hazards & Long-Term Erosion Hazards) Decreased (Construction-Related Erosion Hazards)	Increased (Geologic Hazards & Long-Term Erosion Hazards) Decreased (Construction-Related Erosion Hazards)	Similar
Greenhouse Gas Emissions	Less than Significant	Reduced	Reduced	Reduced	Reduced	Reduced
Hazards and Hazardous Materials	Less than Significant	Reduced	Reduced	Similar	Reduced	Similar
Hydrology and Water Quality	Less than Significant	Reduced	Increased (Long-Term Erosion) Decreased (All Except Long-Term Erosion)	Increased (Long-Term Erosion) Decreased (All Except Long-Term Erosion)	Increased (Long-Term Erosion) Decreased (All Except Long-Term Erosion)	Similar
Land Use and Planning	Less than Significant	Reduced	Reduced	Reduced	Reduced	Similar
Mineral Resources	No Impact	Reduced	Similar	Similar	Similar	Similar
Noise	Less than Significant	Reduced	Increased (Airport-Related Noise) Decreased (Except Airport-Related Noise)	Reduced	Reduced	Reduced
Paleontological Resources	Less than Significant	Reduced	Increased	Reduced	Reduced	Similar
Population and Housing	Less than Significant	Reduced	Reduced	Reduced	Reduced	Reduced
Public Services	Less than Significant	Reduced	Increased (Fire Protection Services, Recreational Facilities,	Increased (Fire Protection, Schools, Recreation, and	Increased (Fire Protection) Decreased (Except	Reduced

Environmental Topic/ Project Objective	Proposed Project Significance of Impacts After Mitigation	Level of Impact Compared to the Proposed Project/Compliance with Project Objectives				
		NADA	EZA	WOA	RPA	SPA
			Library, and School Capacity) Reduced (Sheriff Services and Health Care Services)	Libraries) Decreased (Sheriff Protection Services & Health Care Services)	Fire Protection)	
Recreation	Less than Significant	Reduced	Increased	Increased	Increased	Similar
Transportation	Significant and Unavoidable Direct and Cumulatively-Considerable Impacts	Reduced to Less-than-Significant Levels	Reduced	Similar (Except Roadway Maintenance) Reduced (Roadway Maintenance)	Reduced	Reduced to Less-than-Significant Levels
Tribal Cultural Resources	Less than Significant	Reduced	Increased	Reduced	Reduced	Similar
Utilities and Service Systems	Less than Significant	Reduced	Reduced	Reduced	Reduced	Reduced
Wildfire	Less than Significant	Reduced	Increased	Increased	Increased	Similar
Objective 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.		No	No	No	Yes, but less effectively	Yes
Objective B: To diversify the mix of uses in the Mead Valley community of Riverside County to support the growing goods movement supply chain.		No	No	Yes	Yes, but less effectively	Yes, but less effectively
Objective 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.		No	No	Yes	Yes, but less effectively	Yes, but less effectively
Objective 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.		No	No	Yes	Yes, but less effectively	Yes, but less effectively
Objective 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.		No	No	Yes	Yes, but less effectively	Yes, but less effectively
Objective 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.		No	No	Yes	Yes, but less effectively	Yes, but less effectively
Objective G: To diversify the economy of western unincorporated		No	No	Yes	Yes, but less	Yes, but less

Environmental Topic/ Project Objective	Proposed Project Significance of Impacts After Mitigation	Level of Impact Compared to the Proposed Project/Compliance with Project Objectives				
		NADA	EZA	WOA	RPA	SPA
Riverside County by developing a large property with employment-generating land uses with long-term economic viability.					effectively	effectively
Objective H: To develop uses that have architectural design and operational characteristics that are compatible with other existing and planned developments in the local area.		No	Yes	Yes	Yes	Yes
Objective I: To develop a property that has access to available infrastructure, including roads and utilities.		No	Yes	Yes	Yes	Yes

7.0 REFERENCES

7.1 PERSONS CONTRIBUTING TO EIR PREPARATION

7.1.1 COUNTY OF RIVERSIDE

- Russell Brady, Planning Department
- Darren Edgington, Environmental Project Manager, Environmental Programs Department

7.1.2 T&B PLANNING, INC.

- Tracy Zinn, Principal
- Jerrica Harding, Senior Associate
- Emily Golubow, Project Coordinator
- Andrea Halfhill, Environmental Analyst
- Kristen Goddard, Senior Planner
- Cristina Maxey, GIS/Graphics Manager
- Rhea Smith, GIS/Graphics Technician

7.2 DOCUMENTS APPENDED TO THIS EIR

The following reports, studies, and supporting documentation were used in preparing the Cajalco Commerce Center EIR and are bound separately as Technical Appendices. A copy of the Technical Appendices is available for review at the County of Riverside Planning Department, 4080 Lemon Street, 12th Floor, Riverside, CA 92501.

Appendix A: Notice of Preparation (NOP) and Written Comments on the NOP.

Appendix B: T&B Planning, Inc., 2023. *Land Evaluation and Site Assessment Model for the Mead Valley Commerce Center Project*. July 25, 2023.

Appendix C1: Urban Crossroads, 2023a. *Mead Valley Commerce Center (PT220050) Air Quality Impact Analysis*. November 8 , 2023.

Appendix C2: Urban Crossroads, 2023b. *Mead Valley Commerce Center (PT220050) Mobile Source Health Risk Assessment*. December 4, 2023.

Appendix D1: ELMT Consulting, 20254a. *Mead Valley Commerce Center, Habitat Assessment and Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis)* ~~July 2024~~March 2025.

Appendix D2: ELMT Consulting, 20254b. *Determination of Biologically Equivalent or Superior Preservation Report, Mead Valley Commerce Center (PPT 220050, TPM 38601, TPM 38845)*. ~~May 2024~~March 2025.

Appendix D3 ELMT Consulting, 2024~~e~~. *Mead Valley Commerce Center Riverside County, California; Delineation of State and Federal Jurisdictional Waters.* July 2024.

Appendix D4 Glen Lukos Associates, 2024. R*eport of Findings for 2023-2024 Wet-Season Survey for Listed Branchiopods Conducted for the Mead Valley Commerce Center Project, Mead Valley, Riverside County, California.* July 9, 2024.

Appendix E1: Chronicle Heritage, 2023. *Phase I Cultural Resources Assessment for the Cajalco & Seaton Warehouse and Park Project, Mead Valley, Riverside County, California*. August 21, 2023.

Appendix E2: Chronicle Heritage, 2024. *Phase II Testing and Evaluation for the Cajalco and Seaton Warehouse and Park Project, Mead Valley, Riverside County, California*. February 22, 2024.

Appendix F: Urban Crossroads, 2023c. *Mead Valley Commerce Center (PT220050) Energy Analysis*. November 8, 2023.

Appendix G: Southern California Geotechnical, 2022. *Geotechnical Investigation, Proposed Warehouse Development, SWC Cajalco Road and Seaton Avenue, Riverside County (Perris Area), California for Hillwood*. December 9, 2022.

Appendix H: Urban Crossroads, 2023d. *Mead Valley Commerce Center (PT220050) Greenhouse Gas Analysis*. November 8, 2023.

Appendix I: Group Delta Consultants, Inc., 2023, *Phase I Environmental Site Assessment Update, Seaton Land Assemblage, Seaton Avenue and Cajalco Road, Riverside County, California*. November 27, 2023.

Appendix J1: Albert A. Webb Associates, 2024a. *Mead Valley Commerce Center (PT220050), Riverside County, California, Preliminary Drainage Study*. ~~May~~ September 2024.

Appendix J2: Albert A. Webb Associates, 2024b. *Project Specific Water Quality Management Plan*. May 2024.

Appendix K: General Plan Consistency Analysis

Appendix L: Urban Crossroads, 2024a. *Mead Valley Commerce Center (PT220050) Noise and Vibration Analysis*. February 15, 2024.

Appendix M: Chronicle Heritage, 2023. *Paleontological Resources Assessment for the Cajalco & Seaton Warehouse and Park Project, Riverside County, California*. October 27, 2023.

Appendix N1: Urban Crossroads, 2022. *Cajalco and Seaton Warehouse Vehicle Miles Traveled Analysis*. December 1, 2022.

Appendix N2: Urban Crossroads, 2023e. *Mead Valley Commerce Center (PT220050) Traffic Analysis*. May 17, 2023.

Appendix N3: Urban Crossroads, 2023. *Mead Valley Commerce Center Vehicle Miles Traveled (VMT) Mitigation Assessment*. December 4, 2023f.

Appendix N4: Urban Crossroads, 2024b. *Mead Valley Commerce Center Supplemental Trip Generation Assessment*. January 22, 2024.

Appendix O: Eastern Municipal Water District, 2023. *Water Supply Assessment Report, Hillwood – Mead Valley Commerce Center*. March 15, 2023.

Appendix P: Riverside County Airport Land Use Commission (ALUC), 2024. *Airport Land Use Commission (ALUC) Development Review, File No. ZAP1596MA24*. March 14, 2024.

Appendix Q: Ramboll, n.d. *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'*. No date.

Appendix R: Dudek, 2024a. *Fire Protection Plan Mead Valley Commerce Center Project.* ~~February~~ July 2024.

7.3 Documents Incorporated by Reference

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JN 941-008

MEMORANDUM

TO: Russell Brady
Riverside County Planning Department

FROM: Tracy Zinn, Principal

DATE: October 28, 2025

RE: **Cajalco Commerce Center Responses to Public Comments Submitted After Close of Draft Environmental Impact Report Comment Period**

This memorandum provides responses to comment letters and emails submitted to Riverside County from the following parties and individuals leading up the October 21, 2025, Board of Supervisors hearing concerning the Cajalco Commerce Center project (GPA No. 240005, CZ 2200062, PPT 220050, and TPM 38601), hereafter referred to as the "Project" or "proposed Project."

1. Franco Pacheco
2. Michael McCarthy / Sierra Club
3. Debbie Walsh (RAMV)
4. Vanessa Garcia
5. Patrick Chinglung Hsu
6. Alexa Gutierrez
7. Angelina Diaz
8. Carolina
9. Eduardo Rivera
10. Ian Simpson
11. Isamar Diaz
12. Lanny Del Real
13. Toni Santana
14. Yuri Amezcua

Responses to the letters and emails received from the above-listed parties pertaining to comments with relevance to the California Environmental Quality Act (CEQA) are provided on the following pages. The responses address each comment letter on a point-by-point basis. The comments provided in items 6 through 14 of the above list were identical in content and are therefore addressed collectively through a master response. It should be noted that each of the comments identified by the above-listed parties previously were addressed as part of the Project's Final EIR and/or as part of the October 3, 2025, memorandum from T&B Planning titled, "Cajalco Commerce Center Responses to Public Comments Submitted After Close of Draft Environmental Impact Report Comment Period" (herein, "Responses to Planning Commission Comments Memorandum").

In addition to the written correspondence listed above, a petition from local residents expressing opposition to the warehouse component of the Project and requesting its removal was also received. The petition has been received and acknowledged; however, because it does not contain comments pertaining to CEQA compliance, no response to the petition is provided herein. The County also received oral testimony presented at the October 21,

2025, public hearing; we reviewed the testimony and determined that no new environmental issues beyond those addressed in the written comment letters or in the Final EIR were raised.

As demonstrated by the below responses, the conclusions presented in the Project's Draft Environmental Impact Report (EIR) and Final EIR fully comply with all applicable CEQA requirements, the EIR's findings and conclusions are supported by substantial evidence included in the Project's administrative record, and none of the comment letters received leading up to the October 21, 2025, Board of Supervisor hearing resulted in the need to revise and/or recirculate the Draft EIR (DEIR) or Final EIR (FEIR). The responses contained herein merely clarify or amplify information that is already in the public record.

1.0 COMMENT LETTER 1: RESPONSES TO THE 10/17/2025 FRANCO PACHECO COMMENT LETTER

1-1 This comment expressing opposition to the Project is acknowledged. The comment was considered by the Riverside County Board of Supervisors during their deliberations on the Project at the public hearing held on October 21, 2025. No further response is necessary.

1-2 This comment is duplicative of comments previously raised and addressed in the *Responses to Planning Commission Comments Memorandum* dated October 3, 2025, which was included as Attachment A to the October 21, 2025, Board of Supervisors hearing agenda. See Response 7-2 in that memorandum, which is responsive to this comment.

1-3 This comment is duplicative of comments previously raised and addressed in the *Responses to Planning Commission Comments Memorandum* dated October 3, 2025, which was included as Attachment A to the October 21, 2025, Board of Supervisors hearing agenda. See Response 7-3 in that memorandum, which is responsive to this comment.

1-4 This comment is duplicative of comments previously raised and addressed in the *Responses to Planning Commission Comments Memorandum* dated October 3, 2025, which was included as Attachment A to the October 21, 2025, Board of Supervisors hearing agenda. See Response 7-4 in that memorandum, which is responsive to this comment.

1-5 This comment is duplicative of comments previously raised and addressed in the *Responses to Planning Commission Comments Memorandum* dated October 3, 2025, which was included as Attachment A to the October 21, 2025, Board of Supervisors hearing agenda. See Response 7-5 in that memorandum, which is responsive to this comment.

1-6 This comment is duplicative of comments previously raised and addressed in the *Responses to Planning Commission Comments Memorandum* dated October 3, 2025, which was included as Attachment A to the October 21, 2025, Board of Supervisors hearing agenda. See Response 7-6 in that memorandum, which is responsive to this comment.

1-7 This comment is duplicative of comments previously raised and addressed in the *Responses to Planning Commission Comments Memorandum* dated October 3, 2025, which was included as Attachment A to the October 21, 2025, Board of Supervisors hearing agenda. See Response 7-7 in that memorandum, which is responsive to this comment.

1-8 The commenter submitted a petition from residents opposing the warehouse and urging the County to deny or remove the warehouse component. The petition has been received and acknowledged. As the petition does not raise specific environmental issues under CEQA and does not identify any deficiencies with the analyses presented in the Project's EIR, no further response is necessary.

1-9 This comment is a duplicate comment from a letter submitted on the DEIR, which is included in the FEIR as Comment Letter G. Refer to Responses G-7 and G-8 on FEIR p. F-122, which is responsive to this comment.

1-10 The commenter asserts that approving the Project could jeopardize grant and infrastructure funding intended to support a planned transit-oriented community in Mead Valley. This concern relates to policy and funding considerations rather than potential physical environmental impacts and, therefore, does not constitute a CEQA issue. Additionally, this comment is duplicative of comments previously raised and addressed in the *Responses to Planning Commission Comments Memorandum* dated October 3, 2025, which was included as Attachment A to the October 21, 2025, Board of Supervisors hearing agenda. See Response 2-8 in that memorandum, which is responsive to this comment.

1-11 This comment expressing opposition to the Project is acknowledged. The comment was considered by the Riverside County Board of Supervisors during their deliberations on the Project at the public hearing held on October 21, 2025. No further response is necessary.

2.0 COMMENT LETTER 2: RESPONSES TO THE MICHAEL MCCARTHY COMMENT LETTER

2-1 The commenter provides introductory remarks summarizing the Project's location, scale, and proposed uses. The comment does not raise any environmental issues or identify deficiencies in the Final EIR; therefore, no response is necessary.

2-2 This comment is duplicative of comments previously raised and addressed in the *Responses to Planning Commission Comments Memorandum* dated October 3, 2025, which was included as Attachment A to the October 21, 2025, Board of Supervisors hearing agenda. See Responses 2-2, 2-7, 3-9, 4-33, and 14-1 in that memorandum, which are responsive to this comment.

2-3 This is a duplicate comment from a letter submitted on the DEIR, which is included in the FEIR as Comment Letter G. Refer to Response G-8 on p. F-122, which is responsive to this comment. Additionally, this comment is duplicative of comments previously raised and addressed in the *Responses to Planning Commission Comments Memorandum* dated October 3, 2025, which was included as Attachment A to the October 21, 2025, Board of Supervisors hearing agenda. See Responses 2-3, 2-14, and 4-23, which also are responsive to this comment.

2-4 The commenter's concerns regarding housing displacement and replacement requirements were previously raised and addressed in the *Final EIR*; see Response G-8 on FEIR p. F-122. The commenter's concerns related to housing displacement and compliance with the provisions of AB 98 were addressed in the *Responses to Planning Commission Comments Memorandum* dated October 3, 2025, which was included as Attachment A to the October 21, 2025, Board of Supervisors hearing agenda. See Responses 2-3, 2-14, 4-23, 12-5, 15-1, 15-2, and 15-5 in that memorandum, which are responsive to this comment.

2-5 This comment is duplicative of comments previously raised and addressed in the *Responses to Planning Commission Comments Memorandum* dated October 3, 2025, which was included as Attachment A to the October 21, 2025, Board of Supervisors hearing agenda. See Responses 2-4, 2-16, and 3-17 in that memorandum, which are responsive to this comment.

2-6 This is a duplicate comment from a letter submitted on the DEIR, which is included in the FEIR as Comment Letter G. Refer to Response C-7 on pp. F-58 through F-60. Additionally, this comment is duplicative of comments previously raised and addressed in the *Responses to Planning Commission Comments Memorandum* dated October 3, 2025, which was included as Attachment A to the October 21, 2025, Board of Supervisors hearing agenda. See Responses 2-7, 3-10, 3-17, 3-20, and 3-34, which also are responsive to this comment.

2-7 This is a duplicate comment from a letter submitted on the DEIR, which is included in the FEIR as Comment Letter G. Refer to Responses G-7 and G-8 on FEIR pp. F-122 to F-123. Additionally, this comment is duplicative of comments previously raised and addressed in the *Responses to Planning Commission Comments Memorandum* dated October 3, 2025, which was included as Attachment A to the October 21, 2025, Board of Supervisors hearing agenda. See Responses 2-3, 3-38, 3-40, 4-23, and 4-38, which also are responsive to this comment. The responses reference the Project's General Plan Consistency Analysis (EIR *Technical Appendix K*), which addresses policies contained in the Riverside County General Plan, including the County's Circulation Element, and demonstrates that the Project would not conflict with applicable General Plan policies, including those related to transit-related and Complete Streets.

2-8 This comment appears to conflate the Final EIR's discussion of potential impacts to housing due to the elimination of 26 existing homes on site with the analysis of the Project's potential cumulatively-considerable impacts to air pollution and traffic. The analysis of potential impacts due to the proposed elimination of the existing 26 homes on site is necessarily based on the Riverside County General Plan Housing Element, which considers the County's Regional Housing Needs Assessment (RHNA) that addresses the County's overall need to accommodate housing, irrespective of location. The analysis of potential cumulatively-considerable localized impacts to air pollution and due to traffic are necessarily limited to the local setting, as the Project would not have the potential to affect local air quality or traffic in areas far removed from the Project site, such as the Mecca and Eastern Coachella Valley communities referenced by this comment. The commenter's concerns related to the displacement of housing on site were previously raised and addressed in the *Final EIR*; see Response G-8 on FEIR p. F-122. The commenter's concerns related to housing displacement were also addressed in the *Responses to Planning Commission Comments Memorandum* dated October 3, 2025, which was included as Attachment A to the October 21, 2025, Board of Supervisors hearing agenda. See Responses 2-3, 2-14, 4-23, 12-5, 15-1, 15-2, and 15-5 in that memorandum, which are responsive to comments related to housing displacement. The commenter's concerns related to cumulative impacts in the context of other Foundation General Plan Amendments that were filed with Riverside County long after the Project's applications were filed are addressed in the *Final EIR* (refer to Responses D-4, D-5, F-5, and F-13), and in the *Responses to Planning Commission Comments Memorandum* (refer to Responses 2-2, 2-9, 2-10, 2-11, 2-12, 3-9, 3-10, 4-30, -4-31, and 4-32).

2-9 This comment is duplicative of comments previously raised and addressed in the *Responses to Planning Commission Comments Memorandum* dated October 3, 2025, which was included as Attachment A to the

October 21, 2025, Board of Supervisors hearing agenda. See Responses 2-3, 2-14, and 4-23 in that memorandum, which are responsive to this comment.

2-10 This comment is duplicative of comments previously raised and addressed in the *Responses to Planning Commission Comments Memorandum* dated October 3, 2025, which was included as Attachment A to the October 21, 2025, Board of Supervisors hearing agenda. See Responses 3-22 and 12-4 in that memorandum, which are responsive to this comment.

2-11 This is a duplicate comment from a letter submitted on the DEIR, which is included in the FEIR as Comment Letter A. Refer to Response A-3 on FEIR pp. F-11 to F-12. Additionally, this comment is duplicative of comments previously raised and addressed in the *Responses to Planning Commission Comments Memorandum* dated October 3, 2025, which was included as Attachment A to the October 21, 2025, Board of Supervisors hearing agenda. See Responses 7-7, 11-1, 12-3, 13-4, 14-2, and 15-4, which also are responsive to this comment.

2-12 This comment asserts that the Mead Valley community has a high jobs-to-housing ratio, and should not be used as the basis for concluding that the Project's warehouse use is not justified as a result. While the County acknowledges that Mead Valley has a higher proportion of jobs relative to housing as compared to other communities within Riverside County, western Riverside County as a whole does suffer from a poor jobs-housing ratio. Thus, the EIR correctly concluded that the Project's warehouse use would serve to improve the regional jobs-housing balance. The commenter also is referred to the *Responses to Planning Commission Comments Memorandum* dated October 3, 2025, which was included as Attachment A to the October 21, 2025, Board of Supervisors hearing agenda. See Responses 3-22 and 12-5 in that memorandum, which also are responsive to the commenter's concerns regarding jobs-housing balance.

2-13 This comment expressing opposition to the Project is acknowledged. The comment was considered by the Riverside County Board of Supervisors during their deliberations on the Project at the public hearing held on October 21, 2025. No further response is necessary.

3.0 COMMENT LETTER 3: RESPONSES TO THE 10/20/2025 DEBBIE WALSH (RAMV) COMMENT LETTER

3-1 This comment is duplicative of comments previously raised and addressed in the *Responses to Planning Commission Comments Memorandum* dated October 3, 2025, which was included as Attachment A to the October 21, 2025, Board of Supervisors hearing agenda. See Responses 3-22, 7-2, and 13-6 in that memorandum, which are responsive to this comment.

3-2 The commenter asserts that the proposed warehouse is based on speculation and alleges that the proposed warehouse building would not have a tenant, asserts that the EIR did not evaluate impacts due to the elimination of planned commercial land uses on site, opines that the EIR did not address cumulative effects of warehouse development in the local Mead Valley community, argues that there is no justification for the proposed General Plan Amendment, claims there is no justification for the displacement of the existing 26 homes on site, and asserts without evidence that the Project would result in additional warehouse development in the local area. The comment related to the warehouse being built on speculation and may remain vacant is addressed in the *Responses to Planning Commission Comments Memorandum* dated October 3, 2025, in the response to Comments F-5 and F-13. Comments

relating to cumulative effects of warehouse development are duplicative of comments previously raised and addressed in the responses to Comments D-4, D-5, and F-5 to Comment Letters D and F in the Final EIR, and also are addressed in the *Responses to Planning Commission Comments Memorandum* under the responses to Comments 4-30 and 4-31. With respect to the commenter's comment related to the elimination of planned commercial retail uses on site, the County is not aware of any significant environmental impacts that would result from the proposed conversion of 4.7 acres of the Project site from "Community Development – Commercial Retail (CD-CR)" to "Community Development – Light Industrial (CD-LI)," and this comment does not identify any such impacts. With respect to comments regarding the elimination of 26 existing homes on site, the commenter is referred to the response to Comment 2-8 herein, Response G-8 on p. F-122 of the FEIR, and Responses 2-3, 2-14, 4-23, 12-5, 15-1, 15-2, and 15-5 in the *Responses to Planning Commission Comments Memorandum*, which are responsive to this comment.

3-3 The commenter references an ongoing County effort to update the Mead Valley Area Plan and asserts that this new plan should have been analyzed in the Project's EIR. The current, adopted Mead Valley Area Plan remains the version incorporated into the County's General Plan and is the only applicable plan for purposes of CEQA consistency analysis. The referenced Area Plan update has not been adopted and therefore does not constitute an applicable plan or policy under CEQA Guidelines Section 15125(d), and as the final version of the updated Mead Valley Area Plan is not available at this time, any analysis of Project consistency with this yet-to-be adopted Area Plan update would be speculative (CEQA Guidelines § 15145). Furthermore, it is noted that according to information available on the County's web site[1], the Project site is located within the "Industrial Core" currently being considered to be added to the Mead Valley Area Plan, indicating that the Project's proposed warehouse use would not conflict with any component of the draft Area Plan. Accordingly, as the EIR properly evaluated the Project's consistency with the adopted Mead Valley Area Plan and because there is no evidence that the Project would conflict with the future update to the Mead Valley Area Plan, even despite the fact that the draft update is not required to be considered because it is a draft plan and not adopted, no further analysis or revision to the Draft EIR or Final EIR is necessary.

3-4 The commenter alleges that the EIR did not evaluate cumulative impacts to biological resources, including the burrowing owl, alleges that the EIR did not address impacts from pollution, noise, and lighting on the nearby Mott Rimrock Reserve, asserts that the EIR did not address cumulative effects of warehouse development, and again raises concerns that the Project's warehouse is being built on speculation and may site vacant. Regarding the commenter's assertion that the EIR did not properly evaluate cumulative impacts to biological resources, the commenter is referred to EIR subsection 4.4.5, responses to Comments F-3 through F-5 in the Final EIR, and responses 4-20 and 11-1 in the *Responses to Planning Commission Comments Memorandum* dated October 3, 2025, all of which demonstrate that compliance with all applicable MSHCP requirements would ensure that the Project's cumulatively-considerable impacts to biological resources, inclusive of cumulatively-considerable impacts to the burrowing owl, would be mitigated to less-than-significant levels with implementation of the mitigation measures identified in EIR Subsection 4.4. The commenter's concerns related to cumulative impacts in the context of other Foundation General Plan Amendments that were filed with Riverside County long after the

[1] Refer to: https://planning.rctlma.org/mead-valley-community-plan#2741959481-2566458989

Project's applications were filed are addressed in the *Final EIR* (refer to Responses D-4, D-5, F-5, and F-13), and in the *Responses to Planning Commission Comments Memorandum* (refer to Responses 2-2, 2-9, 2-10, 2-11, 2-12, 3-9, 3-10, 4-30, -4-31, and 4-32). With respect to the commenter's assertion the warehouse is being built on speculation, the commenter is referred herein to the response to Comment 3-2. With respect to impacts to the Mott Rimrock Reserve, the commenter is referred to the response to Comment F-3 of the Final EIR, which is responsive to this comment.

3-5 This comment is duplicative of comments previously raised and addressed in the *Responses to Planning Commission Comments Memorandum* dated October 3, 2025, which was included as Attachment A to the October 21, 2025, Board of Supervisors hearing agenda. See Response 3-3 in that memorandum, which is responsive to this comment.

3-6 The commenter asserts that the EIR did not adequately analyze truck routes and associated impacts, and asserts that the EIR was incorrect in asserting there were no sensitive receptors along this route. The commenter is referred to the response to Comment C-15 of the Final EIR, which explains that Mitigation Measure MM 4.3-8 was added as part of the Final EIR to require the posting of signage directing all truck traffic to the east and prohibiting westbound truck traffic on Cajalco Road. With respect to the commenter's assertion that there are sensitive receptors along Cajalco Road/Cajalco Expressway between the Project site and the I-215 interchange, the commenter is referred to subsection 4.3.1.J and Figure 4.3-10 of the Final EIR, which identifies all nearby sensitive receptors, and shows that there are no sensitive receptors to the east of the Project site adjacent to Cajalco Road/Cajalco Expressway.

3-7 The commenter opines that additional warehouse space is unwarranted, notes that Mead Valley is an Environmental Justice Community, alleges that the proposed park may not be built, alleges there would be a bottleneck on Cajalco Road at Decker due to planned lane widening, argues that the EIR did not adequately address cumulative impacts of other Foundation Component General Plan Amendments, and again asserts the Project would result in impacts on the Mott Rimrock Reserve. With respect to the comment objecting to the addition of warehouse space, the commenter is referred to the response to Comment 3-5 in the *Responses to Planning Commission Comments Memorandum* dated October 3, 2025, which was included as Attachment A to the October 21, 2025 Board of Supervisors hearing agenda, and is responsive to this comment. With respect to the comment on environmental justice, the commenter is referred to the response to Comment G-6 in the Project's Final EIR, which is responsive to this comment. The comment related to whether the proposed park would be developed is unrelated to the Project's potential impacts to the environment, and no response is necessary. With respect to impacts to the Mott Rimrock Reserve, the commenter is referred to the response to Comment F-3 of the Final EIR, which is responsive to this comment. With respect to the comment relating to a bottleneck on Cajalco Road, the commenter is referred to the response to Comment 3-6 of the *Responses to Planning Commission Comments Memorandum*, which is responsive to this concern. With respect to the commenter's concerns over cumulative impacts associated with the Foundation Component General Plan Amendment projects, the commenter is referred to the response to Comment 3-2 provided herein.

3-8 This comment is duplicative of comments previously raised and addressed in the *Responses to Planning Commission Comments Memorandum* dated October 3, 2025, which was included as Attachment A to the October 21, 2025, Board of Supervisors hearing agenda. See Responses 3-19 and 3-21 in that memorandum, which are responsive to this comment.

3-9 The commenter opines that the Project should be denied approval due to significant environmental impacts, including significant health risks to nearby residential uses. The commenter is referred to the analysis of Threshold c. in EIR Subsection 4.3, which provides substantial evidence demonstrating that the Project's localized impacts to air quality, including potential impacts associated with cancer and non-cancer related health risks, would be less than significant. Thus, the commenter is incorrect in asserting that the proposed Project would result in significant and unavoidable impacts due to health risks. The commenter is referred instead to EIR Subsection 5.1, which lists the Project's significant and unavoidable impacts associated with regional air quality and due to Vehicle Miles Traveled (VMT). The commenter's opposition to the Project's significant and unavoidable impacts to regional air quality and due to VMT are acknowledged, and were considered by the Riverside County Board of Supervisors during their deliberations on the Project at the public hearing held on October 21, 2025. No further response is necessary.

3-10 The commenter indicates opposition to approval of the proposed Project due to greenhouse gas (GHG) impacts, noise impacts, and impacts due to traffic/transportation. The commenter is referred to EIR Subsections 4.8 and 4.13, which demonstrate that the Project's impacts due to GHG emissions and noise would be less than significant following the implementation of mitigation measures. With respect to comments on traffic/transportation, the commenter is referred to the responses to Comments D-2, D-3, D-4, D-5, M-1, N-1, N-2, and O-6 in the Final EIR, and the responses to Comments 3-32, 9-2, 1-1, 11-1, and 13-7 in the *Responses to Planning Commission Comments Memorandum* dated October 3, 2025, which was included as Attachment A to the October 21, 2025 Board of Supervisors hearing agenda. The reference responses explain that the issue of traffic congestion is not an environmental concern under CEQA. No further response is necessary.

3-11 This comment is duplicative of comments previously raised and addressed in the response to Comment C-7 in the Final EIR and in the responses to Comments 3-24, 3-25, 3-29, 3-34, 3-41, and 13-6 in the *Responses to Planning Commission Comments Memorandum* dated October 3, 2025, which was included as Attachment A to the October 21, 2025, Board of Supervisors hearing agenda. No further response is necessary.

3-12 The commenter asserts that the Project's proposed modifications would conflict with the overall Riverside County Vision, Mead Valley Area Plan, and General Plan, and lists several General Plan provisions and policies. The commenter is referred to the discussion and analysis of Threshold a. in DEIR Subsection 4.11, *Land Use and Planning*, which was based on a Project-specific General Plan Consistency Analysis that was included as *Technical Appendix K* to the DEIR. As indicated in *Technical Appendix K*, the Project would be consistent with or otherwise would not conflict with all applicable General Plan policies. As this comment does not identify any deficiencies with the analysis presented in DEIR Subsection 4.11 or DEIR Technical Appendix K, no revision to the DEIR is warranted pursuant to this comment. Furthermore, this comment is duplicative of comments previously raised and addressed in the response to Comment 3-20, 3-22, 3-36, and 3-39 in the *Responses to Planning Commission Comments Memorandum* dated October 3, 2025, which was included as Attachment A to the October 21, 2025, Board of Supervisors hearing agenda. No further response is necessary.

3-13 This comment is duplicative of comments previously raised and addressed in the *Responses to Planning Commission Comments Memorandum* dated October 3, 2025, which was included as Attachment A to the

October 21, 2025, Board of Supervisors hearing agenda. See Responses 3-23 through 3-32 in that memorandum, which are responsive to this comment.

3-14 The commenter's opposition to the Project is acknowledged. The comment was considered by the Riverside County Board of Supervisors during their deliberations on the Project at the public hearing held on October 21, 2025. No further response is necessary.

4.0 COMMENT LETTER 4: RESPONSES TO COMMENTS FROM THE 10/11/2025 VANESSA GARCIA COMMENT LETTER

4-1 This comment expressing opposition to the Project is acknowledged. The comment was considered by the Riverside County Board of Supervisors during their deliberations on the Project at the public hearing held on October 21, 2025. No further response is necessary.

5.0 COMMENT LETTER 5: RESPONSES TO COMMENTS FROM THE 10/11/2025 PATRICK CHINGLUNG HSU COMMENT LETTER

5-1 The comment expressing support for the Project is acknowledged. As the comment does not raise any environmental issues under CEQA, no further response is necessary.

5-2 This is a duplicate comment from a letter submitted on the DEIR, which is included in the FEIR as Comment Letter K. Refer to Responses K-2 through K-5 and K-9 through K-14 on FEIR p. F-155 through F-158.

6.0 COMMENT LETTERS 6 THROUGH 14: RESPONSES TO IDENTICAL COMMENT LETTERS

6-1 Comment Letters 6 through 14 contain identical statements regarding the proposed Project and are therefore addressed collectively by this response. These letters express general opposition to the Project and are duplicative of comments previously raised and addressed in the *Responses to Planning Commission Comments Memorandum* dated October 3, 2025, which was included as Attachment A to the October 21, 2025 Board of Supervisors hearing agenda. See Response 11-1 in that memorandum.

Comment Letter 1

Franco Pacheco
Inland Valley Alliance for Environmental Justice
10-17-25

Riverside County Board of Supervisors
Vote no on Cajalco Commerce Center Project (ITEM 23.1)
4080 Lemon Street, Riverside, CA 92501

Dear Riverside County Board of Supervisors:

I am writing to express my strong opposition to Cajalco Commerce center project, which proposes approximately 66 acres in Mead Valley to facilitate the development of the Cajalco Commerce Center. This project would convert land currently designated for residential and agricultural/commercial use into industrial zoning, paving the way for a 1,003,510 square-foot warehouse and associated infrastructure. This proposal raises serious concerns under the California Environmental Quality Act (CEQA) and broader land use principles: 1-1

Incompatible Land Use: The proposed industrial zoning directly abuts existing residential neighborhoods, threatening community character, safety, and livability. The shift from RC-VLDR and A-1-1 to I-P zoning undermines the intent of the Mead Valley Area Plan, which prioritizes rural preservation and low-density development. 1-2

Air Quality and Health Impacts: The EIR acknowledges significant emissions from truck traffic and warehouse operations, including diesel particulate matter and greenhouse gases. These pollutants pose disproportionate risks to vulnerable populations, including children, immuno-compromised people and seniors living nearby. 1-3

Traffic and Infrastructure Strain: With 76 loading docks on each side of the warehouse, the project will generate substantial truck traffic on Cajalco Expressway, Seaton Avenue, and Decker Road, which are not designed for heavy industrial use. This raises safety concerns and threatens roadway integrity. 1-4

Viable and Community-Driven Alternatives: Rather than facilitating a massive industrial project that disrupts the surrounding area, the County should consider community-oriented alternatives that support the local economy, enhance quality of life, and preserve open space. These could include affordable housing that meets regional RHNA targets/state mandates, urban agriculture zones, or a rural innovation hub integrating education, green jobs, and environmental stewardship. Such uses would be more compatible with Mead Valley's existing character and address long-standing environmental justice concerns. 1-5

Loss of Open Space, Agricultural Land, and Housing: This project would permanently eliminate farmland and open space, contrary to the County's stated goals of preserving agricultural heritage and natural resources. The proposed park that is associated with this project would not be considered a sensitive receptor and would end up being surrounded by the other proposed logistic projects that are seeking approval during this GPA cycle. This project also removes existing housing without replacing the units as required by law. 1-6

Environmental Justice and Disproportionate Burden: Mead Valley is recognized as a disadvantaged unincorporated community and an environmental justice (EJ) area, as acknowledged by Riverside County officials. Warehousing development has increasingly targeted EJ communities like Mead Valley, where residents, predominantly people of color, face elevated exposure to pollution, noise, and traffic without commensurate investment in infrastructure or services. Under CEQA and California's EJ policies, such communities warrant heightened protection, not intensified industrial encroachment. Approving this rezoning would perpetuate environmental racism and undermine the County's stated commitment to equity and public health. We urge the planning commission to deny the Cajalco Commerce project and instead pursue land use strategies that align with the General Plan's vision for rural communities, protect public health, and uphold environmental justice. 1-7

Petition and Additional Community Comments: We have also attached a petition signed by Riverside County residents opposing this project. Specifically, the warehouse component. Residents who have signed oppose the project as it stands because of the significantly harmful effects this warehouse will have as cited in the Environmental Impact Report. We will send another updated copy of the petition on October 20th. Residents urge the board to deny this project and encourage the developer to remove the warehouse component and replace it with a more suitable component 1-8

that brings much needed benefits to the area. Currently Mead Valley has the highest amount of industrial warehouse space per sq feet, per resident and continuing to allow these harmful projects in our rural community is unethical and a civil rights issue due to the consistent targeting of removing housing in favor of industrial land in a largely Latino community and a historically African American community. This is not happening at this large of a scale anywhere else in Riverside County. This project will also be used to justify over 1,000 acres of land to be converted to even more warehousing projects which will be disastrous for frontline communities as well as the entire region. Approving this project will also risk grants and funding for infrastructure related to the 1-9

Metro Link Project that is meant to make parts of Mead Valley a transit-oriented community, specifically in the area where the Cajalco Commerce Center is being proposed. By allowing this 1-10

project to continue would be irresponsibly dedicating space in an industry that has lost over 21,000 jobs in logistics since 2022. We need diverse, well-paying jobs that secure a positive, healthy future for Mead Valley and surrounding communities. Not just for the next year, but for decades to come. We kindly urge the Board of Supervisors to deny this project as it stands. 1-11

Franco Pacheco
Mead valley Resident and co-founder of
Inland Valley Alliance for Environmental Justice

Karla Cervantes
Founder of
Mead Valley Coalition for Clean Air

Jennifer Larratt-Smith
Chair, Riverside Neighbors Opposing Warehouses (R-NOW)

Ana Gonzalez
CCEAJ Executive Director

COMMENT LETTER 2

Russell Brady
Project Planner
Riverside County Planning Department
Planning Hearing Secretary
Email: rbrady@rivco.org; planninghearings@rivco.org

RE: Public comment for the Cajalco Commerce Center – Item 23.1 on October 21, 2025 – SCH # 2023060799

Honorable Supervisors, Mr. Brady, County Clerk,

Thank you for the opportunity to provide comments on the final Environmental Impact Report (EIR) on the Cajalco Commerce Center ("Project") – SCH# 2023060799, Item 23.1.

The Cajalco Commerce Center will site a speculative 1,003,510 sq.ft. light industrial warehouse on the corner property of Seaton Avenue and Cajalco Road and a public 13 acre park south of Cajalco Road in the unincorporated community of Mead Valley in Riverside County. The Project has 26 single-family residential structures and a commercial building that will all be demolished. 60 acres of Rural Community-Very Low Density Residential will be rezoned to light industrial.

2-1

Responses to County Comments on Previous letters

The first part of this letter responds to the inadequate responses to the Planning Commission comment letters and DEIR comments. By reference I incorporate all other comment letters that have been previously addressed.

1. The Project continues to omits significant projects that have not been analyzed in the EIR or FEIR. In response to these previous claims, the County has asserted that we have not 'identified any specific cumulative impacts not addressed in the EIR. The EIR omits all foundation general plan amendments projects in process in Mead Valley, which include over 1,000 acres of cumulative residential to industrial rezones, over 25 additional residential structures being demolished. These projects are listed in Table 1 for completeness.

2-2

Table 1- List of foundation general plan amendments in progress that were not considered as part of the cumulative impacts assessment for housing, land-use, traffic, air pollution, and environmental justice impacts.

Community	CASE_ID	Applicant	Existing Land Use	Proposed Land Use	Residential Structures	Acres
Mead Valley	GPA230008	Thrifty Oil Co.	Very Low Density Residential (VLDR)	Light Industrial (LI)	1	9.6
Mead Valley	GPA240004	Rett Coluccio	Very Low Density Residential (VLDR)	Light Industrial (LI)	2	19.5
Mead Valley	GPA240005	John Grace	Very Low Density Residential (VLDR)	Light Industrial (LI) & Recreation (R)	26	64.4
Mead Valley	GPA240012	Rett Coluccio	Very Low Density Residential (VLDR)	Light Industrial (LI)	1	9.5
Mead Valley	GPA240022	Travis Duncan	Very Low Density Residential (VLDR)	Specific Plan (SP)	0	648.5
Mead Valley	GPA240023	Trip Hord	Very Low Density Residential (VLDR)	Light Industrial (LI)	0	104.6
Mead Valley	GPA240026	David Nazaryk	Rural Residential (RR)	Light Industrial (LI)	1	161.5
Mead Valley	GPA240027	Emily Golubow	Very Low Density Residential (VLDR)	Light Industrial (LI)	3	10.5
Mead Valley	GPA240042	Jack Herrill	Very Low Density Residential (VLDR)	Business Park (BP)	9	17.8
Mead Valley	GPA240049	Tyler Banton	Very Low Density Residential (VLDR)	Business Park (BP)	3	19.1
Mead Valley	GPA240059	Jeremy Mape	Very Low Density Residential (VLDR) & Light Industrial (LI)	Light Industrial (LI)	0	8.6
Mead Valley	GPA240063	Scott Smith	Estate Density Residential (EDR)	Business Park (BP)	8	66.5
Mead Valley	GPA240082	Rett Coluccio	Very Low Density Residential (VLDR)	Light Industrial (LI)	3	14.9

2-2 (CONT.)

2. The Lead Agency incorrectly determines that demolishing 26 residential structures is not a significant impact. It continues to assert that (1) the county primarily looks to look at the 40,647 dwelling units required at the county level (2), the demolished structures are not within the Mead Valley Area Plan housing inventory planned sites, and (3) the county did a flawed consistency analysis in Appendix K. We agree that the County needs to check these three categories, but this is missing the forest for the trees. The County has a duty under its housing policy to check consistency at both the County level and at the local community level, as specified under displacement risk policies and the goal to affirmatively further fair housing. Mead Valley is being discriminated in its housing inventory being rezoned for industrial, especially given the extent of existing warehouse burden which is the highest in the Inland Empire. No other area of the county has the extent of industrial rezoning proposed. Adjacent unincorporated communities like Woodcrest, Good Hope, and Lake Mathews are not being rezoned for industrial development, and the diminished number of homes and land in Mead Valley is textbook environmental injustice. Details follow.
    a. County Housing Policies that contradict demolishing homes and rezoning 60 acres of residential land.
        i. H 1.1: Maintain an adequate supply of appropriately zoned land to accommodate housing needs of existing and future residents.
        ii. H 1.5: Encourage the development of higher-density, multifamily housing in locations where adequate infrastructure and public services are planned or are available (including transit stations).
        iii. H 3.2: The County should advocate for revisions to State laws that will make affordable housing easier to achieve, including but not limited to issues related to requiring the payment of prevailing wage, burdensome California Environmental Quality Act (CEQA) requirements adversely affecting housing production, tax code reform, and tools and funding for affordable housing while recognizing the need to maintain the integrity of existing residential communities.
        iv. H 3.7: The County should pursue all available federal, state, and local funds to assist in housing rehabilitation and preservation of at-risk units
        v. H 5.4: The County shall strive to disperse affordable housing projects throughout the county, while ensuring that affordable housing development occurs in areas

2-3

with appropriate access to infrastructure, services, and necessary community amenities, wherever feasible.

vi. H 5.6: The County shall collaborate with community partners to increase residential low-resource areas access to transit, environmental, economic, and educational opportunities.

b. Demolishing 26 residential structures is about 0.56% of the 4,601 housing units in Mead Valley. Displacing 100 residents is 0.51% of the 19,600 residents of the community. These effects are very large on such a small community. For comparison, the recent Altadena and Palisades fires destroyed approximately 12,000 homes[1], which is about 0.33% of the 3.598 million housing units in LA County.

c. While the County housing inventory is treated in RHNA as largely spatially interchangeable, it is not the case that a house in the Eastern Coachella Valley is equivalent to or interchangeable with Mead Valley. Mead Valley has an 'area plan capacity' of 1,350 units in the adopted Housing Element, Table P-32 and P-33. Demolishing 26 units and rezoning 60 acres of residential land reduces the local housing inventory by at least 3% from a single project.

d. The project inaccurately concludes that the project will not 'displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.' The Project documents estimate that 100 residents will be displaced from the demolished housing. As mentioned earlier, 100 residents is 0.5% of the population of Mead Valley. The Project is only compared to the entire County inventory the 'fully entitled' houses that have not yet been built in the County as its inventory comparison.

e. The community of Mead Valley has built an average of 20 residential structures from 2019-2024 according to the State's HCD housing dashboard[2] and shown in **Figure 1**. This project is demolishing over a year of new housing; that is clearly significant on a local level.

f. The County identifies Mead Valley as a community at risk for housing displacement in Figure P-32 in its adopted housing element.

g. The County is significantly behind in its RHNA targets, especially for low-income housing. For 2021 through 2024, the County has only completed 9,837 units of housing out of its 40,000+ unit goal. Less than 350 units of low, very low, or extremely low-income housing units have been built, with more than 90% of housing built in the above moderate income category. As such, the County demolishing low-income housing has a significant impact on the low-income housing category.

h. Lastly, the County fails to demonstrate that the existing housing on site is not low-income housing. In fact, the Appendix I site report states that many of the housing units on site are not permanent structures but 'RV homes, RV mobile homes, shanty town' and other mobile or unpermitted housing occupied by 'vagrants or squatters.'

i. Appendix I – "Two additional detailed site reconnaissance visits were performed on November 1, 2023, by Natalia Delgadillo, and November 9, 2023, by Jack Packwood, of Group Delta. Each property was visited by Group Delta personnel. It should be noted that there is an elevated level of **vagrancy**, unleashed dogs, drug and alcohol use, and other conditions at various locations onsite that make detailed site reconnaissance on

2-3 (CONT.)

2-4

[1] https://www.gov.ca.gov/2025/07/07/six-months-after-the-la-fires-nations-fastest-residential-cleanup-nears-completion-as-governor-newsom-signs-streamlining-executive-order-joins-local-leaders-to-unveil-blueprint-for-rebuildi/

[2] https://www.hcd.ca.gov/housing-open-data-tools/apr-dashboard - accessed October 16, 2025

ii. some parcels difficult, if not impossible, under current conditions. Even with the temporary presence of the Riverside County Sherrif, the site reconnaissance had to be conducted under expedited working conditions. On some parcels, the degree of debris was simply to great and thus impossible to inspect all conditions under safe working conditions, particularly in **areas where vagrants or squatters** were currently living." A couple of annotated images from Appendix I are included as Figure 2.

iii. We note that new non-permanent structures were included such as RVs and 'shanty town' structures were included in the displacement analysis in the DEIR. These residents are likely lower income households that will require replacement housing and relocation assistance per county policy H-32 and payments to displaced tenants per AB 98 as adopted by the County in its Good Neighbor and Logistics Policy.

2-4 (CONT.)

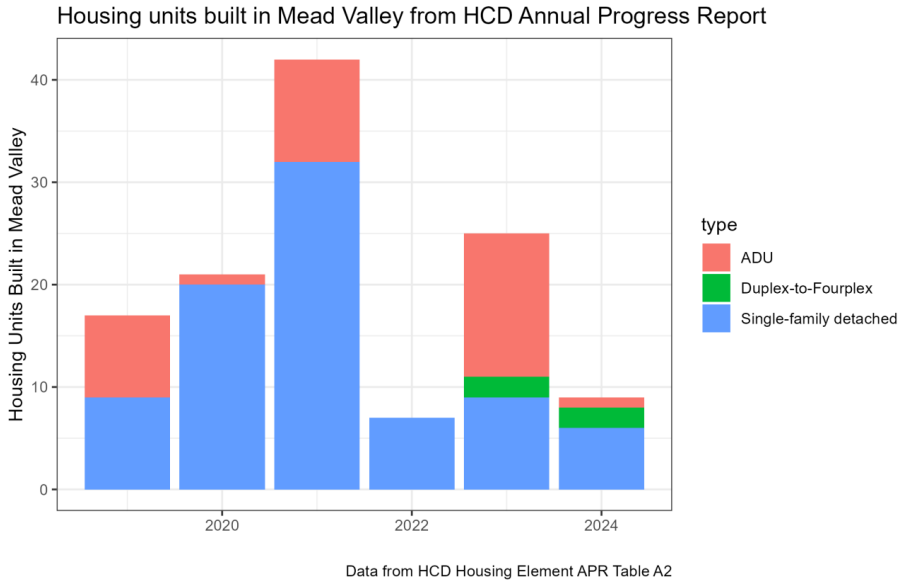

Figure 1. Number of Mead Valley residential units built by year from HCD Annual Progress Report Table A2.

Photograph Number 2:

APN 317-080-008

Abandoned cars and RVs

View to the south of APN317-080-007.

Photograph Number 3:

APN 317-080-008

In-use RV and single-family house. Trash accumulation on the back.

View to the southeast from the northwestern end.

2-4 (CONT.)

Figure 2. Images of site from Appendix I indicating low-income non-permanent housing on site that will displace additional residents not accounted for in analysis.

2-4 (CONT.)

Photograph Number 18:

APN 317-080-027

One of two suspected make-shift septic systems. Disabled car and debris. Occupied RVs, shed, and garage.

2-4 (CONT.)

3. The County asserts that the AB 98 compliance analysis was 'only for informational purposes and it is therefore not obligated to do it correctly and address the missing pieces where the project is not compliant such as 2:1 housing replacement, truck routes, and tenant protections. As a result, the Lead Agency is providing misinformation for decision-makers and the public and we note that for the administrative record that the project is noncompliant and the cherry-picking of the Lead Agency in which AB 98 provisions to include is misleading.

2-5

4. The County acknowledges that it has not analyzed the recreational park's siting in an industrial corridor by the County planning agency and the surrounding foundation general plan amendments for projects GPA 240004 to the east, 240027 to the south, and 240022 to the north, west, and south. Obviously, recreational parks for children shouldn't be sited in an industrial corridor. The Lead Agency fails to analyze for this. The adjacent warehouses and proposed surface pit mine are likely to adversely affect the air quality, noise, and usability of a recreational park and should be appropriately analyzes as negative impacts for the sensitive receptor of a recreational park. Given that the park is the community benefit, its siting is of critical importance and locating in an industrial corridor is incompatible with the County's adopted Healthy Communities and Environmental Justice policies HC 1.1, HC1.2, HC2.1, HC2.2, HC3.2, HC6.2, HC9.1, HC9.5, HC10.2, HC 10.7, HC 14.1, HC 14.2, HC 16.8, HC 18.7, HC 18.9, HC 18.12 and HC 22.4.

2-6

5. The agency is required to assess compatibility with the RCTC transit oriented communities' strategies under the County's circulation, housing, and healthy community policies. Demolishing homes is inconsistent with state and county policy to increase transit ridership by densifying communities around transit hubs. Specifically, it is inconsistent with policies HC3.1, HC3.2, HC5.4, HC 6.1, HC6.2, HC6.3, HC9.1, HC9.5, HC14.2, HC16.10, and HC18.7 in the Healthy Communities element, Housing policies H1.5, H5.4, and H5.6, and Circulation

2-7

policies C1.1, C1.7, C3.8 (no truck routes through community centers), C11.2, C11.3, C11.4 (new development near transit corridor), C12.1, C12.5 (transit oasis), and C12.6 (community center).

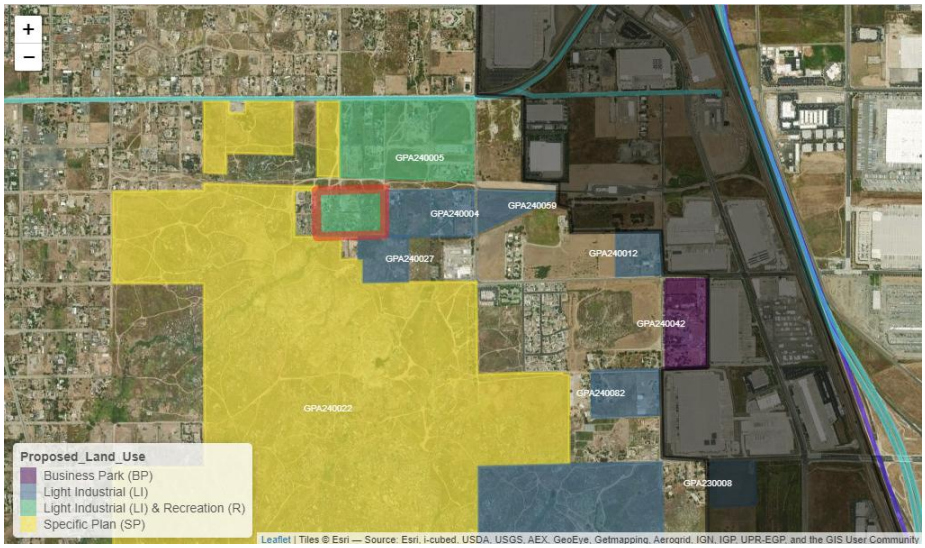

Figure 3. Location of the proposed recreational park in relation to surrounding foundation general plan amendment projects that are all industrial warehouses or quarries incompatible with a sensitive receptor area.

2-7 (CONT.)

6. The County asserts that warehouse megaprojects such as Stoneridge Commerce Center and the World Logistics Center do not need to be included because they are too far from the project at 5 miles and 8 miles away and do not directly contribute to traffic on Cajalco Road. This, of course, ignores those project air pollution, traffic, and housing impacts on the region. In contrast, the County asserts that housing units in Mecca CDP in the Eastern Coachella Valley are interchangeable with Mead Valley and count towards mitigating displacement risk and the total housing inventory, despite being 70 miles away. If the housing displacement is somehow a regional county-wide issue then the warehouses within an easy 10-mile commute should also be included in this analysis for their impacts on jobs and pollution. This is extremely important to consider as a regional issue because the regional warehouse impacts are all accruing to the same major freight corridors on the 215/60.
7. The County asserts that the list of cumulative impacts should be frozen as of the date of the NOP, which was in June 2023. However, I look at it in a different way. The cumulative impacts of the additional 1,100 acres of residential rezones is **Significant New Information** that requires recirculation of the draft EIR as specified under § 15088.5. The additional 1,100 acres of residential rezones to industrial under the Foundation General Plan Amendment is new information, not available at the NOP period, which is a significant impact. The community is being deprived of the opportunity to comment on these as cumulative impacts by the County's own admission. Therefore, this requires recirculation of the draft EIR with a

2-8

full disclosure of all cumulative impacts from residential rezone projects in Mead Valley. Moreover, the additional projects of New Perris Commerce Cetner, Perris Valley Towne Center, Ethanac Logistics Center, etc. are also new cumulatively considerable impacts. The sheer number of projects within 10 miles that have been added is itself evidence that recirculation is required as the Cumulative Impacts Analysis is clearly a woeful underestimate.

8. Mead Valley disproportionate burden of warehousing is incompatible with adding more warehouses, as indicated by the Healthy Communities policies HC10.7, HC 14.2, and most explicitly HC 15.8 that creates a cap on the number of pollution sources within EJ communities. As Mead Valley is the most burdened community for warehousing impacts, a cap on new warehouses is the obvious remedy. Additionally, policy HC 18.12 prioritizes safe and affordable housing in EJ communities while at the same time minimizing the displacement of existing residents, considering Housing Element goal 2, Action 2.1h.
9. The County asserts that No Net Loss policies should be narrowly interpreted and ignores that the project is literally parcel adjacent to urbanized areas to both the east and west of the project. It is an urbanized area 'hole' and the adjacent should be sufficient to trigger the consideration of replacement housing.

2-8 (CONT.)

2-9

New information

Failure to Affirmatively Further Fair Housing via Discriminatory Practices

In addition to the previous responses to the County, it is important to note the cumulative impacts of the foundation general plan amendments. The Project is part of the County's Foundation General Plan Amendment process, an 8-year planning cycle to amend the General Plan holistically. Mead Valley community received 15 of the 76 proposed projects for general plan amendments in the County, and 13 of those 15 projects sought industrial rezones from residential. The entire rest of the county had 6 out of the remaining 61 projects general plan amendments for business park, light industrial, or specific plans that would allow warehouse land uses. In other words, Mead Valley has over 60% of the total possible industrial rezone projects in the unincorporated County and has 80% of its project seeking industrial rezones, whereas other parts of the county are at a ratio of 10% of projects seeking industrial rezones. Cumulatively, the combined projects would increase the industrial area within Mead Valley from 13.3% to 22.8% of the land use. An industrial land corridor map displayed at a town hall meeting in Mead Valley indicated a doubling of the industrial corridor area to approximately 3,170 acres which would make at least 100 other residential housing units non-conforming uses as shown in **Figure 4.**

2-10

Figure 4. Image of proposed new industrial corridor area in Mead Valley displayed at Town Hall October 15, 2025 by Riverside County staff and elected officials.

2-10 (CONT.)

Mead Valley's population of 19,600 is 82.5% Hispanic, with 75% of the community speaking Spanish at home and 39% being foreign born[3]. There are 4,300 households. Most of Mead Valley is designated as disadvantaged by the State and County. Nearby unincorporated communities of Woodcrest, Nuevo, and Lake Mathews have either residential, commercial, or no projects proposed in the Foundation General Plan Amendment Cycle; none have any industrial rezoning.

2-11

The County improperly asserts that the project is needed more than homes to address the County imbalance in the jobs/housing ratio (see Section 4.15 – housing and land use). However the relative ratio of jobs/housing in the County as-a-whole is the incorrect metric since most unincorporated communities are not within the job's radius of this warehouse project. The appropriate metric is the ratio of jobs/housing **in Mead Valley.** Mead Valley has one of the highest ratios of jobs/housing in the whole unincorporated County, as shown in Table P-3 of the Housing Element – with 2018 estimates of 8,039 employed population and 4,717 housing units for a jobs:housing ratio of 1.74. Western Riverside County's ratio is 101,364 employed population and 78,231 housing units for a ratio of 1.29, while the unincorporated County as a whole is 120,100 employed population and 106,558 housing units, for a ratio of 1.13. SCAG states that a job-housing ratio should be 1.36 jobs per housing unit is considered a balanced housing ratio; Mead Valley's job-housing ratio in the housing element Table P-3 is 1.74, which is considered by SCAG to be a 'jobs-rich' area, not a housing-rich area. In contrast, nearby Woodcrest has a jobs-housing ratio of 1, which is jobs-poor, but has no industrial zoning or residential structures under consideration for demolition.

2-12

[3] https://datausa.io/profile/geo/mead-valley-ca/

Every comment made in the response to comments that cites the 'jobs-housing balance' in the County is therefore inaccurately applied. Eastern Riverside County has a poor jobs-housing balance but is 50 miles away. Mead Valley in 2018 was a jobs-rich area. However, in 2018, Mead Valley had only begun its industrial warehousing boom with 209 acres of warehouses built (~5 million square feet). Today in 2025, that number climbed to almost 250% to 693 acres of built warehouses in the industrial corridor, providing thousands of additional jobs while the population went from 19,925 residents in 2018 to 19,588 in 2023 – losing population.

Thus, in contrast to the assertions by the County, this area needs homes and doesn't need jobs. It is other unincorporated communities that needs jobs and don't need more residential structures. This is all according to its own housing element.

Table P-3 Population, Households, and Employment Distribution, 2018

Planning Area	Population	% of Total	Housing Units	% of Total	Households	% of Total	Employed Population	% of Total
Unincorporated Communities in the Western County								
Aguanga CDP	835	0.3%	554	0.5%	337	0.4%	411	0.3%
Anza CDP	3,151	1.0%	1,313	1.2%	1,041	1.2%	1,158	1.0%
Cabazon CDP	3,367	1.1%	1,030	1.0%	973	1.1%	1,286	1.1%
Cherry Valley CDP	7,755	2.5%	2,946	2.8%	2,836	3.1%	3,275	2.7%
Coronita CDP	3,138	1.0%	769	0.7%	738	0.8%	1,659	1.4%
East Hemet CDP	20,679	6.8%	6,269	5.9%	5,766	6.4%	8,509	7.1%
El Cerrito CDP	5,471	1.8%	1,524	1.4%	1,464	1.6%	2,345	2.0%
El Sobrante CDP	13,966	4.6%	4,055	3.8%	4,055	4.5%	6,908	5.8%
French Valley CDP	33,818	11.1%	8,808	8.3%	8,539	9.4%	14,877	12.4%
Good Hope CDP	9,173	3.0%	2,341	2.2%	1,977	2.2%	3,832	3.2%
Green Acres CDP	2,542	0.8%	728	0.7%	666	0.7%	1,017	0.8%
Highgrove CDP	4,986	1.6%	1,477	1.4%	1,382	1.5%	2,568	2.1%
Home Gardens CDP	11,442	3.7%	3,108	2.9%	3,059	3.4%	5,268	4.4%
Homeland CDP	7,326	2.4%	2,326	2.2%	2,100	2.3%	2,925	2.4%
Idyllwild-Pine Cove CDP	2,459	0.8%	4,142	3.9%	1,145	1.3%	1,271	1.1%
Lakeland Village CDP	13,170	4.3%	3,814	3.6%	3,558	3.9%	5,919	4.9%
Lake Mathews CDP	6,848	2.2%	1,977	1.9%	1,895	2.1%	3,363	2.8%
Lake Riverside CDP	1,049	0.3%	397	0.4%	317	0.4%	391	0.3%
Lakeview CDP	2,566	0.8%	590	0.6%	549	0.6%	1,174	1.0%
March ARB CDP	1,150	0.4%	755	0.7%	492	0.5%	272	0.2%
Meadowbrook CDP	3,033	1.0%	995	0.9%	888	1.0%	1,298	1.1%
Mead Valley CDP	19,925	6.5%	4,717	4.4%	4,382	4.8%	8,039	6.7%
Nuevo CDP	7,033	2.3%	1,954	1.8%	1,852	2.0%	1,954	1.6%
Romoland CDP	2,227	0.7%	543	0.5%	520	0.6%	543	0.5%
Temescal Valley CDP	26,709	8.7%	8,551	8.0%	8,084	8.9%	8,551	7.1%

Table 2 - Table P-3 from County Housing element[4].

In addition, the jobs-housing balance argument is especially inaccurate given the large numbers of adjacent warehouses adjacent to Mead Valley. March JPA, Perris, Moreno Valley, Riverside, and Menifee all have significant existing warehouses, entitled warehouses, and under environmental review warehouse as repeated *ad nauseum*. Tearing down 26 residential homes to build yet another warehouse is ridiculous.

2-12 (CONT.)

[4] https://planning.rctlma.org/sites/g/files/aldnop416/files/2024-07/County%20of%20Riverside%206th%20Cycle%20Housing%20Element.pdf

Speculative Warehouse

The project assumes, without justification, that a speculative warehouse will provide jobs and economic value to the community. However, there are significant headwinds in the logistics industry right now, including global tariffs, increasing vacancies, decreasing rents, and accelerating automation. As a result, it is imperative that the economic justification for a 'speculative' warehouse with no tenant is justified.

Colliers Q3 2025 industrial real estate reports that net absorption of warehouse space was negative in the IE, vacancies are at the highest rate in more than 10 years, and there is 49.3M square feet of vacant rental space available – a factor of 50x higher than the Q1 2022 vacancies. See attachment.

CommercialCafe[5] and Commercial Search[6] provide for lease industrial real estate listings by community and it shows 10 industrial buildings available in Mead Valley – and 38 in the greater Perris area. Developers will claim this is only smaller buildings, but over 20 industrial buildings over 400,000 sf were vacant within 10 miles of the project site.

The project is being dumped into a harsh economic environment and the project has no tenant – it is a speculative warehouse – a gamble. All of the purported benefits of the project are speculative and dependent on a logistics industry turnaround during a time of rising international tariffs[7] with Asia-Pacific trade partners.

Specifically, the project is claiming it is necessary to expand goods movement, supply chain uses, and light industrial buildings in Mead Valley for 'employment-generating' purposes while providing no guarantee that the project will not be a dark warehouse full of robots independent of human labor[8]. Robots don't pay taxes and aren't employed.

2-12 (CONT.)

Conclusion

We hope that you take the time to review and address these comments with the seriousness they deserve. This project should be rejected in favor of a medium or high-density residential rezone to take advantage of the planned Mead Valley Metrolink Transit Hub mobility station. This is a jobs-rich community that needs more housing to take advantage of the rich existing jobs situation in Mead Valley, not more warehouses.

2-13

Sincerely,

Michael McCarthy, PhD
Sierra Club
Moreno Valley/Box Springs Group
Co-Conservation Chair
Email: mikem@radicalresearch.llc

[5] https://www.commercialcafe.com/commercial-real-estate/us/ca/mead-valley/
[6] https://www.commercialsearch.com/commercial-real-estate/us/ca/mead-valley/
[7] https://fortune.com/2025/10/19/trump-trade-war-not-looking-to-destroy-china-tariffs-xi-jinping-rare-earth-export-controls/
[8] https://envistacorp.com/blog/dark-warehouse-advantages-disadvantages/

COMMENT LETTER 3

RAMV
Debbie Walsh
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October 20, 2025

Riverside County Board of Supervisors
P.O. Box 1409
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Riverside County Board of Supervisors
4080 Lemon Street
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***Re: Agenda Item** 23.1* **GENERAL PLAN AMENDMENT NO. 240005 (Foundation Component)**
Cajalco Commerce Center (Mead Valley Commerce Center)

Greeting Supervisors:

On behalf of concerned residents throughout the region, the Residents Association of Greater Lake Mathews (RAGLM) and the Rural Association of Mead Valley (RAMV) representing over 35,000 residents, please accept these comments in opposition to the Cajalco Commerce Center (Warehouse).

"Priority should be placed on avoiding land use conflicts between warehouses and sensitive receptors and on mitigating the impacts of any unavoidable land use conflicts.
However, even projects located far from sensitive receptors may contribute to harmful regional air pollution, so you should consider measures to reduce emissions associated with the project to help the State meet its air quality goals. A distant warehouse may also impact sensitive receptors if trucks must pass near sensitive receptors to visit the warehouse." (Rob Bonta, Department of Justice, July 19, 2023).

3-1

A 1.2 million sq ft. warehouse just feet from this Project in the Industrial Corridor is sitting empty and cannot be subleased. Numerous other warehouses have been built on speculation and are empty within the Industrial Corridor already zoned for warehouses.

1. This warehouse project zoning is residential and commercial and located at Seaton and Cajalco. This project will remove valuable revenue and job creating commercial land depriving the residents of real job opportunities, not low income temporary warehouse jobs. The location of this commercial land is critical to the residents of Mead Valley. Types of business include: restaurants, strip malls and grocery stores. The EIR has not adequately addressed the removal of commercial property and replacing this with an Industrial warehouse.
2. This warehouse is outside of the current Industrial Corridor, in the residential community and required a Foundation General Plan Amendment. The EIR has not addressed the sprawl of Industrial warehouses into the residential community and effects on the entire community of pollution, truck traffic and Rancho lifestyle.

3-2

3. There is no significant justification to change the zoning from commercial and residential to Industrial. The EIR fails to justify the need and reasoning for changing the zoning from residential and commercial to Industrial especially when so many warehouses are now empty in Mead Valley.
4. The proposed warehouse requires 26 homes and families to be displaced. There is no justification in the EIR to remove 26 Ranch homes from the community.
5. This warehouse will open the door to numerous additional warehouses on 1100 acres nearby. Piece mealing is not allowed under CEQA. The EIR does not evaluate the additional warehouses within the 1100 acres nearby.
6. The County has been working on a **"NEW" Mead Valley Area Plan since February, 2023** and yet this "NEW" Mead Valley Area plan was not included in the EIR for the Mead Valley Commerce Center or the Cajalco Commerce Center. Even though this plan has been in the works for almost 2 years the Plan was first brought to the attention of the Mead Valley Community at the recent "Town Hall Meeting" on October 15, 2025.
   Exhibit A: Mead Valley Area Plan Map. The Town Hall consisted of a simple Power Point presentation on the Area Plan. No questions were allowed and no information was given.
7. The land for this project and thousands of acres nearby is prime habitat land for endangered and threatened animals such as the Burrowing Owl. The EIR does not include the cumulative impacts of this warehouse and the numerous other warehouses in the "new" Mead Valley Area Plan area.
8. This Property is near the Mott Rimrock Reserve and UCR Research Facility. Pollution, noise and lighting from this warehouse and nearby warehouses will impact the habitat living in the area. The additional impacts to habitat and destruction of habitat has not been adequately addressed in the EIR.
9. Mead Valley leads the list for the highest warehouses in the area per resident. How many more warehouses must this poor area of color endure? The Environmental Justice report has not adequately addressed this concern. The heath impacts to the Mead Valley residents and school children have not been adequately addressed.
10. This warehouse project is yet another warehouse with no tenant. Built on speculation while the industry continues to take a nose dive and empty warehouses explode. The EIR has not addressed the need for warehouses as so many are vacant.
11. Project is adjacent to the Colorado Aqueduct which is drinking water for Southern California. Blasting will need to take place near the aqueduct. Impacts from vibration from the trucks near the aqueduct over time have not been addressed in the EIR. The Colorado Aqueduct provides about 20% of the region's water supply and serves millions of people in Los Angeles and Orange County. Can we afford to risk the Aqueduct being damaged?
12. The EIR did not adequately analyze the truck routes and impacts from this warehouse. The EJ document States:
    "The Project is designed to route all truck traffic to driveways proposed along Seaton Avenue and along Cajalco Road/Cajalco Expressway to access Interstate 215 (I-215), and there are no existing or planned sensitive receptors along these segments of Seaton Avenue and Cajalco Road/Cajalco Expressway."
    The EIR does not property analyze truck traffic from this Project.
    (a) the project cannot route ALL truck traffic to the I-215 Freeway. That is impossible.
    (b) The current warehouses in Mead Valley along Harvill Ave. route trucks using Cajalco going west to the I-91 and back from the ports using Cajalco east.
    "There are no existing or planned sensitive receptors" is inaccurate. There are a number of sensitive receptors along Cajalco where the trucks will pass. This Project will route a substantial number of trucks onto Cajalco road going west past two elementary schools, a middle school and community library.
13. We do not need to add additional land to the current Industrial Corridor with so much land now empty and warehouses setting empty.

3-2 (CONT.)
3-3
3-4
3-5
3-6
3-7

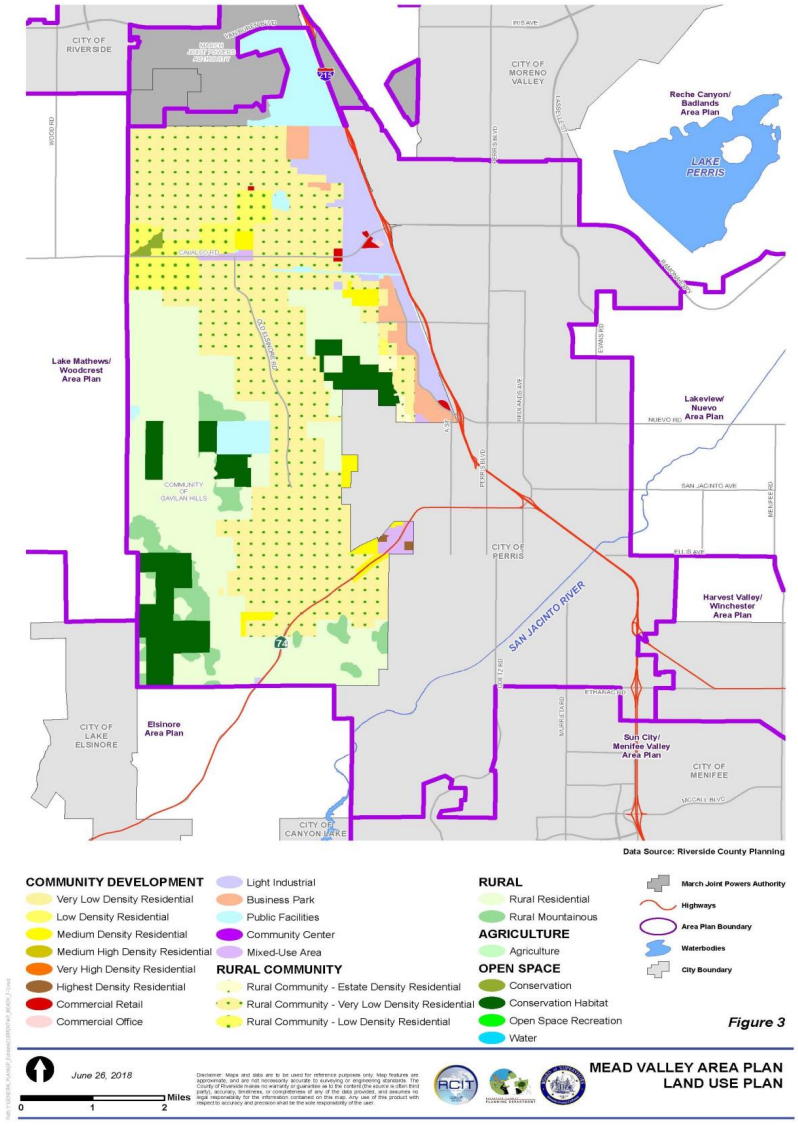
14. Mead Valley is an Environmental Justice Community similar to Bloomington where the majority of poor Hispanic families were uprooted, schools bulldozed and community destroyed in order to build massive warehouses under speculation. We do not need to repeat what happened in Bloomington.
15. The park may or may not be built. The warehouse is being built of speculation. The Park is a sensitive receptor. Plans for a "Park" just feet from the dock doors, next to the Colorado Aqueduct, at the end of the road is open to homeless camps and drug dealers. Hidden from view. This will not benefit the community, but the developer. There is a nice park located at the Mead Valley Community Center with a 24-7 security officer. That park needs to be expanded.
16. Cajalco Road will widen at Decker to add one more lane and then narrow at Seaton to one lane causing a bottleneck. The majority of the trucks from this project will use Cajalco West to the I-15. Few warehouse trucks access the I-215 from Cajalco going east.
17. This project is part of a large number of other Foundation GPS's getting ready for approval. Piecemealing these projects to get millions of square feet of warehouses approved.
18. This project and others that are part of the FGPA's will destroy valuable habitat land next to the Mott Rimrock Reserve.
19. The numerous Projects are being piecemealed instead of being considered as one project. The impacts to the community of Mead Valley cannot be evaluated as these projects come up individually.

3-7 (CONT.)

“NEW” Proposed Mead Valley Area Plan

3-7
(CONT.)

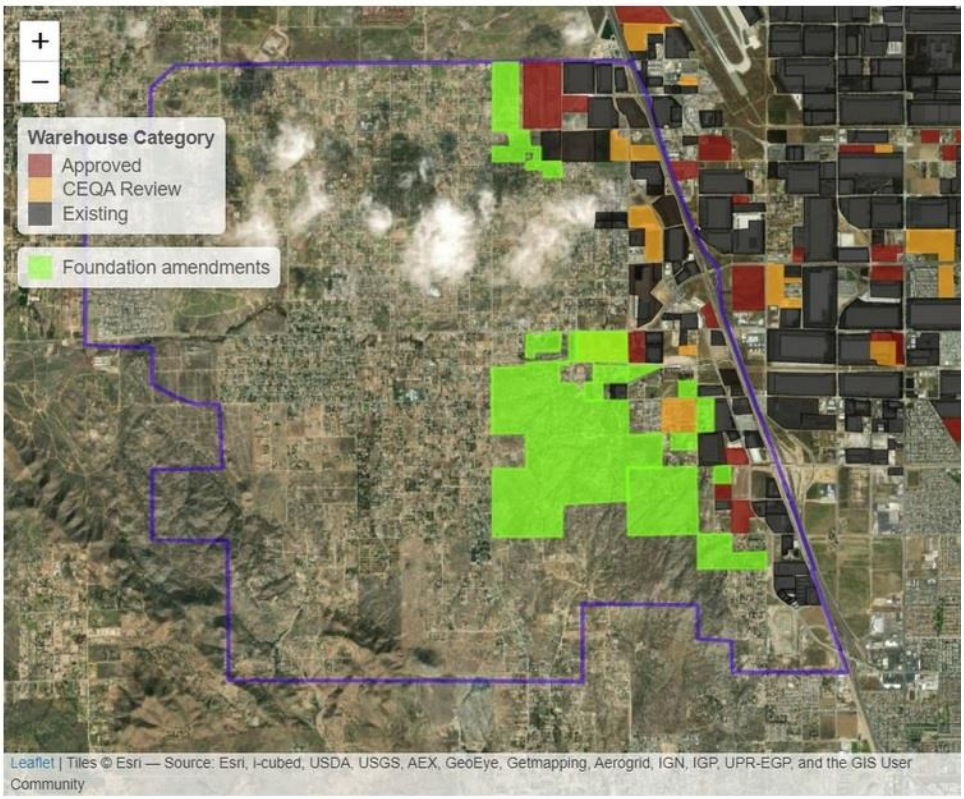
Current Adopted Mead Valley Area Plan Map



3-7 (CONT.)

10.3.4 Planned Warehouses map for Mead Valley Foundation plan amendments

Figure 10.5



3-7 (CONT.)

This Project did not provide the required findings necessary to change from rural and agriculture land uses to Industrial land use.

I. FINDINGS FOR FOUNDATION COMPONENT GENERAL PLAN AMENDMENT CANNOT BE MADE

No. 220003 should not be approved as the required findings for approving such an amendment are unsupported by substantial evidence and cannot be made. Zone change 220003 does not allow for a Foundation Component General Plan Amendment that is required by this Project. Foundation General Plan

3-8

Amendments are subject to an eight-year approval cycle. (Ord. 348 § 2.5 (B).) Pursuant to Ordinance 348 Section 2.5.

(1) That new conditions or circumstances disclosed during the review process justify modifying the General Plan;

(2) That the modifications do not conflict with the overall Riverside County Vision, and

(3) That they would not create an internal inconsistency among the elements of the General Plan.

These findings cannot be made for the site

A. No New Conditions or Circumstances Justify Modifying the General Plan

There is no support for the first required finding for approving a Foundation Component Amendment to the General Plan as there is no evidence of new circumstances or conditions relative to this site. The Foundation or any GPA should not be initiated.

B. The Modifications Conflict with the Overall Riverside County Vision, Mead Valley Area Plan, and General Plan

3-8 (CONT.)

According the General Plan, "The Mead Valley land use plan provides for a predominantly rural community character with an equestrian focus. This is reflected by the Very Low Density Residential and Low Density Residential land use designations within the Rural Community Foundation Component and Rural Residential designation within the Rural Foundation Component that dominate the planning area."

The Rural Community Foundation Component is intended to identify communities and neighborhoods having a rural lifestyle, where animal-keeping uses and limited infrastructure (compared with Community Development areas) are prevalent. Rural Community areas will serve as transition areas between Community Development and Rural Foundation Components. Along these lines, the Very Low Density Residential land use designation provides for the development of detached single- family residential dwelling units and ancillary structures on large parcels, and the Rural Community Foundation Component encourages equestrian and other animal-keeping uses.

Hence, the area targeted for land use change is an area intended to act as a gradual transition between Community Development and Rural Foundation components of the General Plan. This would diminish Rural Community Foundation Component of the General Plan and degrade its application in this area. Zone Change 220003 would also permit Light Industrial uses to encroach further west to develop adjacent to higher density residential uses. In this way, this conflicts with the overall purpose of these Foundation Components and the General Plan.

- *"Is flexible so that it can be adjusted to accommodate future circumstances, yet provides a solid foundation of stability so that basic ingredients in the plan are not sacrificed."* Again, no new "future circumstances" justify undermining GP stability.
- *"Protects high-value environmental resources and private property rights - and develops the complex tools needed to do so."* Private property rights surrounding, and environmental resources on and surrounding, the Zone Change 220003 site (and entire Project site) are not being protected by this proposed amendment. Residences nearby the site will be harmed by intensified land uses, increased air pollutant emissions, traffic, noise, aesthetic, and other impacts that will harm both the environment and property values.
- *"Provides a long-term means for economic stability to be achieved through investment by a variety of interests: residential, agricultural, property owner, environmental, institutional, business community, labor, and others."* Zone Change 220003 would prefer the interests of the property owner over neighboring residential uses and agricultural zoning.
- *"Preserve crucial open space and transportation corridors, resulting in more compact and efficient development than would otherwise happen."* Zone Change 220003 would promote further sprawl west away from the I-215 transportation corridor.
- *"Provide a range of community design options to respond to varied lifestyle choices."* Zone Change 220003 would delete the adopted range of design options seeking to maintain rural uses in this area of the County.
- *"Put a focus on high quality, efficient growth that uses land resources efficiently."* Zone Change 220003 would promote further sprawl and inefficient growth.
- "*Provide a process for adjustment through General Plan reviews, in accordance with state law, at regular intervals or when triggered by key events."* No "new" condition or event has occurred justifying adjustment at this site.
- *"Corridors and areas are preserved for distinctive purposes: …economic development, including agriculture; residences…"* Zone Change 220003 would blur distinct lines and fail to preserve residential and agricultural purposes. Furthermore, if agricultural uses would occur in areas zoned for agriculture near the site, County Ordinance 625.1 (right-to-farm ordinance) would not protect such uses unless they were in operation for at least 3 years before the proposed project is developed, potentially precluding agricultural activities on surrounding properties with agricultural zoning.
- *"The rich diversity of Riverside County's environmental resources; even those modified by human activities; is preserved and enhanced for the enjoyment of present and future generations."* Zone Change 220003 would not preserve blue line streams or rural uses at the site.
- *"New growth patterns no longer reflect a pattern of random sprawl. Rather, they follow a framework of transportation and open space corridors, with concentrations of development that fit into that framework. In other words, important open space and transportation corridors define growth areas."* Zone Change 220003 promotes growth of industrial warehouse uses outside the designated transportation corridor, to where such growth was planned to be limited.

3-8 (CONT.)

- *"The extensive heritage of rural living conditions continues to be accommodated in areas committed to that lifestyle and its sustainability is reinforced by the strong open space and urban development commitments provide for elsewhere in the RCIP."* Zone Change 220003 would permit industrial development to encroach upon rural living areas and agricultural zoning.
- *"Each of our rural areas and communities has a special character that distinguishes them from urban areas and from each other. They benefit from some conveniences such as small-scale local commercial services and all-weather access roads, yet maintain an unhurried, uncrowded life style. Rural residents accept the fact that they must travel some distance for more complete services and facilities."* Zone Change 220003 would permit industrial development to encroach upon rural living areas and agricultural zoning.
- *"Land use and transportation decisions are made with an understanding of their impact on the health of Riverside County residents; achieved through partnerships with project sponsors and evaluation of land use and transportation decisions from the perspective of health outcomes."* Zone Change 220003 and the Project proposed would locate high cube warehouses adjacent to low density and very low density residential uses without concern for the health and safety of residents, as discussed further below.
- *"Air quality is viewed as such an important factor in quality of life that its measurements are used as a major factor in evaluating the Plan's performance."* Zone Change 220003 would permit the locating of significant additional diesel trucks and associated localized diesel PM emissions adjacent to residences.
- *"Measures that reduce carbon emissions and increase energy efficiency are now routinely included in all areas of growth within Riverside County - new development, retrofitting of existing structures, as well as new and ongoing operations."* Zone change 220003 would permit further westerly sprawl and development intensity away from infrastructure, increasing carbon emissions and reducing energy efficiency.
- *"Along with its emphasis on achieving community desires, Riverside County remains highly respected for its sensitivity to private property rights."* Approval of Zone Change 220003 would be insensitive to the private property rights of neighboring residents who relied on the GP stability, absent important changed circumstances, when deciding to invest in their properties.

3-8 (CONT.)

A GPA and zone change from rural to Industrial for this Project conflicts with the General Plan Vision, any Foundation GPA should not be initiated.

II. THE PROJECT SHOULD BE DENIED WHERE IT WILL RESULT IN SIGNIFICANT ENVIRONMENTAL IMPACTS, INCLUDING SIGNIFICANT HEALTH RISKS FROM DEVELOPING DISTRIBUTION WAREHOUSES ADJACENT TO RESIDENTIAL USES

The "Project" necessitating zone change 220003 is a proposal to develop a industrial high-cube warehouse/ distribution centers totaling over 1 million square feet.

This Foundation Component General Plan Amendment application is thus just one part of a larger proposal to decimate land use planning in this area, and to develop a project which is completely contrary to adopted General Plan and Zoning designations..

The Commission has the opportunity to encourage upholding the General Plan by recommending this environmentally harmful and inconsistent Project not move forward as planned. Thorough consideration should be given to the following potentially significant environment impacts that will be caused by allowing the Project to move forward:

3-9

A. Health Risk Impacts from Light Industrial Land Use adjacent to Residential Uses.

The health risk impacts from initiating zone change 220003 and the proposed Project are of particular concern and provide a strong reason to deny initiation of zone change 220003. Because of the cancer risk and other impacts of diesel emissions on human health, SCAQMD, CARB, WRCOG, and others have recommending siting warehouses at least 1000 feet from residences and other sensitive receptors. ("Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning: a Reference for Local Governments within the South Coast Air Quality Management District," May 6, 2005, "Good Neighbor Guidelines for Siting New and/or Modified Warehouse/Distribution Facilities," WRCOG Regional Air Quality Task Force, September 12, 2005.) This Project proposes to site warehouses adjacent to homes is inconsistent with this clear guidance.

The scope and breadth of health effects of diesel PM emissions are the subject of ongoing study. At present, diesel PM is known to cause cancer; immune system effects; reproductive, developmental, and endocrine effects; nervous system effects; and lung health problems, as recognized by the County in the General Plan. Immune system effects include increased allergic inflammatory responses and suppression of infection fighting ability. Diesel PM's reproductive effects include decreased sperm production, changes in fetal development, low birth weight and other harms. Diesel PM exposure may also cause impairment to the central nervous system.
(*See, The Health Effects of Air Pollution on Children*, Michael T. Kleinman, Ph.D, Fall 2000, < http://www.aqmd.gov/docs/default-source/students/health-effects.pdf >[1]; *Diesel and Health in America: the Lingering Threat*, Clean Air Task Force, February 2005, <http://www.catf.us/resources/publications/files/Diesel_Health_in_America.pdf>, *"Dirty Air Triggers More Heart Attacks than Cocaine,"* Kate Kelland, Reuters 2011, and *"Air Pollution Worse than Cocaine for Triggering Heart Attacks, says study,"* Press Association 2011.)

3-9 (CONT.)

[1] Please consider electronic citations as though they were set forth in full herein. We are happy to provide hard copies of any document upon request.

certified WBENC WOMEN'S BUSINESS ENTERPRISE

SCAQMD has stated with regards to the health effects from diesel PM:

> "Diesel particles consist mainly of elemental carbon and other carbon-containing compounds… Diesel particles are microscopic…Due to their minute size, diesel particles can penetrate deeply into the lung. There is evidence that once in the lung, diesel particles may stay there for a long time.
>
> In addition to particles, diesel exhaust contains several gaseous compounds including carbon monoxide, nitrogen oxides, sulfur dioxide and organic vapors, for example formaldehyde and 1,3-butadiene. Formaldehyde and 1,3-butadiene have been classified as toxic and hazardous air pollutants. Both have been shown to cause tumors in animal studies and there is evidence that exposure to high levels of 1,3-butadiene can cause cancer in humans…
>
> Diesel emissions may also be a problem for asthmatics. Some studies suggest that children with asthma who live near roadways with high amounts of diesel truck traffic have more asthma attacks and use more asthma medication.
>
> Some human volunteers, exposed to diesel exhaust in carefully controlled laboratory studies, reported symptoms such as eye and throat irritation, coughing, phlegm production, difficulty breathing, headache, lightheadedness, nausea and perception of unpleasant odors. Another laboratory study, in which volunteers were exposed to relatively high levels of diesel particles for about an hour, showed that such exposures could cause lung inflammation." (*The Health Effects of Air Pollution on Children, supra.*)

Furthermore, infants, children, and the elderly are more susceptible to diesel PM and its associated health impacts. ("Studies Link Fine Particulate Exposure to Children's and Seniors' Health," July/August 2015 < http://www.aqmd.gov/docs/default-source/publications/aqmd- advisor/july-advisor-2015.pdf?sfvrsn=6 >) Recent studies have linked exposure to childhood allergies, aging of the brain, and higher death rates, among other things. (*Id.*) Other recognized effects of diesel PM on children include slowed lung function and growth, increased emergency room visits, increased incidences of asthma and bronchitis, crib death, asthma respiratory infections, allergic symptoms, and asthma hospitalizations. (*Diesel and Health in America: the Lingering Threat*, *supra*.) Importantly, this exposure to high pollutant levels in children occurs while their lungs are still developing, and therefore has more severe impacts on this sensitive group. (*The Health Effects of Air Pollution on Children, supra*.)

This increased susceptibility to air pollutant emissions for children has resulted in the California EPA Office of Environmental Health Hazard Assessment ("OEHHA") weighting cancer risk by a factor of 10 for exposures to carcinogens from birth to two years old, and by a factor of 3 for exposures from 2 years old to 15 years old. (*Technical Support Document for Cancer Potency Factors: Methodologies for derivation, listing of available values, and adjustments to allow for early life stage exposures*, California EPA OEHHA Air Toxicology and Epidemiology Branch, April 2009, p. 3. http://oehha.ca.gov/media/downloads/crnr/tsdcancerpotency.pdf)

This Project is proposed to be developed directly adjacent to residential uses in total disregard of good neighbor policies for land use siting and appropriate residential setbacks.

3-9 (CONT.)

C. GHG Emissions

The proposed zone change intensifies the use of the site from very low density residential to light industrial. Increased intensity of site development from potentially 2 homes (1 acre minimum for VLDR) as currently planned to an additional 152 truck loading bays if zone change 220003 is approved (not even considering the whole Project) will significantly increase mobile GHG emissions.

D. Noise

The County's General Plan recognizes that mobile noise sources may be the most annoying noise producers in the community. (*See General Plan Noise Element)* Noise from traffic and truck trips will increase noise to adjacent residences with increased trip generation and truck use. (U.S. Department of Housing and Urban Development. (March 1985) The Noise Guidebook. https://.hudexchange.info/resource/313/hud-noise-guidebook/. [Noise level a function of distance, among other factors].)The reduced setback achieved by Zone Change 220003 of residential uses from industrial uses will significantly impact noise experienced by residents.

The health impacts of noise to area residents from this Project may also be significant. Suter, Dr. Alice H., Administrative Conference of the United States. (November 1991) Noise and Its Effects. http://www.northfriends.org/images/WLCcomments/Johnson%20and%20Sedlack%20Attachment%203.pdf.

E. Traffic/ Transportation

The Project would significantly increase local traffic in a residential area. The Project would also increase regional traffic on area freeways including I-215, SR-60, etc. where distribution warehouses in the Inland Empire regularly travel to/ from the ports of Los Angeles and Long Beach.

In addition, the conversion of minimal passenger vehicle trips to passenger vehicle and heavy- duty truck trips adds significantly to the need and cost of road repair. According to one study, a 40-ton truck does as much damage to the road as 9,600 passenger cars. ("*Overweight trucks damage infrastructure*" April Castro, USA Today, 2007 http://usatoday30.usatoday.com/news/nation/2007-09-10-3878428638_x.htm) Impacts to transportation infrastructure will be significantly increased by this Project.

3-10

Warehouses within 1000 feet of a sports park or school significantly harms people living near warehouses, children who may be using this proposed sports park, harming their environmental and quality of life and harming the entire community. **This will bring thousands of children to a place that causes serious harm such as asthma, lung and heart disease.**

The Riverside County General Plan is required and must protect the children under its jurisdiction. Forcing Mead Valley children to use this park because you have failed to build your own park is a disgrace to everyone who lives in Riverside County. Mead Valley is an Environmental Justice community and one of the poorest communities in the County. Mead Valley receives millions of dollars in EJ funding every year, but instead of building a nice park, money was spent on hundreds of trees. With the cost of water who can afford water for those trees. **What real benefit is this to the community? A real sports park closer to the local schools would be beneficial to the residents of our community.**

3-11

IV. Warehouse Siting and Design Considerations

The most important consideration when planning a logistics facility is its location. Warehouses located in residential neighborhoods or near other sensitive receptors expose community residents and those using or visiting sensitive receptor sites to the air pollution, noise, traffic, and other environmental impacts they generate. Therefore, placing facilities away from sensitive receptors significantly reduces their environmental and quality of life harms on local communities. The suggested best practices for siting and design of warehouse facilities does not relieve lead agencies' responsibility under CEQA to conduct a project-specific analysis of the project's impacts and evaluation of feasible mitigation measures and alternatives; lead agencies' incorporation of the best practices must be part of the impact, mitigation and alternatives analyses to meet the requirements of CEQA. Examples of best practices when siting and designing warehouse facilities include:

- Per CARB guidance, siting warehouse facilities so that their property lines are at least 1,000 feet from the property lines of the nearest sensitive receptors.[14]
- Creating physical, structural, and/or vegetative buffers that adequately prevent or substantially reduce pollutant dispersal between warehouses and any areas where sensitive receptors are likely to be present, such as homes, schools, daycare centers, hospitals, community centers, and parks.
- Providing adequate areas for on-site parking, on-site queuing, and truck check-in that prevent trucks and other vehicles from parking or idling on public streets.
- Placing facility entry and exit points from the public street away from sensitive receptors, e.g., placing these points on the north side of the facility if sensitive receptors are adjacent to the south side of the facility.
- Locating warehouse dock doors and other onsite areas with significant truck traffic and noise away from sensitive receptors, e.g., placing these dock doors on the north side of the facility if sensitive receptors are adjacent to the south side of the facility.
- Screening dock doors and onsite areas with significant truck traffic with physical, structural, and/or vegetative barriers that adequately prevent or substantially reduce pollutant dispersal from the facility towards sensitive receptors.
- Posting signs clearly showing the designated entry and exit points from the public street for trucks and service vehicles.
- Posting signs indicating that all parking and maintenance of trucks must be conducted within designated on-site areas and not within the surrounding community or public streets.

3-11 (CONT.)

B. The Modifications Conflict with the Overall Riverside County Vision, Mead Valley Area Plan and General Plan

3-12

According to the General Plan, "The Mead Valley land use plan provides for a predominantly rural community character with an equestrian focus. This is reflected by the Very Low Density Residential and

Low Density Residential land use designations within the Rural Community Foundation Component and Rural Residential designation within the Rural Foundation Component that dominate the planning area."
.
Along these lines, the Very Low Density Residential land use designation provides for the development of detached single- family residential dwelling units and ancillary structures on large parcels, and the Rural Community Foundation Component encourages equestrian and other animal- keeping uses.

AIR QUALITY, ENERGY, GREENHOUSE GAS EMISSIONS AND HEALTH RISK ASSESSMENT IMPACT ANALYSIS.

In accordance with the CEQA requirements, the County does not, however, have the expertise to develop plans, programs, procedures, and methodologies to ensure that air quality within the County and region will meet federal and state standards. Instead, the County relies on the expertise of the SCAQMD and utilizes the SCAQMD CEQA Handbook as the guidance document for the environmental review of plans and development proposals within its jurisdiction.

The Environmental Justice Element of the General Plan:
Policies:
HC 14.1 When feasible, avoid siting homes and other sensitive receptors near known or anticipated sources of air pollution.
HC 14.2 When feasible, avoid locating new sources of air pollution near homes and other sensitive receptors.

Health Risk Reduction
This category includes policies that work towards reducing unique and compounded health risks. The following policies address pollution exposure and access to food and encourages safe and sanitary homes and an environment conducive to engaging in physical activity.
Pollution Exposure Policies:
HC 16.1 In cooperation with affected federal state, local agencies, county departments, and impacted community residents, monitor changes to the Salton Sea and other bodies of water that impact air quality and water quality and seek and pursue opportunities to address impacts to the maximum extent possible, and make public the data and other information related to the status of the effort.
HC 16.2 Pursue funding and other opportunities from state, federal, and local government and non-government sources and allocate county general funds to improve public health and limit pollution exposure and promote efforts to ameliorate environmental justice constraints in environmental justice communities.
HC 16.3 Assist communities in seeking funding for community initiated clean air projects including the installation of on-site air monitoring equipment in areas of high exposure to air contaminants.
HC 16.4 Pursue funding to connect low-income residents and communities to municipal water and wastewater services. In the interim, seek financial assistance for septic system repair in order to limit groundwater contamination by poorly maintained septic systems or to provide for connections to wastewater systems as a viable alternative if such systems can be made readily available.
HC 16.5* Evaluate the compatibility of unhealthy and polluting land uses being located near sensitive receptors including possible impacts on ingress, egress, and access routes. Similarly, encourage sensitive receptors, such as housing, schools, hospitals, clinics, and childcare facilities to be located away from uses that pose potential hazards to human health and safety.
HC 16.6* When developing and siting large scale logistics, warehouse and distribution projects, address

3-12
(CONT.)

the Good Neighbor Policy for Logistics and Warehouse/Distribution uses criteria adopted by the Board of Supervisors on November 19, 2019 and as may be subsequently amended.
HC 16.7 Evaluate public and private facilities for health hazards or major sources of contamination, identify, and implement alternatives for removal of contamination.
HC 16.8 Evaluate creating a cap or threshold on the number of pollution sources within EJ communities and make recommendations thereon.
HC 16.9 Explore the feasibility of creating a partnership with the South Coast Air Quality Management District (SCAQMD) to establish a mitigation program to reduce the impact of air pollution as well as assist with the implementation of air quality programs.
HC 16.10* Plan for compact development projects in appropriate locations, including in existing communities and the clustering of affordable and mixed income housing therein, that make the most efficient use of land and concentrate complementary uses in close proximity to transit or non-transit mobility options and advocate for expanded transit and non-transit mobility options to serve such areas.
HC 16.11 Implement development of bicycle and pedestrian facilities to reduce dependency on fossil fuel based transportation and pursue funding to implement mobility plans and projects.
HC 16.12 Plan and implement complete streets which include sidewalks, greenbelts, and trails to facilitate use by pedestrians and bicyclists where such facilities are well separated from parallel or cross through traffic to ensure pedestrian and cyclist safety and rehabilitate/expand existing to achieve same or similar design features.

HC 16.13 Provide buffer spaces and vegetative barriers between high-volume roadways/ transportation and train track corridors and sensitive land uses.

HC 16.14* Assure that sensitive receptors are separated and protected from polluting point sources, as feasible, including agricultural businesses that produce or use pesticides and chemical fertilizers.
HC 16.15* Assure that site plan design protects people and land, particularly sensitive land uses such as housing and schools, from air pollution and other externalities associated with industrial and warehouse development through the use of barriers, distance, or similar solutions or measures from emission sources when possible.

HC 16.22* Discourage industrial uses which use large quantities of water in manufacturing or cooling processes that result in subsequent effluent discharges and encourage agricultural businesses to limit and reduce the production and use of pesticides and chemical fertilizers to the maximum County of Riverside General Plan.

HC 16.23* Discourage industrial and agricultural uses which produce significant quantities of toxic emissions into the air, soil, and groundwater to prevent the contamination of these physical environments.

HC 16.24* Ensure compatibility between industrial development and agricultural uses and adjacent land uses. To achieve compatibility, industrial development and agricultural uses will be required to include criteria addressing noise, land, traffic and greenhouse gas emissions to avoid or minimize creating adverse conditions for adjacent communities.

HC 18.7* Discourage industrial, agricultural and other land uses that may pollute and cause health conflicts with residential land uses either directly or indirectly. Ensure that community members are properly notified and involved in the decision-making process for new land use proposals.

3-12
(CONT.)

HC 18.8* Work with the development community including small property and mobile home park owners so new residential development, particularly for low income households, is designed to limit their exposure to high noise levels, pesticide and fertilizer exposure, dust pollution, and other potential impacts associated with adjacent industrial and agricultural uses.
HC 18.9* Encourage the location and design of new developments to visually enhance and not degrade the character of the surrounding area through consideration of the following concepts.

Riverside County General Plan Vision statements and concepts
CHANGE OF ZONE NO. 2200062 would permit Light Industrial uses to encroach west into the established rural residential developed community. In this way, this Project conflicts with the overall purpose of these Foundation Components and the General Plan.

This Project also conflicts with the following County Vision statements and Vision concepts:

- *"Is flexible so that it can be adjusted to accommodate future circumstances, yet provides a solid foundation of stability so that basic ingredients in the plan are not sacrificed."* Again, no new "future circumstances" justify undermining GP stability.
- *"Protects high-value environmental resources and private property rights - and develops the complex tools needed to do so."* Private property rights surrounding, and environmental resources on and surrounding, the Project site are not being protected by this proposed zone change. Residences nearby the site will be harmed by intensified land uses, increased air pollutant emissions, traffic, noise, aesthetic, and other impacts that will harm both the environment and property values.
- *"Provides a long-term means for economic stability to be achieved through investment by a variety of interests: residential, agricultural, property owner, environmental, institutional, business community, labor, and others."* The project would prefer the interests of the property owner over neighboring residential uses and agricultural zoning.
- *"Provide a range of community design options to respond to varied lifestyle choices."* The Project would delete the adopted range of design options seeking to maintain rural uses in this area of the County.
- *"The rich diversity of Riverside County's environmental resources; even those modified by human activities; is preserved and enhanced for the enjoyment of present and future generations."* The Project would not preserve blue line streams or rural uses at the site.
- *"New growth patterns no longer reflect a pattern of random sprawl. Rather, they follow a framework of transportation and open space corridors, with concentrations of development that fit into that framework. In other words, important open space and transportation corridors define growth areas."*
"The extensive heritage of rural living conditions continues to be accommodated in areas committed to that lifestyle and its sustainability is reinforced by the strong open space and urban development commitments provide for elsewhere in the RCIP." The Project would permit industrial development to encroach upon rural living areas and agricultural zoning.
- *"Each of our rural areas and communities has a special character that distinguishes them from urban areas and from each other. They benefit from some conveniences such as small-scale local commercial services and all-weather access roads, yet maintain an unhurried, uncrowded life style. Rural residents accept the fact that they must travel some distance for more complete services and facilities."* The Project would permit industrial development to encroach upon rural living areas and agricultural zoning.
- *"Land use and transportation decisions are made with an understanding of their*

3-12 (CONT.)

impact on the health of Riverside County residents; achieved through partnerships with project sponsors and evaluation of land use and transportation decisions from the perspective of health outcomes." The Project proposed would locate high cube warehouses adjacent to low density and very low density residential uses without concern for the health and safety of residents, as discussed further below.

- *"Air quality is viewed as such an important factor in quality of life that its measurements are used as a major factor in evaluating the Plan's performance."* The Project would permit the locating of significant additional diesel trucks and associated localized diesel PM emissions adjacent to residences.
- *"Measures that reduce carbon emissions and increase energy efficiency are now routinely included in all areas of growth within Riverside County - new development, retrofitting of existing structures, as well as new and ongoing operations."* The Project would permit further westerly sprawl and development intensity away from infrastructure, increasing carbon emissions and reducing energy efficiency.
- *"Along with its emphasis on achieving community desires, Riverside County remains highly respected for its sensitivity to private property rights."* ***Change of Zone no.*** *2200062* (would be insensitive to the private property rights of neighboring residents who relied on the GP stability, absent important changed circumstances, when deciding to invest in their properties.

The Mead Valley Community Plan requires that this type of Project create an EIR to thoroughly mitigate all environmental elements for this type of industrial development.

General Plan Environmental Justice Element cannot be met with a Foundation GPA. A massive warehouse directly adjacent to hundreds ranch homes, which are north and south of the Project site.

3-12 (CONT.)

II. THE PROJECT SHOULD BE DENIED WHERE IT WILL RESULT IN SIGNIFICANT ENVIRONMENTAL IMPACTS, INCLUDING SIGNIFICANT HEALTH RISKS FROM DEVELOPING DISTRIBUTION WAREHOUSES ADJACENT TO RESIDENTIAL USES AND A BUDDIST TEMPLE.

This Project application is thus just one part of a larger proposal to decimate land use planning in this area, and to develop a project, which is completely contrary to adopted General Plan and Zoning designations.

A. Health Risk Impacts from Light Industrial Land Use adjacent to Residential Uses.

The health risk impacts from initiating this Project and the proposed Project are of particular concern and provide a strong reason to deny this zone change. Because of the cancer risk and other impacts of diesel emissions on human health, **SCAQMD, CARB, WRCOG, and others have recommending siting warehouses at least 1000 feet from residences and other sensitive receptors.** ("Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning: a Reference for Local Governments within the South Coast Air Quality Management District," May 6, 2005, "Good Neighbor Guidelines for Siting New and/or Modified Warehouse/Distribution Facilities," WRCOG Regional Air Quality Task Force, September 12, 2005.) This Project proposes to site warehouses adjacent to homes and a Buddhist Church. This is inconsistent with this clear guidance. This warehouse is proposed directly across the street from numerous homes. SCAQMD recommends all warehouses be sited 1000 feet from sensitive receptors.

3-13

E. Traffic/ Transportation

The Project would significantly increase local traffic in our rural community. The Project would also increase regional traffic on area freeways including I-215, SR-60, etc. where distribution warehouses in

the Inland Empire regularly travel to/ from the ports of Los Angeles and Long Beach. It would also increase traffic substantially on Cajalco Road that is already rated a transportation F and used by numerous Harvill and gridlocked most of the day.
In addition, the conversion of minimal passenger vehicle trips to passenger vehicle and heavy-duty truck trips adds significantly to the need and cost of road repair. According to one study, a 40-ton truck does as much damage to the road as 9,600 passenger cars. ("*Overweight trucks damage infrastructure*" April Castro, USA Today, 2007 http://usatoday30.usatoday.com/news/nation/2007-09-10-3878428638_x.htm) Impacts to transportation infrastructure will be significantly increased by this Project.

3-13 (CONT.)

III. CONCLUSION

When taken as a whole, the significant environmental and human costs of considering approval of the proposed Project warrant its immediate denial. The Project does not meet the requirements for Environmental Justice, or a Zone Change. All of the trucks will NOT be going east on Cajalco from this project. The entire intersection at Seaton and Cajalco will need to be improved. Denial is especially deserved as little to no benefit to Mead Valley Residents would result-- distribution warehouse projects are notorious for under-delivering on job promises, particularly as automation of such facilities occurs. (*See, e.g.,* The Press Enterprise, Jack Katzanek (February 1, 2012)*"Moreno Valley: Sketchers' warehouse has caused net job loss,"* http://www.pe.com/business/business-headlines/20120201-moreno-valley-skecherswarehouse-has-caused-net-job-loss.ece.)

The impacts of this project will be felt much further than Mead Valley. The entire region will be impacted. Truck traffic will be using Cajalco to El Sobrante, La Sierra, Washington, Wood, Markham, Clark and neighborhood streets.

For each of these reasons detailed herein, I respectfully ask the Supervisors to deny this Project.

3-14

Sincerely,

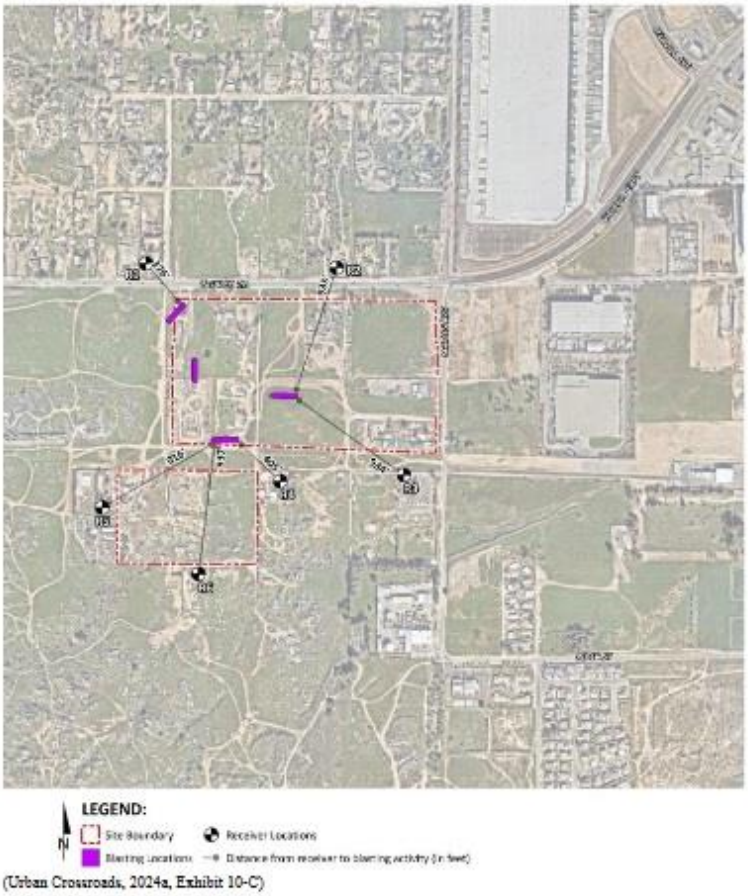
Debbie Walsh

RAMV

Exhibit A

“New” Proposed Mead Valley Area Plan

Figure 4.13-6 Blasting Activity and Receiver Locations



(Urban Crossroads, 2024a, Exhibit 10-C)

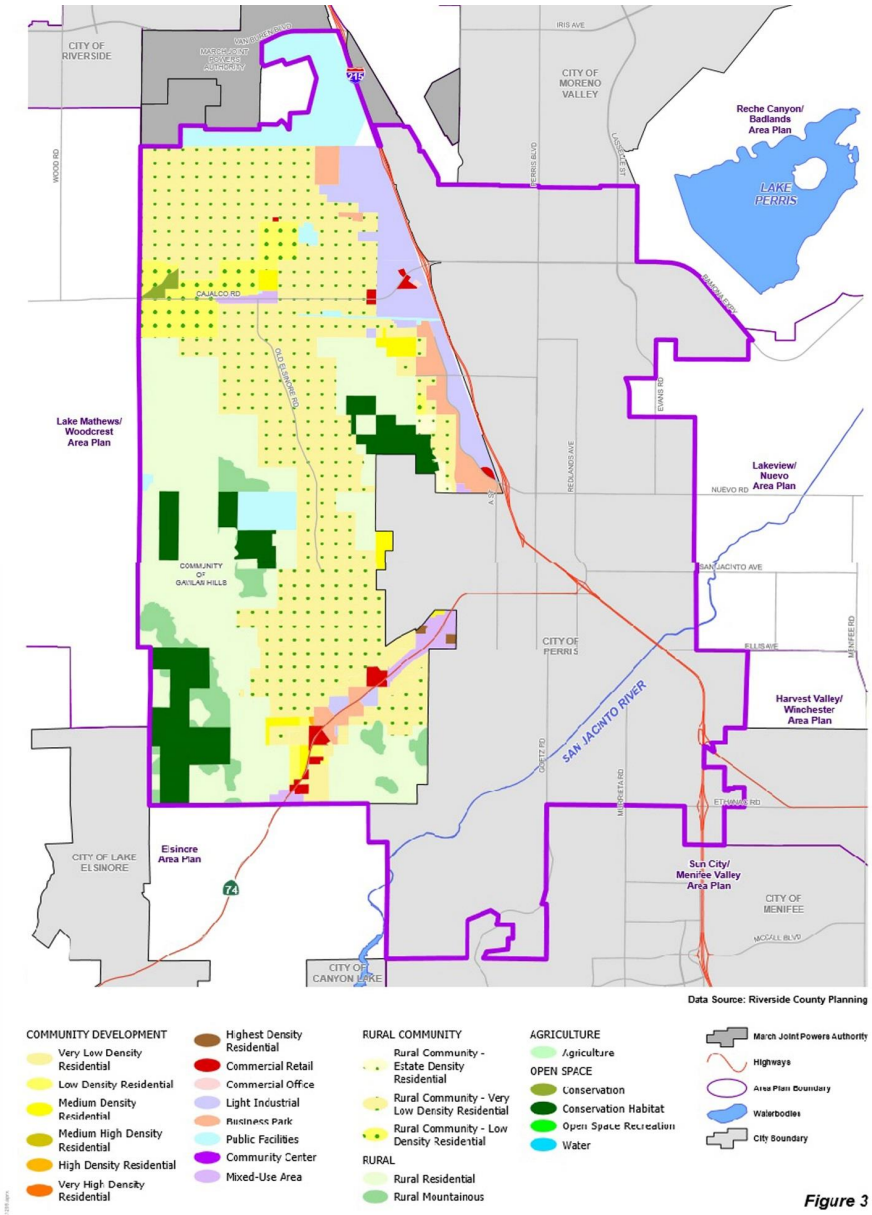
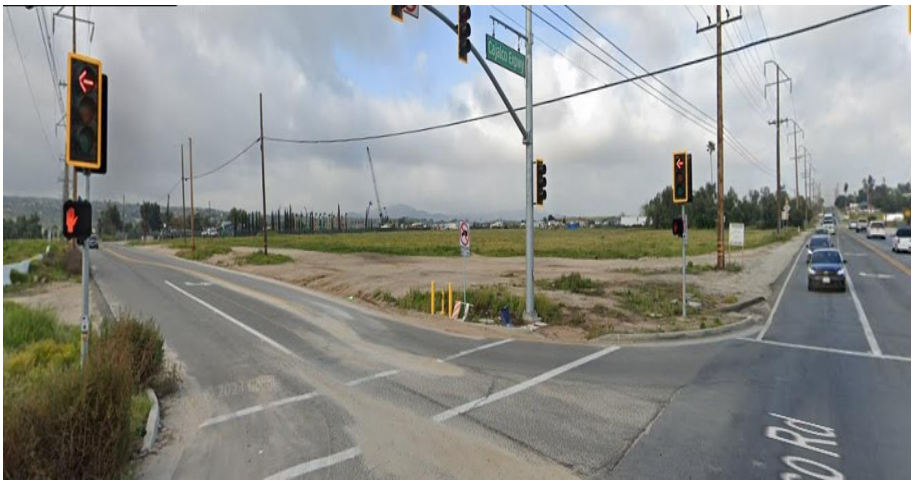

CITY OF RIVERSIDE
MARCH JOINT POWERS AUTHORITY
CITY OF MORENO VALLEY
IRIS AVE
Reche Canyon/ Badlands Area Plan
LAKE PERRIS
WOOD RD
CAJALCO RD
PERRIS BLVD
LASSELLE ST
RAMONA EXPY
EVANS RD
Lake Mathews/ Woodcrest Area Plan
OLD ELSINORE RD
REDLANDS AVE
Lakeview/ Nuevo Area Plan
NUEVO RD
COMMUNITY OF GAVILAN HILLS
SAN JACINTO AVE
CITY OF PERRIS
ELLIS AVE
MURRIETA RD
Harvest Valley/ Winchester Area Plan
SAN JACINTO RIVER
GOETZ RD
ETHANAC RD
CITY OF LAKE ELSINORE
Elsinore Area Plan
74
Sun City/ Menifee Valley Area Plan
CITY OF MENIFEE
MCCALL BLVD
CITY OF CANYON LAKE
Data Source: Riverside County Planning
COMMUNITY DEVELOPMENT
Very Low Density Residential
Low Density Residential
Medium Density Residential
Medium High Density Residential
High Density Residential
Very High Density Residential
Highest Density Residential
Commercial Retail
Commercial Office
Light Industrial
Business Park
Public Facilities
Community Center
Mixed-Use Area
RURAL COMMUNITY
Rural Community - Estate Density Residential
Rural Community - Very Low Density Residential
Rural Community - Low Density Residential
RURAL
Rural Residential
Rural Mountainous
AGRICULTURE
Agriculture
OPEN SPACE
Conservation
Conservation Habitat
Open Space Recreation
Water
March Joint Powers Authority
Highways
Area Plan Boundary
Waterbodies
City Boundary

Figure 3

Land Use Map at Cajalco x Seaton showing the commercial land in red



No Trucks sign on Seaton.

COMMENT LETTER 4

Subject: FW: Cajalco commerce Center Project Comment

From: Vanessa Garcia <nessavg20@gmail.com>
Sent: Saturday, October 11, 2025 10:25 AM
To: Clerk of the Board <COB@RIVCO.ORG>
Cc: Supervisor Medina - 1st District <district1@RIVCO.ORG>; Office of 2nd District Supervisor <District2@rivco.org>; District3 Information <D3Email@RIVCO.ORG>; District 4 Supervisor V. Manuel Perez <District4@RIVCO.ORG>; District 5 <District5@rivco.org>
Subject: Cajalco commerce Center Project Comment

Dear Supervisors,

I urge you to vote no on the proposed warehouse project.

This has been my home for over 10 years, and it breaks my heart that our community is often forgotten until a warehouse proposal appears. The families who live and work here, who face the daily traffic and congestion, do not want a massive warehouse.

What we want are stores, parks, sidewalks, and trees—the kind of growth that improves our quality of life, not industrial expansion that worsens it.

Please, drive through our streets during peak hours in the morning and afternoon—you'll see firsthand the gridlock we already face. Our small rural community simply cannot handle development of this magnitude.

I'm asking you to stand with our residents and please protect our neighborhoods and preserve the character of our community.

4-1

Thank You.

Vanessa Garcia - Resident of Mead Valley

Comment Letter 5

Subject: FW: My support of Hillwood's development project—-Re: PPT220050/Cajalco Commerce Center in the Board of Supervisors Hearing on October 21, 2025

From: Patrick Chinglung Hsu <pnwnsllc@gmail.com>
Sent: Saturday, October 11, 2025 7:47 AM
To: Brady, Russell <rbrady@RIVCO.ORG>
Cc: Patrick Hsu <pnwnsllc@gmail.com>
Subject: Re: My support of Hillwood's development project—-Re: PPT220050/Cajalco Commerce Center in the Board of Supervisors Hearing on October 21, 2025

Russell,
As one of the property owners nearby Hillwood's Cajalco Commerce Center,
I would like to endorse this project for the benefit of Mead Valley community for the following reasons:

1. Working opportunities either short term construction job or full time position as warehouse worker for almost no job opportunity in the Mead Valley, this is a big deal.

5-1

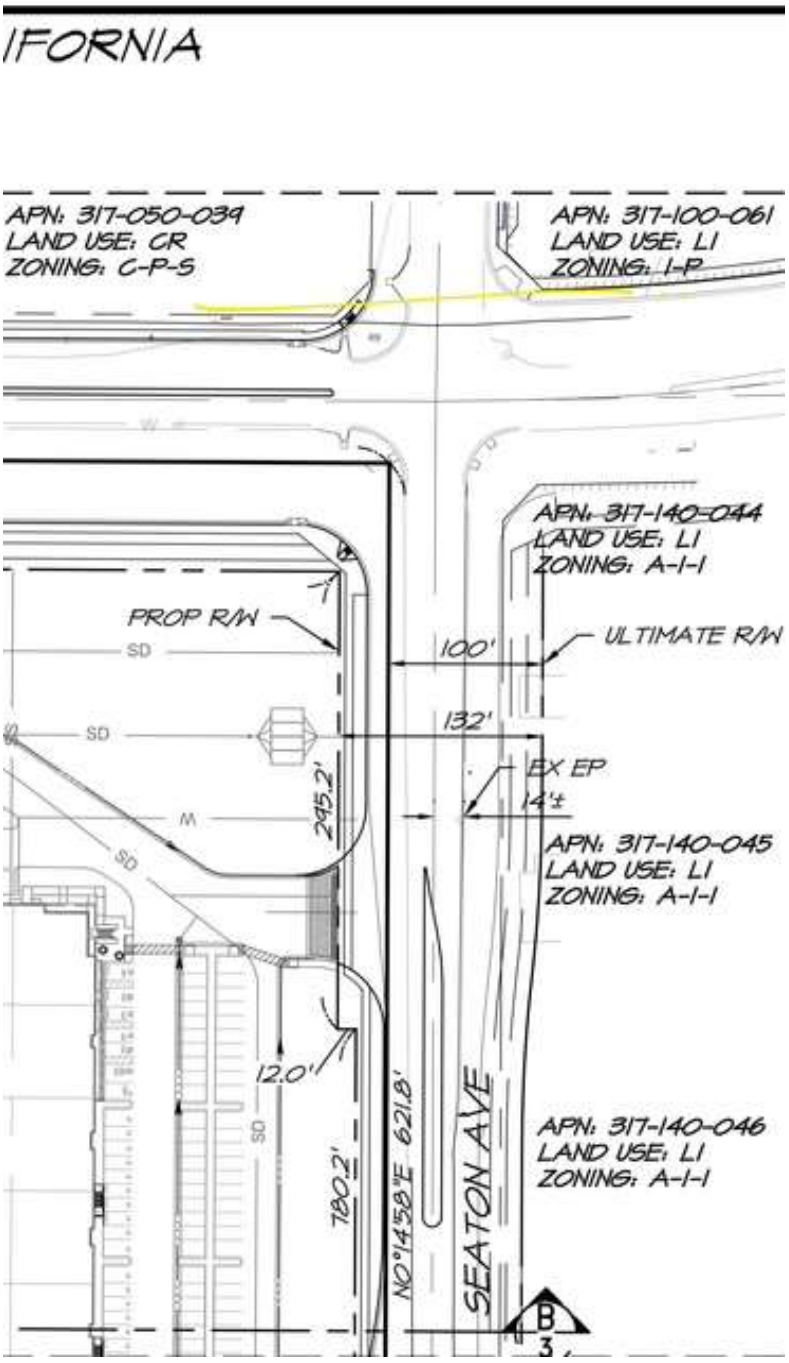
2. The traffic backups are not bearable since am and pm traffic hours are almost back to back without much opportunity for local side street and private traffic to enter Cajalco Road.
Without this project, the traffic would deteriorate to a point to put through and local traffic to a standing still when county road widening construction is decade away, if funding is not secured.

However, I have a suggestion to benefit traveling public, Hillwood developer and County of Riverside:
The north west corner of Cajalco/Seaton is posed a potential trouble unless the street curb, storm drain inlets, RTA bus turnout and utilities are matching with north east corner at Home Depot side.

Without the long term vision to relocate above street fixtures, ie, street curb, drainage inlets, RTA bus turnout and utility poles, the potential liability to cause severe injury to fatality are highly possible.
To have both Hillwood developer and County working together to have just 5-10% more in relocation cost, the return from liability free in the future would be an excellent investment.

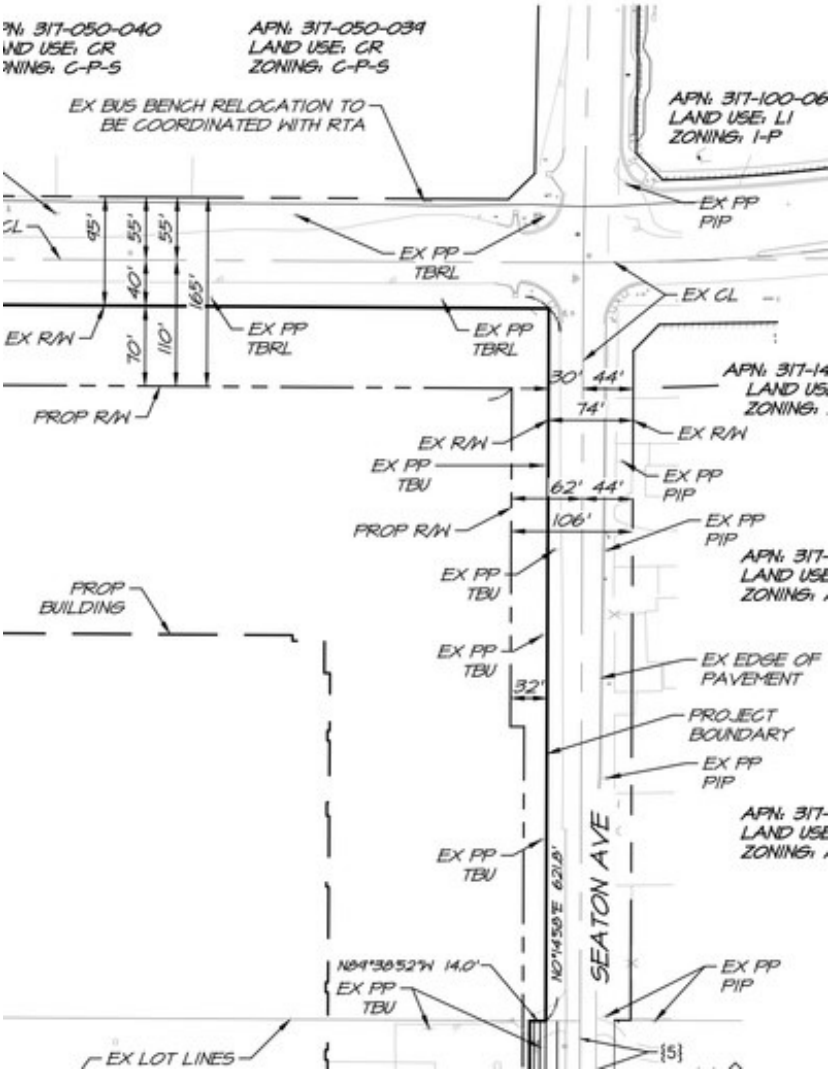
5-2

Enclosed pictures to show you the dilemma/risk facing traveling public:


IFORNIA
APN: 317-050-039
LAND USE: CR
ZONING: C-P-S
APN: 317-100-061
LAND USE: LI
ZONING: I-P
APN: 317-140-044
LAND USE: LI
ZONING: A-1-1
PROP R/W
SD
100'
ULTIMATE R/W
132'
EX EP
14'±
245.2'
APN: 317-140-045
LAND USE: LI
ZONING: A-1-1
12.0'
780.2'
N0°14'58"E 621.8'
SEATON AVE
APN: 317-140-046
LAND USE: LI
ZONING: A-1-1
B
3

5-2
(CONT.)

STATE OF CALIFORNIA
P NO. 38601
. S.B.M.



5-2
(CONT.)

5-2
(CONT.)

5-2
(CONT.)

5-2
(CONT.)

5-2
(CONT.)

5-2
(CONT.)

Patrick Hsu
951.329.2089

On Oct 7, 2025, at 2:09 PM, Brady, Russell <rbrady@rivco.org> wrote:

Patrick, as discussed, attached are the latest plans for the PPT that show the proposed road improvements. Let me know if you need anything else or if you have anything in writing to provide that you want to make part of the record for the Board to consider.

Thanks

Russell Brady
Riverside County Planning
4080 Lemon Street 12th Floor
Riverside, CA 92501
951-955-3025

Comment Letter 6

Subject: FW: Comment for the Cajalco Commer Center Project

-----Original Message-----
From: Alexa Gutierrez <alexafgtz@gmail.com>
Sent: Saturday, October 11, 2025 7:00 AM
To: Clerk of the Board <COB@RIVCO.ORG>
Cc: Supervisor Medina - 1st District <district1@RIVCO.ORG>; Office of 2nd District Supervisor <District2@rivco.org>; District3 Information <D3Email@RIVCO.ORG>; District 4 Supervisor V. Manuel Perez <District4@RIVCO.ORG>; District 5 <District5@rivco.org>
Subject: Comment for the Cajalco Commer Center Project

Dear Supervisors,

I am writing to you today as a concerned constituent and community member in opposition of the Cajalco Commerce Center project. I urge you to vote no on the over 1 million square foot warehouse that will lead to the following and more:

- The destruction of nearby homes
- The disruption of wildlife and loss of habitat
- Significant impacts to air quality
- Worsened road quality

As stated by the American Lung Association, Riverside County already has some of the worst particulate matter pollution in the country. An additional warehouse and increase in the number of trucks on our roads will be detrimental to the already at-risk health of residents. Mead Valley residents deserve better investments, improved infrastructure, and cleaner air.

Thank you for considering my comments before you vote on this project.

6-1

Comment Letter 7

Subject: FW: Comment for the Cajalco Commer Center Project

From: carolina <csxviii@gmail.com>
Sent: Friday, October 10, 2025 11:26 AM
To: Clerk of the Board <COB@RIVCO.ORG>
Cc: Supervisor Medina - 1st District <district1@RIVCO.ORG>; Office of 2nd District Supervisor <District2@rivco.org>; District3 Information <D3Email@RIVCO.ORG>; District 4 Supervisor V. Manuel Perez <District4@RIVCO.ORG>; District 5 <District5@rivco.org>
Subject: Comment for the Cajalco Commer Center Project

CAUTION: This email originated externally from the **Riverside County** email system. **DO NOT** click links or open attachments unless you recognize the sender and know the content is safe.

Dear Supervisors,

I am writing to you today as a concerned constituent and community member in opposition of the Cajalco Commerce Center project. I urge you to vote no on the over 1 million square foot warehouse that will lead to the following and more:

- The destruction of nearby homes
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- Significant impacts to air quality
- Worsened road quality

As stated by the American Lung Association, Riverside County already has some of the worst particulate matter pollution in the country. An additional warehouse and increase in the number of trucks on our roads will be detrimental to the already at-risk health of residents. Mead Valley residents deserve better investments, improved infrastructure, and cleaner air.

Thank you for considering my comments before you vote on this project.
Carolina

7-1

Comment Letter 8

Subject: FW: Comment for the Cajalco Commer Center Project

From: carolina <csxviii@gmail.com>
Sent: Friday, October 10, 2025 11:26 AM
To: Clerk of the Board <COB@RIVCO.ORG>
Cc: Supervisor Medina - 1st District <district1@RIVCO.ORG>; Office of 2nd District Supervisor <District2@rivco.org>; District3 Information <D3Email@RIVCO.ORG>; District 4 Supervisor V. Manuel Perez <District4@RIVCO.ORG>; District 5 <District5@rivco.org>
Subject: Comment for the Cajalco Commer Center Project

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- The destruction of nearby homes
- The disruption of wildlife and loss of habitat
- Significant impacts to air quality
- Worsened road quality

As stated by the American Lung Association, Riverside County already has some of the worst particulate matter pollution in the country. An additional warehouse and increase in the number of trucks on our roads will be detrimental to the already at-risk health of residents. Mead Valley residents deserve better investments, improved infrastructure, and cleaner air.

Thank you for considering my comments before you vote on this project.
Carolina

8-1

Comment Letter 9

Subject: FW: Comment for the Cajalco Commer Center Project

-----Original Message-----
From: EDUARDO RIVERA <eriveragil@aol.com>
Sent: Thursday, October 9, 2025 11:32 AM
To: Clerk of the Board <COB@RIVCO.ORG>
Cc: Supervisor Medina - 1st District <district1@RIVCO.ORG>; Office of 2nd District Supervisor <District2@rivco.org>; District3 Information <D3Email@RIVCO.ORG>; District 4 Supervisor V. Manuel Perez <District4@RIVCO.ORG>; District 5 <District5@rivco.org>
Subject: Comment for the Cajalco Commer Center Project

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Dear Supervisors,

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- The destruction of nearby homes
- The disruption of wildlife and loss of habitat
- Significant impacts to air quality
- Worsened road quality

As stated by the American Lung Association, Riverside County already has some of the worst particulate matter pollution in the country. An additional warehouse and increase in the number of trucks on our roads will be detrimental to the already at-risk health of residents. Mead Valley residents deserve better investments, improved infrastructure, and cleaner air.

Thank you for considering my comments before you vote on this project.

Sent from my iPhone

9-1

COMMENT LETTER 10

Subject: FW: Comment for the Cajalco Commer Center Project

From: Ian Simpson <iansimpson727@gmail.com>
Sent: Friday, October 10, 2025 9:02 PM
To: Clerk of the Board <COB@RIVCO.ORG>
Cc: Supervisor Medina - 1st District <district1@RIVCO.ORG>; Office of 2nd District Supervisor <District2@rivco.org>; District3 Information <D3Email@RIVCO.ORG>; District 4 Supervisor V. Manuel Perez <District4@RIVCO.ORG>; District 5 <District5@rivco.org>
Subject: Comment for the Cajalco Commer Center Project

Dear Supervisors,

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- The destruction of nearby homes
- The disruption of wildlife and loss of habitat
- Significant impact to the air quality
- Worsened road quality

As stated by the American Lung Association, Riverside County already has some of the worst particulate matter pollution in the country. An additional warehouse and increase in the number of trucks on our roads will be detrimental to the already at-risk health of residents. Mead Valley residents deserve better investments, improved infrastructure, and cleaner air.

Thank you for considering my comments before you vote on this project.

10-1

Comment Letter 11

Subject: FW: Comment for the Cajalco Commer Center Project

-----Original Message-----
From: Isamar Diaz <isamardiaz@live.com>
Sent: Friday, October 10, 2025 9:13 PM
To: Clerk of the Board <COB@RIVCO.ORG>
Cc: Supervisor Medina - 1st District <district1@RIVCO.ORG>; Office of 2nd District Supervisor <District2@rivco.org>; District3 Information <D3Email@RIVCO.ORG>; District 4 Supervisor V. Manuel Perez <District4@RIVCO.ORG>; District 5 <District5@rivco.org>
Subject: Comment for the Cajalco Commer Center Project

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Dear Supervisors,

I am writing to you today as a concerned constituent and community member in opposition of the Cajalco Commerce Center project. I urge you to please vote NO on the over 1 million square foot warehouse that will lead to the following and more:

- The destruction of nearby homes
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As stated by the American Lung Association, Riverside County already has some of the worst particulate matter pollution in the country. An additional warehouse and increase in the number of trucks on our roads will be detrimental to the already at-risk health of residents. Mead Valley residents deserve better investments, improved infrastructure, and cleaner air.

Thank you for considering my comments before you vote on this project.

Thank You,
Isamar Diaz
A Proud Mead Valley Community Member

11-1

Comment Letter 12

Subject: FW: Comment for the Cajalco Commer Center Project

-----Original Message-----
From: Lanny Del Real <lannydelreal@gmail.com>
Sent: Friday, October 10, 2025 5:12 PM
To: Clerk of the Board <COB@RIVCO.ORG>
Cc: Supervisor Medina - 1st District <district1@RIVCO.ORG>; Office of 2nd District Supervisor <District2@rivco.org>; District3 Information <D3Email@RIVCO.ORG>; District 4 Supervisor V. Manuel Perez <District4@RIVCO.ORG>; District 5 <District5@rivco.org>
Subject: Comment for the Cajalco Commer Center Project

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Dear Supervisors,

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As stated by the American Lung Association, Riverside County already has some of the worst particulate matter pollution in the country. An additional warehouse and increase in the number of trucks on our roads will be detrimental to the already at-risk health of residents. Mead Valley residents deserve better investments, improved infrastructure, and cleaner air.

Thank you for considering my comments before you vote on this project.

-Lanny Del Real

12-1

COMMENT LETTER 13

Subject: FW: Comment for the Cajalco Commer Center Project

From: Toni Santana <edgemont13199@gmail.com>
Sent: Thursday, October 9, 2025 10:13 PM
To: Clerk of the Board <COB@RIVCO.ORG>
Cc: Supervisor Medina - 1st District <district1@RIVCO.ORG>; Office of 2nd District Supervisor <District2@rivco.org>; District3 Information <D3Email@RIVCO.ORG>; District 4 Supervisor V. Manuel Perez <District4@RIVCO.ORG>; District 5 <District5@rivco.org>
Subject: Comment for the Cajalco Commer Center Project

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Dear Supervisors,

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As stated by the American Lung Association, Riverside County already has some of the worst particulate matter pollution in the country. An additional warehouse and increase in the number of trucks on our roads will be detrimental to the already at-risk health of residents. Mead Valley residents deserve better investments, improved infrastructure, and cleaner air.

Thank you for considering my comments before you vote on this project.

13-1

Comment Letter 14

Subject: FW: Comment for the Cajalco Commer Center Project

-----Original Message-----
From: yuriamezcua83@gmail.com <yuriamezcua83@gmail.com>
Sent: Thursday, October 9, 2025 10:45 AM
To: Clerk of the Board <COB@RIVCO.ORG>
Cc: Supervisor Medina - 1st District <district1@RIVCO.ORG>; Office of 2nd District Supervisor <District2@rivco.org>; District3 Information <D3Email@RIVCO.ORG>; District 4 Supervisor V. Manuel Perez <District4@RIVCO.ORG>; District 5 <District5@rivco.org>
Subject: Comment for the Cajalco Commer Center Project

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Dear Supervisors,

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As stated by the American Lung Association, Riverside County already has some of the worst particulate matter pollution in the country. An additional warehouse and increase in the number of trucks on our roads will be detrimental to the already at-risk health of residents. Mead Valley residents deserve better investments, improved infrastructure, and cleaner air.

Thank you for considering my comments before you vote on this project.

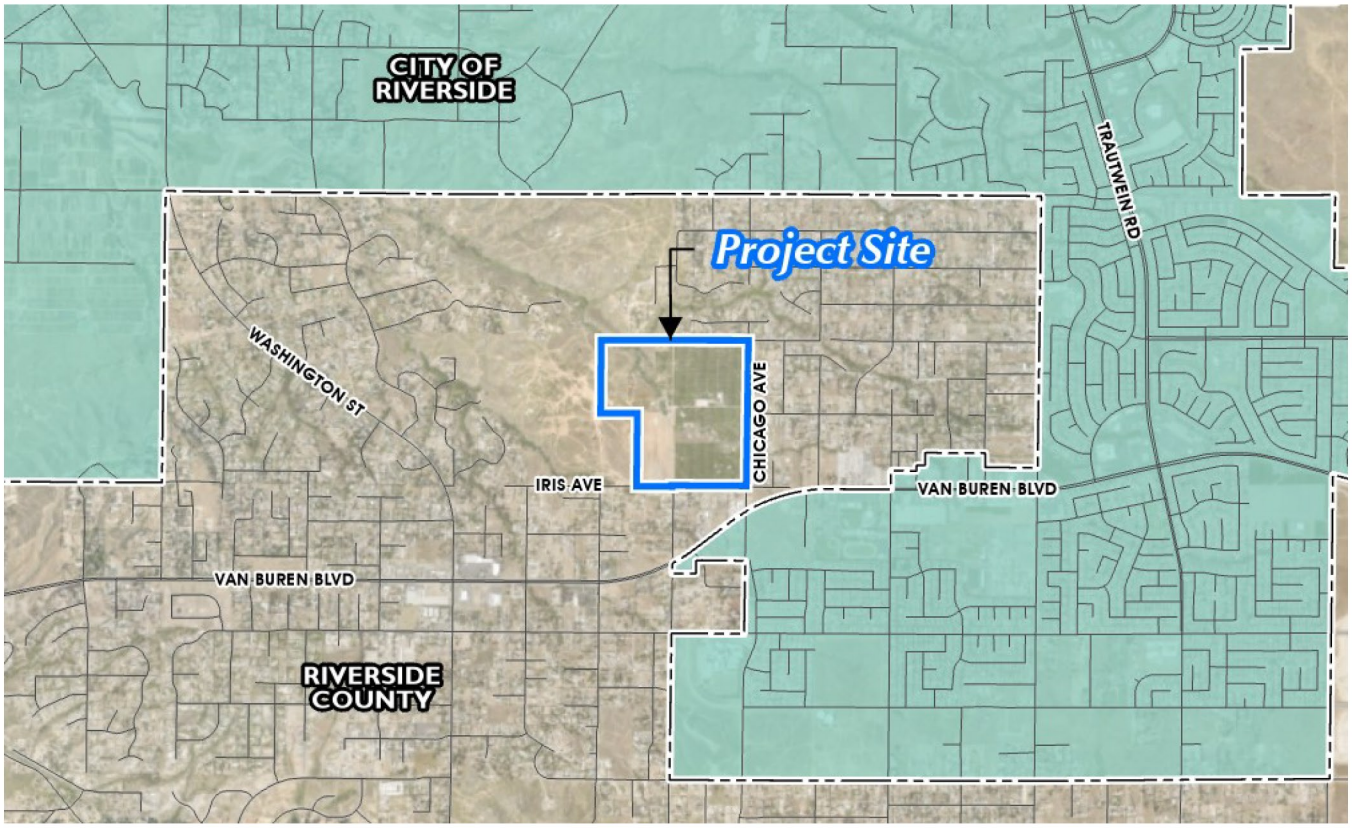
Respectfully,

A Mead Valley resident that dodges crazy truck traffic daily

14-1

Final Environmental Impact Report
SCH No. 2023030118

Arroyo Vista
Tentative Tract Map No. 38510
Riverside County, California



Lead Agency
Riverside County
Planning Department
4080 Lemon Street, 12th Floor
Riverside, CA 92501

July 3, 2025

F.0 FINAL ENVIRONMENTAL IMPACT REPORT

F.1 INTRODUCTION

This Final Environmental Impact Report (FEIR) was prepared in accordance with the California Environmental Quality Act (CEQA) as amended (Public Resources Code Section 21000 *et seq.*) and State CEQA Guidelines (Title 14, California Code of Regulations, Section 15000 *et seq.*).

According to State CEQA Guidelines Section 15132, the FEIR shall consist of:

a. The Draft EIR (DEIR) or a revision of the draft;

b. Comments and recommendations received on the DEIR either verbatim or in summary;

c. A list of persons, organizations, and public agencies commenting on the DEIR;

d. The responses of the Lead Agency to significant environmental points raised in the review and consultation process; and

e. Any other information added by the Lead Agency.

In accordance with the above-listed requirements, this FEIR for the Arroyo Vista Project (hereafter, the "Project") and associated discretionary and administrative actions, consists of the following:

a. Comment letters and responses to public comment; and

b. The circulated Arroyo Vista Project DEIR and Technical Appendices, SCH No. 2021080570, with additions shown as underlined text and deletions shown as ~~stricken text~~ (refer to Subsection F.3, *Additions, Corrections, and Revisions to the DEIR*, for a summary of the changes to the EIR since the DEIR was circulated for public review).

This FEIR document was prepared in accordance with CEQA and the State CEQA Guidelines and represents the independent judgment of the CEQA Lead Agency (Riverside County).

F.2 RESPONSES TO DEIR COMMENTS

Riverside County received eight (8) comment letters in response to the DEIR. A list of the agencies, organizations, and persons that submitted comments on the DEIR is presented in Table F-1, *Organizations, Persons, and Public Agencies that Commented on the DEIR*.

F.2.1 CEQA REQUIREMENTS

CEQA Guidelines Section 15088 requires the Lead Agency (Riverside County) to evaluate comments received from public agencies and interested parties who reviewed the DEIR and to provide written responses with good faith and reasoned analysis to comments that relate to significant environmental issues.

Table F-1 Organizations, Persons, and Public Agencies that Commented on the DEIR

Comment Letter	Commenting Party	Date
A	City of Riverside	April 24. 2025
B	Soboba Band of Luiseño Indians	April 23, 2025
C	Pechanga Band of Indians	April 24, 2025
D	Veer Management Company, Inc.	March 10, 2025
E	Debbie Kruse	April 3, 2025
F	Laura Sandidge	April 2, 2025
G	Michele Kruse	April 10, 2025
H	Bruce Rodgers	March 31, 2025

State CEQA Guidelines Section 15204(a) outlines the parameters for public agencies and interested parties to submit comments and the Lead Agency's responsibility for responding to specific comments. Per CEQA Guidelines Section 15204(a), comments should be related to:

> *[T]he sufficiency of the document in identifying and analyzing possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible…CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or suggested by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.*

CEQA Guidelines Section 15204(c) further advises that, "[r]eviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to CEQA Guidelines Section 15064, an effect shall not be considered significant in the absence of substantial evidence." Additionally, CEQA Guidelines Section 15204(d) notes that, "[e]ach responsible agency and trustee agency shall focus its comments on environmental information germane to that agency's statutory responsibility;" but, pursuant to CEQA Guidelines Section 15204(e), "[t]his section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section [CEQA Guidelines Section 15204]."

Per CEQA Guidelines Section 15088(c), the level of detail contained in the response may correspond to the level of detail provided in the comment: "A general response may be appropriate when a comment does not contain or specifically refer to readily available information, or does not explain the relevance of evidence submitted with the comment."

F.2.2 Responses to DEIR Comments

Copies of each of the comment letters referenced in Table F-1 are provided on the following pages, followed by responses to each individual comment. CEQA Guidelines Section 15088.5 requires recirculation when "significant" new information is added to an EIR, meaning the EIR is changed in a way that deprives the public

of a meaningful opportunity to comment on a substantial adverse environmental effect or a feasible way to avoid such an effect, including a feasible project alternative, that the applicant declines to implement. "Significant" new information requiring recirculation includes (1) a new significant environmental impact; (2) a substantial increase in the severity of an environmental impact; (3) a feasible project alternative or mitigation measure that would clearly lessen the significant environmental impacts of the project, but the applicant declines to adopt it; or (4) a fundamentally and basically inadequate and conclusory draft EIR (CEQA Guidelines Section 15088.5; see also, *Laurel Heights Improvement Assn. v. Regents of University of California* [1993] 6 Cal. 4th 1112). None of the responses to the comment letters submitted to the County required the addition of significant new information to the DEIR or otherwise meet the requirements of CEQA Guidelines Section 15088.5. Instead, these responses to comments supplement the Draft EIR's analysis of the same potentially significant impacts already disclosed therein. Therefore, recirculation is not required.

Comment Letter A

Community & Economic Development
Department
Planning Division

City of Arts & Innovation

April 24, 2025

Krista Mason
Project Planner
Riverside County Planning Department
4080 Lemon Street, 12th Floor
Riverside, CA 92502-3634

Subject: **City of Riverside's Review a Notice of Availability of a Draft Environmental Impact Report for the Arroyo Vista Project**

Dear Ms. Mason:

Thank you for the opportunity to comment on the Notice of Availability (NOA) of a Draft Environmental Impact Report (DEIR) for the Arroyo Vista Project.

The City of Riverside (City) understands that the project consists of various discretionary actions intended to allow for the development of 232 single-family homes, water quality basins, a sewer lift station, trailhead, and associated street improvements.

Given the proximity to the City of Riverside and its location within the City's Sphere of Influence (SOI), this comment letter is provided with respect to the DEIR and impact evaluations and determinations made therein. Additionally, and under separate cover, the City will provide comments on the project itself.

Community and Economic Development Department – Planning Division:

- Aesthetics
  - The Project site is bisected by a blue line stream and significant tributary to the Woodcrest Arroyo, one of six officially designated Arroyos within the City of Riverside. Given the project's location within the City's SOI, it is reasonable to project that, should the site and surrounding area be annexed to the City, the official arroyo designation would be extended to incorporate the remainder of the primary channel and major tributaries including the tributary that extends to the project site. Arroyos – both designated and undesignated – are a significant natural open space and visual resource (Riverside General Plan 2025 Policy OS-2.4) and, as such, visual impacts of the project on the arroyo itself should be analyzed and mitigated as necessary, including but not limited to changes to natural landforms and vistas from Project grading; degradation of aesthetic and visual character from encroachment of Project infrastructure, roadways, buildings, walls and fences; introduction of excessive outdoor lighting; and other relevant aesthetic considerations.

3900 Main Street, Riverside, CA 92522 | Phone: (951) 826-5371 | **RiversideCA.gov**

A-1

A-2

Comment Letter A

- Agriculture and Forestry Resources
  - The DEIR states that both on- and off-site mitigation of impacts related to the conversion of farmland of statewide and local importance or unique farmland is totally infeasible. On-site mitigation is ruled out because:
    - "Single-family homes cannot co-exist with agricultural uses," and
    - "Reservation of the land would negatively affect the Project Applicant's rate of return on its investment."

    The first statement is unsubstantiated and is not supported by evidence. Agricultural uses certainly can and frequently do co-exist with residential subdivisions, examples of which can be found within proximity of the project site. The second statement is not sufficient justification to rule out mitigation and is not supported by evidence. Mitigation must be ruled out because it is genuinely infeasible, not merely insufficiently lucrative.

    Off-site mitigation is ruled out based on the theory that it would not satisfy CEQA's requirements for adequate mitigation; this rationale rests on the assumption that there is no land available for compensatory mitigation that is not "suitable for, if not actively being used for, agricultural production." This is unsubstantiated and not supported by evidence. Additionally, the rejection of this mitigation measure fails to consider opportunities for compensatory mitigation to restore lands to agricultural productivity where existing policy supports the continuation of productive agricultural uses, such as farmland that has been degraded or removed from production within the 5,500-acre Arlington Heights Greenbelt within the City of Riverside. As such, off-site compensatory mitigation for farmland conversion cannot be ruled out as infeasible.
- Land Use and Planning
  - As discussed in Chapter 2.0 of the DEIR, the Project is located within the City's SOI and has a General Plan 2025 Land Use Designation of A – Agriculture. In addition, the Project site is situated on hilly terrain bisected by a significant arroyo. Further, according to the DEIR, the site was in active agricultural production from at least 1967 through approximately 2020. The General Plan 2025, Proposition R (1979), Measure C (1987) and the Hillside and Arroyo Grading provisions of Title 17 of the Riverside Municipal Code (RMC 17.28.020) all contain relevant policies and regulations that require or prioritize preservation of agricultural land, retention of significant natural features and landforms, and protection of open space, including policies explicitly intended to manage growth and encourage preservation and conservation within the SOI (Policy LU-4.4, OS-1.7 and others). The relevant CEQA impact threshold requires an evaluation of whether the project would create impacts due to a conflict with **any** land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Given the Project's location with the SOI, the DEIR must be revised to evaluate the project's consistency with each of these policy documents, revise the impact analysis to discuss any conflicts, and identify and impose any necessary mitigation.

A-3

A-4

A-5

A-6

A-7

Comment Letter A

Public Utilities Department – Strategic Initiatives Division:

- Page 4.20-1 – Utilities and Service Systems (Existing Conditions)
  - Please revise the statement that Southern California Edison will be the provider for both natural gas and electric services at the project site. SoCal Gas will be the provider for natural gas services, while Southern California Edison will be the provider for electric services.

Public Works Department – Land Development Division:

- Page 1-11 – Responsible and Trustee Agencies
  - Please revise the statement that Western Municipal Water District will the lead agency for water and sewer connections at the project site. The City of Riverside will be the lead agency for such connections. The DEIR must be revised to update references and assess any impacts potentially arising from the Project's connection to and use of City of Riverside municipal water and sewer services, including but not limited to impacts required for off-site improvements to water and sewer systems necessary to serve the project.
- Page 3-20 – Construction Schedule and Equipment
  - Table 3-2: Estimated Construction Schedule
    - The existing construction schedule seems outdated; please update.

Commented [MC1]: Remove from letter, include in email to the agency

Public Works Department – Traffic Engineering Division:

- Appendix KI – VMT Analysis
  - Page 2 – VMT Analysis
    - Please explain why this project is using RIVTAM rather than RIVCOM, which is also referenced in the County guidelines and contains more recently calibrated data than RIVTAM.
  - Page 4 – VMT Reduction Measures
    - As a matter of information, the City of Riverside has a VMT Mitigation Pilot Program that can be used as a VMT reduction option.
- Appendix K2 – Traffic Analysis
  - Page 19 – Queuing Analysis
    - Table 1-3: Summary of Improvements by Analysis Scenario
      - Please provide the project fair share amount
      - Please note that the City of Riverside currently does not have a Fair Share Program; therefore, the project may be conditioned to install traffic signal infrastructure improvements such as high visibility crosswalks, traffic signal controller, a battery backup system, audible push button system etc. at the intersections listed on this table. The Traffic Division will add these improvements as conditions of approval.
  - Page 44 – Cumulative Development Traffic
    - Please clarify if the year all cumulative projects could be fully built and occupied is 2027 or 2028.
  - Page 63 – Intersections Operations Analysis
    - Table 7-1: Intersection Analysis for Horizon Year (2045) Conditions
      - Chicago Avenue/Alta Cresta Avenue & Van Buren Boulevard Intersection.

A-8

A-9

A-10

A-11

A-12

A-13

Comment Letter A

- It appears that the project will add more than 8 seconds of delay in the AM peak hour of traffic which will be a project related traffic deficiency. Please address and revise any findings as appropriate.
- Please provide a fair share amount for this intersection. Project may be conditioned to install traffic signal infrastructure improvements such as high visibility crosswalks, traffic signal controller, a battery backup system, audible push button system etc. at these intersections. The Traffic Division will add these improvements as conditions of approval.

- Page 67 – Fair Share Contribution
  - Please specify that the City of Riverside currently does not have a Fair Share Program and that the fair share calculation has been added for information purposes.
  - Table 8-1: Project Fair Share Calculations
    - Please clarify why the intersection of Trautwein & Van Buren is not included in this table when fair share calculations are indicated in Table 1-3. Include if possible.
    - Wood Road & Van Buren Boulevard Intersection
      - Table 1-3 shows that this intersection is included in the WRCOG TUMF Program. Please specify if this intersection should be included in fair share calculations.
      - Please provide a fair share amount for this intersection. Project may be conditioned to install traffic signal infrastructure improvements such as high visibility crosswalks, traffic signal controller, a battery backup system, audible push button system etc. at these intersections. The Traffic Division will add these improvements as conditions of approval.

A-13 (CONT.)

The City appreciates your consideration of the comments provided in this letter. Should you have any questions regarding this letter, please contact me at (951) 826-5944, or by e-mail at mtaylor@riversideca.gov.

A-14

We thank you again for the opportunity to provide comments on this proposal and look forward to working with you in the future.

Sincerely,

Matthew Taylor
Principal Planner

cc: Patricia Lock Dawson, Mayor
Riverside City Council Members

Comment Letter A

Mike Futrell, City Manager
Rafael Guzman, Assistant City Manager
Jennifer A. Lilley – Community and Economic Development Director
Maribeth Tinio, City Planner
David A. Garcia, Public Utilities General Manager
Gil Hernandez, Public Works Director
Jack Liu, Interim City Attorney

A. *Responses To Comment Letter A: City of Riverside*

A-1 This introductory comment includes a brief description of the proposed Project, and notes that the Project is within the City of Riverside's Sphere of Influence (SOI). This comment is acknowledged; no further response is required.

A-2 This comment provides no substantial evidence regarding a significant impact. This comment notes that the property is bisected by a blue line stream, indicates that the on-site arroyo vegetation are a significant natural open space and visual resource, and argues that the visual impacts of the Project on the arroyo habitat should be analyzed and mitigated as necessary. The commenter is referred to the existing site photos presented on EIR Figures 4.1-1 through Figure 4.1-3, which shows the existing visual characteristics of the Project site as viewed from publicly-accessible areas surrounding the Project site. As is clearly shown on these images, under existing conditions the arroyo habitat on the Project site is not prominently visible from any off-site locations. Rather, existing views of the Project site are dominated by views of lands formerly used for agricultural production and that is covered with upland vegetation. Moreover, the arroyo plants that were identified on site are concentrated within the southern willow scrub habitat areas on site. As shown on EIR Figure 4.4-1, the southern willow scrub habitat occurs in association with the existing on-site drainage that traverses the Project site in a southeast to northwest direction, and due to the lower elevation of this drainage and associated riparian habitat the arroyo is not prominently visible, if visible at all, from off-site publicly-accessible viewing areas. Further, as shown on EIR Figure 3-11, *Proposed Limits of Physical Disturbance*, the Project has been designed to avoid the on-site southern willow scrub habitat to the maximum extent feasible. Accordingly, given that the arroyo willow plants on site are not prominently visible from off-site locations, and because the Project has been designed to avoid the portions of the Project site containing arroyo willow plants to the extent feasible, the proposed Project would not result in a significant impact to visual quality. Thus, no revision to the DEIR is warranted pursuant to this comment.

A-3 This comment states that the Draft EIR's conclusion that mitigation of impacts to Farmland of Statewide Importance, Farmland of Local Importance, and Unique Farmland is infeasible is not supported by evidence within the Draft EIR, and asserts that agricultural uses can co-exist with single-family residential land uses. The comment provides no substantial evidence of a significant environmental effect. First, the commenter is incorrect in asserting that land use compatibility between residential and agricultural uses was the sole reason that on-site mitigation was considered infeasible. Rather, the commenter is referred to the discussion presented in DEIR Subsection 4.2.7, which notes that it would not be feasible to develop the site with residential uses while still preserving a portion of the site for agricultural production. The landowners previously determined that agricultural production on site was no longer feasible and ceased operations around 2019-2020. Specifically, correspondence related to the feasibility of agricultural production has been obtained from two of the existing property owners and is included as (new) EIR *Technical Appendix O*. As documented therein, despite efforts by the landowners to continue agricultural production, agricultural production on the site was ceased in or about 2020 after several years of farming at an economic loss. Specifically, between 2017 and 2019, one of the landowners reported average annual losses of approximately $75,230 per year as a result of continued agricultural production on site. Part of the reason for this infeasibility is that water in the local area costs between 75-100% more than other areas where agricultural uses continue to be feasible, such as in the Coachella Valley. In addition, one of the landowners cites theft of agricultural

products as a contributing factor. The feasibility of agricultural production on site is further undermined by the fact that the site is located in a quarantine area for the Asian citrus psyllid and Huanglongbing disease, which requires additional costs associated with pest control as well as costs associated with harvesting and transporting the products to market. When considering the need to avoid biologically-sensitive arroyo habitat and tribal cultural resources while also accommodating residential uses, preserving only a small portion of the Project site for on-going agricultural production would be even less feasible than it is under existing conditions. Furthermore, it has long been recognized by Riverside County that agricultural uses present compatibility issues with nearby residential uses due to nuisance complaints associated with agricultural-related dust and odors, and Riverside County Ordinance No. 625 (Right-to-Farm Ordinance) has been in effect since 1986 to specifically address compatibility issues between residential and agricultural uses. Thus, the DEIR was accurate in determining that colocation of agricultural and residential uses would present land use compatibility issues. Accordingly, no revision to the DEIR is warranted pursuant to this comment.

A-4 The commenter asserts that the Draft EIR's statement that reserving a portion of the Project site for agricultural purposes would not be economically viable is not supported by the evidence. The County disagrees. The Project consists of a proposal to develop the 140.8-acre Project site with 231 single-family dwelling units. Any lands on site reserved for agricultural purposes would significantly reduce the number of dwelling units that could be accommodated on site, which would in turn adversely affect the Project Applicant's rate of return on its investment. Furthermore, and as noted in the response to Comment A-3, it would not be feasible to preserve a portion of the Project site for on-going agricultural production while still accommodating residential dwelling units and preserving the biologically-sensitive arroyo habitat on site. Accordingly, the DEIR was accurate in concluding that it would not be feasible to preserve portions of the Project site for on-going agricultural production. Furthermore, the commenter is referred to the discussion of the No Development Alternative (NDA) within DEIR subsection 6.3.1, which considers an alternative that would retain the Project site in its existing condition, and the commenter is referred also to the analysis of the High Density Residential Alternative (HDRA) within DEIR subsection 6.3.3, which included a discussion and analysis of an alternative that would permit development of portions of the Project site with higher density residential uses while leaving the remaining portions of the Project site in its existing condition. The commenter is referred also to the responses to Comments A-3 and A-5. The comment provides no substantial evidence of a significant environmental effect. No further response is necessary.

A-5 The commenter asserts that the DEIR's conclusion that off-site mitigation is infeasible is unsubstantiated and unsupported by the evidence. The County disagrees and finds that mitigation for impacts to important farmlands is infeasible for the reasons discussed in DEIR subsections 4.2.7 and 4.2.8. Furthermore, in 2015 Riverside County adopted a comprehensive update to its General Plan and concurrently certified an EIR (SCH No. 2009041065). The General Plan EIR concluded that buildout of the land uses anticipated by the Riverside County General Plan would result in significant and unavoidable impacts to important farmlands throughout the County and determined that mitigation for such impacts would be infeasible, and as such the County adopted a Statement of Overriding Considerations in accordance with State CEQA Guidelines § 15093. The Project site is designated by the Riverside County General Plan for "Rural Community – Very Low Density Residential (CD-VLDR)" land uses; thus, the Project's significant and unavoidable impacts to important farmlands are

consistent with the significant and unavoidable impacts disclosed by the General Plan EIR. Furthermore, DEIR subsections 4.2.7 and 4.2.8 provide an exhaustive explanation as to why mitigation for impacts to important farmlands is not feasible for the proposed Project. The commenter is referred also to the response to Comment A-6. The comment provides no substantial evidence of a significant environmental effect. No further response is necessary.

A-6 This comment opines that the Draft EIR failed to consider compensatory mitigation for farmland conversion and provides an example of lands within the City of Riverside that may provide for potential compensatory mitigation opportunities. The comment provides no substantial evidence of a significant environmental effect. The commenter is referred to the responses to Comments A-3 through A-5. Furthermore, it is unclear from this comment how an existing preserved greenbelt within the City of Riverside would serve to mitigate for the Project's impacts to important farmlands. Lands within this portion of the City of Riverside either already are part of the California Citrus State Historic Park or consist of lands that already are zoned by the City of Riverside for "Residential Agricultural Zone (RA-5)." The City's RA-5 zoning classification is specifically intended to accommodate agricultural uses either independently or in conjunction with single-family uses, and as such these lands would not provide for any compensatory mitigation opportunities to address the Project's significant and unavoidable impacts to important farmland types. Moreover, these lands are all within the jurisdictional authority of the City of Riverside, meaning the City of Riverside would have discretionary authority over any proposal to change the General Plan land use designations or zoning classifications for lands within the Arlington Heights Greenbelt area. Furthermore, the finding that the Project's impacts to important farmland types cannot be mitigated to below a level of significance is consistent with the conclusion reached by the County's 2015 General Plan Update EIR (SCH No. 2009041065), which concluded that mitigation for impacts to important farmland types that would result from buildout of the land uses accommodated by the General Plan would be significant and unmitigable. Accordingly, the County finds that the DEIR properly concluded that no off-site mitigation is available to address the Project's impacts to important farmland types. Thus, no revision to the DEIR is warranted pursuant to this comment.

A-7 This commenter notes that the Project site is located within the City of Riverside's SOI and asserts that the Project should be required to comply with City of Riverside policies and regulations and requests that the Draft EIR be revised to include analysis of consistency with relevant City of Riverside plans, policies, and regulations. The comment provides no substantial evidence of a significant environmental effect. As acknowledged by this comment, the Project site is located within the SOI for the City of Riverside, and is not currently located within the City of Riverside. As such, the proposed Project is not subject to compliance with the City of Riverside Municipal Code requirements, such as the grading provisions of Title 17, Proposition R, and Measure C. With respect to the City of Riverside General Plan, the General Plan Land Use Element includes Objective LU-87 and Policies LU-87.2 through LU-87.5. The proposed Project would not conflict with these policies. Policies LU-87.2 and LU-87.5 specifically relate to lands proposed for annexation, and the Project does not include any applications for annexation. Policy LU-87.3 encourages the City to annex lands that would increase the City's industrial land base and/or that would provide opportunities to develop more prominent gateways into the City from the north, while the Project would not include any industrial lands and the Project site is located on the south side of the City of Riverside. Policy LU-87.4 provides direction to City of

Riverside staff to coordinate land use designations within the SOI with the County of Riverside, and is not applicable to the proposed Project. Accordingly, the proposed Project would not conflict with any of the City of Riverside General Plan policies related to its SOI, and as such no revision to the DEIR is warranted pursuant to this comment.

A-8 This comment requests that the Draft EIR be revised to state that Southern California Edison will be the provider of electric services and SoCal Gas will be the provider of natural gas services. This revision has been made on page 4.20-1 of the Final EIR. The comment provides no substantial evidence of a significant environmental effect. No further response is necessary.

A-9 This comment inaccurately asserts that the City of Riverside would be the lead agency for both water and sewer connections and requests that the Draft EIR be revised accordingly. While the County agrees that the Project would be provided with sewer services by the City of Riverside, according to the Project engineer, the nearest potable water facilities to the Project site consist of an 8-inch water line located within Iris Avenue along the Project site's frontage that is owned and maintained by the Western Municipal Water District (WMWD). Minor revisions were made in EIR Sections 1.0 and 3.0 to revise the discussion where warranted to indicate the City of Riverside as a Responsible Agency for approval of the Project's proposed sewer improvements and connections, while no revision was needed with respect to the DEIR's statement that WMWD would provide the Project with potable water. The comment provides no substantial evidence of a significant environmental effect and no further response is necessary.

A-10 This comment requests that the construction schedule be updated as it is out of date. The County disagrees. The construction schedule and anticipated opening year assumed by the DEIR represents a "worst case" scenario for the evaluation of potential Project impacts to the environment since emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent. Specifically, 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. Thus, any updated analysis using a revised construction schedule would result in reduced impacts to the environment as compared to what already is evaluated and disclosed by the DEIR. The comment provides no substantial evidence of a significant environmental effect. Accordingly, no revision to the DEIR is warranted pursuant to this comment.

A-11 This comment requests clarification as to why the Project's Vehicle Miles Traveled (VMT) Analysis utilizes RIVTAM rather than RIVCOM. The comment provides no substantial evidence of a significant environmental effect. The VMT analysis for the proposed Project was prepared in accordance with the County of Riverside's adopted Transportation Analysis Guidelines for Level of Service Vehicle Miles Traveled ("Guidelines"), dated December 2020. The Guidelines explicitly identify a significance threshold of 15.2 VMT per capita, based on outputs from the Riverside County Travel Demand Model (RIVTAM) (see Guidelines, p. 23). In alignment with best practices outlined in the Technical Advisory on Evaluating Transportation Impacts in CEQA (OPR, December 2018; now administered by the Land Use and Community Infrastructure [LCI] Division), it is noted that:

"It is critical, however, that the agency be consistent in its VMT measurement approach throughout the analysis to maintain an 'apples-to-apples' comparison" (p. 16).

Accordingly, the use of the RIVTAM model for the Project's VMT analysis ensures consistency with the County's adopted methodology and supports a standardized, reliable comparison across VMT assessments. Therefore, its application to the Arroyo Vista Project is considered appropriate and consistent with CEQA guidance. Accordingly, no revision to the DEIR is warranted pursuant to this comment.

A-12 This comment notes that the City of Riverside has a VMT Mitigation Pilot Program that could be utilized for VMT reduction. The comment provides no substantial evidence of a significant environmental effect. While the County of Riverside appreciates the City of Riverside's initiative in developing a VMT Mitigation Pilot Program, it is important to note that under CEQA, each lead agency is responsible for establishing its own procedures, thresholds, and methodologies based on its unique jurisdictional context. The County of Riverside adopted its Transportation Analysis Guidelines for Level of Service and Vehicle Miles Traveled in December 2020 to guide the evaluation of transportation impacts within unincorporated areas of the County. These Guidelines were developed to reflect the County's specific land use patterns, regional transportation network, and planning priorities, and are supported by County-adopted models and screening criteria, including the use of the RIVTAM model and locally derived VMT thresholds. While mitigation strategies from other lead agencies may provide helpful insight, applying them without adaptation to the County's context could result in analytical inconsistencies or measures that are not effective in addressing the County's specific transportation conditions. For this reason, the County relies on its adopted Guidelines to ensure that mitigation measures are both legally defensible and locally appropriate under CEQA. Accordingly, no revision to the DEIR is warranted pursuant to this comment.

A-13 This comment relates to the Project's Traffic Analysis ("TA"; DEIR *Technical Appendix K2*) and provides comments on the content of the Project's TA. The comment provides no substantial evidence of a significant environmental effect. As explained in DEIR Subsection 4.18, *Transportation*, on December 28, 2018, updates to the State CEQA Guidelines were approved by the Office of Administrative Law (OAL). As part of the updates to the CEQA Guidelines, thresholds of significant for evaluation of impacts to transportation have changed. As required by Senate Bill (SB) 743, new Threshold b. of the CEQA Guidelines for Transportation requires an evaluation of impacts based upon VMT, which replaced the Level of Service (LOS) criteria (i.e., automobile delay) that has been utilized in the past to evaluate potential effects to transportation under CEQA. Pursuant to CEQA Guidelines Section 15064.3(a), "…a project's effect on automobile delay shall not constitute a significant environmental impact." Accordingly, comments pertaining to the Project's TA technical report are unrelated to the proposed Project's potential impacts to the environment, and as such no response is necessary.

A-14 This concluding comment thanks the County for the opportunity to provide comments, and provides the commenter's contact information should any questions arise. This comment is acknowledged; no further response is necessary.

Comment Letter B

April 23, 2025

Krista Mason
Urban and Regional Planner IV
County of Riverside
Planning Department
4080 Lemon Street, 12th Floor
P.O. Box 1409
Riverside, CA 92502-1409

Re: Formal Comments to The Draft Environmental Impact Report for the Arroyo Vista Project- General Plan Amendment No. 220009 (GPA220009), Change of Zone No. 22000031 (CZ22000031), and Tentative Tract Map No. 38510 (TTM38510)- Riverside County, California

The Soboba Band is hereby providing to the County of Riverside Planning Department, formal comments to the Draft EIR for the aforementioned project.

As part of the AB52 process, and in an effort to mitigate impacts to Tribal Cultural Resources (TCRs) which would result from the approval of the Arroyo Vista Project, the Soboba Band provided to the County of Riverside on February 5, 2025, extensive mitigation measures intended to avoid and minimize impacts to TCRs. The inclusion of these measures into the Environmental Impact Report (EIR) for the Arroyo Vista Project would avoid damaging effects to Tribal Cultural Resources located both adjacent and within the boundary of the Arroyo Vista Project, per California Public Resources Code Section 21084.3(a). (see attachment)

The Soboba Band received a response the following day on February 6, 2025 from Darren Edgington, Environmental Project Manager at the County of Riverside Planning Department. (see attachment).

Within the formal response on Riverside County letterhead, Mr. Edgington acknowledged receipt of Soboba's letter, and goes on to state the following:

"The County and applicants have reviewed the set of mitigation measures you provided, and we are in agreement with those measures and will incorporate them into the Environmental Impact Report".

Mr. Edgington went on to state that, *"Because the County and the Tribe agree to measures to mitigate or avoid a significant effect, as defined in Section 21080.3.2(b)(1) of the Public Resources Code, we hereby conclude consultation for this project effective February 6, 2025".*

Although the County's response had stated that, "*The Riverside County Planning Department will notify the Tribe when the environmental document is released for public review as well as when the project is scheduled for a public hearing",* the notification of the Draft EIR's availability was

Confidentiality: The entirety of the contents of this letter shall remain confidential between Soboba and the County of Riverside. No part of the contents of this letter may be shared, copied, or utilized in any way with any other individual, entity, municipality, or tribe, whatsoever, without the expressed written permission of the Soboba Band of Luiseño Indians.

B-1

Comment Letter B

actually sent to the tribe by Deborah Bryant at T&B Planning, a consultant apparently retained by the County, to provide the Draft Environmental Impact Report Notice of Availability.

Unfortunately, the notification provided by T&B Planning was insufficient. The title of the email not only referenced a Notice of Preparation of the Draft Environmental Impact Report, as opposed to the Notice of Availability, but the actual Draft EIR was buried in a series of pages and links before it could finally be accessed.

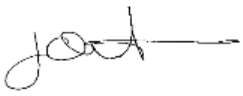
Upon review of the Draft EIR, it was apparent that the Mitigation Measures for Tribal Cultural Resources provided by the Soboba Band, were not incorporated into the Draft Environmental Impact Report, despite the acknowledgement by Darren Edgington in his letter from February 6, 2025, where he based his conclusion of consultation under AB52, on the inclusion of these measures. Therefore, **consultation with the Soboba Band in accordance with California Assembly Bill 52 is not concluded for the Arroyo Vista Project- GPA 220009, CZ 2200031, TTM 38510.**

The Soboba Band requests the immediate removal of the current cultural resource mitigation measures from the TCR section of the Draft EIR circulated by T&B Planning, and that the mitigation measures for Tribal Cultural Resources (TCR) provided to the County of Riverside on February 5, 2025 are incorporated into the EIR as agreed upon by the County of Riverside on February 6, 2025. The Soboba Band is committed to continuing its consultation with the County in accordance with AB52. With that being said, we look forward to a prompt response from the County, and their commitment to the incorporation of the mitigation measures agreed upon with the Soboba Band.

B-1 (CONT.)

B-2

Sincerely,



Joseph Ontiveros, Tribal Historic Preservation Officer
Soboba Band of Luiseño Indians
P.O. Box 487
San Jacinto, CA 92581
Phone (951) 654-5544 ext. 4137
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Confidentiality: The entirety of the contents of this letter shall remain confidential between Soboba and the County of Riverside. No part of the contents of this letter may be shared, copied, or utilized in any way with any other individual, entity, municipality, or tribe, whatsoever, without the expressed written permission of the Soboba Band of Luiseño Indians.

B. Responses To Comment Letter B: Soboba Band of Luiseño Indians

B-1 This comment provides details on the communication between the Soboba Band and Riverside County regarding Tribal Cultural Resources mitigation measures. The comment provides no substantial evidence of a significant environmental effect. This comment also states that the County's notification of the Draft EIR's availability was insufficient. The County acknowledges that the subject line of the email sent by T&B Planning referenced the Notice of Preparation rather than the Notice of Availability. However, the County confirms that the email transmitted to the Tribe provided access to the Draft Environmental Impact Report (Draft EIR) and that the Tribe successfully received the materials intended for public review. While the County appreciates the commenter's concerns, no further action is required at this time, as the Tribe was provided the opportunity to review and comment on the Draft EIR during the public review period, which occured. No further response is necessary.

B-2 This comment states that the mitigation measures provided by the Soboba Band were not incorporated into the Draft EIR. The comment provides no substantial evidence of a significant environmental effect. Additionally, the comment requests that the cultural resource mitigation measures be removed and replaced with the mitigation measures provided by the Soboba Band. The County acknowledges the Soboba Band's comment regarding the mitigation measures. The County's letter dated February 6, 2025, responded to the Soboba Band's letter dated February 5, 2025, which included suggested edits to the Tribal Cultural Resources mitigation measures in the Draft EIR. The Soboba Tribe included a Microsoft Word document titled "Arroyo Vista – Draft Section 4.19 Tribal Cultural Resources – Soboba Pechanga – Redlines – 2.5.25." The County reviewed the Tribe's edits to the mitigation measures provided in that document and agreed to incorporate the proposed revisions into the Final EIR, as discussed herein in Table F-3, *Errata Table of Additions, Corrections, and Revisions*. The new information appended to the Soboba Band's comment letter on February 5, 2025, was not part of the materials previously submitted to the County during over 2 years of consultation, despite prior opportunities provided for such input. As such, the County appropriately incorporated the tribe's edits to the mitigation measures received and considers consultation under AB 52 to be concluded. Additionally, pursuant to Public Resources Code Section 21080.3.2(b)(2), mutual agreement is not required for the conclusion of consultation, and the County properly exercised its discretion to conclude consultation based on the record. If the Soboba Tribe does not agree with the edits to the TCR section mitigation measures that it provided, then the County will consider consultation concluded without agreement.

Comment Letter C

PECHANGA CULTURAL RESOURCES
Pechanga Band of Indians

Post Office. Box 2183 • Temecula, CA 92593
Telephone (951) 770-6300 • Fax (951) 506-9491

Chairperson:
Neal Ibanez

Vice Chairperson:
Bridgett Barcello

Committee Members:
Darlene Miranda
Richard B. Scearce, III
Robert Villalobos
Shevon Torres
Juan Rodriguez

Direcctor:
Gary DuBois

Coordinator:
Paul Macarro

Cultural Analyst:
Tuba Ebru Ozdil

April 24, 2025

Via E-Mail and USPS
Mrs. Krista Mason
Project Planner
Riverside County Planning Department
4080 Lemon Street, 12th Floor
Riverside, CA 92502-3634

Re: Pechanga Tribe Comments on the Draft Environmental Impact Report for the Arroyo Vista Project SCH: 2021080570 General Plan Amendment No. 220009 (GPA220009), Change of Zone No. 22000031 (CZ22000031), and Tentative Tract Map No. 38510 (TTM38510)

Dear Mrs. Mason,

This comment letter is submitted by the Pechanga Band of Indians (hereinafter, "Pechanga Band" or "Tribe"), a federally recognized Indian tribe and sovereign government whose ancestral territory includes the location of the proposed Arroyo Vista Project ("Project"). This letter addresses the Tribe's continued concerns about the Project's environmental and cultural resources impacts as well as the Tribe's concerns regarding the County of Riverside's ("County") lack of compliance with the mandates of Assembly Bill 52 (2014) (hereafter "AB 52") and Senate Bill 18 (2005) (hereafter "SB 18"). The Tribe requests this letter to be incorporated into the CEQA record for this Project and that the Tribe be notified of all documents issued for and actions concerning this Project.

The Pechanga Band has continually asserted that the Project area lies within '*Atáaxum* (Luiseño), and therefore the Tribe's, aboriginal territory. This is evidenced by the existence of an extensive record of cultural features, resources, place names, *tóota yixélval* (rock art, pictographs, petroglyphs) within the Project and the surrounding region. The Project region is affiliated with the Pechanga Band because of the Tribe's cultural ties to this area as well as an extensive documentation of the Tribe's ancestors living in the area. '*Atáaxum* people retain specific oral histories for this landscape that are maintained in traditional stories and song. The landscape lies within an area to which the Pechanga Band attaches religious and cultural significance.

The Tribe understands that the proposed Project includes a development of 231 single family residential dwelling units, a trailhead/parking area, a sewer lift station, three water quality basins, and natural open space areas. The proposed development activity will have substantial impacts on

C-1

Sacred Is The Duty Trusted Unto Our Care And With Honor We Rise To The Need

Comment Letter C

both tangible and intangible *'Atáaxum* (Luiseño) Tribal Cultural Resources ("TCR"), including a recorded Traditional Cultural Property ("TCP") and Traditional Cultural Landscape ("TCL") known as Sycamore Canyon, unless properly mitigated.

C-1 (CONT.)

The Draft Environmental Impact Report ("DEIR") is significantly flawed in its legal and technical analysis concerning the Project's impacts, proposed mitigation measures, and findings related to TCRs. In particular, the DEIR fails to appropriately address the contextual information the Tribe provided as well as the mitigation measures provided by the Tribe and agreed upon by the County of Riverside. On February 5, 2025, the Tribe sent the attached letter to the County of Riverside, offering comments on the Project and proposed specific TCR mitigation measures. The County's attached response letter, dated February 6, 2025, committed the County to adopting the Tribe's recommended mitigation measures, stating: **"The County and applicants have reviewed the set of mitigation measures you provided, and we are in agreement with those measures and will incorporate them into the Environmental Impact Report."**

C-2

Despite the County's letter confirming agreement, the DEIR fails to incorporate the Tribe's TCR mitigation measures. The DEIR (pages 4.5-31 and 4.19-16) states that the County will include the feasible mitigation measures made by the Tribe, but will address feasibility as the Cultural Resource Monitoring Program ("CRMP") is developed. The County did not consult with the Tribe on this approach to mitigation, this approach is wholly inconsistent with what the County communicated to the Tribe in its February 6, 2025 letter, and this approach is not consistent with the requirements of CEQA. Adequately describing feasible mitigation measures is a core aspect of the environmental impact report. It is not appropriate for the County to delay discussion and incorporation of recommended mitigation measures until the development of a CRMP, which would occur well after the EIR is approved, particularly when the DEIR concludes there will be significant and unavoidable direct and cumulatively-considerable impacts to TCRs. The mitigation must be incorporated into the EIR itself. The County must adopt feasible mitigation measures to reduce impacts to TCRs.

C-3

By unilaterally moving forward with this improvised approach, the County has not complied with the mandates set forth under AB 52 and SB 18. Both AB 52 and SB 18 require meaningful consultation with Native American Tribes regarding projects that may affect TCRs. The County did not notify the Tribe of any changes to the Tribally recommended TCR mitigation measures or provide any justification for their exclusion from the DEIR, nor has the County requested further consultation with the Tribe. These omissions represent a clear violation of the procedural requirements of AB 52 and SB 18, which require that mitigation measures agreed upon through consultation with Tribes be included in the final Environmental Impact Report (EIR) and that Tribes be informed of any changes or deviations from agreed-upon measures.

C-4

The County's Notice of Completion and Availability (NOA) dated March 10, 2025 also fails to list TCRs and cultural resources within the Scope of Analysis section of the notice, and therefore the County has failed to provide notice that the proposed Project could significantly impact TCRs and cultural resources, despite repeated notifications that this area holds sacred and ceremonial TCRs. The Tribe has consistently informed the County during site visits and consultation meetings about the Project's potential to significantly affect these TCRs, but these concerns have not been

C-5

Comment Letter C

properly identified and addressed in either the CEQA environmental analysis or notices. This omission is a failure to comply with the consultation and evaluation requirements under AB 52, which mandate that TCRs be thoroughly assessed and considered in the review process. The County's failure to incorporate these critical considerations into the DEIR undermines the legal and ethical obligations to protect sacred and ceremonial sites.

C-5 (CONT.)

In addition, DEIR section *S.6.2 Impacts of the Proposed Project* identifies Tribal Cultural Resources having a significant and unavoidable direct and cumulatively-considerable impacts.

> *Implementation of the proposed Project would result in direct physical impacts to approximately 0.61 acre of the overall 12.17 acres mapped for Site P-33-12915/CA-RIV-7181, and would impact approximately 1.00 acre of the overall 3.80 acres mapped for Site P-33-12916/CA-RIV-7182, both of which are considered tribal cultural resources. In addition, the Project would result in direct impacts to Sites CA-01, CAR-04, CAR-05, CAR-08, CAR-10, and CAR-13-1, and portions of CA-RIV-7184, all of which are assumed to comprise potential tribal cultural resources. The Project site also has been identified as a component of a TCR landscape; thus, development of the Project site with residential uses would result in a potentially significant impact to the TCR landscape. While implementation of Mitigation Measures MM 4.5-1 through 4.5-13 would reduce impacts to tangible tribal cultural resources identified on site, it has been determined that the Project's impacts to the TCR landscape would remain significant even with implementation of the required mitigation measures. There are no feasible mitigation measures available to reduce the Projects impacts to the TCR landscape to below a level of significance; thus, Project impacts to Tribal Cultural Resources would remain significant and unavoidable.*

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Based on this section of the DEIR and its determination that impacts to the Tribal Cultural Resource (TCR) landscape would remain significant and unavoidable even with implementation of Mitigation Measures MM 4.5-1 through 4.5-13, listing the mitigation measures alone is not sufficient to satisfy the requirements of the California Environmental Quality Act (CEQA). Under CEQA Guidelines Section 15093, when a project will result in significant and unavoidable environmental impacts, the lead agency may not approve the project unless it first adopts a Statement of Overriding Considerations. This statement must be supported by substantial evidence in the record and must clearly articulate the specific economic, legal, social, technological, or other benefits of the proposed project that outweigh its significant adverse environmental effects. In this case, because the DEIR explicitly concludes that there are no feasible mitigation measures to reduce the Project's impacts to the TCR landscape to a less-than-significant level, the County must adopt a Statement of Overriding Considerations if it intends to approve the Project. Proceeding without such a statement, or proceeding without incorporating mitigation that does reduce the Project's impacts to a less-than-significant level, would be inconsistent with CEQA.

The County's February 6, 2025 letter states, *"Based on this thorough review and the project modifications, the County has determined that the revised project represents a more balanced*

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approach with reduced impacts to tribal cultural resources. The additional safeguards and design adjustments align with best practices for cultural resources protection and were developed in direct response to the Tribe's input." However, the revised development design was discussed and completed with the applicant without invitation or participation of the Tribe. As a result, Tribal concerns regarding impacts to sacred and ceremonial TCRs were not meaningfully incorporated into the revised Project design. This "re-design in a vacuum" approach is inconsistent with the requirements of AB 52 and SB 18, which mandates meaningful Tribal consultation and requires local governments to consider the cultural values and significance of Tribal resources when making planning decisions. The core intent of SB 18 and AB 52, in particular, is to ensure that Tribes are actively involved in the planning process when projects may affect sacred sites and cultural landscapes—not simply informed after key decisions have been made.

The Tribe does not oppose the development of the Project in principle; however, the Tribe strongly objects to the impacts on sacred and ceremonial TCRs that would occur if the DEIR is approved. With proper implementation of the Tribe's recommended mitigation measures, which were previously agreed upon by the County, the Project can proceed on a path forward that significantly reduces adverse impacts to these critical cultural resources. The Tribe is once again providing the proposed mitigation measures for the TCRs that were approved and agreed upon by the County of Riverside. The Tribe respectfully requests that these mitigation measures be fully incorporated and adopted into the Final Environmental Impact Report (EIR) for the Project.

We thank you for the opportunity to submit these comments on the DEIR for the Arroyo Vista TTM 38510 Project. Please contact me at eozdil@pechanga-nsn.gov and Cole Bauman, Associate General Counsel at cbauman@pechanga-nsn.gov to continue consultation and for any questions about these comments.

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Sincerely,

Tuba Ebru Ozdil
Cultural Analyst

Cc Pechanga Office of the General Counsel

Pechanga Cultural Resources • Pechanga Band of Indians

Sacred Is The Duty Trusted Unto Our Care And With Honor We Rise To The Need

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Attachment 1

Pechanga Band of Indians Proposed
Mitigation Measures for Tribal Cultural Resources

Public agencies must, when feasible, avoid damaging effects to any tribal cultural resource. Pub. Res. Code § 21084.3 (a). Appropriate mitigation for a tribal cultural resource is different than mitigation for archeological resources. During AB 52 consultation between the County of Riverside and the Soboba Band of Luiseño Indians (Soboba Band) a identified that the Arroyo Vista Project is located within the Peet' Wikikmal Traditional Cultural Landscape (TCL), and therefore a Tribal Cultural Resource, and the Pechanga Band of Indians (Pechanga Band) identified that the Arroyo Vista Project is a part of Sycamore Canyon Traditional Cultural Property (TCP) and therefore a Tribal Cultural Resource (TCR) has been identified. The TCR fully encompasses the 140.8 acre Arroyo Vista Project, and as such all tangible and intangible natural and cultural resources are contributing elements of the TCR. The TCR is presumed eligible for listing in the CRHR under Criteria 1 and 4. Upon review of the land use plan, entitlement plan and the grading plan for the Arroyo Vista Project, the Project will have a significant impact on the TCR. The following mitigation measures are recommended to minimize significant impacts on this Tribal Cultural Resource.

TCR – 1 The Soboba Band, and the Pechanga Band request avoidance, to the greatest extent possible, of the most significant places within the TCR—namely CA-RIV-7182 and CA-RIV-7184 as part of the identified TCR. Additionally, all significant archaeological sites, geologic features, water resource features, and native plants traditionally used by the Soboba Band, and the Pechanga Band shall be avoided through re-design.

TCR – 2 Tribal Cultural Resources Photo Report. A comprehensive photo documentation report shall be prepared for all cultural and natural elements of the Tribal Cultural Resource (TCRs) that cannot be avoided. The documentation will capture both the TCR itself and the broader landscape context to ensure that the full significance of the resources is preserved and understood. This report shall include high-resolution photographs, detailed site mapping, and geospatial data, and shall be prepared in consultation with Tribes and will be subject to review and approval by the Soboba Band of Luiseño Indians, and Pechanga Band of Indians prior to grading permit issuance. The report shall include but not limited to following:

1. High-Resolution Photography for Resource Documentation: All cultural and natural elements of TCRs that cannot be avoided shall be thoroughly

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documented through high-resolution photography, in consultation and subject to prior approval by Soboba Band and Pechanga Band, capturing both the resource itself and the broader landscape in which it is situated. This documentation will ensure that the full context of the TCR, including its spatial relationship with surrounding features, is preserved.

2. Photography Requirements:
    - Resolution: Photographs must be taken using a camera with a resolution of at least 300 pixels per inch (ppi), or equivalent, ensuring that the fine details of the resource are captured.
    - Wide-Angle and Contextual Shots: In addition to detailed close-up shots of the TCR, wide-angle photographs shall be taken from multiple vantage points to document the broader landscape, including topographical features, surrounding vegetation, and any other elements that provide cultural, historical, or ecological context to the resource.
    - Panoramic Views: Panoramic images shall be taken at the highest points within the project boundary to capture the overall setting and viewshed of the TCR, including the surrounding terrain, which may have cultural or natural significance. These shots should cover a 360-degree field of view to provide a complete visual context of the resource in relation to its surroundings.
    - Aerial photography utilizing a drone shall also capture topographical features, surrounding vegetation, and any other elements that provide cultural, historical, or ecological context to the TCR.
3. Site Mapping and Geospatial Data:
    - Photographic Location Mapping: Each photograph shall be accompanied by a detailed map showing the exact locations from which the photos were taken. This map shall include the coordinates (latitude and longitude) and elevation data, providing spatial context for each image.
    - Integration with GIS: All photographic documentation, along with relevant mapping, shall be integrated into a Geographic Information System (GIS) database to allow for precise tracking and analysis of the resource's location, topography, and surrounding environment.
4. Documentation of Cultural and Ecological Features: In addition to the resource itself, any associated cultural or natural features that contribute to the significance of the TCR (such as water sources, sacred sites, vegetation, wildlife habitat, or landscape features) shall be documented. These features will be photographed and mapped to ensure a comprehensive understanding of the TCR's significance within the larger ecological and cultural landscape.
5. Approval and Review: All photographic documentation, maps, and GIS data shall be submitted to the Soboba Band and Pechanga Band for review

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and approval before any project activities that could affect the TCR are initiated. The document shall be finalized until the tribes shall have the opportunity to provide feedback on the completeness and cultural sensitivity of the documentation.

6. Archiving and Long-Term Preservation: Copies of all photographic documentation, maps, and geospatial data shall be archived in a format approved by the consulting tribes, and securely stored in both digital and physical formats. These records will be made available to the Tribes and the County of Riverside.
7. 3D Modeling of the TCR and Landscape: In addition to photographic documentation, a 3D digital model of the TCR and its surrounding landscape shall be created to provide a detailed, interactive representation of the resource. This model will capture the TCR's physical characteristics, spatial relationships, and context within the broader environment. The 3D model shall be developed using accurate measurements and high-quality data, allowing for virtual exploration and analysis. The final 3D model, along with the associated photographic and geospatial data, shall be submitted for review and approval by the Soboba Band and Pechanga Band prior to finalizing the 3D modeling. Final documentation will be available to the Tribes and the County of Riverside.

TCR – 3 Preparation of a Tribal Cultural Resource Management Plan (TCRMP). The TCRMP shall be developed in close consultation with the Soboba Band and the Pechanga Band, to manage the impacts to the tangible cultural and natural resources identified in the project area and will outline in detail how the Tribal mitigation shall be implemented in a manner that respects Tribal cultural values. The TCRMP will be developed prior to grading permit issuance and approved by the County of Riverside after the Tribes have fully reviewed and provided all edits. The TCRMP will function like a cultural resources management plan (CRMP), but will consider the TCRs as defined by California Public Resources Code Section 21074(a) and will be used as a guide to identify, protect, and manage the tangible and intangible TCRs already present on site and those inadvertently identified within the project area, and ensure that impacts to these resources are minimized or avoided during project implementation.

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The TCRMP will include protection protocols to safeguard the known TCRs during construction and throughout the life of the project. This will include but is not limited to:

- Incorporating an exhibit that details and identifies the tangible components of the TCR that encompasses the project area (i.e., features, natural resources, sites, preservation areas).
- The development of buffer zones and exclusion areas around sensitive sites, as determined in consultation with the Soboba Band and the Pechanga Band, to ensure that the avoided resources are not

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disturbed by construction activities. (TCR- 5)

- Temporary protection measures during construction for Tribal Ceremonial Areas, such as restricted access to areas of spiritual or ceremonial importance and respecting seasonal and cultural restrictions on land use. (TCR-6)

In addition, the TCRMP will specify the process for the following:

- Preconstruction Meeting Requirements and monthly check in meetings
- Cultural resources monitoring during construction and other ground-disturbing activities.
- Avoidance Plan
- Relocation Plan
- Control Grading Plan
- Inadvertent Finds
- Inadvertent Findings of Human Remains
- Photo Recordation of Inadvertent Features
- Final Disposition of Inadvertently found Tribal Resources
- The Development process of a long-term management plan to ensure the protection of TCRs beyond the ground disturbing and construction phase of the project
- Role and Responsibilities and contact information for all parties

The Soboba Band and the Pechanga Band will co-manage the TCRMP with the landowner, HOA or environmental agency such as RCA. CRMPs traditionally only address tangible archaeological and historical resources that are eligible for listing in the CRHR. A TCRMP is required for this Project because the identified TCR can only be defined by the Soboba Band and the Pechanga Band, which includes places, sites, features, sacred places, and objects that have cultural significance, as well as archaeological resources.

TCR – 4 Tribal Monitoring Agreements. The developer/Land Owner is required to enter into Agreements with the Soboba Band of Luiseño Indians and the Pechanga Band of Indians. The agreements shall be in place prior to issuance of a grading permit. To accomplish this, the applicant should contact the Tribes no less than 30 days and no more than 60 days prior to issuance of a grading permit. This Agreement will address the treatment and disposition of Tribal cultural resources, the designation, responsibilities, and participation of Tribal monitors during grading, excavation and ground disturbing activities; project grading and development scheduling; terms of compensation for the monitors; and treatment and final disposition of any cultural resources, sacred sites, and human remains discovered onsite. The Tribal Monitor(s) shall have the authority to temporarily

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divert, redirect, or halt the ground-disturbance activities to allow recovery of cultural resources, in coordination with the Project Archaeologist. Tribal Monitors shall be allowed to monitor all grading, excavation and groundbreaking activities.

TCR – 5 Environmentally Sensitive Areas (ESA). Prior to the start of ground-disturbing activities, all Tribal features shall be fenced off with construction fencing and identified as ESAs to ensure Project personnel do not disturb the features. The installation of the ESA fencing shall be monitored by the project archeologist and Tribal Monitors. Specific requirements pertaining to the avoidance buffer, style, materials, access, maintenance, and other requirements shall be provided within the TCRMP.

TCR – 6 Temporary Avoidance of Tribal Ceremonial Areas. Prior to the issuance of a grading permit, the applicant is to develop a plan of action for the temporary avoidance of and protection of Tribal ceremonial areas. This plan of action is to be developed and implemented in consultation with the Soboba Band of Luiseño Indians and the Pechanga Band of Indians.

TCR – 7 Avoidance Plan. Prior to issuance of a grading permit, an avoidance plan shall be developed in consultation with the Soboba Band of Luiseño Indians and Pechanga Band of Indians. This plan shall indicate the areas/locations of the features that will be avoided by this project and the protection measures to be implemented during construction. In addition, the locations will be designated, in consultation with the Soboba Band of Luiseño Indians and Pechanga Band of Indians, on a confidential map. The developer/ applicant shall provide evidence to the Riverside County Planning Department that the map has been included in the Grading Plans, and shall indicate the presence of environmentally constrained area(s) and the requirements for avoidance of portions of CA-RIV-7181, portions of CA-RIV-7182 which contains *Tóota Yixéval*, as well as Feature B, C, D and E of CA-RIV-7184 which also include *Tóota Yixéval*, Temporary Site number CA-02, and features A, B, and C of CA-RIV-7183, prior to grading permit issuance as identified in 060-Planning-CUL-4 MM 4.5-4 ECS Sheet – Resource Relocation and Reburial and 060-Planning-CUL 5 MM 4.5-5 ECS Sheet.

TCR – 8 Relocation of Cultural Features. Prior to the start of ground-disturbing activities, all impacted features recommended for relocation, P-33-012915/CA-RIV-7181, P-33-012917/CA-RIV-7182, CA-01, and CA-RIV-7184 , shall be temporarily fenced off with construction fencing and identified as ESAs to ensure project personnel does not disturb the features (MM- TCR-4). The installation of the ESA fencing shall be monitored by the project archaeologist and Tribal monitors. Once the final location of the features has been determined and the area prepped, the features are to be moved to their final resting location. The features are only to be moved once. If the feature(s) do not survive the relocation efforts in one piece, all feasible fragments will be relocated to the final location. The relocation area shall be preserved in perpetuity and protected from all future

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ground-disturbing activity via an enforceable legal instrument such as a conservation easement or other restrictive binding upon successive owners of the relocation area.

TCR – 9 Controlled Grading and Grubbing. All grading shall be controlled in areas around identified Tribal Cultural Resources, such as cultural features or cultural areas of concern, including but not limited to all impacted areas within Site(s) CA-RIV-7181, CA-RIV-7182, CA-RIV-7183, CA-RIV-7184, and Temporary Site numbers CA-01 and CA-02 and as determined by the Soboba Band of Luiseño Indians and the Pechanga Band of Indians. The identified areas shall be inspected by the Principal Investigator/Archaeologist and Native American monitor(s) prior to initiating grading for each area. Grading shall be controlled within the Environmentally Sensitive Buffer Area using a slope board or similar equipment to allow soil to be removed in increments of only a few inches at a time. Other areas that may require controlled grading shall be determined by the Principal Investigator/Archaeologist and the Native American monitor(s) based on the results and soil types identified during grading. Should any changes be needed, an updated exhibit will be produced and approved by all parties prior to any ground disturbance in the newly identified area.

TCR – 10 Inadvertent Finds. Avoidance and preservation in place is the preferred method for all Tribal Cultural Resources inadvertently discovered during the course of ground disturbing activities. If avoidance and preservation is considered not feasible, a feasibility study shall be required for final determination regarding the need for avoidance. If the County determines that the study has adequately demonstrated that preservation is not feasible, a Data Recovery/Treatment Plan for the resource shall be drafted in consultation with the Soboba Band and the Pechanga Band, and subject to review and approval by the County of Riverside prior to implementation and recommencement of ground disturbing activities.

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If during ground disturbance activities, Tribal cultural resources are discovered that were not assessed by the archaeological report(s) and/or environmental assessment conducted prior to Project approval, the following procedures shall be followed. Treatment of tribal cultural resources inadvertently discovered during the project's ground-disturbing activities shall be subject to the consultation process required by state law and AB 52.

i. All ground disturbance activities within 100 feet of the discovered cultural resources shall be halted until a meeting is convened between the Project Applicant, the Project Archaeologist, the Tribal Representative(s), and the County to discuss the significance of the find.

ii. At the meeting, the significance of the discoveries shall be discussed and after consultation with the Tribal Representative(s) and the Project Archaeologist, a

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decision shall be made, with the concurrence of the County, as to the appropriate mitigation (documentation, recovery, avoidance, etc.) for the cultural resources.

iii. Further ground disturbance, including but not limited to grading, trenching etc., shall not resume within the area of the discovery until an agreement has been reached by all parties as to the appropriate mitigation. Work shall be allowed to continue outside of the buffer area and will be monitored by additional Tribal Monitors if needed.

iv. Treatment and avoidance of the newly discovered resources shall be consistent with the Cultural Resources Management Plan and Monitoring Agreements entered into with the appropriate tribes. This may include avoidance of the cultural resources through project design, in-place preservation of cultural resources located in native soils and/or re-burial on the Project property so they are not subject to further disturbance in perpetuity as identified in Non-Disclosure of Reburial Condition/Mitigation Measures.

v. If the find is determined to be significant and avoidance of the site has not been achieved, a Phase III data recovery plan shall be prepared by the Project Archeologist, in consultation with the Tribe, and shall be submitted to the County for their review and approval prior to implementation of the said plan.

vi. Pursuant to Calif. Pub. Res. Code § 21083.2(b) avoidance is the preferred method of preservation for archaeological resources and cultural resources. If the Project Applicant and the Tribe(s) cannot agree on the significance or the mitigation for the archaeological or cultural resources, these issues will be presented to the County of Riverside for decision. The County shall make the determination based on the provisions of the California Environmental Quality Act with respect to archaeological resources, recommendations of the project archeologist and shall consider the cultural and religious principles and practices of the Tribe. Notwithstanding any other rights available under the law, the decision of the County shall be appealable to the County Planning Commission and Historical Commission.

vii. Evidence of compliance with this mitigation measure, if a significant archaeological resource is found, shall be provided to County of Riverside upon the completion of a treatment plan and final report detailing the significance and treatment finding.

TCR – 11 Human Remains. If human remains are discovered, no further disturbance shall occur in the affected area until the County Coroner has made necessary findings as to origin. If the County Coroner determines that the remains are potentially Native American, the California Native American Heritage Commission shall be notified within 24 hours of the published finding to be given

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a reasonable opportunity to identify the "most likely descendant". The "most likely descendant" shall then make recommendations, and engage in consultations concerning the treatment of the remains (California Public Resources Code 5097.98). (GP Objective 23.3, CEQA).

TCR – 12 Photo Recordation of Inadvertent Features. All inadvertently discovered tribal features within the Project that cannot be avoided shall be captured in three-dimensional (3D) images for the creation of 3D models. These images and models are to be added as an addendum to the Tribal Cultural Resource Photo Report **(TCR-1)**

TCR – 13 Final Disposition. Tangible cultural resources within the TCR inadvertently discovered during ground disturbing activities, as well as previously identified features that are not of ceremonial nature, which cannot remain in their existing location, shall be relocated to multiple mutually agreed upon areas within the 140.8-acre Project Area. These areas will be identified and described within the TCRMP and the CRMP as open space preservation areas, that will be preserved in perpetuity so that no future disturbances will occur.

In the event that Native American cultural resources are discovered during the course of grading (inadvertent discoveries), the following procedures shall be carried out for final disposition of the discoveries: a) One or more of the following treatments, in order of preference, shall be employed with the tribes. Evidence of such shall be provided to the County of Riverside:

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i. Preservation-In-Place of the cultural resources, if feasible. Preservation in place means avoiding the resources, leaving them in the place where they were found with no development affecting the integrity of the resources.

ii. Reburial of the resources on the Project property. The measures for reburial shall include, at least, the following: Measures and provisions to protect the future reburial area from any future impacts in perpetuity. Reburial shall not occur until all legally required cataloging and basic recordation have been completed, with an exception that sacred items, burial goods, and Native American human remains are excluded. Any reburial process shall be culturally appropriate. Listing of contents and location of the reburial shall be included in the confidential Phase IV report. The Phase IV Report shall be filed with the County under a confidential cover and not subject to Public Records Request.

TCR – 14 Preservation and Management Plan. Prior to Building Permit Issuance, the landowner and the Tribes shall develop a Preservation and Maintenance Plan for the long-term care and management of CA-RIV-7181, CA-RIV-7182, CA-RIV-7183, CA-RIV-7184, and Temporary site number CA-01 and any additional areas that may be included as mitigation for inadvertently found

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cultural sites. The plan shall indicate at a minimum, the specific areas to be included in and excluded for long-term maintenance, prohibited activities, methods of preservation to be employed, measures for stabilization of the relocated resources, security and long-term preservation, the party responsible for the long-term maintenance, appropriate protocols and necessary emergency protocols. The plan shall be developed in consultation with the Soboba Band and the Pechanga Band, and subject to review and approval by the County of Riverside. The project applicant/landowner shall submit a fully executed copy of the preservation and maintenance plan to the County of Riverside and the Tribes.

TCR-15 Non-Disclosure. It is understood by all parties that 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 7927.000, 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 7927.000.

TCR-16 Phase IV Report. Prior to final inspection, the Project Archeologist is to submit two (2) copies of the Phase IV Tribal Cultural Resources Monitoring Report that complies with the Planning Department's requirements for such reports. The Phase IV report shall include evidence of the required cultural/historical sensitivity training for the construction staff held during the pre-grade meeting. Phase IV report shall also include 3D image models of all inadvertently found tribal sites within the project that could not be avoided. The Planning Department shall review the reports to determine adequate mitigation compliance. Provided the reports are adequate, the Planning Department shall clear this condition. Once the report(s) are determined to be adequate, two (2) copies shall be submitted to the South Coastal Information Center (SCIC) at San Diego State University (SDSU) and one (1) copy shall be submitted to the Soboba Cultural Resources and Pechanga Cultural Resources Department.

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Attachment 2

County of Riverside - February 6, 2025 Letter

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(CONT.)

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RIVERSIDE COUNTY
PLANNING DEPARTMENT

John Hildebrand
Planning Director

February 6, 2025

Tuba Ebru Ozdil, *Cultural Analyst*
Pechanga Band of Indians
P.O. Box 2183
Temecula, CA 92593

RE: Arroyo Vista Project (GPA220009, CZ2200031, TTM38510)

Dear Mrs. Ozdil:
The County is in receipt of your letter dated February 5, 2025 regarding the Arroyo Vista Project in the community of Woodcrest in Riverside County. The County appreciates the Tribe's thoughtful input and the information provided regarding the potential impacts to tribal cultural resources associated with the proposed project. Over a period of 2.5 years of consultation, we carefully reviewed the Tribe's comments, conducted additional analysis, and worked with the project proponent to incorporate project design revisions. As a result, the project has been modified to include enhanced mitigation measures, adjusted site design, and additional monitoring protocols to better protect tribal cultural resources. These revisions reflect a collaborative effort to minimize potential impacts while allowing the project to move forward in a manner that respects and preserves as much of the Tribe's cultural heritage as feasible.

Based on this thorough review and the project modifications, the County has determined that the revised project represents a more balanced approach with reduced impacts to tribal cultural resources. The additional safeguards and design adjustments align with best practices for cultural resource protection and were developed in direct response to the Tribe's input. The County and applicants have reviewed the set of mitigation measures you provided, and we are in agreement with those measures and will incorporate them into the Environmental Impact Report. Because the County and the Tribe agree to measures to mitigate or avoid a significant effect, as defined in Section 21080.3.2(b)(1) of the Public Resources Code, we hereby conclude consultation for this project effective February 6, 2025. The Riverside County Planning Department will notify the Tribe when the environmental document is released for public review as well as when the project is scheduled for a public hearing.

While the County does not consider the decisions made to be precedent setting, the County remains committed to ongoing coordination with the Tribe throughout project implementation to ensure that the adopted mitigation measures are effective and that any unforeseen concerns are promptly addressed. We appreciate the Tribe's engagement in this process and look forward to continuing our collaboration on this and future matters of mutual interest.

Sincerely,

Darren Edgington
Environmental Project Manager

Cc: file

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Attachment 3

February 5, 2025 Letter

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(CONT.)

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PECHANGA CULTURAL RESOURCES
Pechanga Band of Indians

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Tuba Ebru Ozdil

February 5, 2025

Krista Mason
Urban and Regional Planner IV
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Planning Department
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Re: Proposed Mitigation Measures for Tribal Cultural Resources (TCR) – Arroyo Vista Project (GPA 220009, CZ 2200031, TTM 38510)

On behalf of the Pechanga Band of Indians, I am writing to formally submit the attached mitigation measures for the preservation and protection of the Tribal Cultural Resources (TCRs) associated with the Arroyo Vista Project, as outlined under California Public Resources Code Section 21084.3(a). The Pechanga Band of Indians respectfully requests the inclusion of these measures in the Environmental Impact Report (EIR) for the Arroyo Vista Project to ensure the protection of both tangible and intangible cultural resources within the identified Sycamore Canyon Traditional Cultural Property (TCP), Traditional Cultural Landscape (TCL), and Tribal Cultural Resource (TCR) areas.

The Pechanga Band asserts that the Project area lies within '*Atáaxum* (Luiseño), and therefore the Tribe's, aboriginal territory as evidenced by the existence of cultural resources, place names, *tóota yixélval* (rock art, pictographs, petroglyphs), and an extensive '*Atáaxum* artifact record within and the vicinity of the project. This culturally sensitive area is affiliated with the Pechanga Band of Indians because of the Tribe's cultural ties to this area as well as an extensive documentation of the Tribe's ancestors living in the area. In addition, the Project location is within a known TCP and this TCR contains several recorded sites as well as significant and ceremonial Tribal areas within the Project Area. '*Atáaxum* people attach specific oral histories to this landscape which are maintained in traditional stories and song. The landscape lies within an area to which the Pechanga Band attaches religious and cultural significance.

While the proposed project includes preservation efforts through horizontal avoidance and other mitigation strategies, the Pechanga Band has serious concerns regarding the direct impacts to significant tribal cultural resources, particularly where avoidance has not been achieved through

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project design. The current documentation in the EIR does not sufficiently address how the proposed engineering solutions will fully minimize the impacts during grading operations and construction of the project. For instance, although horizontal avoidance may reduce the physical footprint of disturbance, it does not ensure that surrounding tribal cultural resources—particularly those tied to the village site and its landscape—will be shielded from direct and indirect impacts such as vibrations from potential blasting operations, regular grading activities, and water runoff.

Further, the proposed mitigation measures, including capping or relocation, have not been clearly explained, and there is uncertainty regarding their long-term effectiveness in preserving the integrity of these tangible Tribal cultural resources. The Pechanga Band does not support the capping of cultural resources, as this method will fail to adequately protect or preserve the tribal cultural significance of the sites. Additionally, some of these sites remain classified as potential Tribal Cultural Resources due to the absence of Phase II testing, which only adds further uncertainty regarding their full cultural significance. It is important to note that all Tribal Cultural Resources are of significant value to the Tribe and serve as contributing elements to the TCL, TCP, and TCR.

It is crucial to note that both the Pechanga Band of Indians and Soboba Band of Luiseño Indians have consistently informed the County of Riverside, as well as the project applicant, that these resources are indeed TCRs and are contributing elements to the TCL and TCP. In this context, providing percentages of avoidance does not diminish or justify the impacts to the resources themselves. The integrity and content of the village site and surrounding landscape are being impacted regardless of the acreage affected, and this must be properly addressed in the EIR.

Additionally, the current documentation primarily references the physicality of the archaeological sites within the TCL and TCP. However, it fails to address the full range of impacts to the TCR and the TCL, including the Tribes' interest in the intangible aspects of these resources. These are not merely archaeological sites but culturally significant places that embody ancestral practices, values, and history, which go far beyond their physical attributes. A thorough evaluation of all impacts, both direct and indirect, to the full scope of the TCL and its associated cultural resources must be included in the EIR.

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(CONT.)

The County's Environmental Impact Report (EIR) acknowledges that the proposed project, in combination with other developments in western Riverside County, could have significant cumulative impacts on TCRs, including buried resources. However, the analysis lacks a detailed cumulative impact study that fully considers how the project's impacts interact with those of other developments in the region. Without this analysis, it remains unclear how the County's proposed mitigation measures can adequately address the combined effects on TCRs.

The EIR suggests that mitigation will reduce impacts to less-than-significant levels, but this conclusion is premature given the absence of a thorough cumulative analysis. Mitigation measures must be based on a clear understanding of the extent and nature of the impacts, which cannot be determined without first evaluating the cumulative effects of all nearby projects. Without this information, there is a risk that the proposed mitigation may not be sufficient. Furthermore, the specific proposed mitigation measures are not sufficiently referenced or outlined in the EIR, leaving ambiguity about their potential effectiveness.

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In light of these concerns, the Pechanga Band recommends that the County conduct a detailed cumulative impact analysis to assess the combined impacts to both known and undiscovered TCRs. Only with this comprehensive analysis can the County ensure that the impacts to TCRs are appropriately addressed and reduced to less-than-significant levels. This analysis will allow for more informed and effective mitigation measures, ultimately safeguarding the integrity of the cultural resources involved.

The attached proposed TCR mitigation measures were drafted in collaboration with the Soboba Band of Luiseño Indians, and we believe they represent a balanced and effective approach to addressing the potential impacts to the tribal cultural resources in the project area. The proposed TCR mitigation measures have been drafted based on the information currently available; however, they may have been different had a cumulative impacts analysis been completed.

The Pechanga Band proposes the attached Tribal Cultural Resources (TCR) section mitigation measures to ensure that all aspects of the TCRs—both tangible and intangible—are properly preserved and protected throughout the project. We also request the removal of the current cultural resource mitigation measures from the TCR section of the EIR. Instead, we ask that the proposed edits to these measures be incorporated into the Cultural Section of the EIR, as detailed in the attached draft Section 4.19 TCR document.

We respectfully request that the County of Riverside incorporate these updated mitigation measures and edits into the EIR before proceeding further with the project. The Pechanga Band is committed to continuing its consultation efforts and collaborating with the County and project applicant to ensure the protection of our cultural heritage throughout the development process.

Please do not hesitate to contact me directly at (951) 770-6313 or via email at eozdil@pechjanga-nsn.gov if you have any questions or would like to discuss these concerns further.

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(CONT.)

Thank you for your attention to this important matter. We look forward to working together to ensure the appropriate protection and preservation of the identified Tribal Cultural Resources.

Sincerely,

Tuba Ebru Ozdil
Cultural Analyst

Cc: Michael Torres, TTLC Riverside Chicago, LLC
Sarah Moore, Assistant Planning Director
Darren Edgington, Environmental Project Manager
Heather Thomson, County Archaeologist

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Mitigation Measures for Tribal Cultural Resources

Public agencies must, when feasible, avoid damaging effects to any tribal cultural resource. Pub. Res. Code § 21084.3 (a). Appropriate mitigation for a tribal cultural resource is different than mitigation for archeological resources. During AB 52 consultation between the County of Riverside and the Soboba Band of Luiseño Indians (Soboba Band) a identified that the Arroyo Vista Project is located within the Peet' Wikikmal Traditional Cultural Landscape (TCL), and therefore a Tribal Cultural Resource, and the Pechanga Band of Indians (Pechanga Band) identified that the Arroyo Vista Project is a part of Sycamore Canyon Traditional Cultural Property (TCP) and therefore a Tribal Cultural Resource (TCR) has been identified. The TCR fully encompasses the 140.8 acre Arroyo Vista Project, and as such all tangible and intangible natural and cultural resources are contributing elements of the TCR. The TCR is presumed eligible for listing in the CRHR under Criteria 1 and 4. Upon review of the land use plan, entitlement plan and the grading plan for the Arroyo Vista Project, the Project will have a significant impact on the TCR. The following mitigation measures are recommended to minimize significant impacts on this Tribal Cultural Resource.

TCR - 1 The Soboba Band, and the Pechanga Band request avoidance, to the greatest extent possible, of the most significant places within the TCR—namely CA-RIV-7182 and CA-RIV-7184 as part of the identified TCR. Additionally, all significant archaeological sites, geologic features, water resource features, and native plants traditionally used by the Soboba Band, and the Pechanga Band shall be avoided through re-design.

TCR -2 **Tribal Cultural Resources Photo Report.** A comprehensive photo documentation report shall be prepared for all cultural and natural elements of the Tribal Cultural Resource (TCRs) that cannot be avoided. The documentation will capture both the TCR itself and the broader landscape context to ensure that the full significance of the resources is preserved and understood. This report shall include high-resolution photographs, detailed site mapping, and geospatial data, and shall be prepared in consultation with Tribes and will be subject to review and approval by the Soboba Band of Luiseño Indians, and Pechanga Band of Indians prior to grading permit issuance. The report shall include but not limited to following:

1. High-Resolution Photography for Resource Documentation: All cultural and natural elements of TCRs that cannot be avoided shall be thoroughly documented through high-resolution photography, in consultation and subject to prior approval by Soboba Band and Pechanga Band, capturing both the resource itself and the broader landscape in which it is situated. This documentation will ensure that the full context of the TCR, including its spatial relationship with surrounding features, is preserved.
2. Photography Requirements:

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- Resolution: Photographs must be taken using a camera with a resolution of at least 300 pixels per inch (ppi), or equivalent, ensuring that the fine details of the resource are captured.
- Wide-Angle and Contextual Shots: In addition to detailed close-up shots of the TCR, wide-angle photographs shall be taken from multiple vantage points to document the broader landscape, including topographical features, surrounding vegetation, and any other elements that provide cultural, historical, or ecological context to the resource.
- Panoramic Views: Panoramic images shall be taken at the highest points within the project boundary to capture the overall setting and viewshed of the TCR, including the surrounding terrain, which may have cultural or natural significance. These shots should cover a 360-degree field of view to provide a complete visual context of the resource in relation to its surroundings.
- Aerial photography utilizing a drone shall also capture topographical features, surrounding vegetation, and any other elements that provide cultural, historical, or ecological context to the TCR.

3. Site Mapping and Geospatial Data:
   - Photographic Location Mapping: Each photograph shall be accompanied by a detailed map showing the exact locations from which the photos were taken. This map shall include the coordinates (latitude and longitude) and elevation data, providing spatial context for each image.
   - Integration with GIS: All photographic documentation, along with relevant mapping, shall be integrated into a Geographic Information System (GIS) database to allow for precise tracking and analysis of the resource's location, topography, and surrounding environment.
4. Documentation of Cultural and Ecological Features: In addition to the resource itself, any associated cultural or natural features that contribute to the significance of the TCR (such as water sources, sacred sites, vegetation, wildlife habitat, or landscape features) shall be documented. These features will be photographed and mapped to ensure a comprehensive understanding of the TCR's significance within the larger ecological and cultural landscape.
5. Approval and Review: All photographic documentation, maps, and GIS data shall be submitted to the Soboba Band and Pechanga Band for review and approval before any project activities that could affect the TCR are initiated. The document shall be finalized until the tribes shall have the opportunity to provide feedback on the completeness and cultural sensitivity of the documentation.
6. Archiving and Long-Term Preservation: Copies of all photographic documentation, maps, and geospatial data shall be archived in a format approved by the consulting tribes, and securely stored in both digital and physical formats. These records will be made available to the Tribes and the County of Riverside.
7. 3D Modeling of the TCR and Landscape: In addition to photographic documentation, a 3D digital model of the TCR and its surrounding landscape

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shall be created to provide a detailed, interactive representation of the resource. This model will capture the TCR's physical characteristics, spatial relationships, and context within the broader environment. The 3D model shall be developed using accurate measurements and high-quality data, allowing for virtual exploration and analysis. The final 3D model, along with the associated photographic and geospatial data, shall be submitted for review and approval by the Soboba Band and Pechanga Band prior to finalizing the 3D modeling. Final documentation will be available to the Tribes and the County of Riverside.

TCR-3 **Preparation of a Tribal Cultural Resource Management Plan (TCRMP).** The TCRMP shall be developed in close consultation with the Soboba Band and the Pechanga Band, to manage the impacts to the tangible cultural and natural resources identified in the project area and will outline in detail how the Tribal mitigation shall be implemented in a manner that respects Tribal cultural values. The TCRMP will be developed prior to grading permit issuance and approved by the County of Riverside after the Tribes have fully reviewed and provided all edits. The TCRMP will function like a cultural resources management plan (CRMP), but will consider the TCRs as defined by California Public Resources Code Section 21074(a) and will be used as a guide to identify, protect, and manage the tangible and intangible TCRs already present on site and those inadvertently identified within the project area, and ensure that impacts to these resources are minimized or avoided during project implementation.

The TCRMP will include protection protocols to safeguard the known TCRs during construction and throughout the life of the project. This will include but is not limited to:

- Incorporating an exhibit that details and identifies the tangible components of the TCR that encompasses the project area (i.e., features, natural resources, sites, preservation areas).
- The development of buffer zones and exclusion areas around sensitive sites, as determined in consultation with the Soboba Band and the Pechanga Band, to ensure that the avoided resources are not disturbed by construction activities. (TCR- 5)
- Temporary protection measures during construction for Tribal Ceremonial Areas, such as restricted access to areas of spiritual or ceremonial importance and respecting seasonal and cultural restrictions on land use. (TCR-6)

In addition, the TCRMP will specify the process for the following:

- Preconstruction Meeting Requirements and monthly check in meetings

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- Cultural resources monitoring during construction and other ground-disturbing activities.
- Avoidance Plan
- Relocation Plan
- Control Grading Plan
- Inadvertent Finds
- Inadvertent Findings of Human Remains
- Photo Recordation of Inadvertent Features
- Final Disposition of Inadvertently found Tribal Resources
- The Development process of a long-term management plan to ensure the protection of TCRs beyond the ground disturbing and construction phase of the project
- Role and Responsibilities and contact information for all parties

The Soboba Band and the Pechanga Band will co-manage the TCRMP with the landowner, HOA or environmental agency such as RCA. CRMPs traditionally only address tangible archaeological and historical resources that are eligible for listing in the CRHR. A TCRMP is required for this Project because the identified TCR can only be defined by the Soboba Band and the Pechanga Band, which includes places, sites, features, sacred places, and objects that have cultural significance, as well as archaeological resources.

TCR – 4 **Tribal Monitoring Agreements.** The developer/Land Owner is required to enter into Agreements with the Soboba Band of Luiseño Indians and the Pechanga Band of Indians. The agreements shall be in place prior to issuance of a grading permit. To accomplish this, the applicant should contact the Tribes no less than 30 days and no more than 60 days prior to issuance of a grading permit. This Agreement will address the treatment and disposition of Tribal cultural resources, the designation, responsibilities, and participation of Tribal monitors during grading, excavation and ground disturbing activities; project grading and development scheduling; terms of compensation for the monitors; and treatment and final disposition of any cultural resources, sacred sites, and human remains discovered onsite. The Tribal Monitor(s) shall have the authority to temporarily divert, redirect, or halt the ground-disturbance activities to allow recovery of cultural resources, in coordination with the Project Archaeologist. Tribal Monitors shall be allowed to monitor all grading, excavation and groundbreaking activities.

TCR – 5 **Environmentally Sensitive Areas (ESA).** Prior to the start of ground-disturbing activities, all Tribal features shall be fenced off with construction fencing and identified as ESAs to ensure Project personnel do not disturb the features. The installation of the ESA fencing shall be monitored by the project archeologist and Tribal Monitors. Specific requirements pertaining to the avoidance buffer, style, materials, access, maintenance, and other requirements shall be provided within the TCRMP.

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TCR – 6 **Temporary Avoidance of Tribal Ceremonial Areas.** Prior to the issuance of a grading permit, the applicant is to develop a plan of action for the temporary avoidance of and protection of Tribal ceremonial areas. This plan of action is to be developed and implemented in consultation with the Soboba Band of Luiseño Indians and the Pechanga Band of Indians.

TCR – 7 **Avoidance Plan.** Prior to issuance of a grading permit, an avoidance plan shall be developed in consultation with the Soboba Band of Luiseño Indians and Pechanga Band of Indians. This plan shall indicate the areas/locations of the features that will be avoided by this project and the protection measures to be implemented during construction. In addition, the locations will be designated, in consultation with the Soboba Band of Luiseño Indians and Pechanga Band of Indians, on a confidential map. The developer/ applicant shall provide evidence to the Riverside County Planning Department that the map has been included in the Grading Plans, and shall indicate the presence of environmentally constrained area(s) and the requirements for avoidance of portions of CA-RIV-7181, portions of CA-RIV-7182 which contains *Tóota Yixéval*, as well as Feature B, C, D and E of CA-RIV-7184 which also include *Tóota Yixéval*, Temporary Site number CA-02, and features A, B, and C of CA-RIV-7183, prior to grading permit issuance as identified in 060-Planning-CUL-4 MM 4.5-4 ECS Sheet – Resource Relocation and Reburial and 060-Planning-CUL 5 MM 4.5-5 ECS Sheet.

TCR – 8 **Relocation of Cultural Features.** Prior to the start of ground-disturbing activities, all impacted features recommended for relocation, P-33-012915/CA-RIV-7181, P-33-012917/CA-RIV-7182, CA-01, and CA-RIV-7184 , shall be temporarily fenced off with construction fencing and identified as ESAs to ensure project personnel does not disturb the features (MM- TCR-4). The installation of the ESA fencing shall be monitored by the project archaeologist and Tribal monitors. Once the final location of the features has been determined and the area prepped, the features are to be moved to their final resting location. The features are only to be moved once. If the feature(s) do not survive the relocation efforts in one piece, all feasible fragments will be relocated to the final location. The relocation area shall be preserved in perpetuity and protected from all future ground-disturbing activity via an enforceable legal instrument such as a conservation easement or other restrictive binding upon successive owners of the relocation area.

TCR – 9 **Controlled Grading and Grubbing.** All grading shall be controlled in areas around identified Tribal Cultural Resources, such as cultural features or cultural areas of concern, including but not limited to all impacted areas within Site(s) CA-RIV-7181, CA-RIV-7182, CA-RIV-7183, CA-RIV-7184, and Temporary Site numbers CA-01 and CA-02 and as determined by the Soboba Band of Luiseño Indians and the Pechanga Band of Indians. The identified areas shall be inspected by the Principal Investigator/Archaeologist and Native American monitor(s) prior to initiating grading for each area. Grading shall be controlled within the Environmentally Sensitive Buffer Area using a slope board or similar

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equipment to allow soil to be removed in increments of only a few inches at a time. Other areas that may require controlled grading shall be determined by the Principal Investigator/Archaeologist and the Native American monitor(s) based on the results and soil types identified during grading. Should any changes be needed, an updated exhibit will be produced and approved by all parties prior to any ground disturbance in the newly identified area.

TCR-10 **Inadvertent Finds.** Avoidance and preservation in place is the preferred method for all Tribal Cultural Resources inadvertently discovered during the course of ground disturbing activities. If avoidance and preservation is considered not feasible, a feasibility study shall be required for final determination regarding the need for avoidance. If the County determines that the study has adequately demonstrated that preservation is not feasible, a Data Recovery/Treatment Plan for the resource shall be drafted in consultation with the Soboba Band and the Pechanga Band, and subject to review and approval by the County of Riverside prior to implementation and recommencement of ground disturbing activities.

If during ground disturbance activities, Tribal cultural resources are discovered that were not assessed by the archaeological report(s) and/or environmental assessment conducted prior to Project approval, the following procedures shall be followed. Treatment of tribal cultural resources inadvertently discovered during the project's ground-disturbing activities shall be subject to the consultation process required by state law and AB 52.

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i. All ground disturbance activities within 100 feet of the discovered cultural resources shall be halted until a meeting is convened between the Project Applicant, the Project Archaeologist, the Tribal Representative(s), and the County to discuss the significance of the find.

ii. At the meeting, the significance of the discoveries shall be discussed and after consultation with the Tribal Representative(s) and the Project Archaeologist, a decision shall be made, with the concurrence of the County, as to the appropriate mitigation (documentation, recovery, avoidance, etc.) for the cultural resources.

iii. Further ground disturbance, including but not limited to grading, trenching etc., shall not resume within the area of the discovery until an agreement has been reached by all parties as to the appropriate mitigation. Work shall be allowed to continue outside of the buffer area and will be monitored by additional Tribal Monitors if needed.

iv. Treatment and avoidance of the newly discovered resources shall be consistent with the Cultural Resources Management Plan and Monitoring Agreements entered into with the appropriate tribes. This may include

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avoidance of the cultural resources through project design, in-place preservation of cultural resources located in native soils and/or re-burial on the Project property so they are not subject to further disturbance in perpetuity as identified in Non-Disclosure of Reburial Condition/Mitigation Measures.

v. If the find is determined to be significant and avoidance of the site has not been achieved, a Phase III data recovery plan shall be prepared by the Project Archeologist, in consultation with the Tribe, and shall be submitted to the County for their review and approval prior to implementation of the said plan.

vi. Pursuant to Calif. Pub. Res. Code § 21083.2(b) avoidance is the preferred method of preservation for archaeological resources and cultural resources. If the Project Applicant and the Tribe(s) cannot agree on the significance or the mitigation for the archaeological or cultural resources, these issues will be presented to the County of Riverside for decision. The County shall make the determination based on the provisions of the California Environmental Quality Act with respect to archaeological resources, recommendations of the project archeologist and shall consider the cultural and religious principles and practices of the Tribe. Notwithstanding any other rights available under the law, the decision of the County shall be appealable to the County Planning Commission and Historical Commission.

Vii. Evidence of compliance with this mitigation measure, if a significant archaeological resource is found, shall be provided to County of Riverside upon the completion of a treatment plan and final report detailing the significance and treatment finding.

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TCR – 11 **Human Remains.** If human remains are discovered, no further disturbance shall occur in the affected area until the County Coroner has made necessary findings as to origin. If the County Coroner determines that the remains are potentially Native American, the California Native American Heritage Commission shall be notified within 24 hours of the published finding to be given a reasonable opportunity to identify the "most likely descendant". The "most likely descendant" shall then make recommendations, and engage in consultations concerning the treatment of the remains (California Public Resources Code 5097.98). (GP Objective 23.3, CEQA).

TCR – 12 **Photo Recordation of Inadvertent Features.** All inadvertently discovered tribal features within the Project that cannot be avoided shall be captured in three-dimensional (3D) images for the creation of 3D models. These images and models are to be added as an addendum to the Tribal Cultural Resource Photo Report **(TCR-1)**

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TCR - 13 **Final Disposition.** Tangible cultural resources within the TCR inadvertently discovered during ground disturbing activities, as well as previously identified features that are not of ceremonial nature, which cannot remain in their existing location, shall be relocated to multiple mutually agreed upon areas within the 140.8-acre Project Area. These areas will be identified and described within the TCRMP and the CRMP as open space preservation areas, that will be preserved in perpetuity so that no future disturbances will occur.

In the event that Native American cultural resources are discovered during the course of grading (inadvertent discoveries), the following procedures shall be carried out for final disposition of the discoveries: a) One or more of the following treatments, in order of preference, shall be employed with the tribes. Evidence of such shall be provided to the County of Riverside:

i. Preservation-In-Place of the cultural resources, if feasible. Preservation in place means avoiding the resources, leaving them in the place where they were found with no development affecting the integrity of the resources.

ii. Reburial of the resources on the Project property. The measures for reburial shall include, at least, the following: Measures and provisions to protect the future reburial area from any future impacts in perpetuity. Reburial shall not occur until all legally required cataloging and basic recordation have been completed, with an exception that sacred items, burial goods, and Native American human remains are excluded. Any reburial process shall be culturally appropriate. Listing of contents and location of the reburial shall be included in the confidential Phase IV report. The Phase IV Report shall be filed with the County under a confidential cover and not subject to Public Records Request.

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TCR–14 **Preservation and Management Plan.** Prior to Building Permit Issuance, the landowner and the Tribes shall develop a Preservation and Maintenance Plan for the long-term care and management of CA-RIV-7181, CA-RIV-7182, CA-RIV-7183, CA-RIV-7184, and Temporary site number CA-01 and any additional areas that may be included as mitigation for inadvertently found cultural sites. The plan shall indicate at a minimum, the specific areas to be included in and excluded for long-term maintenance, prohibited activities, methods of preservation to be employed, measures for stabilization of the relocated resources, security and long-term preservation, the party responsible for the long-term maintenance, appropriate protocols and necessary emergency protocols. The plan shall be developed in consultation with the Soboba Band and the Pechanga Band, and subject to review and approval by the County of Riverside. The project applicant/landowner shall submit a fully executed copy of the preservation and maintenance plan to the County of Riverside and the Tribes.

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TCR-15 **Non-Disclosure.** It is understood by all parties that 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 7927.000, 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 7927.000.

TCR-16 **Phase IV Report.** Prior to final inspection, the Project Archeologist is to submit two (2) copies of the Phase IV Tribal Cultural Resources Monitoring Report that complies with the Planning Department's requirements for such reports. The Phase IV report shall include evidence of the required cultural/historical sensitivity training for the construction staff held during the pre-grade meeting. Phase IV report shall also include 3D image models of all inadvertently found tribal sites within the project that could not be avoided. The Planning Department shall review the reports to determine adequate mitigation compliance. Provided the reports are adequate, the Planning Department shall clear this condition. Once the report(s) are determined to be adequate, two (2) copies shall be submitted to the South Coastal Information Center (SCIC) at San Diego State University (SDSU) and one (1) copy shall be submitted to the Soboba Cultural Resources and Pechanga Cultural Resources Department.

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C. *Responses To Comment Letter C: Pechanga Band of Indians*

C-1 This comment letter summarizes the Project and details the Project's potential impacts to Tribal Cultural Resources located on the Project site. This comment also summarizes the comment letter's contents and expresses concern with AB 52 and SB 18 mandates. The comment provides no substantial evidence of a significant environmental effect. The County has complied with all requirements of AB 52 and SB 18 for this Project and has met all statutory requirements. The County acknowledges receipt of the Tribe's letter dated April 24, 2025, and it has been incorporated into the administrative record and the Tribe is on the list to be notified of all documents and actions concerning this Project.

C-2 This comment opines that the analysis related to Tribal Cultural Resources in the Draft EIR is flawed. Additionally, this comment summarizes the communication between the Pechanga Band and the County regarding proposed mitigation measures. The comment provides no substantial evidence of a significant environmental effect. The County complied fully with CEQA and the State CEQA Guidelines by identifying tribal cultural resources in consultation with consulting tribes, analyzing the effect that the Project would have on tribal cultural resources, and developing mitigation measures. The DEIR took into account all of the information that the Tribes provided the County during two years of consultation; however, some information could not be included in a public document due to confidentiality. Further, the mitigation measures in the DEIR included recommended changes provided by the Tribe in its letter to the County dated February 6, 2025. The Pechanga Tribe included a Microsoft Word document titled "Arroyo Vista – Draft Section 4.19 Tribal Cultural Resources – Soboba Pechanga – Redlines – 2.5.25." The County reviewed the Tribe's edits to the mitigation measures provided in that document and agreed to incorporate the proposed revisions into the Final EIR. No further response is necessary.

C-3 This comment states that the County did not adequately incorporate the mitigation measures provided by the Tribe, and that this approach contradicts the County's February 6th, 2025, letter to the Tribe. This comment also asserts that the Draft EIR is inconsistent with CEQA and does not adequately describe or include feasible mitigation measures. The comment provides no substantial evidence of a significant environmental effect. Please refer to the response to Comment C-2. The Cultural Resources Monitoring Program (CRMP) is a *monitoring* program, which is limited to the methods and procedures for responding to, and evaluating significance of, previously unknown tribal cultural resources that are encountered during ground-disturbing activities associated with Project construction. Implementing the unanticipated discovery protocols would not result in the need for new mitigation measures; rather, the County would consult with the Tribes on appropriate treatment in the event that resources are uncovered. All feasible mitigation measures have been incorporated into the DEIR, and as such no revisions to the DEIR are warranted pursuant to this comment.

C-4 This comment asserts that the County did not comply with the requirements of AB 52 and SB 18 because the Tribe was not notified regarding changes to or omission of mitigation measures provided by the Tribe. The comment provides no substantial evidence of a significant environmental effect. The County has complied with all of the requirements of AB 52 and SB 18 for this Project. The Applicant engaged the Tribes during preparation of technical studies beginning on March 22, 2022, and the County initiated formal consultation with tribes under AB 52 and SB 18 on September 8, 2022. The Tribes participated in all phases of the archaeological fieldwork and reporting for the cultural resources

technical studies. Subsequently, field visits with tribal representatives occurred on October 24, 2022, throughout December 2022, on July 18, 2023, and on June 4, 2024. Additional consultation meetings were held by the County with the Tribes on September 11 and December 17, 2024, and between the Applicant and the Tribes in August 2024 and April 2025. Because the Tribes did not respond to multiple requests from County staff to provide specific information about tribal cultural resources, the County directed the preparation of a Tribal Cultural Resources Assessment (TCRA) to assemble into one document as much information as the County could gather. The TCRA was submitted to the County on October 28, 2024, and reviewed, but rejected, by the Tribes without providing additional information.

AB 52 and SB 18 do not require that all mitigation measures proposed by a tribe be included in the DEIR. Rather, AB 52 and SB 18 require that the County engage in good faith consultation and take into account the information from tribes in determining appropriate and feasible mitigation. Section 21080.3.2(b) of the Public Resources Code states that the consultation shall be considered concluded when either of the following occurs: 1) the parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource, or 2) a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. The County considers two years of consultation efforts composed of numerous field and office meetings, and substantial revisions to the Project design to specifically avoid and preserve in place tribal cultural resources, to be consultation in good faith. Further, the mitigation measures in the DEIR included recommended changes provided by the tribe in its letter to the County dated February 6, 2025. The Pechanga Tribe included a Microsoft Word document titled "Arroyo Vista – Draft Section 4.19 Tribal Cultural Resources – Soboba Pechanga – Redlines – 2.5.25." The County reviewed the Tribe's edits to the mitigation measures provided in that document and agreed to incorporate the proposed revisions into the Final EIR. Therefore, the County considered this to be in agreement and concluded consultation accordingly. No further response is necessary.

C-5 This comment states that the County failed to identify Tribal Cultural Resources within the Notice of Application (NOA) scope of analysis and therefore fails to comply with AB 52. The comment provides no substantial evidence of a significant environmental effect. The fact that the NOA public notice did not disclose the impact to tribal cultural resources does not constitute non-compliance with CEQA for the identification, evaluation, and treatment of tribal cultural resources, which is fully detailed in Section 4.19 of the DEIR. Furthermore, the Project's NOA fully complied with the requirements of State CEQA Guidelines § 15085, which does not require NOAs to include a list of issues evaluated by the EIR. Moreover, the Project's Notice of Preparation (NOP), previously circulated for public review in March 2023 and included in *Technical Appendix A* to the Project's DEIR, clearly indicated that the topic of Tribal Cultural Resources would be evaluated in the Project's EIR. No further response is necessary.

C-6 This comment notes that the DEIR concludes that the Project would result in significant and unmitigable impacts to Tribal Cultural Resources, and asserts that a Statement of Overriding Considerations (SOC) must be adopted for the Project. The comment provides no substantial evidence of a significant environmental effect. The County agrees that the Project's impacts to tribal cultural resources would be significant and unavoidable. In the event that the Riverside County Board of

Supervisors approves the proposed Project, the County would concurrently adopt findings and a Statement of Overriding Considerations in full compliance with CEQA and the State CEQA Guidelines. No further response is necessary.

C-7 This comment opines that Project re-design did not meaningfully consider impacts to Tribal Cultural Resources and did not include discussions with the Tribe. The comment provides no substantial evidence of a significant environmental effect. The County has been consulting with tribes for 2 years and has considered the information provided by the Tribes. This comment also summarizes the Tribe's position on the Project and includes the commenter's contact information. The Applicant has voluntarily redesigned the Project to increase preservation in place of tribal cultural resources where feasible. Multiple versions of site plans, grading plans, fencing designs, and cut and fill maps that illustrated the various re-designs were transmitted to the Tribes for review, and no comments on these plans were provided by the Tribes. However, the County considered the comments provided by the Tribes regarding impacts to a cultural landscape and Subsection 4.19 of the DEIR addresses this impact. No further response is necessary.

C-8 The commenter includes several attachments, including Attachment 1 that includes the Tribe's requested mitigation language, and provides copies of previous Project-related correspondence including a February 6, 2025 comment letter from Riverside County to the Tribe (included as Attachment 2), and the Tribe's February 5, 2025 comment letter to Riverside County that also includes suggested mitigation language (included as Attachment 3). The comment provides no substantial evidence of a significant environmental effect. No response is necessary to Attachments 2 or 3 to this comment letter, as these comment letters appear to have been included for informational and historical reference purposes only. With respect to the specific mitigation language requested by the commenter, the commenter is referred to Table F-2, *Responses to Pechanga Comments on Tribal Cultural Resources Mitigation Measures*, which provides a reference to the Final EIR mitigation measures that have been modified per the Tribe's request, along with an explanation as to why certain measures requested by the Tribe have not been included. As indicated in Table F-2, this Final EIR incorporates the majority of the mitigation language requested by the commenter where feasible. The commenter is referred to Table F-3, *Errata Table of Additions, Corrections, and Revisions*, which describes the revisions that have been made to the Project's mitigation measures for cultural and tribal cultural resources in direct response to the request of the Tribe. With the revisions to incorporate the additional mitigation language that the County has found to be feasible, the County finds that the Project's significant and unavoidable impacts to tribal cultural resources would be mitigated to the maximum feasible extent in compliance with all CEQA requirements. No further response is necessary.

Table F-2 Responses to Pechanga Comments on Tribal Cultural Resources Mitigation Measures

Pechanga Requested Measures	DEIR Mitigation Measure(s) Addressing Tribe's Request	Remarks
TCR-1 (avoidance and preservation in place to the greatest extent possible for 7182 and 7184)	MM 4.5-2	Portions of the requested revisions were made to Mitigation Measure MM 4.5-2. The second half of the measure requested by the Tribe relates to redesigning the Project to avoid other resources, water resources,

Pechanga Requested Measures	DEIR Mitigation Measure(s) Addressing Tribe's Request	Remarks
		and native plants, which cannot be accommodated because re-design as a mitigation measure would create additional mitigation and this would represent improper deferral of both analysis and mitigation.
TCR-2 (TCR Photo Report Documentation)	MM 4.5-3	The revised mitigation requires that prior to impacting a site that cannot be avoided, the site must be thoroughly documented in coordination with the Tribes using photography and GIS mapping.
TCR-3 (TCRMP)	MM 4.5-5	The commenter is referred to Mitigation Measure MM 4.5-5 requiring the preparation and implementation of a Cultural Resources Monitoring Program (CRMP), which already requires the same measures requested by the Tribe. The mitigation already requires that the CRMP be developed in coordination with the Tribes. The only aspect that cannot be included is the co-management of the TCRMP with the landowner or HOA, etc., as by the time the Project is built out the requirements of the Project's CRMP will have already been completed.
TCR-4 (Tribal Monitoring Agreement)	MM 4.5-5	The requested measures have been incorporated in the revised Mitigation Measure MM 4.5-5
TCR-5 (Fencing ESAs)	MM 4.5-7	This suggested mitigation measure already is addressed by EIR Mitigation Measure MM 4.5-7.
TCR-6 (Temp Avoidance of Ceremony Areas)	N/A	The Tribe never provided the County or Applicant with locations of ceremony areas, nor was this request discussed with the County. As such, the Project would not result in any impacts to any identified ceremony areas of importance to the Tribe. Pursuant to Section 15126.4(a)(3) of the State CEQA Guidelines, "[m]itigation measures are not required for effects which are not found to be significant." Accordingly, no revision to the DEIR is warranted pursuant to this requested measure.
TCR-7 (Avoidance Map)	MM 4.5-3	The requested mitigation relating to resources preserved in place already is included as EIR Mitigation Measure MM 4.5-3.
TCR-8 (Relocation)	MM 4.5-2	Language pertaining to the relocation of features already is included as EIR Mitigation Measure MM 4.5-2.
TCR-9 (Controlled Grading and Grubbing)	MM 4.5-1	The requested language already is included as part of EIR Mitigation Measure MM 4.5-1.
TCR-10 (Inadvertent Finds)	MM 4.5-11	The requested language already is included as part of EIR Mitigation Measure MM 4.5-11.
TCR-11 (Human Remains)	MM 4.5-10	The requested language already is included as part of EIR Mitigation Measure MM 4.5-10.
TCR-12 (Photo Documentation of Inadvertent Discoveries)	MM 4.5-3	The requested language already is included as part of EIR Mitigation Measure MM 4.5-3.
TCR-13 (Relocation/Reburial of Inadvertent discoveries)	MM 4.5-7	The requested language already is included as part of EIR Mitigation Measure MM 4.5-7.
TCR-14 (O&M Plan)	MM 4.5-8	The requested language already is included as part of EIR Mitigation Measure MM 4.5-8.

Pechanga Requested Measures	DEIR Mitigation Measure(s) Addressing Tribe's Request	Remarks
TCR-15 (non-disclosure)	N/A	This is required underexisting State law and does not need to be identified as a separate mitigation measure. Furthermore, this measure already is included as County Regulation and Design Requirement (CRDR) 4.5-1.
TCR-16 (Phase IV report)	MM 4.5-10	The requested language already is included as part of EIR Mitigation Measure MM 4.5-10.

Comment Letter D

From: Veer Partners
To: Mason, Krista
Subject: Arroyo Vista Project SCH:2021080570
Date: Monday, March 10, 2025 5:38:28 PM

CAUTION: This email originated externally from the **Riverside County** email system. **DO NOT** click links or open attachments unless you recognize the sender and know the content is safe.

Krista,

RE:
Arroyo Vista Project
SCH:2021080570
GPA22009
CZ2200031
TTM38510

We are the owners and developers of the ARCO AMPM Gas Station & Car Wash (18002 Van Buren Blvd) currently under construction adjacent to this project.

We are writing to say that we are in **favor** of this new development as it will only further enrich our community with beauty and success.

We hope this project is swiftly approved by all so that construction may begin promptly.

Thank you,

Kevin Bibayan
18002 Van Buren LLC

D-1

--
Thank you,

Veer Management Company Inc
Office: (626) 348-2304 | Fax: (323) 476-1026
110 E Longden Ave Suite A Irwindale CA 91706

D. Responses To Comment Letter D: Veer Management Company, Inc.

D-1 This comment provides background information on the commenter and expresses support for the Project. This comment is for informational purposes and does not address the analysis of environmental impacts presented in the Draft EIR. Therefore, no response to this comment or revision to the Draft EIR is required.

Comment Letter E

Outlook

[Draft] Re: EIR-Public Comment

From
Draft saved Thu 4/10/2025 1:54 PM
To Jerrica Harding <jharding@tbplanning.com>

From: Mason, Krista <KMason@Rivco.org>
Sent: Thursday, April 3, 2025 1:26 PM
To: Jessica Heidari <jheidari@tkcteam.com>; Jerrica Harding <jharding@tbplanning.com>
Subject: EIR-Public Comment

Please see the email attached.

From: Debbie Kruse <dkruse4@yahoo.com>
Sent: Thursday, April 3, 2025 11:34 AM
To: Mason, Krista <KMason@Rivco.org>
Subject: Arroyo Vista Project in Woodcrest

CAUTION: This email originated externally from the **Riverside County** email system. **DO NOT** click links or open attachments unless you recognize the sender and know the content is safe.

My name is Debbie Kruse. I live at 16015 Gamble Avenue, which is at the corner of Iris and Gamble, in Woodcrest. I have lived here for the last 34 years and have seen many changes and, this change will not be for the better. I moved up here for a reason. I wanted to live in a rural community, away from the city. The city keeps moving closer and closer! And now, the county wants to approve 231 houses right in the middle of our rural community. E-1

Have you seen the traffic in Woodcrest lately? I'm not sure where you are going to put these additional cars because, as it is, the traffic is horrendous!! So if every house has at least 2 vehicles, that's 462 additional cars on Van Buren at any given time. Van Buren can't handle the traffic that it has already nor can Washington. And these are the only two ways to basically get to Woodcrest. I won't even mention the 215 Fwy,, that's another nightmare. Alessandro is just as bad, if not worse. And Trautwein, in the morning and evening, is like a parking lot. So yeah, lets just add more houses which means more cars and more traffic on roads that are already bumper to bumper! A 5 minute drive up Van Buren can now take 20 minutes or longer! E-2

Orangecrest is so overbuilt and now, you want to overpopulate our rural community! E-3

Additionally, where are all the animals that live in this field, that was previously the orange groves, going to go? There are coyotes, bobcats, mountain lions and so on. When they start building, where do you think these animals are going to go? E-4

So, putting 231 houses in Woodcrest is a really bad idea. E-5

E. Responses To Comment Letter E: Debbie Kruse

E-1 The commenter indicates they are a local resident and are opposed to the development of 231 houses on the Project site. The comment provides no substantial evidence of a significant environmental effect. This comment is acknowledged and will be considered by the Riverside County Planning Commission and Board of Supervisors during their deliberations over whether to approve, conditionally approve, or deny approval of the proposed Project. As this comment does not specifically address the content or analysis provided in the Project's DEIR, no further response is necessary.

E-2 This comment expresses concern regarding the potential traffic impacts generated by the Project and describes existing traffic conditions. The comment provides no substantial evidence of a significant environmental effect. Pursuant to CEQA Guidelines Section 15064.3(a), "…a project's effect on automobile delay shall not constitute a significant environmental impact." Accordingly, the Project's impacts due to traffic congestion are outside of the purview of CEQA. Notwithstanding, a Traffic Analysis (TA) was prepared for the proposed Project and was included as DEIR *Technical Appendix K2*. The Project's TA demonstrates that with the payment of fees, fair-share contributions, and Project-related improvements, all study area intersections would operate at an acceptable Level of Service (LOS). No further response is necessary.

E-3 The commenter opines that the County desires to overpopulate the community. The comment provides no substantial evidence of a significant environmental effect. This comment does not pertain to the environmental analysis required under CEQA, and no response to this comment or revisions to the Draft EIR are required. Notwithstanding, the commenter's opposition to the proposed Project will be considered by the Riverside County Planning Commission and Board of Supervisors during their deliberations over whether to approve, conditionally approve, or deny approval of the proposed Project. No further response is necessary.

E-4 This comment expresses concern regarding wildlife species residing within the Project site. The comment provides no substantial evidence of a significant environmental effect. The commenter is referred to the discussion and analysis presented in DEIR Subsection 4.4, *Biological Resources*. The analysis presented in Subsection 4.4 demonstrates that with the implementation of mitigation measures, the Project's impacts to biological resources, including sensitive animal species, would be reduced to less-than-significant levels. As this comment does not identify any deficiencies with the analysis presented in DEIR Subsection 4.4, no revision to the DEIR is warranted pursuant to this comment.

E-5 The commenter reiterates their opposition to the proposed Project. The comment provides no substantial evidence of a significant environmental effect. This comment is acknowledged and will be considered by the Riverside County Planning Commission and Board of Supervisors during their deliberations over whether to approve, conditionally approve, or deny approval of the proposed Project. As this comment does not specifically address the content or analysis provided in the Project's DEIR, no further response is necessary.

Comment Letter F

From: L S
To: Mason, Krista
Subject: Arroyo Vista – General Plan Amendment No. 220009 (GPA220009), Change of Zone No. 2200031 (CZ2200031), and Tentative Tract Map No. 38510 (TTM38510)
Date: Wednesday, April 2, 2025 9:13:18 PM

CAUTION: This email originated externally from the **Riverside County** email system. **DO NOT** click links or open attachments unless you recognize the sender and know the content is safe.

I am writing in response to the Notice of Preparation and in opposition to the Arroyo Vista project in Woodcrest. Changing the general plan amendment, the zoning and the tentative tract map goes against everything Woodcrest was built upon. While not opposed to needed housing, to pack 232 homes into this acreage is detrimental to the very low density agricultural community. In addition to the dangerous precedent of zoning changes, this rural community does not have the services to accommodate this amount of homes in regards to jobs, schools, medical facilities, community centers, recreation, etc. This means these 1000+ new residents will come to the city of riverside to use services that they aren't paying taxes for and we already have a lack of amenities in the surrounding city area of Orangecrest and Mission Grove. Lastly, the amount of traffic in the area is already at gridlock status on Van Buren Blvd, the 91/60/215 freeways and all surrounding streets in the area. We are already overburdened by all the warehouse semi truck traffic on Van Buren. To add 1000+ more cars on the road from this project is not responsible or sustainable, further adding to our areas poor air quality, greenhouse gases and dilapidated road conditions. F-1 F-2 F-3 F-4

I would like to be notified when the DEIR is published. Thank you. F-5

Laura Sandidge
nichole19161@gmail.com
92508

F. Responses To Comment Letter F: Laura Sandidge

F-1 The commenter expresses opposition to the proposed Project due to the Project's proposed increase in density on site. The comment provides no substantial evidence of a significant environmental effect. This comment is acknowledged and will be considered by the Riverside County Planning Commission and Board of Supervisors during their deliberations over whether to approve, conditionally approve, or deny approval of the proposed Project. As this comment does not specifically address the content or analysis provided in the Project's DEIR, no further response is necessary.

F-2 The commenter expresses concern over the Project's potential impacts to jobs, schools, medical facilities, community centers, recreation, etc. The comment provides no substantial evidence of a significant environmental effect. As documented in DEIR Subsection 4.15, *Population and Housing*, under the analysis of Threshold c., the Project's expected population increase of 421 persons as compared to the population anticipated based on the site's existing General Plan and Lake Mathews/Woodcrest Area Plan (LMWAP) land use designations represents only 0.27% of the expected 155,100 person increase anticipated in the unincorporated portions of Riverside County between 2016 and 2045. Thus, the Project's potential impacts to employment opportunities would not result in any impacts to the environment not already addressed by the DEIR. With respect to the commenter's concerns regarding schools and medical facilities, the commenter is referred to DEIR Subsection 4.16, which demonstrates that with payment of school impact fees and the County's Development Impact Fee (DIF) fees, as well as with County compliance with mitigation measures included in the General Plan, the Project's impacts to schools and medical facilities would be less than significant. With respect to the Project's impacts on community centers and recreation, the commenter is referred to DEIR Subsection 4.17, *Recreation*, which notes that the Project Applicant would be required to pay fees pursuant to Section 10.35 of Ordinance No. 460, which would provide funding to allow Riverside County to acquire and/or improve new parkland within the County and would reduce the Project's potential impacts to recreational facilities to below a level of significance. As this comment does not identify any deficiencies with the analysis presented in the Project's DEIR, no revision to the DEIR is warranted pursuant to this comment.

F-3 The commenter asserts that the Project's "1000+" residents would utilize services within the City of Riverside would contribute to a lack of amenities in the surrounding areas and within Orangecrest and Mission Grove. First, the commenter overstates the number of residents that would be associated with the Project, as the Project is expected to generate a future on-site population of approximately 772 persons (as noted in DEIR subsection 3.6.2). The commenter is referred to the discussion and analysis of Thresholds b. and c. in DEIR Subsection 4.17, which addresses the Project's potential impacts to recreational resources. As noted therein, "…because the Project Applicant would be required to provide for adequate parkland either on site or through in-lieu fees, any increase in the use of existing recreational facilities within the County by future Project residents would be off-set by existing County residents utilizing the Project's proposed recreational amenities and/or the recreational amenities to be accommodated by the Project Applicant's payment of in-lieu fees pursuant to Ordinance No. 460" (DEIR at p. 4.17-4). With respect to non-recreational amenities and services, the commenter is referred to the response to Comment F-2. As this comment does not identify any deficiencies with the analyses presented in DEIR Subsection 4.17, no revision to the DEIR is warranted pursuant to this comment.

Comment Letter G

Outlook

[Draft] Re: Fwd: Arroyo Vista Project

From
Draft saved Thu 4/10/2025 2:57 PM
To Jerrica Harding <jharding@tbplanning.com>

From: Michele Kruse <michelekrs@yahoo.com>
Sent: Thursday, April 10, 2025 12:49 PM
To: Mason, Krista <KMason@Rivco.org>
Subject: Fw: Fwd: Arroyo Vista Project

CAUTION: This email originated externally from the **Riverside County** email system. **DO NOT** click links or open attachments unless you recognize the sender and know the content is safe.

Hello,

Argument **against** "Change of Zone No. 2200031; a proposal to change from Light Agricultural to One-Family Dwellings (10,000 s.f. minimum lot size).

Woodcrest is an agricultural and rural community. Although growth has occurred in the surrounding area, residents of this area deserve a voice and their desire to be acknowledged. Millions of dollars were spent for the current planning study in place. It was agreed upon by the supervisors and community at the time of its passage. Where the supervisors have come and go, the majority of the community remains. I have spoken to every household on Gamble Avenue, no one wants this zoning change because the traffic coming onto Iris and Gamble will be more than twenty fold. G-1 G-2

I recognize the agriculture zoning to be modified to one house per acre to be a reasonable accommodation; **however, the 1 resident per 10,000 s.f. is absurd** and will negatively change the nature of the area and severely impact traffic on the residential streets. The developer's belief that the majority of the traffic will divert on Chicago Ave to the east is an unrealistic pipe dream. Chicago Avenue is about 100 yard in length and is sandwiched between two high traffic businesses, people living in the area currently come down Iris and use Gamble as an exit point to avoid the Chicago/Van Buren intersection, adding 200 plus houses will be a catastrophe. G-3 G-4

Sincerely,
Michele Kruse (resident of Woodcrest)
16015 Gamble Ave., Riverside CA 92508

Comment Letter G

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This email is confidential and intended solely for the use of the individual(s) to whom it is addressed. The information contained in this message may be privileged and confidential and protected from disclosure.
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County of Riverside California

G. *Responses To Comment Letter G: Michele Kruse*

G-1 The commenter expresses opposition to the proposed Project, and in particular the Project's proposed increase in density. The comment provides no substantial evidence of a significant environmental effect. This comment is acknowledged and will be considered by the Riverside County Planning Commission and Board of Supervisors during their deliberations over whether to approve, conditionally approve, or deny approval of the proposed Project. As this comment does not specifically address the content or analysis provided in the Project's DEIR, no further response is necessary.

G-2 The commenter expresses opposition to the proposed minimum 10,000 square-foot (s.f.) lot sizes proposed within portions of the Project, and asserts that the Project's density would severely impact traffic congestion in the local area. The comment provides no substantial evidence of a significant environmental effect. With respect to Project impacts due to traffic congestion, pursuant to CEQA Guidelines Section 15064.3(a), "…a project's effect on automobile delay shall not constitute a significant environmental impact." Accordingly, the Project's impacts due to traffic congestion are outside of the purview of CEQA. Notwithstanding, a Traffic Analysis (TA) was prepared for the proposed Project and was included as DEIR *Technical Appendix K2*. The Project's TA demonstrates that with the payment of fees, fair-share contributions, and Project-related improvements, all study area intersections would operate at an acceptable Level of Service. With respect to the commenter's opposition to the proposed increase in density, this comment will be considered by the Riverside County Planning Commission and Board of Supervisors during their deliberations over whether to approve, conditionally approve, or deny approval of the proposed Project. No further response is necessary.

G-3 This commenter asserts skepticism that the majority of Project-related traffic would be diverted to the east to Chicago Avenue, and asserts that future residents would instead use Iris Avenue and Gamble Avenue to access Van Buren Boulevard. This comment is unclear, as the DEIR does not assert that all Project traffic would utilize Chicago Avenue to access Van Buren Boulevard. Rather, the commenter is referred to Exhibit 4-1 of the Project's Traffic Analysis ("TA"; DEIR *Technical Appendix K2*), which shows the Project's anticipated trip distribution and shows that approximately 30% of Project traffic is assumed to utilize Gamble Avenue to access Van Buren Boulevard, with approximately 70% of Project traffic assumed to utilize Chicago Avenue to access Van Buren Boulevard. As the DEIR relied upon appropriate assumptions regarding traffic distribution patterns, no revision to the DEIR is warranted pursuant to this comment. The commenter is referred also to the response to Comment G-2 with respect to the Project's potential effects on traffic congestion. The comment provides no substantial evidence of a significant environmental effect. No further response is necessary.

Comment Letter H

From: QT Tran
To: Mason, Krista
Subject: Arroyo Vista Project
Date: Monday, March 31, 2025 3:13:17 PM

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Argument **against** "Change of Zone No. 2200031; a proposal to change from Light Agricultural to One-Family Dwellings (10,000 s.f. minimum lot size).

Woodcrest is an agricultural and rural community. Although growth has occurred in the surrounding area, residents of this area deserve a voice and their desire to be acknowledged. Millions of dollars were spent for the current planning study in place. It was agreed upon by the supervisors and community at the time of its passage. Where the supervisors have come and go, the majority of the community remains. I have spoken to every household on Gamble Avenue, no one wants this zoning change because the traffic coming onto Iris and Gamble will be more than twenty fold. H-1 H-2

I recognize the agriculture zoning to be modified to one house per acre to be a reasonable accommodation; **however, the 1 resident per 10,000 s.f. is absurd** and will negatively change the nature of the area and severely impact traffic on the residential streets. The developer's belief that the majority of the traffic will divert on Chicago Ave to the east is an unrealistic pipe dream. Chicago Avenue is about 100 yard in length and is sandwiched between two high traffic businesses, people living in the area currently come down Iris and use Gamble as an exit point to avoid the Chicago/Van Buren intersection, adding 200 plus houses will be a catastrophe. H-3 H-4

Sincerely,
Bruce Rogers (28 year resident of Woodcrest)
16016 Gamble Ave., Riverside CA 92508
Phone: 951.722.6716

H. Responses To Comment Letter H: Bruce Rodgers

H-1 The commenter expresses concerns regarding growth in the local Woodcrest community, and expresses opposition to the Project's proposed density. The comment provides no substantial evidence of a significant environmental effect. This comment is acknowledged and will be considered by the Riverside County Planning Commission and Board of Supervisors during their deliberations over whether to approve, conditionally approve, or deny approval of the proposed Project. As this comment does not specifically address the content or analysis provided in the Project's DEIR, no further response is necessary.

H-2 The commenter expresses opposition to the Project's proposal to include lots as small as 10,000 s.f. in size, and asserts that the Project's proposed increase in density would result in increased traffic congestion in the area. The commenter's opposition to the proposed Project is acknowledged and will be considered by the Riverside County Planning Commission and Board of Supervisors during their deliberations over whether to approve, conditionally approve, or deny approval of the proposed Project. With respect to Project impacts due to traffic congestion, pursuant to CEQA Guidelines Section 15064.3(a), "…a project's effect on automobile delay shall not constitute a significant environmental impact." Accordingly, the Project's impacts due to traffic congestion are outside of the purview of CEQA. Notwithstanding, a Traffic Analysis (TA) was prepared for the proposed Project and was included as DEIR *Technical Appendix K2*. The Project's TA demonstrates that with the payment of fees, fair-share contributions, and Project-related improvements, all study area intersections would operate at an acceptable Level of Service. No further response is necessary.

H-3 This commenter asserts skepticism that the majority of Project-related traffic would be diverted to the east to Chicago Avenue, and asserts that future residents would instead use Iris Avenue and Gamble Avenue to access Van Buren Boulevard. This comment is unclear, as the DEIR does not assert that all Project traffic would utilize Chicago Avenue to access Van Buren Boulevard. Rather, the commenter is referred to Exhibit 4-1 of the Project's Traffic Analysis ("TA"; DEIR *Technical Appendix K2*), which shows the Project's anticipated trip distribution and shows that approximately 30% of Project traffic is assumed to utilize Gamble Avenue to access Van Buren Boulevard, with approximately 70% of Project traffic assumed to utilize Chicago Avenue to access Van Buren Boulevard. As the DEIR relied upon appropriate assumptions regarding traffic distribution patterns, no revision to the DEIR is warranted pursuant to this comment. With respect to Project impacts due to traffic congestion, the commenter is referred to the response to Comment H-2. No further response is necessary.

F.3 ADDITIONS, CORRECTIONS, AND REVISIONS TO THE DEIR

Substantive changes made to the text, tables, and/or exhibits of the DEIR in response to public comments on the DEIR are itemized in Table F-3, *Errata Table of Additions, Corrections, and Revisions*. Additions are shown in Table F-3 as underline text and deletions are shown as ~~stricken~~ text. No corrections or additions made to the DEIR are considered substantial new information requiring recirculation or additional environmental review under CEQA Guidelines § 15088.5.

Table F-3 Errata Table of Additions, Corrections, and Revisions

Revised DEIR Page(s)	Section(s)	Additions, Corrections, and Revisions
1-11	1.5	Subsection 1.5 was revised to include Technical Appendix O, Agricultural Infeasibility Correspondence, in the included list of technical appendices.
1-11	1.5	Subsection 1.5 was revised to clarify that the Western Municipal Water District (WMWD) only would be responsible for approving the Project's water connections, and to indicate that the City of Riverside would be a Responsible Agency for approval of the Project's proposed sewer improvements and connections.
3-28	3.8 and Table 3-5	Table 3-5, *Matrix of Project Approvals/Permits*, was revised to indicate that the City of Riverside would be a Responsible Agency for approval of the Project's proposed sewer connections and improvements, and the need for approval of sewer facilities was removed from the list of approvals/decisions required from the WMWD.
4.5-31	4.5.7	Reference to CAR-12 was removed from Mitigation Measure MM 4.5-1: *Although all bedrock features will be either preserved in place or relocated into open space on site, the soils surrounding cultural Site(s) P-33-002918 (CA-RIV-7184) Features B, C, D, E, P-33-12916 Features A, B, C, D, CA-001, CAR-04, CAR-05, CAR-08, CAR-10, ~~CAR-12~~, and CAR13-I will be impacted during construction activities.*
4.5-31	4.5.7	Mitigation Measure MM 4.5-2 was removed.
4.5-31 through 4.5-37	4.5.7 and 4.5.8	Mitigation Measures MM 4.5-3 through MM 4.5-13 were revised to MM 4.5-2 through MM 4.5-12.
4.5-32	4.5.7	Mitigation Measure MM 4.5-2 was revised for clarity: *Prior to the issuance of grading permits: the developer/applicant shall provide evidence to the Riverside County Planning Department that a~~n~~ confidential Environmental Constraints Sheet has been included in the Grading Plans. This sheet shall indicate an area to be used for relocation of the bedrock milling features that cannot be avoided by this project. In addition, a permanent space within this area will be predetermined and designated, in consultation with the Soboba Band of Luiseño Indians and Pechanga Band of Indians, ~~and designated~~ on a confidential map for reburial of any artifacts that will be impacted and/or discovered during grading.*
4.5-32	4.5.7	Mitigation Measure MM 4.5-3 was revised for clarity and to remove reference to resources that are not applicable to the mitigation measure: *Prior to final map approval the developer/ applicant shall provide evidence to the Riverside County Planning Department that an Environmental Constraints Sheet has been included in the Grading Plans. This sheet shall indicate the presence of environmentally constrained area(s) and the requirements for avoidance of ~~the applicable~~ portions of P-33-012915 (CA-RIV-7181), portions of P-33-012916 (CA-RIV-7182), and P-33-012917 (CA-RIV-7183) ~~Features A, B, and C, P-33-02918 (CA-RIV-7184), Features A and C, CA-002, CAR-09, and CAR-11. Avoidance~~*

Table F-3 Errata Table of Additions, Corrections, and Revisions

Revised DEIR Page(s)	Section(s)	Additions, Corrections, and Revisions
		~~*includes all Project related temporary and permanent activity or use during and following construction.*~~
4.5-32	4.5.7	Mitigation Measure MM 4.5-4 was revised for clarity and to remove reference to resources that are not applicable to the mitigation measure: *Site P-33-002918 (CA-RIV-7184) Features ~~B,~~ D, ~~and E,~~ P-33-12916 (CA-RIV-7182) Features A, B, C, D, CAR-04, CAR-05, CAR-08, CAR-10, ~~CAR-12,~~ and CAR-13-I cannot be avoided through Project redesign. Prior to grading permit issuance, the Project Supervisor and Project Archaeologist and a representative from the Soboba Band of Luiseño Indians and Pechanga Band of Indians shall meet onsite to determine the strategy for relocating the milling features to a permanent open space area predetermined and designated, in consultation with ~~the~~ Tribes, ~~and designated~~ on a confidential map. Before construction activities are allowed to start and using professional archaeological methods, as well as follow the cultural customs and traditions of Tribes, any visible artifacts shall be recovered and recorded, and photo documentation of each feature in situ shall occur. No sacred sites shall be photographed, and prior approval is needed from Soboba Band of Luiseño Indians and Pechanga Band of Indians. 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. The ability of features to be relocated depends on the extent of subsurface bedrock, which cannot be fully understood until after ground disturbance begins. In the event that a feature cannot be relocated without damage, after a reasonable and good faith effort as determined by the County, the Project Supervisor and Project Archaeologist, in coordination with the Native American Monitors, shall ~~be reburied~~ rebury the resource in the pre-designated reburial location.*
4.5-33	4.5.7	Mitigation Measure MM 4.5-5 was revised for clarity: *Prior to the issuance of grading permits, the developer/permit applicant shall enter into agreement(s) with the ~~Soboba Band and Pechanga Band for one Native American monitor from each tribe for the duration of ground disturbing activity associated with project construction~~ consulting tribe(s) for the appropriate number of Native American Monitor(s). In conjunction with the Archaeological Monitor(s), the Native American Monitor(s) shall attend the pre-grading meeting with the contractors to provide Cultural Sensitivity Training for all construction personnel. In addition, an adequate number of Native American Monitor(s) shall be on-site during all initial ground-disturbing activities and excavation of soils in each portion of the project site including clearing, grubbing, tree removals, grading and trenching. In conjunction with the Archaeological Monitor(s), the Native American Monitor(s) have the authority to temporarily divert, redirect or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources. Activities will be documented in Tribal Monitoring Notes which will be required to be submitted to the County Archaeologist prior to grading final inspection. The developer/permit applicant shall submit a fully executed copy of the agreement(s) 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. ~~If either or both tribes decline to enter into agreement for Native American monitoring within 60 days of extending an offer, then the County will require the Archaeological Monitor to notify the tribes in the event of an unanticipated discovery.~~*
4.5-34	4.5.7	Mitigation Measure MM 4.5-6 was revised for clarity:

Table F-3 Errata Table of Additions, Corrections, and Revisions

Revised DEIR Page(s)	Section(s)	Additions, Corrections, and Revisions
		A Cultural Resource Monitoring Plan shall be developed, in consultation with Soboba Band of Luiseño Indians and Pechanga Band of Indians, 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 ~~to the greatest extent feasible~~ as well as address potential impacts to undiscovered buried archaeological resources associated with this project.
4.5-34	4.5.7	Mitigation Measure MM 4.5-8 was revised for clarity: *Historic Resources- all historic archaeological materials recovered during the archaeological investigations (this includes ~~any~~ collections made during an earlier project, such as testing of archaeological sites that took place years ago, if applicable), shall be curated ~~and permanently housed~~ 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- One of the following treatments shall be applied.*
4.5-37	4.5.7	Subsection 4.5.8 was revised to remove reference to a removed mitigation measure: *Implementation of Mitigation Measure MM4.5-1 would ensure that controlled grading is implemented at Sites P-33-002918 (CA-RIV-7184) Features B, C, D, E, P-33-12916 Features A, B, C, D, CA-001, CAR-04, CAR-05, CAR-08, CAR-10, CAR-12, and CAR13-I, which would ensure the systematic removal of the ground surface to allow for the identification, documentation, and recovery of any associated subsurface tribal cultural resources deposits. ~~Implementation of Mitigation Measure MM 4.5-1 would ensure that Project construction workers are subject to sensitivity training to enable them to assist in the identification of potential subsurface cultural resources.~~*
4.5-1 through 4.5-54	4.13	Final EIR Subsection 4.13, *Noise*, was revised based on updates to the Project's Noise Impact Analysis (*Technical Appendix J*), which in turn was updated based on updated traffic counts collected as part of the Project's Traffic Analysis (*Technical Appendix K2*) and associated revisions to the analyses. Revisions to Subsection 4.13 are shown in ~~strikeout~~/underline format, and are briefly discussed below: • Table 4.13-1, *24-Hour Ambient Noise Level Measurements*, was updated to reflect ambient noise conditions for Year 2025, and to identify the associated CNEL noise levels at each location. The revisions generally resulted in a reduction in background ambient noise levels in the local area, thereby potentially increasing any Project-related contributions to the existing noise environment. As such, the revisions provide for a more conservative analysis as compared to the baseline ambient noise level measurements disclosed by the Draft EIR. • The discussion of Construction Vibration Standards in subsection 4.13.3.C.3 have been revised to utilize the Caltrans' vibration standard of 0.3 PPV (in/sec), rather than the standards identified by the General Plan Noise Element, which generally are applicable only to vibration associated with trains. The revised threshold did not identify any new or more severe impacts associated with construction-related vibration. • A minor revision was made on pp. 4.13-19 and -20 to provide additional detail related to the noise criteria based on background noise levels. This addition did not change any of the conclusions reached by EIR Subsection 4.13. • The discussion of vibration thresholds on Final EIR p. 4.13-20 has been revised to cite the Caltrans vibration threshold of significance of 0.3 PPV (in/sec). • The discussion of off-site transportation noise prediction model inputs on p. 4.13-29 has been revised to reflect the updated analysis scenarios studied by the Project's Traffic Analysis.

Table F-3 Errata Table of Additions, Corrections, and Revisions

Revised DEIR Page(s)	Section(s)	Additions, Corrections, and Revisions
		• Table 4.13-7, *Construction Equipment Noise Level Summary*, has been revised to include noise levels associated with demolition activities, although the highest Project-related noise levels disclosed in Table 4.13-7 were not affected. • Additional text has been added on p. 4.13-33 and Table 4.13-9, *Rock, Crushing Construction Noise Levels*, has been added to provide additional discussion and analysis of construction-related rock crushing noise impacts. The revised analysis demonstrates that noise associated with rock crushing activities would be less than significant. • The analysis of Project-related traffic noise impacts has been revised to address revised analysis scenarios included in the Project's Traffic Analysis. Specifically, EAPC 2027 has been revised to EAPC 2030. Based on the updated traffic-related noise levels presented in the revised Table 4.13-17, one roadway segment (Gamble Avenue south of Iris Avenue) would experience a noise level increase exceeding the identified threshold of significance; however, the resulting noise level along this roadway segment (53.0 dBA CNEL) is well below the General Plan Noise Element "Normally Acceptable" noise level of 60 dBA CNEL. Thus, the revised analysis does not identify any new or more severe impacts due to traffic-related noise under EAPC conditions. In addition, the discussion and analysis of Horizon Year (2045) conditions was updated to reflect the updated ambient noise levels shown in revised Table 4.13-1. • Table 4.13-20, *Project General Construction Vibration Levels*, and Table 4.13-21, *Rock crushing Equipment Vibration Levels*, and associated text analyses have been revised to utilize the Caltrans 0.30 PPV (in/sec) threshold of significance. The revised analyses do not identify any new or more severe construction-related vibration impacts. The above revisions did not result in any new or more severe impacts due to Project-related noise, and reflect minor revisions needed to clarify or amplify the information presented in the Draft EIR.
4.19-17	4.19.7	Reference to CAR-12 was removed from Mitigation Measure MM 4.5-1. *Although all bedrock features will be either preserved in place or relocated into open space on site, the soils surrounding cultural Site(s) P-33-002918 (CA-RIV-7184) Features B, C, D, E, P-33-12916 Features A, B, C, D, CA-001, CAR-04, CAR-05, CAR-08, CAR-10, ~~CAR-12~~, and CAR13-I will be impacted during construction activities.*
4.19-17	4.19.7	Mitigation Measure MM 4.5-2 was removed.
4.19-17 through 4.19-22	4.19.7 and 4.19.8	Mitigation Measures MM 4.5-3 through MM 4.5-13 were revised to MM 4.5-2 through MM 4.5-12.
4.19-17	4.19.7	Mitigation Measure MM 4.5-2 was revised for clarity: *Prior to the issuance of grading permits: the developer/applicant shall provide evidence to the Riverside County Planning Department that a~~n~~ confidential Environmental Constraints Sheet has been included in the Grading Plans. This sheet shall indicate an area to be used for relocation of the bedrock milling features that cannot be avoided by this project. In addition, a permanent space within this area will be predetermined and designated, in consultation with the Soboba Band of Luiseño Indians and Pechanga Band of Indians, ~~and designated~~ on a confidential map for reburial of any artifacts that will be impacted and/or discovered during grading.*
4.19-18	4.19.7	Mitigation Measure MM 4.5-3 was revised for clarity and to remove reference to resources that are not applicable to the mitigation measure: *Prior to final map approval the developer/ applicant shall provide evidence to the Riverside County Planning Department that an Environmental Constraints Sheet has been included in the*

Table F-3 Errata Table of Additions, Corrections, and Revisions

Revised DEIR Page(s)	Section(s)	Additions, Corrections, and Revisions
		Grading Plans. This sheet shall indicate the presence of environmentally constrained area(s) and the requirements for avoidance of ~~the applicable~~ portions of P-33-012915 (CA-RIV-7181), portions of P-33-012916 (CA-RIV-7182), and P-33-012917 (CA-RIV-7183) ~~Features A, B, and C, P-33-02918 (CA-RIV-7184), Features A and C, CA-002, CAR-09, and CAR-11. Avoidance includes all Project related temporary and permanent activity or use during and following construction.~~
4.19-18	4.19.7	Mitigation Measure MM 4.5-4 was revised for clarity and to remove reference to resources that are not applicable to the mitigation measure: *Site P-33-002918 (CA-RIV-7184) Features ~~B,~~ D, ~~and E,~~ P-33-12916 (CA-RIV-7182) Features A, B, C, D, CAR-04, CAR-05, CAR-08, CAR-10, ~~CAR-12,~~ and CAR-13-I cannot be avoided through Project redesign. Prior to grading permit issuance, the Project Supervisor and Project Archaeologist and a representative from the Soboba Band of Luiseño Indians and Pechanga Band of Indians shall meet onsite to determine the strategy for relocating the milling features to a permanent open space area predetermined and designated, in consultation with ~~the~~ Tribes, ~~and designated~~ on a confidential map. Before construction activities are allowed to start and using professional archaeological methods, as well as follow the cultural customs and traditions of Tribes, any visible artifacts shall be recovered and recorded, and photo documentation of each feature in situ shall occur. No sacred sites shall be photographed, and prior approval is needed from Soboba Band of Luiseño Indians and Pechanga Band of Indians. 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. The ability of features to be relocated depends on the extent of subsurface bedrock, which cannot be fully understood until after ground disturbance begins. In the event that a feature cannot be relocated without damage, after a reasonable and good faith effort as determined by the County, the Project Supervisor and Project Archaeologist, in coordination with the Native American Monitors, shall ~~be reburied~~ rebury the resource in the pre-designated reburial location.*
4.19-18	4.19.7	Mitigation Measure MM 4.5-5 was revised for clarity: *Prior to the issuance of grading permits, the developer/permit applicant shall enter into agreement(s) with the ~~Soboba Band and Pechanga Band for one Native American monitor from each tribe for the duration of ground-disturbing activity associated with project construction~~ consulting tribe(s) for the appropriate number of Native American Monitor(s). In conjunction with the Archaeological Monitor(s), the Native American Monitor(s) shall attend the pre-grading meeting with the contractors to provide Cultural Sensitivity Training for all construction personnel. In addition, an adequate number of Native American Monitor(s) shall be on-site during all initial ground-disturbing activities and excavation of soils in each portion of the project site including clearing, grubbing, tree removals, grading and trenching. In conjunction with the Archaeological Monitor(s), the Native American Monitor(s) have the authority to temporarily divert, redirect or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources. Activities will be documented in Tribal Monitoring Notes which will be required to be submitted to the County Archaeologist prior to grading final inspection. The developer/permit applicant shall submit a fully executed copy of the agreement(s) 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. ~~If either or both tribes decline to enter into agreement for Native American monitoring within 60 days of extending an offer, then the County~~*

Table F-3 Errata Table of Additions, Corrections, and Revisions

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		~~*will require the Archaeological Monitor to notify the tribes in the event of an unanticipated discovery.*~~
4.19-18	4.19.7	Mitigation Measure MM 4.5-6 was revised for clarity: *A Cultural Resource Monitoring Plan shall be developed, in consultation with Soboba Band of Luiseño Indians and Pechanga Band of Indians, 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* ~~*to the greatest extent feasible*~~ *as well as address potential impacts to undiscovered buried archaeological resources associated with this project.*
4.19-18	4.19.7	Mitigation Measure MM 4.5-8 was revised for clarity: *Historic Resources- all historic archaeological materials recovered during the archaeological investigations (this includes* ~~*any*~~ *collections made during an earlier project, such as testing of archaeological sites that took place years ago, if applicable), shall be curated* ~~*and permanently housed*~~ *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- One of the following treatments shall be applied.*
4.19-22	4.19.8	Subsection 4.19.8 was revised to remove reference to a removed mitigation measure: *Implementation of Mitigation Measure MM4.5-1 would ensure that controlled grading is implemented at Sites P-33-002918 (CA-RIV-7184) Features B, C, D, E, P-33-12916 Features A, B, C, D, CA-001, CAR-04, CAR-05, CAR-08, CAR-10, CAR-12, and CAR13-1, which would ensure the systematic removal of the ground surface to allow for the identification, documentation, and recovery of any associated subsurface tribal cultural resources deposits.* ~~*Implementation of Mitigation Measure MM 4.5-1 would ensure that Project construction workers are subject to sensitivity training to enable them to assist in the identification of potential subsurface cultural resources.*~~
4.20-1	4.20.1	Subsection 4.20.1 was revised to clarify that Southern California Gas Company would be responsible for providing the Project with natural gas services, as follows: *The Project site is located within the boundaries of WMWD for water services, the City of Riverside for sewer services, Southern California Edison for* ~~*natural gas and*~~ *electric services, Southern California Gas Company (SoCal Gas) for natural gas, and numerous service providers for cable television and telephone services.*
Through out	Througho ut	The Project's Phase I and Limited Phase II Environmental Site Assessment was updated on May 22, 2025, and citations throughout the EIR were updated accordingly: ~~*(Geotek, 2021a)*~~ *(Geotek, 2025)*
Through out	Througho ut	The citation for the Project's Updated Geotechnical Evaluation was updated to reflect the Environmental Site Assessment date change: ~~*(Geotek, 2021b)*~~ *(Geotek, 2021)*
Through out	Througho ut	The Project's Traffic Analysis was updated on June 23, 2025, and the citation for the Project Traffic Analysis was updated accordingly: *(Urban Crossroads, 2025a)* ~~*(Urban Crossroads 2023b)*~~
Through out	Througho ut	The citation for the Project's VMT Analysis was updated to reflect the Traffic Analysis date change:

Table F-3 Errata Table of Additions, Corrections, and Revisions

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		(*Urban Crossroads, 2023a*) ~~(*Urban Crossroads, 2023b*)~~
Through out	Througho ut	The citation for the Project's GHG Analysis was updated to reflect technical studies date changes: *(Urban Crossroads, 2023b)* ~~(*Urban Crossroads, 2023c*)~~
Through out	Througho ut	The Project's Noise Impact Analysis was updated on June 23, 2025, and citations throughout the EIR were updated accordingly: *(Urban Crossroads, 2025b)* ~~(*Urban Crossroads, 2023f*)~~

F.4 No Recirculation of DEIR Required

CEQA Guidelines Section 15088.5 describes the conditions under which a DEIR that was circulated for public review is required to be re-circulated for additional public review and comment. CEQA Guidelines Section 15088.5 states that new information added to a DEIR is not significant unless the DEIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. "Significant new information" requiring recirculation includes, for example, a disclosure showing that:

1. A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented;
2. A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance;
3. A feasible project alternative or mitigation measure considerably different from the others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it; and/or
4. The DEIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

Based on the comment letters received by the County of Riverside and the responses thereto (presented in Subsection F.2, above) and the minor revisions made to the DEIR (presented in Subsection F.3, above), there were no public comments that resulted in the identification of any new significant environmental effect or a substantial increase in the severity of an environmental effects that were disclosed in the DEIR. The public comments also did not result in or require revisions to the text or graphics contained in the DEIR, beyond the minor revisions pursuant to comments from the City of Riverside, as summarized above in Table F-3. Additionally, the DEIR was fundamentally and basically adequate, and all conclusions within the DEIR were supported by evidence provided within the DEIR or the administrative record for the proposed Project. Furthermore, public comment letters on the DEIR did not identify any alternatives to the proposed Project considerably different from those analyzed in the DEIR that would substantially lessen the significant

environmental impacts of the proposed Project while still attaining the Project's basic objectives. Based on the foregoing, recirculation of the DEIR is not warranted according to the guidance set forth in Section 15088.5 of the CEQA Guidelines.

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Acronyms and Abbreviations

Acronym	Definition
§	Section
°F	Fahrenheit
µg/m^3	Micrograms per Cubic Meter
No.	Number
A/C	Air Conditioning
A-1	Light Agriculture
A-1-10	Light Agriculture, 10-Acre Minimum Lot Size
A-2	Heavy Agriculture
AB	Assembly Bill
ABAU	Adjusted Business as Usual
ACM	Alternative Calculation Method
ACOE	Army Corps of Engineers
A-D	Agriculture -Dairy
AFY	acre-feet per year
AIA	Airport Influence Area
AIRFA	American Indian Religious Freedom Act
ALUC	Airport Land Use Commission
amsl	above mean sea level
A-P	Light Agriculture with Poultry
A-P	Alquist-Priolo
APE	area of potential
APN	Assessor's Parcel Number
APS	alternative planning strategy
APSA	Aboveground Petroleum Storage Act
AQIA	Air Quality Impact Analysis
AQMP	Air Quality Management Plan
AUL	Activity and Use Limitation
BAAQMD	Bay Area Air Quality Management District
BACM	best available control measures
BERD	Built Environment Resources Directory
BTS	backbone transmission system
BTU	British Thermal Unit
c.y.	cubic yards
C/V	Citrus/Vineyard
C2F6	hexafluoroethane
C2H6	ethane
CAA	Clean Air Act

ACRONYMS AND ABBREVIATIONS (CONT'D)

Acronym	Definition
CAAQS	California Ambient Air Quality Standards
CAL FIRE	California Department of Forestry and Fire Protection
CalARP	California Accidential Release Prevention
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CalGEM	California Geological Energy Management Division
CalSTA	California State Transportation Agency
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CAPP	Community Air Protection Program
CARB	California Air Resources Board
CBSC	California Building Standards Commission
CBSC	California Building Standards Code
CCAA	California Clean Air Act
CCR	California Code of Regulations
CCRUS	Carbon Capture, Removal, Utilization, and Storage
CD	consistency determination
CDC	California Department of Conservation
CDE	California Department of Education
CDFA	California Department of Food and Agriculture
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CF4	tetrafluoromethane
CFGC	California Gish and Game Code
cfs	cubic feet per second
CGC	California Government Code
CH2FCF	1,1,1,2-tetrafluoroethane
CH3CF2	1,1-difluoroethane
CH4	methane
CHF3	fluoroform
CHMIRS	California Hazardous Material Incident Report Systems
CHPO	County Historic Preservation Officer
CHRIS	California Historical Resources Information System
CIWMB	California Integrated Waste Management Board
CIWMP	Countywide Integrated Waste Management Plan
CLCA	California Land Conservation Act
CMP	Congestion Management Plan
CMUTCD	California Manual on Uniform Traffic Control Devicess

ACRONYMS AND ABBREVIATIONS (CONT'D)

Acronym	Definition
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Survey
CNRA	California Natural Resources Agency
CO	Carbon Monoxide
CO2	carbon dioxide
Co2e	CO2 Equivalent
COA	Conditions of Approval
COG	Council of Governments
COHb	carboxyhemoglobin
COP	Community Oriented Policing
COPPS	Community Oriented and Policing Problem Solving
C-P-S	Scenic Highway Commercial
CPUC	California Public Utilities Commission
CR	Commercial Retail
CRA	Colorado River Aqueduct
CRHR	California Register of Historic Resources
CRMP	Cultural Resource Monitoring Program
CRMP	Cultural Resources Monitoring Plan
CRNA	California Natural Resources Agency
CSA	Community Service Area
CTA	core transport agents
CTC	California Transportation Commission
CWA	Clean Water Act
cy	cubic yards
CZ	Change of Zone
dB	Decibel
dBA	Weighted Decibels
DEH	Department of Environmental Health
DG	Decomposed Granite
DIF	Development Impact Fee
DIVCA	Digital Infrastructure and Video Competition Act of 2006
DMV	Department of Motor Vehicles
DOE	Department of Energy
DOF	Department of Finance
DOSH	Division of Occupational Safety and Health
DPM	diesel particulate matter
DPR	Department of Parks and Recreation
DSOD	Division of Safety of Dams
DTSC	Department of Toxic Substance Control

ACRONYMS AND ABBREVIATIONS (CONT'D)

Acronym	Definition
DWR	Department of Water Resources
EA	Environmental Assessment
EA	Energy Analysis
EI	Expansion Index
EIC	Eastern Information Center
EIR	Environmental Impact Report
EMFAC	Emission FACtor
EO	Executive Order
EPA	Environmental Protection Agency
EPCRA	Emergency Planning and Community Right-to-Know
EPS	emission performance standard
ERNS	Emergency Response Notification System
ERO	Electric Reliability Organization
ESA	Endangered Species Act
ETW	equivalent test weight
EV	electric vehicle
EVA	Emergency Vehicle Access
EVMWD	Elsinore Valley Municipal Water District
FAA	Federal Aviation Administration
FAR	firm access rights
FCC	Federal Communications Commission
FEIR	Final Environmental Impact Report
FERC	Federal Energy Regulatory Commission
FHWA	Federal Highway Administration
FMMP	Farmland Mapping and Monitoring Program
FMP	Fuel Management Plan
FMZ	Fuel Management Zone
fps	feet per second
FYI	For Your Information
GCC	Global Climate Change
Gg	gigagram
GHG	Greenhouse Gas
GHGA	Greenhouse Gas Analysis
GIS	Geographic Information System
GOBiz	Governor's Office of Business and Economic Development
GPA	General Plan Amendment
gpd	gallons per day
gpm	gallons per minute

ACRONYMS AND ABBREVIATIONS (CONT'D)

Acronym	Definition
GSA	Groundwater Sustainability Agency
GSP	Groundwater Sustainability Plan
GT&S	gas transmission and storage
GWh	gigawatt hours
GWP	Global Warming Potential
HA	Habitat Analysis
HANS	Habitat Acquisition and Negotiation Strategy
HAP	Hazardous Air Pollutants
HB	Home-Based
HCN	Habitat Conservation Plan
HCP	Habitat Conservation Plan
HFC	hydrofluorocarbons
HHDT	heavy-heavy duty trucks
HI	Hazard Index
HMIS	Hazardous Materials Inventory Statements
HMMP	Hazardous Materials Management Plan
HMTA	Hazardous Materials Transportation Act
HMTUSA	Hazardous Materials Transportation Uniform Safety Act
HOA	Home Owner's Association
hp-hr-gal	horsepower hour per gallon
HSC	Health and Safety Code
HSWA	Hazardous and Solid Waste Amendments
HWCL	Hazardous Waste Control Law
I	Interstate
IA	Implementing Agreement
Ibank	California Infrastructure and Economic Development Bank
IEPR	Integrated Energy Policy Report
IPCC	Intergovernmental Panel on Climate Change
IRP	Integrated Resource Planning
ISO	Independent System Operator
ISTEA	Intermodal Surface Transportation Efficiency Act
ITE	Institute of Traffic Engineers
ITIP	Interregional Transportation Improvement Plan
ITP	incidential take permits
IWMA	Integrated Waste Management Act
IWMP	Integrated Waste Management Plan
JPA	Joint Powers Authority

ACRONYMS AND ABBREVIATIONS (CONT'D)

Acronym	Definition
kWh	kilowatt hours
LADWP	Los Angeles Department of Water and Power
LCA	life-cycle analysis
LCD	Liquid Crystal Display
LCFS	Low Carbon Fuel Standard
LDA	light-duty auto-vehicles
LDT	light-duty trucks
Leq	equivalent continuous noise level
LI	Light Industrial
LMWAP	Lake Mathews/Woodcrest Area Plan
LOS	Level of Service
LRA	Local Responsibility Area
LSA	Lake and Streambed Alteration
LST	Localized Significance Threshold
LTF	Local Transportation Fund
LTO	Licensed Timber Operator
LUST	Leaking Underground Storage Tank
MARB	March Air Force Base
MBTA	Migratory Bird Treaty Act
MDAQMD	Mojave Desert Air Quality Management District
mgd	million gallons per day
MHDT	medium-heavy duty trucks
MICR	maximum individual cancer risk
MMcfd	million cubic feet per day
MMTCO2e/yr	million metric tons of CO2e per year
MPO	Metropolitan Planning Organization
MRZ	Mineral Resource Zone
M-SC	Manufacturing Service - Commercial
MSHCP	Multiple Species Habitat Conservation Plan
MTCO2e	metric tons of carbon dioxide equivalents
MWD	Metropolitan Water District
N2	nitrogen
N2o	Nitrous Oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NCCP	Natural Community Conservation Planning Act
NEPSSA	Narrow Endemic Plant Species Survey Area
NERC	North American Electric Reliability Corporation

ACRONYMS AND ABBREVIATIONS (CONT'D)

Acronym	Definition
NESHAP	National Emissions Standards for Hazardous Air Pollutants
NF3	nitrogen trifluoride
NHL	National Historic Landmark
NHPA	National Historic Preservation Act
NIOSH	National Institute for Occupational Safety and Health
NMFS	National Marine Fisharies Service
NO	nitric oxide
NO2	Nitrogen dioxide
NOP	Notice of Preparation
NOx	Nitrogen oixides
NPDES	National Pollutant Discharge Elimination System
NPL	National Priority List
NPPA	Native Plant Protection Act
NPS	Non-Point Source
NRHP	National Register of Historic Places
O2	oxygen
O3	ozone
OAL	Office of Administrative Law
OCP	organo-chlorinated pesticides
OEHHA	Office of Environmental Health Hazard Assessment
OHWM	Ordinary High Water Mark
OPR	Office of Planning and Research
OS-C	Open Space - Conservation
OSHA	Occupational and Safety Health Act
PA	Production/Attraction
Pb	Lead
PCBs	polychlorinated byphenyls
PFC	perfluorocarbons
PG&E	Pacific Gas and Electric
PM	Particulate Matter
ppb	parts per billion
pph	persons per household
ppm	parts per million
ppt	parts per trillion
PPV	Peak Particle Velocity
PRC	Public Resources Code
PUC	Public Utilities Commission
PV	photovoltaic

ACRONYMS AND ABBREVIATIONS (CONT'D)

Acronym	Definition
R-1-10,000	One Family Dwellings, 10,000 s.f. Minimum Lot Sizes
R-A	Residential Agriculture
RCDWR	Riverside County Department of Waste Resources
RCFCWCD	Riverside County Flood Control and Water Conservation District
RCFD	Riverside County Fire Department
RCHNA	Riverside County Habitat Conservation Agency
RC-LDR	Rural Community - Low Density Residential
RCPLS	Riverside County Public Library System
RCRA	Resource Conservation and Recovery Act
RCSD	Riverside County's Sheriff's Department
RCSD	Riverside County Sheriff's Department
RCTC	Riverside County Transportation Commission
RC-VLDR	Rural Community - Very Low Density Residential
REC	Recognized Environmental Condition
RHNA	Regional Housing Needs Assessment
RIVTAM	Riverside Transportation Analysis Model
RM	Rural Mountainous
ROG	reactive organic gases
ROW	Right of Way
RPF	Registered Professional Forester
RPOSD	Riverside County Regional Park and Open Space District
RPS	Renewables Portfolio Standard
RPS	Renewable Porfolio Standard
RPW	Relatively Permanent Water
RSHA	Regional System of Highways and Arterials
RSL	Regional Screening Level
RTA	Riverside Transit Agency
RTIP	Regional Transportation Improvement Plan
RTOA	Regional Transportation Planning Agency
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RUSD	Riverside Unified School District
RWQCB	Regional Water Quality Control Board
RWQCP	Riverside Water Quality Control Plant
s.f.	square foot
SAA	Steambed Alteration Agreement
SAFE	Safer Affordable Fuel-Efficient
SARA	Superfund Amendments and Reauthorization Act
SB	Senate Bill
SBBA	San Bernadino Basin
SCAB	South Coast Air Basin

ACRONYMS AND ABBREVIATIONS (CONT'D)

Acronym	Definition
SCAB	Southern California Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SCH	State Clearinghouse
SCS	Sustainable Communities Commission
SCS	sustainable communities strategy
SDAB	San Diego Air Basin
SDG&E	San Diego Gas and Electric
SDWA	Safe Drinking Water Act
SED	Socio-economic Data
SEMS	Superfund Enterprise Management System
SF6	sulfer hexaflouride
SFP	School Facilities Program
SGC	Strategic Growth Council
SGMA	Sustainable Groundwater Management Act
SHA	Safe Harbor Agreement
SHMA	Seismic Hazards Mapping
SHPO	State Historic Preservation Office
SHRC	State Historical Resources Commission
SIC	Standard Industrial Classification Code
SIP	State implementation plans
SJVUAPCD	San Joaquin Unified Air Pollution Control District
SKR HCP	Stephens' Kangaroo Rat Habitat Conservation Plan
SLF	Sacred Lands File
SLIC	Spills, Leaks, Investigation and Cleanup Cost Recovery Listing
SLPS	Short-Lived Climate Pollutant Strategy
SMARA	Surface Mining and Reclamation Act of 1975
SNURs	Significant New Use Rules
SO2	sulfur dioxide
SO4	sulfates
SOC	Statement of Overriding Considerations
SOI	Sphere of Influence
SOx	sulfur oxides
SR	State Route
SRA	Source Receptor Area
SRA	State Responsibility Area
STA	State Transit Assistance
STIP	Statewide Transportation Improvement Program
STP	Shovel Test Pits
SWAT	Solid Waste Assessment Test

ACRONYMS AND ABBREVIATIONS (CONT'D)

Acronym	Definition
SWF/LF	Solid Waste Fill/Landfill
SWP	State Water Project
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
SWRCY	Solid Waste Recycling Facilities
TA	Traffic Analysis
TAC	Toxic Air Contaminants
TAZ	Traffic Analysis Zone
TDA	Transportation Development Act
TDM	Transportation Demand Management
TEA-21	Transportation Equity Act for the 21st Century
THP	Timber Harvesting Plan
TNW	Traditionally Navigable Water
TODs	Transit Oriented Developments
tpd	tons per day
TSCA	Toxic Substances Control Act
TTM	Tentative Tract Map
TUMF	Transportation Uniform Mitigation Fee
U.S.	United States
USACE	United States Army Corps of Engineers
USCB	United States Census Bureau
USDA	United States Department of Agriculture
USFWS	United States Fish and Wildlife Service
USGS	United States Geographical Survey
UST	Underground Storage Tank
UWIG	Urban /Wildlife Interface Guidelines
UWMP	Urban Water Management Plan
VHFHSZ	Very High Fire Hazard Severity Zones
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compounds
WDR	Water Discharge Requirement
WMIE	Waste Management of the Inland Empire
WMUDS	Waste Management Unit Database System
WMWD	Western Municipal Water District
WQMP	Water Quality Management Plan
WRCOG	Western Riverside Council of Governments
WRRA	Waste Reuse and Recycling Act

ACRONYMS AND ABBREVIATIONS (CONT'D)

Acronym	Definition
WSA	Water Supply Assessment
WTP	Water Treatment Plant
ZORI	Zones of Required Investigation

S.0 EXECUTIVE SUMMARY

S.1 INTRODUCTION

The California Environmental Quality Act (CEQA), Public Resources Code Section 21000, *et seq.* requires that before a public agency makes a decision to approve a project that could have one or more adverse effects on the physical environment, the agency must inform itself about the project's potential environmental impacts, give the public an opportunity to comment on the environmental issues, and take feasible measures to avoid or reduce potential harm to the physical environment.

This Draft Environmental Impact Report (EIR), having California State Clearinghouse (SCH) No. 2023030118, was prepared in accordance with CEQA Guidelines Article 9, §§ 15120-15132 to evaluate the potential environmental impacts associated with planning, constructing, and operating the proposed Project, which herein consists of applications for a General Plan Amendment (GPA220009), Change of Zone (CZ2200031), and Tentative Tract Map (TTM38510), which are collectively referred to herein as the "Project" or "proposed Project." This EIR does not recommend approval or denial of the proposed Project; rather, this EIR is a source of factual information regarding potential impacts that the Project may cause to the physical environment. The Draft EIR will be available for public review for a minimum period of 45 days. After consideration of public comment, the County of Riverside will consider certifying the Final EIR and adopting required findings.

This Executive Summary complies with CEQA Guidelines Section 15123, "Summary." This EIR includes a description of the proposed Project and evaluates the physical environmental effects that could result from Project implementation. The County of Riverside determined that the scope of this EIR should cover 21 subject areas. The scope includes all of the subject areas listed in Appendix G to the CEQA Guidelines and in consideration of public comment received by the County in response to this EIR's Notice of Preparation (NOP) and during a publicly-noticed Scoping Session, which occurred on March 3, 2023. The NOP, and written comments received by the County in response to the NOP, are attached to this EIR as *Technical Appendix A*. In consideration of public comment on the NOP, the 21 environmental subject areas that could be reasonably and significantly affected by planning, constructing, and/or operating the proposed Project are analyzed herein, including:

1. Aesthetics
2. Agriculture and Forestry Resources
3. Air Quality
4. Biological Resources
5. Cultural Resources
6. Energy
7. Geology and Soils
8. Greenhouse Gas Emissions
9. Hazards and Hazardous Materials
10. Hydrology and Water Quality
11. Land Use and Planning
12. Mineral Resources
13. Noise
14. Paleontological Resources
15. Population and Housing
16. Public Services
17. Recreation
18. Transportation
19. Tribal Cultural Resources
20. Utilities and Service Systems
21. Wildfire

Refer to EIR Section 4.0, *Environmental Analysis*, for a full account and analysis of the subject matters listed above. For each of the aforementioned subject areas, this EIR describes: 1) the physical conditions that existed at the approximate time this EIR's NOP was filed with the California State Clearinghouse (March 3, 2023); 2) discloses the type and magnitude of potential environmental impacts resulting from Project planning, construction, and operation; and 3) if warranted, recommends feasible mitigation measures that would reduce or avoid significant adverse environmental impacts that the proposed Project may cause. A summary of the proposed Project's significant environmental impacts and the mitigation measures imposed by the County of Riverside on the Project to lessen or avoid those impacts is included in this Executive Summary as Table S-1, *Summary of Impacts, Mitigation Measures, and Conclusions*. The County of Riverside applies mitigation measures that it determines: 1) are feasible and practical for project applicants to implement; 2) are feasible and practical for the County of Riverside to monitor and enforce; 3) are legal for the County to impose; 4) have an essential nexus to the Project's impacts; and 5) would result in a benefit to the physical environment. CEQA does not require the Lead Agency to impose mitigation measures that are duplicative of mandatory regulatory requirements.

This EIR also discusses alternatives to the proposed Project. Alternatives are described that would attain most of the Project's objectives while avoiding or substantially lessening the proposed Project's significant adverse environmental effects. A full discussion of Project alternatives is found in Section 6.0, *Alternatives*.

S.2 PROJECT SYNOPSIS

S.2.1 LOCATION AND REGIONAL SETTING

As depicted on EIR Figure 2-2, the Project site is located within the Woodcrest community of the Lake Mathews/Woodcrest Area Plan (LMWAP) of unincorporated Riverside County. More specifically, the 140.8-acre Project site is bound to the south by Iris Avenue and to the east by Chicago Avenue. Under existing conditions, the northwestern portions of the Project site consist of natural open space, while a single-family home and several ancillary structures are located in the east-central portions of the Project site. The remaining portions of the Project site were previously used for agricultural production (orchards), although the orchards were removed from the Project site in 2020/2021 and the trees were chipped and spread across the Project site. Under existing conditions, the Project site generally is surrounded by rural residential uses, with exception of natural open space areas located to the west of the property and medium-density residential uses to the south of Van Buren Boulevard. The Project site encompasses Assessor Parcel Numbers (APNs) 245-300-001 and 245-300-004. The 140.8-acre Project site is located in Section 24, Township 3 South, Range 5 West, San Bernardino Baseline and Meridian. Refer to EIR Section 2.0 for a detailed description of the local setting and surrounding land uses.

S.2.2 PROJECT OBJECTIVES

The underlying purpose of the proposed Project is to develop a low-density residential community that minimizes impacts to the Woodcrest community and preserves sensitive environmental resources. The following is a list of specific objectives that the proposed Project intends to achieve.

A. To efficiently develop an underutilized property with low-density residential uses with a range of lot sizes while preserving, to the maximum extent feasible, areas on site that contain sensitive environmental resources, including major site drainages.

B. To ensure land use compatibility with the surrounding community by accommodating larger lots at northern, eastern, and southern portions of the property to serve a land use transition between the existing rural residential uses in the surrounding community and smaller residential lot sizes.

E. To develop a residential community with a design that takes topographic, geologic, hydrologic, and environmental opportunities and constraints into consideration.

F. To increase the available housing supply within the region by providing detached single-family homes that will be marketable within the evolving economic profile of Riverside County and surrounding communities.

G. To assist Riverside County in meeting its Regional Housing Needs Assessment (RHNA) allocation by developing low density residential uses.

H. To provide a system of public and community facilities, including recreational facilities, in an efficient and timely manner in order to meet the needs of Project residents.

S.2.3 Project Summary Description

The proposed Project consists of applications for a General Plan Amendment (GPA220009), Change of Zone (CZ2200031), and Tentative Tract Map (TTM38510). Collectively, approval of these applications would allow for the future development of the 140.8-acre Project site with 231 single-family dwelling units, a trailhead/parking area, a sewer lift station, three water quality basins, and natural open space areas with associated trails. A new intersection would be created along Iris Avenue to provide access to the site, while the alignment of Chicago Avenue through the Project site has been designed to divert Project-related traffic away from the existing rural residential community to the north and east of the Project site. This EIR analyzes the physical effects associated with all components of the proposed Project, including planning, construction, and ongoing operation.

Specifically, the Project Applicant is requesting the following governmental approvals from Riverside County to implement the Project (refer to Chapter 3.0, *Project Description*, for a complete description of the Project's construction and operational characteristics):

- **General Plan Amendment No. 220009 (GPA No. 220009)** would modify the General Plan and LMWAP land use designations for the 140.8-acre Project site. Under existing conditions, the Project site is designated "Rural Community – Very Low Density Residential (RC-VLDR)." As part of GPA No. 220009, the 140.8-acre Project site would be redesignated to "Rural Community – Low Density Residential (RC-LDR)." The RC-LDR land use designation is intended to accommodate single-family detached residences on large parcels of 0.5 to 1 acre, as well as limited agriculture, including equestrian and animal keeping uses.

- **Change of Zone No. 2200031** would change the Project site's zoning classification to accommodate the proposed development. Under existing conditions, the Project site is zoned "Light Agriculture, 10-Acre Minimum Lot Size (A-1-10)." As part of CZ2200031, the zoning classification for the 140.8-

acre Project site would be changed to "One Family Dwellings, 10,000 s.f. Minimum Lot Sizes (R-1-10,000)." The R-1-10,000 zoning classification allows for one-family dwellings and limited agricultural uses on minimum 10,000 square foot (s.f.) lot sizes.

- **Tentative Tract Map No. 38510 (TTM No. 38510)** would subdivide the approximately 140.8-acre Project site to accommodate a total of 231 residential lots on 87.57 acres, a sewer lift station on 0.25-acre, three water quality basins on 5.39 acres, four open space lots on 23.82 acres, a trail head and associated parking on 0.62-acre, and roadway dedications on 23.14 acres. Proposed residential lots would include a mixture of minimum lot sizes ranging from 0.25-acre to 1.0 acre, with individual lots ranging in size from 10,890 s.f. to 46,129 s.f. The average lot size would be 16,517 s.f. (net). Larger lots (minimum one-acre and 0.75-acre lots) are generally proposed along the northern and eastern site boundaries, medium-sized lots (0.3-acre) are proposed along the southern boundary, while 0.25-acre lots are proposed in the interior portions of the Project site.

S.3 Areas of Controversy and Issues to be Resolved

CEQA Guidelines § 15123(b)(2) requires that areas of controversy known to the Lead Agency (Riverside County) be identified in the Executive Summary. Substantive issues raised in response to the NOP are summarized in Table 1-1 in EIR Section 1.0. 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, Project impacts to the environment under the issues of air quality, cultural resources, greenhouse gas emissions, and tribal cultural resources were identified as potential areas of concern.

S.4 Project Alternatives

S.4.1 No Development Alternative (NDA)

The No Development Alternative (NDA) considers no development/disturbance on the Project site beyond that which occurs under existing conditions. As such, the Project site would continue to consist of 140.8 acres, the east central portion of which contains an existing single family home and the remaining portions are open space. Under the NDA, no improvements would be made to the Project site and none of the Project's roadway, utility, or other infrastructure improvements would occur. This alternative was selected by the Lead Agency to compare the environmental effects of the proposed Project with an alternative that would leave the Project site in its existing condition.

S.4.2 No Project Alternative (NPA)

The No Project Alternative (NPA) assumes development of the Project site in accordance with the site's existing General Plan and land uses. The Project site is located within the LMWAP portion of the Riverside County General Plan. As shown on Figure 2-5 in EIR Subsection 2.0, the Project is designated for "Rural Community – Very Low Density Residential (RC-VLDR)" land uses by the General Plan and the LMWAP. According to Appendix E to the General Plan, RC-VLDR land uses are anticipated to be developed at a midpoint density of 0.75 dwelling units per acre (du/ac). Thus, under this alternative, the 140.8-acre Project

site would be developed with 106 Very Low Density Residential dwelling (minimum 1-acre lot sizes) on approximately 88.09 acres of the Project site, a sewer lift station on approximately 0.25-acre, water quality basins on 5.39 acres, open space on 23.75 acres, and roadways on 22.77 acres. Open space areas and roadway improvements under this alternative would be similar to those proposed as part of the Project. This alternative was selected by the Lead Agency to compare the environmental effects of the proposed Project with an alternative that would allow for buildout of the Project site in accordance with the site's existing General Plan and LMWAP land use designations.

S.4.3 High Density Residential Alternative (HDRA)

Under the High Density Residential Alternative (HDRA), approximately 5.5 acres of the Project site located along Iris Avenue west of Chicago Avenue would be developed with up to 110 very high density single-family attached dwelling units, with the remaining portions of the Project site remaining in their existing condition. Implementation of the HDRA would require a Foundation Component General Plan Amendment (FGPA) to change the site's adopted General Plan and LMWAP land use designation from "Rural Community – Very Low Density Residential (RC-VLDR)" to "Community Development - Very High Density Residential (VHDR)." Pursuant to the Riverside County General Plan Administration Element, FGPAs are required for any change from the "Rural Community" Foundation Component to the "Community Development" Foundation Component, and FGPAs only may be approved during the County's designated 8-year cycle, with the most recent 8-year FGPA cycle having occurred in 2024. Thus, implementation of the HDRA would not occur until at least 2032. The High Density Residential Alternative (HDRA) has been identified in order to consider an alternative that would allow for some residential development on site, while avoiding the Project's significant and unavoidable impacts due to VMTs and reducing to the maximum feasible extent the Project's significant and unavoidable impacts to agricultural resources and TCRs.

S.4.4 Environmentally Superior Alternative

State CEQA Guidelines § 15126.6 requires the identification of the environmentally superior alternative. As discussed herein, implementation of the NDA would result in no physical environmental impacts beyond those that have already occurred on the property. Because the NDA would avoid all of the Project's impacts, it warrants consideration as the "environmentally superior alternative." However, pursuant to State CEQA Guidelines § 15126.6(e)(2), if a no project alternative is identified as the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives. Accordingly, the HDRA, as discussed herein in EIR subsection 6.3.3, is identified as the Environmentally Superior Alternative pursuant to CEQA Guidelines § 15126.6 because it would result in a substantial reduction in environmental impacts in comparison to the Project, and would avoid the Project's significant and unavoidable impacts due to VMT.

S.5 EIR Process

As a first step in the CEQA compliance process, Riverside County determined that the proposed Project likely would result in significant environmental effects, and distributed a Notice of Preparation (NOP) for public review on March 3, 2023. An Initial Study was not prepared for the Project, and thus this EIR evaluates all of the environmental subjects listed in Appendix G to the CEQA Guidelines, as set forth in the County's standard Environmental Assessment Checklist form. This EIR has been prepared as a Project EIR pursuant to CEQA Guidelines § 15161. As described by CEQA Guidelines § 15161, a Project EIR is the most common type of

EIR that: 1) examines the environmental impacts of a specific development project; 2) should focus primarily on the changes in the environment that would result from the development of the project; and 3) shall 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, the County of Riverside will consider the following issues regarding the proposed Project: a) evaluation of this EIR to determine if the physical environmental impacts are adequately disclosed; b) assessment of 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) consideration of alternatives to the Project that would reduce or eliminate significant environmental effects of the Project; and, if necessary, d) consideration of Project benefits that override the Project's unavoidable and unmitigable significant effects on the environment.

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 (CEQA Guidelines §§ 15090-15093).

S.6 Summary of Impacts, Mitigation Measures and Conclusions

S.6.1 Effects Found Not to be Significant

An Initial Study was not prepared for the proposed Project because the County determined that an EIR clearly was required. As such, this EIR evaluates all of the environmental topics identified in Appendix G to the CEQA Guidelines and in the County's standard Environmental Assessment Checklist form. There were no issues found to be not significant as a result of the Project's NOP process.

S.6.2 Impacts of the Proposed Project

Table S-1, *Summary of Impacts, Mitigation Measures, and Conclusions*, provides a summary of the proposed Project's environmental impacts, as required by CEQA Guidelines § 15123(a). Also presented are the mitigation measures recommended by Riverside County to further avoid adverse environmental impacts or to reduce their level of significance. After the application of all feasible mitigation measures, the Project would result in significant and unavoidable environmental effects, as summarized below.

- Agriculture and Forestry Resources: Significant and Unavoidable Direct and Cumulatively-Considerable Impact. The Project would result in the conversion of approximately 56.8 acres of "Farmland of Statewide Importance," approximately 50.6 acres of "Unique Farmland," approximately 2.4 acres of "Farmland of Local Importance" to non-agricultural use. There are no feasible mitigation measures for impacts associated with converting Farmland to non-agricultural use. On-site mitigation

would not be feasible, as development of the Project site with 232 single-family homes cannot co-exist with agricultural uses, and restricting a small portion of the land for agricultural uses would not be economically feasible for agricultural operations. Further, it would not be economically viable for the Project Applicant to reserve all or a portion of the Project site for agricultural uses, as reservation of the land would negatively affect the Project Applicant's rate of return on its investment. Off-site mitigation also would not be feasible. Available agricultural land within the general Project area is subject to the identical market conditions and challenges that other agricultural operations have faced before making the decision to cease operating or relocate; namely, market pressures related to urbanization, increasing expenses, and declining profitability. As discussed in the General Plan EIR (SCH No. 2009041065), similar agriculture operations either are in the process of converting to urbanized land uses, or are relatively small and surrounded by urban development on all sides. As development in Riverside County continues, these locations will become less viable for agriculture, and significant agricultural operations are not likely to continue. Therefore, off-site mitigation would be economically infeasible, or would be precluded due to the unavailability of appropriate mitigation land. Accordingly, feasible mitigation is not available to reduce impacts associated with the conversion of approximately 56.8 acres of "Farmland of Statewide Importance," approximately 50.6 acres of "Unique Farmland," and approximately 2.4 acres of "Farmland of Local Importance" to non-agricultural use.

- Transportation: Significant and Unavoidable Direct and Cumulatively-Considerable Impact. Buildout of the residential uses proposed as part of the Project would result in a vehicle miles traveled (VMT) per capita that is 30.8% above the County's VMT per capita threshold of significance. As noted by the County Guidelines, Transportation Demand Management (TDM) strategies have been evaluated for the purpose of reducing VMT impacts determined to be potentially significant through use of the California Air Pollution Control Officers Association (CAPCOA) Handbook for Analyzing Greenhous Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity (2021 Handbook). For residential land use projects, the 2021 Handbook provides a list of Neighborhood Design measures that reduce VMT. However, the maximum achievable reduction for these measures as noted in the 2021 handbook is limited to 10%. Therefore, even with implementation of all feasible trip reduction measures, including those listed in Mitigation Measure MM 4.18-2, the Project would be unable to reduce its VMT impact to below the impact threshold. It is also recognized that as the Project area and surrounding communities develop as envisioned under the County of Riverside's General Plan, new residential, retail, and other development would be implemented. These actions could collectively alter transportation patterns, improve the region's jobs/housing ratio, reduce VMT, and support implementation of new or alternative TDM measures. There are no means currently, however, to quantify any VMT reductions that could result from such future growth patterns. Accordingly, even with implementation of Mitigation Measure MM 4.18-2, Project impacts due to VMT would remain significant and unavoidable.

- Tribal Cultural Resources: Significant and Unavoidable Direct and Cumulatively-Considerable Impact: Implementation of the proposed Project would result in direct physical impacts to approximately 0.61 acre of the overall 12.17 acres mapped for Site P-33-12915/CA-RIV-7181, and would impact approximately 1.00 acre of the overall 3.80 acres mapped for Site P-33-12916/CA-RIV-7182, both of which are considered tribal cultural resources. In addition, the Project would result in

direct impacts to Sites CA-01, CAR-04, CAR-05, CAR-08, CAR-10, and CAR-13-1, and *portions* of CA-RIV-7184, all of which are assumed to comprise potential tribal cultural resources. The Project site also has been identified as a component of a TCR landscape; thus, development of the Project site with residential uses would result in a potentially significant impact to the TCR landscape. While implementation of Mitigation Measures MM 4.5-1 through 4.5-13 would reduce impacts to tangible tribal cultural resources identified on site, it has been determined that the Project's impacts to the TCR landscape would remain significant even with implementation of the required mitigation measures. There are no feasible mitigation measures available to reduce the Project's impacts to the TCR landscape to below a level of significance; thus, Project impacts to Tribal Cultural Resources would remain significant and unavoidable.

Table S-1 Summary of Impacts, Mitigation Measures, and Conclusions

Summary of Impacts	Significance Determination	Mitigation Measures (MM) and Regulatory Requirements (RR)	Responsible Parties	Monitoring Parties	Implementation Stage
4.1 Aesthetics					
Threshold a: There are no officially-designated scenic highway corridors in the Project vicinity or viewshed. The closest State-designated scenic highway to the Project site is SR 243, which is located approximately 27.1 miles east of the Project site. The closest County-eligible scenic highway is El Sobrante Road, which is located approximately 3.7 miles southwest of the Project site. Due to distance and intervening topography, the Project site would not be visible from any portion of an officially-designated or eligible scenic highway corridor, and impacts would be less than significant.	Less-than-Significant Impact	**RR 4.1-1:** The Project is required to comply with Riverside County Ordinance No. 915, which 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 or degrade their quality of life.	Project Applicant, Future Building Occupants	As specified by Ordinance No. 915	As specified by Ordinance No. 915
Thresholds b. and c: The Project site is largely disturbed and implementation of the Project would not result in any damage to scenic resources including trees, rock outcroppings, unique or landmark features, or scenic vistas available to the public. The Project would appear as a continuation of the existing rural residential development pattern in the area, and there are no components of the Project that would result in the creation of an aesthetically offensive site open to public view. The Project also would be subject to compliance with the applicable zoning provisions of Ordinance No. 348, and would be required to comply with all other applicable County ordinances governing scenic quality. Therefore, the Project would not result in the creation of an aesthetically offensive site open to public view. The Project also would not degrade the existing visual character or quality of public views of the site and its surroundings. Impacts would be less than significant.	Less-than-Significant Impact				
Threshold d.: The Project site is located	No Impact				

Summary of Impacts	Significance Determination	Mitigation Measures (MM) and Regulatory Requirements (RR)	Responsible Parties	Monitoring Parties	Implementation Stage
approximately 1.1 miles north of the limits of Zone B of the Mt. Palomar Lighting Policy area. Therefore, the Project is not subject to the provisions of Ordinance No. 655. As such, the Project has no potential to impact the nighttime use of Mt. Palomar Observatory as protected through Riverside County Ordinance No. 655, and no impact would occur. Thresholds e. and f.: Development on the Project site would be subject to Riverside County Ordinance No. 915. None of the Project's proposed building materials would consist of reflective materials, except for the proposed windows, which would not be mirrored and would have similar low-potential glare characteristics as do other glass windows on residential buildings in the Project vicinity. Impacts would be due to light and glare less-than-significant.	Less-than-Significant Impact				
4.2 Agriculture and Forestry Resources					
Threshold a: The Project would result in the conversion of approximately 56.8 acres of "Farmland of Statewide Importance," approximately 50.6 acres of "Unique Farmland," approximately 2.4 acres of "Farmland of Local Importance" to non-agricultural use. As previously indicated, between 2014 and 2016, Riverside County had a decline in "Important Farmlands" of approximately 0.9%. The Project would contribute towards the loss of "Important Farmland" within Riverside County because agricultural production on site would be permanently precluded with implementation of the proposed Project. This represents a significant impact of the proposed Project on both a direct and cumulatively-considerable basis for which feasible mitigation measures are not available.	Significant and Unavoidable Impact	**RR 4.2-1:** Prior to Project occupancy, the provisions of Riverside County 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.	Project Applicant, Future Building Occupants	Riverside County Planning Department	Prior to Project occupancy

Summary of Impacts	Significance Determination	Mitigation Measures (MM) and Regulatory Requirements (RR)	Responsible Parties	Monitoring Parties	Implementation Stage
Threshold b: The Project Applicant is proposing to rezone the Project site for "One Family Dwellings, 10,000 s.f. Minimum Lot Sizes (R-1-10,000)" land uses as part of Change of Zone No. 2200031 (CZ2200031), which is not an agricultural zoning classification pursuant to Ordinance No. 625. Therefore, with approval of CZ2200031, the Project would not conflict with existing agricultural zoning, and no impact would occur. There are no components of the proposed Project that could result in indirect impacts to off-site agricultural uses. The Project site is not subject to a Williamson Act contract and is not located within any County Agricultural Preserves, and with mandatory compliance with Riverside County Ordinance No. 625 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. Impacts would be less than significant.	Less-than-Significant Impact				
Threshold c: Although the Project site occurs within 300 feet of agriculturally-zoned property located north and east of the Project site, 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 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.	Less-than-Significant Impact				
Threshold d.: Assuming mandatory compliance with Riverside County Ordinance	Less-than-Significant Impact				

Summary of Impacts	Significance Determination	Mitigation Measures (MM) and Regulatory Requirements (RR)	Responsible Parties	Monitoring Parties	Implementation Stage
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.: 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.	No Impact				
4.3 Air Quality					
Threshold a: The Project's regional and localized construction- and operational-source emissions would not exceed applicable regional significance thresholds or LSTs. Additionally, although the Project is inconsistent with the site's existing General Plan land use designation and zoning classification, the analysis of Thresholds b. and c. demonstrates that the Project's construction and long-term operational activities would not exceed any of the SCAQMD Regional Thresholds or LSTs. As such, the Project would not conflict with or obstruct implementation of the applicable air quality plan, and impacts would be less than significant. Threshold b.: Project construction-and operational-related regional emissions would not exceed any of the SCAQMD Regional Thresholds for criteria pollutants. As such, Project regional construction- and operational-related emissions would not 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, and impacts	Less-than-Significant Impact Less-than-Significant Impact	**RR 4.3-1:** 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, Riverside 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 Riverside County 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.	Project Applicant, Construction Contractors	SCAQMD, Riverside County Building & Safety Department	During construction activities

Summary of Impacts	Significance Determination	Mitigation Measures (MM) and Regulatory Requirements (RR)	Responsible Parties	Monitoring Parties	Implementation Stage
would be less than significant. Threshold c.: Project-related construction emissions would not exceed the SCAQMD LSTs for any criteria pollutant, and long-term operation of the Project would not expose sensitive receptors to substantial pollutant concentrations. The Project would not produce the volume of traffic required to generate a CO "hot spot." Given the distance of the Project from surrounding sensitive receptors, the dominant wind patterns blowing to the northwest away for receptors, and the annual $PM_{2.5}$ emissions from equipment during each year of construction, any DPM generated from construction activity would result in less-than-significant ground-level concentrations of DPM and would not result in a significant health risks to nearby sensitive receptors. Therefore, the Project would not expose sensitive receptors, which are located within one (1) mile of the Project site, to substantial pollutant concentrations, and impacts would be less than significant. Threshold d.: The Project does not propose land uses typically associated with emitting objectionable odors. Standard construction requirements would minimize odor impacts from construction. Additionally, it is expected that Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with Riverside County Ordinance No. 745. The proposed Project also would be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. The Project also would be required to comply with California Code of Regulations (CCR), Title 13, Sections 2449(d)(3) and 2485, which minimize the idling time of construction equipment. The Project also would also comply with the SCAQMD (Southern Coast Air	Less-than-Significant Impact Less-than-Significant Impact	**RR 4.3-2:** The Project is required to comply with the provisions of South Coast Air Quality Management District Rule 113, *Table of Standards*, by requiring that all architectural coatings must consist of low VOCs (i.e., VOCs of less than 50 grams per liter [g/L]) unless otherwise specified in the SCAQMD Table of Standards. **RR 4.3-3:** 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 431.2 (Low Sulfur Fuel) and Rule 1186 / 1186.1 (Street Sweepers). **RR 4.3-4:** 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.	Project Applicant, Construction Contractors Project Applicant, Construction Contractors Project Applicant, Construction Contractors, Future Building Tenants	Riverside County Building & Safety Department, SCAQMD SCAQMD, Riverside County Building and Safety Department SCAQMD	During construction activities involving architectural coatings During construction activities As specified by Rule 402

Summary of Impacts	Significance Determination	Mitigation Measures (MM) and Regulatory Requirements (RR)	Responsible Parties	Monitoring Parties	Implementation Stage
Quality Management District) Regulation XI, Rule 1113 – Architectural Coating, which would minimize odor impacts from VOC emissions during architectural coating. The proposed system for the sewer lift station has been designed to efficiently pump out wastewater multiple times per hour, would include redundancies to prevent failure, and would be required to include odor control measures in conformance with County standards. Therefore, odors associated with the proposed Project construction and operations would be less than significant and no mitigation is required.					
4.4 Biological Resources					
Threshold a.: The Project would not conflict with the 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. However, the Project would result in permanent impacts to approximately 0.24-acre of MSHCP Section 6.1.2 riparian/riverine habitat within Drainage 1. Thus, prior to mitigation, the Project's anticipated impacts to MSHCP Section 6.1.2 would represent potentially significant impacts. The Project would also result in impacts to 0.24-acre of southern willow scrub plant that provides moderate quality habitat for the State- and federally-listed endangered least Bell's vireo. Additionally, the Project has the potential to result in impacts to the burrowing owl, if the site were to become occupied prior to commencement of construction activities; thus, prior to mitigation, potential impacts to the burrowing owl represent a conflict with MSHCP Section 6.3.2. Implementation of Mitigation Measure MM 4.4-1 would ensure that Project impacts to 0.24-acre of MSHCP	Less than Significant with Mitigation Incorporated	**RR 4.4-1:** 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*. **RR 4.4-2:** Prior to issuance of grading permits, the Project Applicant shall make payment of fees in accordance with the Stephen's Kangaroo Rat Habitat Conservation Plan pursuant to Riverside County Ordinance No. 663, *Establishing the Riverside County Stephens' Kangaroo Rat Habitat Conservation Plan and Setting Mitigation Fees*. **RR 4.4-3:** Prior to issuance of grading permits or other permits authorizing ground-disturbing activities associated with the Project, the Project Applicant shall provide the Riverside County Planning Department with copies of the appropriate Wildlife Agency permits to address impacts to approximately 0.14-acre of Regional Board jurisdictional waters and 0.24-acre of CDFW jurisdictional streambed. Permits required include, but may not be limited to, a Waste Discharge Order pursuant to Section 13260 of the California Water Code from the Santa Ana Regional Water Quality Control Board (Regional Board), and a Section 1602 Streambed Alteration Agreement (SAA) from the California Department of Fish and Wildlife (CDFW).	Project Applicant Project Applicant Project Applicant	Riverside County Planning Department, CDFW Riverside County Planning Department, CDFW Riverside County Planning Department, CDFW, Regional Board, Corps	Prior to the issuance of grading permits Prior to the issuance of grading permits Prior to issuance of grading permits or other permits authorizing ground-disturbing activities.

Summary of Impacts	Significance Determination	Mitigation Measures (MM) and Regulatory Requirements (RR)	Responsible Parties	Monitoring Parties	Implementation Stage
Section 6.1.2 riparian/riverine habitat within Drainage 1 are mitigated through the management of 2.75 acres of riparian/riverine habitat onsite. Implementation of Mitigation Measures MM 4.4-2 and MM 4.4-3 would ensure that appropriate fencing is installed in order to mitigate impacts due to onsite development. Implementation of Mitigation Measures MM 4.4-4 and MM 4.4-5 would preclude indirect effects to the preserved riparian/riverine habitat on site during both construction and long-term operation. Implementation of Mitigation Measure MM 4.4-6 would ensure that appropriate pre-construction surveys are conducted prior to ground disturbing and rock blasting activities, in accordance with MSHCP Objective 6 for the burrowing owl. Implementation of Mitigation Measure MM 4.4-7 would require pre-construction surveys for nesting bird species, including the least Bell's vireo, and requires the avoidance with appropriate buffers for any active nests identified during the nesting season (February 1st through August 31st). Implementation of Mitigation Measure MM 4.4-8 would ensure that all ground-disturbing activities are monitored by a biological monitor and would ensure that impacts to biological resources are avoided or properly addressed. Impacts would be reduced to less-than-significant levels. Thresholds b. and c.: The Project ~~-~~would not result in any impacts to special status plants. However, there is a potential for the Project site to become occupied by burrowing owls prior to commencement of construction activities. Additionally, territories ~~-~~fo~~o~~r the least Bell's vireo were detected on-site during the 2024 focused surveys. A total of 0.24-acre of permanent and temporary impacts to suitable habitat for and occupied by least Bell's vireo	Less than Significant with Mitigation Incorporated	**MM 4.4-1** In order to mitigate Project impacts to 0.14-acre of RWQCB jurisdiction, 0.24-acre of CDFW jurisdiction (consisting of 0.24-acre of southern willow scrub), and 0.24-acre of MSHCP Section 6.1.2 riparian/riverine resources (consisting of 0.24-acre of southern willow scrub), prior to final building inspection a conservation easement shall be placed over the 2.75 acres of riparian/riverine habitat onsite. A Habitat Mitigation Monitoring and Reporting Program shall be prepared to be approved by the County of Riverside Environmental Programs Division, Western Riverside County Regional Conservation Authority and regulatory agencies. Invasive plant species shall be removed to enhance the riparian/riverine habitat onsite and the Project Applicant shall replant the impacted areas with native landscaping. **MM 4.4-2** In order to mitigate impacts to riparian/riverine resources and least Bell's vireo, prior to final building inspection the Project Applicant shall preserve and enhance approximately 92% of the onsite drainage features. The Project Applicant shall install six-foot solid concrete masonry walls on an average of approximately 98 feet from the edge of the riparian habitat to act as a buffer between the riparian habitats within Drainage 1 and 2 and onsite development. Double picket tubular steel fencing with gaps no greater than 2" shall be installed along the backyards of Lots 87 through 90 as to prevent cats from crossing the fence line. **MM 4.4-3** In order to mitigate impacts to riparian/riverine resources and least Bell's vireo, prior to final building inspection the Project Applicant shall fence the onsite trail with a four-foot high wood split rail fence with wire mesh covering the entire width and height of the fence to deter pedestrians and dogs from entering into the riparian riverine habitat. The trail shall have posted signs at all trail entrances reflecting limited hours of use to the trail, signage to enforce dogs on leash at all times, as well as cautionary signage of rattlesnakes to deter residents from entering into the riparian habitat. Landscaping associated with the trail shall have a restriction of non-native and invasive plant species and will not use any species listed in Table 6-2 of the MSHCP. Habitat enhancement and restoration activities shall be phased to ensure that higher quality habitat	Project Applicant Project Applicant Project Applicant	Riverside County Planning Department Riverside County Planning Department Riverside County Planning Department	Prior to final building inspection Prior to final building inspection Prior to final building inspection

Summary of Impacts	Significance Determination	Mitigation Measures (MM) and Regulatory Requirements (RR)	Responsible Parties	Monitoring Parties	Implementation Stage
(southern willow scrub) would occur within Drainage 1. Implementation of MM 4.4-6 and MM 4.4-7 would ensure pre-construction nesting surveys are conducted prior to commencement of construction activities (including blasting), and further requires appropriate avoidance of any active nests that may be identified if construction activities are to take place during the nesting season for birds. Implementation of the required mitigation would reduce Project impacts to below a level of significance.		shall be available through restoration prior to impacting potentially occupied least Bell's vireo habitat. The Project's CC&Rs shall include a provision requiring the Project's Homeowner's Association (HOA) to be responsible for the maintenance of the trail, including fencing along the trail. Additionally, the Project's CC&Rs shall require the Project's HOA to educate residents of the natural occurring wildlife and natural habitat on the Project site.			
Threshold d.: The Project site has not been identified as occurring in a wildlife corridor, and the Project site does not contain any native wildlife nursery sites. The nearest movement corridors to the Project site, as identified by the MSHCP, occur approximately 1.8 miles to the northeast and 3.0 miles to the southwest. As such, implementation of the proposed project would not impact wildlife movement opportunities and impacts to wildlife corridors and linkages would be less than significant.	Less-than-Significant Impact	**MM 4.4-4** In order to preclude potential indirect impacts due to encroachment into open space areas during construction activities, the following measures shall be implemented. The following measures shall be specified in bid documents issued to prospective construction contractors, and Project construction contractors shall permit periodic inspection of the construction site by County of Riverside staff or its designee to confirm compliance. • Construction worker training shall be provided by a qualified biologist at the first pre-construction meeting; • Exclusionary fencing and signs shall be erected near the top of slope adjacent to conserved riparian/riverine habitat to prevent accidental/unauthorized intrusions during construction; • No equipment shall be operated in areas of flowing water; • Construction access and staging areas for storage of materials and heavy equipment, and for fueling, cleaning, or maintenance of construction vehicles or equipment, shall be prohibited within 20 feet from the top of slope adjacent to conserved riparian/riverine habitat; and • A qualified biologist shall be onsite during initial clearing/grubbing, grading, and/or construction activities within the riparian/riverine habitat that will be impacted within the onsite drainage features, or within 100 feet of the habitat to be avoided, and shall periodically monitor these activities to ensure they do not exceed the fenced construction limits.	Construction Contractors, Project Applicant	County of Riverside Building & Safety Department	Prior to and during construction activities
Threshold e.: The Project would result in impacts to 0.24-acre of southern willow scrub, 1.79 acres of Riversidean sage scrub, 8.35 acres of non-native grassland, 99.79 acres mapped as disturbed, and 2.61 acres mapped as developed. The Project would generally maintain existing drainage patterns, and impacts to Goldenstar Creek would be less than significant. As previously noted, the only sensitive vegetation community on site is southern willow scrub, while Riversidean sage scrub, non-native grassland, disturbed, and developed areas are not considered special-status plant communities. Project impacts to 0.24-acre of southern willow scrub habitat represents a significant impact. Implementation of MM 4.4-1 would ensure that Project impacts to 0.24-	Less than Significant with Mitigation Incorporated	**MM 4.4-5** In order to preclude potential indirect impacts to	Project	Riverside County	Prior to issuance of

Summary of Impacts	Significance Determination	Mitigation Measures (MM) and Regulatory Requirements (RR)	Responsible Parties	Monitoring Parties	Implementation Stage
acre of southern willow scrub are mitigated through the management of 2.75 acres of riparian/riverine habitat onsite, and would reduce Project impacts to special-status plant communities to below a level of significance.		on-site preserved riparian habitat and/or on-site mitigation areas, prior to issuance of building permits for lots abutting the on-site drainages Riverside County shall review the building plans to ensure that edge effects have been minimized through the planting of native landscaping on manufactured slopes within the conserved areas, and through the installation of fencing/signage near the top of slope adjacent to conserved areas to prevent unauthorized public access, vandalism, illegal dumping, and other adverse human disturbances.	Applicant, Construction Contractors	Building & Safety Department	grading permits
Threshold f.: The Project would not result in impacts to federally-protected wetland habitat or Corps jurisdictional waters. However, implementation of the proposed Project would result in impacts to 0.14 acres of Regional Board jurisdictional waters and 0.24 acres of CDFW jurisdictional streambed. Project impacts to areas subject to RWQCB and/or CDFW represent significant impacts for which mitigation would be required. Implementation of MM 4.4-1 would ensure that Project impacts to approximately 0.14-acre of Regional Board jurisdictional waters and 0.24-acre of CDFW jurisdictional streambed are mitigated through the management of 2.75 acres of riparian/riverine habitat onsite. Implementation of the required mitigation would reduce the Project's impacts to waters subject to jurisdiction by the Regional Board and CDFW to less-than-significant levels.	Less than Significant with Mitigation Incorporated	**MM 4.4-6** To avoid take of active burrowing owl burrows (nests) and in accordance with MSHCP Objective 6, prior to issuance of grading permits or other permits authorizing ground disturbance (e.g., vegetation clearing, clearing and grubbing, tree removal, site watering, equipment staging), 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. The results of the survey should be submitted to Riverside County and the California Department of Fish and Wildlife (CDFW) within three days of survey completion. The pre-construction survey shall be conducted in accordance with the current Burrowing Owl Instruction for the Western Riverside MSHCP. • Burrowing Owl Management Plan: If active burrowing owl burrows are detected, the Project Applicant shall not commence activities until no sign is present that the burrows are being used by adult or juvenile owls or following CDFW approval of a Burrowing Owl Plan as described below. If owl presence is difficult to determine, a qualified biologist shall monitor the burrows with motion-activated trail cameras for at least 24 hours to	Project Applicant, Project Biologist	Riverside County Environmental Programs Department, Riverside County Planning Department	Prior to vegetation removal or ground-disturbing activities. Surveys to take place within 30 days of the commencement of any ground disturbing activities.
Threshold g: 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). There are no oak trees or vegetation communities containing oak trees within the Project site, and Ordinance No. 559 applies to properties located above 5,000 amsl in elevation. Therefore, the Project has no potential to conflict with the County's Oak Tree Management Guidelines or Riverside County Ordinance No. 559, and no impact would occur.	No Impact				

Summary of Impacts	Significance Determination	Mitigation Measures (MM) and Regulatory Requirements (RR)	Responsible Parties	Monitoring Parties	Implementation Stage
		evaluate burrow occupancy. The onsite qualified biologist will verify the nesting effort has finished according to methods identified in the Burrowing Owl Plan. • The Burrowing Owl Plan shall be prepared in accordance with guidelines in the CDFW Staff Report on Burrowing Owl (March 2012) and Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). The qualified biologist and Project Applicant shall coordinate with the County of Riverside, CDFW, and United States Fish and Wildlife Service (USFWS) to develop a Burrowing Owl Plan to be approved by the County, CDFW, and USFWS prior to commencing Project activities. The Burrowing Owl Plan shall describe proposed avoidance, relocation, monitoring, minimization, and/or mitigation actions. The Burrowing Owl Plan shall include the number and location of occupied burrow sites and details on proposed buffers if avoiding the burrowing owls or information on the adjacent or nearby suitable habitat available to owls for relocation. If no suitable habitat is available nearby for relocation, details regarding the creation and funding of artificial burrows (numbers, location, and type of burrows) and management activities for relocated owls shall also be included in the Burrowing Owl Plan. The County shall implement the Burrowing Owl Plan following CDFW and USFWS review and approval. • If burrowing owls are observed within Project site(s) during Project implementation and construction, the Project Applicant shall notify CDFW and the County immediately in writing within 48 hours of detection. A Burrowing Owl Plan shall be submitted to CDFW and the County for review and approval within two weeks of detection and no Project activity shall continue within 1,000 feet of the burrowing owls until CDFW approves the Burrowing Owl Plan. The County shall be responsible for implementing appropriate avoidance and mitigation measures, including burrow avoidance, passive or active relocation, or other			

Summary of Impacts	Significance Determination	Mitigation Measures (MM) and Regulatory Requirements (RR)	Responsible Parties	Monitoring Parties	Implementation Stage
		appropriate mitigation measures as identified in the Burrowing Owl Plan. • If ground-disturbing activities occur but the site is left undisturbed for more than 30 days, a preconstruction survey for burrowing owl shall be conducted within 3 days prior to initiation of Project activities and reported to CDFW and the County as described above. If burrowing owl are found, the same coordination described above shall be necessary. • A final report shall be prepared by the qualified biologist documenting the results of the burrowing owl surveys and detailing avoidance, minimization, and mitigation measures. The final report shall be submitted to the County and CDFW within 30 days of completion of the survey and burrowing monitoring for mitigation monitoring compliance record keeping.			
		MM 4.4-7 Prior to the issuance of grading or blasting permits, Riverside County shall ensure that the following note is included on the Project's 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. *"In order to avoid violation of the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code Sections 3503, 3503.5, and 3513, vegetation clearing and blasting activities shall be conducted outside of the bird nesting season 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 or blasting activities, to determine the presence of nests or nesting birds. The nest surveys shall include the Project site and adjacent areas where project activities have the potential to cause nest failure. The survey results shall be provided to the County's Planning Department. The Project Applicant shall adhere to the following:*	Project Applicant, Construction Contractors, Project Biologist	Riverside County Environmental Programs Department, Riverside County Planning Department	Prior to issuance of grading permits

Summary of Impacts	Significance Determination	Mitigation Measures (MM) and Regulatory Requirements (RR)	Responsible Parties	Monitoring Parties	Implementation Stage
		1) The Project Applicant shall designate a biologist (Designated Biologist) experienced in: identifying local and migratory bird species of special concern; conducting bird surveys using appropriate survey methodology; nesting surveying techniques, recognizing breeding and nesting behaviors, locating nests and breeding territories, and identifying nesting stages and nest success; determining/establishing appropriate avoidance and minimization measures; and monitoring the efficacy of implemented avoidance and minimization measures. *2) Pre-activity field surveys shall be conducted at the appropriate time of day/night, during appropriate weather conditions, no more than 3 days prior to the initiation of Project activities. Surveys shall encompass all suitable areas including trees, shrubs, bare ground, burrows, cavities, and structures. Survey duration shall take into consideration the size of the Project site; density, and complexity of the habitat; number of survey participants; survey techniques employed; and shall be sufficient to ensure the data collected is complete and accurate.* *If no nesting birds are observed during the survey, site preparation construction, and blasting activities may begin. If active nests are identified, avoidance or minimization measures shall be undertaken in consultation with the County of Riverside and CDFW. Measures shall include immediate establishment of an appropriate buffer zone to be established by a qualified biologist, and approved by the County of Riverside, based on their best professional judgement and experience (typically 300-foot buffer for most species, 500-foot buffer for raptor species) . The buffer around the nest shall be delineated and flagged, and no construction activity shall occur within the buffer area until a qualified biologist determines nesting species have fledged and the nest is no longer active, or the nest has failed. The Designated Biologist shall monitor the nest at the onset of Project activities, and at the onset of any changes in such Project activities (e.g., increase in number or type of equipment, change in equipment usage, etc.) to determine the efficacy of the buffer. If the Designated Biologist determines that such Project activities may be causing an adverse reaction, the Designated Biologist shall adjust the buffer accordingly or implement alternative avoidance and minimization measures,*			

Summary of Impacts	Significance Determination	Mitigation Measures (MM) and Regulatory Requirements (RR)	Responsible Parties	Monitoring Parties	Implementation Stage
		such as redirecting or rescheduling construction or erecting sound barriers. All work within these buffers will be halted until the nesting effort is finished (i.e., the juveniles are surviving independent from the nest). The onsite qualified biologist will review and verify compliance with these nesting avoidance buffers and will verify the nesting effort has finished. Work can resume within these avoidance areas when no other active nests are found. Within 30 days of completion of the survey and nesting bird monitoring, a report shall be prepared and submitted to the County for mitigation monitoring compliance record keeping." **MM 4.4-8** As a condition of future grading permits, biological monitoring shall be required during all initial ground-clearing operations. A biological monitor shall be present during initial site clearing activities and at appropriate intervals throughout construction to ensure compliance with mitigation measures and regulatory permit conditions. Monitors shall be responsible for ensuring that impacts to special status species, native vegetation, wildlife habitat, and sensitive or unique biological resources that may be present prior to commencement of construction activities are avoided or appropriately addressed. Monitors shall also conduct Workers Environmental Awareness Program (WEAP) training to inform construction personnel of applicable mitigation measures and permit conditions, as well as any potential for infraction. If any special status plants or wildlife are found, the biologist shall take appropriate action as defined in the MSHCP, mitigation measures, permit conditions, and/or applicable regulations. Federal, State, and local agencies shall be consulted as needed and appropriate. If needed, an avoidance buffer shall be established to protect the resource until this action has been completed. If common or special status wildlife is discovered, the biologist or biological monitor may move it out of harm's way or encourage it to move out of the work area prior to initiation of Project activities, if safe and feasible and permitted to do so. Monitoring and survey activities shall be documented and, at the conclusion of Project construction activities, all monitoring reports and communications shall be retained in Project files to allow for review by the Lead Agency and wildlife agencies, if requested.	Project Applicant, Future Occupants, Biological Monitors	Riverside County Environmental Programs Department, Riverside County Planning Department	Prior to issuance of future grading permits.

Summary of Impacts	Significance Determination	Mitigation Measures (MM) and Regulatory Requirements (RR)	Responsible Parties	Monitoring Parties	Implementation Stage
4.5 Cultural Resources					
Thresholds a. and b.: The existing single-family residence was not found to represent a historical resource and is ineligible for inclusion in the NRHP and CRHR. As such, the existing residence does not comprise a historical resource as defined in Section 105064.5 of the California Code of Regulations, and impacts due to the demolition of this existing residence would be less than significant. As no other historical sites or resources were identified on site, Project impacts to historical sites and resources would be less than significant. 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. Implementation of MM 4.5-12~~1~~ 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.: Implementation of the proposed Project would result in direct physical impacts to approximately 0.61-acre of the overall 12.17 acres mapped for Site P-33-12915/CA-RIV-7181, and would impact	Less than Significant with Mitigation Incorporated Less than Significant with Mitigation Incorporated	**MM 4.5-1** 060 - Planning-CUL.2 Controlled Grading. Although all bedrock features will be either preserved in place or relocated into open space on site, the soils surrounding cultural Site(s) P-33-002918 (CA-RIV-7184) Features B, C, D, E, P-33-12916 Features A, B, C, D, CA-001, CAR-04, CAR-05, CAR-08, CAR-10, CAR-12, and CAR13-I will be impacted during construction activities. To address controlled grading in this area, a plan will be developed in consultation with Soboba Band of Luiseño Indians and Pechanga Band of Indians, and included in the Cultural Resources Monitoring Program (CRMP) 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 required pursuant to Mitigation Measure MM 4.5-10~~1~~. ~~**MM 4.5-2** 060 - Planning-CUL. 1 Cultural Sensitivity Training. The County shall ensure that a worker awareness training program is developed and delivered to train the Contractor's equipment operators and the Project's field consultants about tribal cultural resources and the requirements for avoidance and minimization. The program shall inform workers about the following topics: federal and state regulations pertaining to cultural resources and tribal cultural resources; the presence of Environmentally Sensitive Areas (ESAs) that are restricted from all Project related activities; the requirement for ground disturbing activities near the ESAs to be monitored by a Tribal Monitor; the subsurface indicators of resources that shall require a work stoppage; procedures for notifying the County and, if necessary, the coroner, of any occurrences; confidentiality requirements; appropriate and respectful behavior when in the presence of tribal cultural resources; maintaining a harassment free and safe work environment for monitors; and enforcement of penalties and repercussions for non compliance with the program.~~ ~~The County shall offer the opportunity to consulting tribes to provide content for the training program. The training shall be given first to construction supervisors and may be recorded. The construction supervisors are responsible for ensuring that all workers that will operate ground disturbing equipment receive~~	Project Applicant, Project Archaeologist ~~Project Applicant, Construction Contractors~~	Riverside County Planning Department, Tribal Monitor ~~Riverside County Planning Department, Tribal Monitor~~	Prior to ground disturbing activities and to be included in the CRMP ~~Prior to ground disturbing activities~~

Summary of Impacts	Significance Determination	Mitigation Measures (MM) and Regulatory Requirements (RR)	Responsible Parties	Monitoring Parties	Implementation Stage
approximately 0.97-acre of the overall 3.80 acres mapped for Site P-33-12916/CA-RIV-7182, both of which are considered eligible under NRHCP Criterion D and CRHR Criterion 4. In addition, because a Phase II testing program was not conducted for Sites CAR-04, CAR-05, CAR-08, CAR-09, CAR-10, CAR-11, CAR-12, and CAR-13-1, for purposes of analysis herein these sites are considered eligible for inclusion in the NRHP and CRHR. The Project would result in direct impacts to Sites CAR-04, CAR-05, CAR-08, CAR-10, and CAR-13-1. Therefore, Project impacts to Sites P-33-12915/CA-RIV-7181, P-33-12916/CA-RIV-7182, CAR-04, CAR-05, CAR-08, CAR-10, and CAR-13-1 represent a significant impact of the proposed Project for which mitigation would be required. The remaining archeological sites identified on the Project site either are not considered eligible for listing under the NRHP or the CRHR (Sites P-33-12917/CA-RIV-7183, P-33-02918/CA-RIV-7184, CA-01, and CA-02) or would not be impacted by the Project (Sites CAR-09, CAR-11, and CAR-12); thus, Project impacts to Sites P-33-12917/CA-RIV-7183, P-33-02918/CA-RIV-7184, CA-01, CA-02, CAR-09, CAR-11, and CAR-12 would be less than significant. In addition, the existing residence does not comprise a historical resource as defined in Section 105064.5 of the California Code of Regulations, and impacts due to the demolition of this existing residence would be less than significant. Implementation of Mitigation Measure MM 4.5-1 would ensure that controlled grading is implemented at Sites P-33-002918 (CA-RIV-7184) Features B, C, D, E, P-33-12916 Features A, B, C, D, CA-001, CAR-04, CAR-05, CAR-08, CAR-10, CAR-12, and CAR13-I , which would ensure the systematic removal of the ground surface to allow for the identification, documentation, and		~~this training prior to operating equipment that will disturb original ground. All trained workers will be required to receive a brochure and hardhat sticker and sign a form indicating their understanding of the requirements and restrictions and copies of the forms shall be provided to the County as proof of compliance. Materials and supplies delivery drivers, above ground construction workers (i.e., framers, carpenters, electricians, plumbers, painters, and roofers) are not required to receive the training because the type of specialized activities that they will perform does not have the potential to disturb cultural resources or tribal cultural resources.~~ ~~MM 4.5-3~~MM 4.5-2 060 - Planning-CUL. 4 ECS Sheet-Resource Relocation and Reburial Prior to issuance of grading permits: the developer/applicant shall provide evidence to the Riverside County Planning Department that a confidential~~n~~ Environmental Constraints Sheet has been included in the Grading Plans. This sheet shall indicate an area to be used for relocation of the bedrock milling features that cannot be avoided by this project. In addition, a permanent space within this area will be predetermined and designated, in consultation with Soboba Band of Luiseño Indians and Pechanga Band of Indians, ~~and designated~~ on a confidential map for reburial of any artifacts that will be impacted and/or discovered during grading. ~~MM 4.5-4~~MM 4.5-3 060 - Planning-CUL. 5 ECS Sheet - Resources Preserved in Place Prior to final map approval the developer/ applicant shall provide evidence to the Riverside County Planning Department that an Environmental Constraints Sheet has been included in the Grading Plans. This sheet shall indicate the presence of environmentally constrained area(s) and the requirements for avoidance of ~~the applicable~~ *portions* of P-33-012915 (CA-RIV-7181), portions of P-33-012916 (CA-RIV-7182), and P-33-012917 (CA-RIV-7183)~~, Features A, B and C, P-33-02918 (CA-RIV-7184) Features A and C, CA-002, CAR-09, and CAR-11. Avoidance includes all Project related temporary and permanent activity or use during and following construction~~. ~~MM 4.5-5~~MM 4.5-4 060 - Planning-CUL. 6 Feature Relocation. Site P-33-002918 (CA-RIV-7184) Feature D, P-33-	Project Applicant Project Applicant Project Applicant,	Riverside County Planning Department Riverside County Planning Department Riverside County Planning	Prior to final map approval Prior to final map approval Prior to issuance of grading permits

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recovery of any subsurface cultural deposits. ~~would ensure that Feature E of Site P-33-02918 (CA-RIV-7184) and CAR-12 are capped with layers of soil or sand fill, above which landscaping, trails, recreation areas, or access roads could be constructed, which would preclude impacts to these resources. Implementation of Mitigation Measure MM 4.5-1 would ensure that Feature E of Site P-33-02918 (CA-RIV-7184) and CAR-12 are capped with layers of soil or sand fill, above which landscaping, trails, recreation areas, or access roads could be constructed, which would preclude impacts to these resources. Implementation of Mitigation Measure MM 4.5-1 also would ensure that controlled grading is implemented at Sites P-33-002918 (CA-RIV-7184) Features B, C, D, E, P-33-12916 Features A, B, C, D, CA-001, CAR-04, CAR-05, CAR-08, CAR-10, and CAR13-I, which would ensure the systematic removal of the ground surface to allow for the identification, documentation, and recovery of any subsurface cultural deposits.~~ Implementation of Mitigation Measure MM 4.5-1~~2~~ would ensure that Project construction workers are subject to sensitivity training to enable them to assist in the identification of potential subsurface cultural resources. Implementation of Mitigation Measures MM 4.5-2~~3~~ and MM 4.5-3~~4~~ would ensure that the Project's Final Map includes an Environmental Constraints Sheet that identifies the open space areas on site that would be used for the relocation of bedrock milling features. Implementation of Mitigation Measures MM 4.5-4~~5~~ would ensure that mitigation for impacts to Sites P-33-002918 (CA-RIV-7184) Features B, C, D, P-33-12916 (CA-RIV-7182) Features A, B, C, D, CA-001, CAR-04, CAR-05, CAR-08, and CAR-10 are coordinated between the Project Applicant, Project Archaeologist, and a representative from the		12916 (CA-RIV-7182) Features A, B, C, D, and E, CAR-04, CAR-05, CAR-08, CAR-10, ~~CAR-12,~~ and CAR-13-I cannot be avoided through Project redesign. Prior to grading permit issuance, the Project Supervisor and Project Archaeologist and a representative from the Soboba Band of Luiseño Indians and Pechanga Band of Indians shall meet onsite to determine the strategy for relocating the milling features to a permanent open space area predetermined and designated, in consultation with ~~the~~ Tribes, ~~and designated~~ on a confidential map. Before construction activities are allowed to start and using professional archaeological methods, as well as follow the cultural ~~costumes~~ customs and traditions of Tribes, any visible artifacts shall be recovered and recorded, and photo documentation of each feature in situ shall occur. No sacred sites shall be photographed, and prior approval is needed from Soboba Band of Luiseño Indians and Pechanga Band of Indians. 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. The ability of features to be relocated depends on the extent of subsurface bedrock, which cannot be fully understood until after ground disturbance begins. In the event that a feature cannot be relocated without damage, after a reasonable and good faith effort as determined by the County, the Project Supervisor and Project Archaeologist, in coordination with the Native American Monitors, shall ~~be reburied~~rebury the resource in the pre-designated reburial location. ~~MM 4.5-6~~MM 4.5-5 060 - Planning-CUL. 7 Native American Monitor. Prior to the issuance of grading permits, the developer/permit applicant shall enter into agreement(s) with t~~he Soboba Band and Pechanga Band for one Native American monitor from each tribe for the duration of ground disturbing activity associated with project construction~~ consulting tribe(s) for the appropriate number of Native American Monitor(s). In conjunction with the Archaeological Monitor(s), the Native American Monitor(s) shall attend the pre-grading meeting with the contractors to provide Cultural Sensitivity Training for all construction	Project Supervisor, Project Archaeologist Project Applicant	Department, Native American Monitor Riverside County Planning Department, Native American Monitors	Prior to issuance of grading permits

Summary of Impacts	Significance Determination	Mitigation Measures (MM) and Regulatory Requirements (RR)	Responsible Parties	Monitoring Parties	Implementation Stage
consulting Tribe(s), and would ensure that these resources all would be relocated to permanent open space areas. Implementation of Implementation of Mitigation Measures MM 4.5-5~~6~~ and MM 4.5-6~~7~~ would ensure that all ground-disturbing activities (i.e., grading) are monitored by a Native American Monitor and a County-approved archaeologist, and would ensure the appropriate treatment of any subsurface resources that may be identified. Implementation of Mitigation Measure MM 4.5-7~~8~~ would ensure that temporary fencing is installed to preclude unplanned construction-related impacts to portions of P-33-012915, portions of P-33-012916 (CA-RIV-7182), P-33-012917 (CA-RIV-7183) Features A, B and C, P-33-02918 (CA-RIV-7184) Feature A, CA-002, CAR-09, and CAR-11. Implementation of Mitigation Measure MM 4.5-8~~9~~ would ensure that all cultural resources uncovered on site are properly relinquished and housed at an appropriate curation facility. Implementation of Mitigation Measure MM 4.5-9~~10~~ would ensure that deed restrictions are recorded to restrict development within the ESAs, thereby ensuring long-term preservation of any sites or relocated sites within the Project's open space areas. Implementation of the required mitigation would reduce the Project's impacts to Sites P-33-12915/CA-RIV-7181, P-33-12916/CA-RIV-7182, CAR-04, CAR-05, CAR-08, CAR-10, and CAR-13-1 to below a level of significance. Implementation of Mitigation Measure MM 4.5-10~~1~~ would ensure that a Phase IV Monitoring Report is prepared to demonstrate compliance with the mitigation measures presented herein. Implementation of Mitigation Measures MM 4.5-11~~2~~ and MM 4.5-12~~3~~ 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	Less than Significant with Mitigation	personnel. In addition, an adequate number of Native American Monitor(s) shall be on-site during all initial ground-disturbing activities and excavation of soils in each portion of the project site including clearing, grubbing, tree removals, grading and trenching. In conjunction with the Archaeological Monitor(s), the Native American Monitor(s) have the authority to temporarily divert, redirect or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources. Activities will be documented in Tribal Monitoring Notes which will be required to be submitted to the County Archaeologist prior to grading final inspection. The developer/permit applicant shall submit a fully executed copy of the agreement(s) 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. ~~If either or both tribes decline to enter into agreement for Native American monitoring within 60 days of extending an offer, then the County will require the Archaeological Monitor to notify the tribes in the event of an unanticipated discovery.~~ ~~MM 4.5-7~~MM 4.5-6 060 - Planning-CUL. 8 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 Cultural Resource Monitoring Plan shall be developed, in consultation with Soboba Band of Luiseño Indians and Pechanga Band of Indians, 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 to the ~~greatest extent feasible~~ as well as address potential impacts to undiscovered buried archaeological resources associated with this project. A fully executed copy of the contract and a digitally-signed copy of the Monitoring Plan shall be provided to the County Archaeologist to ensure compliance with this condition of approval. Working directly under the Project Archaeologist, an adequate number of qualified Archaeological Monitors shall be present	Project Applicant, Project Archaeologist	Riverside County Planning Department	Prior to issuance of grading permits

Summary of Impacts	Significance Determination	Mitigation Measures (MM) and Regulatory Requirements (RR)	Responsible Parties	Monitoring Parties	Implementation Stage
activities are appropriately treated as directed by the Archaeological Monitor, County Archaeologist, and Native American Monitor. Implementation of the required mitigation would reduce the Project's potential impacts to subsurface archaeological sites or resources to below a level of significance. Threshold e.: There are no known dedicated cemeteries 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. In the event that human remains are discovered during construction activities, MM 4.5-12 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 MM 4.5-12, State law, and applicable regulatory requirements would reduce the Project's potential impacts to buried human remains to less-than-significant-levels.	Incorporated	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 Professional 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 4.5-8~~MM 4.5-7 060 - Planning-CUL. 9 Temporary Fencing. Temporary fencing shall be required for the protection of cultural site(s) portions of P-33-012915 (CA-RIV-7181), portions of P-33-012916 (CA-RIV-7182), P-33-012917 (CA-RIV-7183) Features A, B and C, P-33-02918 (CA-RIV-7184) Feature A, CA-02, CAR-09, and CAR-11 during grading activities. Prior to commencement of grading or brushing, the project archaeologist shall confirm the site boundaries and determine an adequate buffer for protection of the site(s), in consultation with Soboba Band of Luiseño Indians and Pechanga Band of Indians. The applicant shall direct the installation of fencing under the supervision of the project archaeologist and Native American Monitor(s). The fencing can be removed only after grading operations have been completed. ~~MM 4.5-9~~MM 4.5-8 070 - Planning-CUL. 1 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. Historic Resources- all historic archaeological materials recovered during the archaeological investigations (this includes ~~any~~ collections made during an earlier project, such as testing of archaeological sites that took place years ago, if applicable), shall be curated ~~and permanently housed~~ 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- One of the following treatments shall be applied.	Project Applicant, Project Archaeologist, Construction Contractors Landowner(s), Project Archaeologist	Riverside County Building and Safety Department, Riverside County Planning Department, Native American Monitors Riverside County Planning Department	Prior to commencement of ground disturbing activities and during all site grading and construction activities Prior to grading permit final inspection

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		a) Preservation-In-Place of the cultural resources, if feasible. Preservation in place means avoiding the resources, leaving them in the place where they were found with no development affecting the integrity of the resources. b) Reburial of the resources on the Project property. The measures for reburial shall include, at least, the following: Measures to protect the reburial area from any future impacts. 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. Any reburial processes shall be culturally appropriate. Listing of contents and location of the reburial shall be included in the confidential Phase IV Report. The Phase IV Report shall be filed with the County under a confidential cover and not subject to a Public Records Request.			
		~~MM 4.5-10~~MM 4.5-9 070 - Planning-CUL. 2 Deed Restrictions. At the conclusion of all construction activities, the Project proponent and landowner shall record a deed restriction on the avoidance areas (and the reburial location, if used) with the County to restrict development of the ESAs in the future. Deed restrictions shall not disclose the nature of the ESAs. A copy of the deed restriction(s) shall be submitted to the County planning staff as proof of compliance prior to the issuance of certificates of occupancy for the Project.	Project Applicant	Riverside County Building & Safety Department	Prior to final building inspection
		~~MM 4.5-11~~MM 4.5-10 070 - Planning CUL. 3 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 results of any feature relocation or residue analysis required as well as evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting and evidence that any artifacts have	Project Applicant, Project Archaeologist	Riverside County Planning Department, Soboba Band of Luiseño Indians, Pechanga Band of Indians	Prior to grading permit final inspection

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		been treated in accordance to procedures stipulated in the Cultural Resources Management Plan. The copy of the report shall be provided to the County of Riverside Planning Department, Soboba Band of Luiseño Indians, and Pechanga Band of Indians.			
		~~MM 4.5-12~~MM 4.5-11 015 - Planning-CUL. 1 Human Remains. If human remains are found on this site, the developer/permit holder or any successor in interest shall comply with State Health and Safety Code Section § 7050.5 and Public Resources Code § 5097.98.	Project Applicant, Construction Contractors, Project Archaeologist	County Coroner	In the event that human remains are encountered.
		~~MM 4.5-13~~MM 4.5-12 015 - Planning-CUL. 2 Unanticipated Resources. The developer/permit holder or any successor in interest shall comply with the following for the life of this permit. If during ground disturbance activities, unanticipated historical or archaeological resources* are discovered, the following procedures shall be followed. All ground disturbance activities within 100 feet of the discovered historical or cultural resource shall be halted and the applicant shall call the County Archaeologist immediately upon discovery of the historical or archaeological resource. For archaeological resources, a meeting shall be convened between the developer, the Project archaeologist**, the Native American tribal representative (or other appropriate ethnic/cultural group representative), and the County Archaeologist to discuss the significance of the find. At the meeting with the aforementioned parties, a decision is to be made, with the concurrence of the County Archaeologist, as to the appropriate treatment (documentation, recovery, avoidance, etc.) for the cultural resource. For any historical resources that may be uncovered, a meeting with the County Archaeologist shall be held to determine the significance of and appropriate treatment for the historical resource(s), which may include documentation and/or resource recovery and curation at facilities such as the Western Science Center in Hemet, depending on the significance of the resource. Resource evaluations shall be limited to nondestructive analysis. Further ground disturbance shall not resume within the area of the discovery until the appropriate	Project Applicant, Project Archaeologist, Construction Contractors	Riverside County Planning Department, Native American Tribes	In the event that unanticipated cultural resources are encountered

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		treatment has been accomplished. * A cultural resource site is defined, for this purposes of Mitigation Measure MM 4.5-12~~3~~, as being a feature and/or three or more artifacts in close association with each other. ** If not already employed by the project developer, a County approved archaeologist shall be employed by the Project developer to assess the significance of the cultural resource, attend the meeting described above, and continue monitoring of all future site grading activities as necessary. **RR 4.5-1:** 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).	N/A	N/A	N/A
4.6 Energy					
Threshold a.: 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 not 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 conservation 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.: Energy consumed by the Project's operation is calculated to be	Less-than-Significant Impact Less-than-Significant Impact	**RR 4.6-1:** 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 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.	N/A	N/A	N/a

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comparable to, or less than, energy consumed by other single-family residential projects of similar scale and intensity that are operating in California, as the Project would be subject to current regulatory requirements, such as the 2022 version of Title 24, which was not in effect when most existing residential developments were constructed. Based on the analysis presented herein, the Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency, and impacts would be less than significant.		**RR 4.6-2:** 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.	N/A	N/A	N/A
4.7 Geology and Soils					
Thresholds a. and c.: 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. A significant impact could occur if the Project did not comply with the site-specific recommendations of the Project's Geotechnical Update (*Technical Appendix F1*). Implementation of MM 4.7-1 woule ensure that appropriate measures are incorporated into future grading and/or building permit applications to address seismic-related hazards in conformance with the CBSC and the Riverside County Building Code. Impacts due to strong seismic ground shaking would be reduced to less-than-significant levels.	Less than Significant with Mitigation Incorporated	**RR 4.7-1:** The Project is required to comply with the provisions of County Ordinance Nos. 457 and 460. 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. **RR 4.7-2:** The Project is required to comply with the provisions of SCAQMD Rule 403, by addressing blowing dust from the Project's construction activities. **RR 4.7-3:** The Project is required to comply with the provisions of the County's National Pollution Discharge Elimination System (NPDES) permit, and the future-required Storm Water Pollution Prevention Plan (SWPPP). Compliance with the NPDES permit and the future-required SWPPPs would ensure an effective combination of erosion control and sediment control measures (i.e., Best Management Practices) are implemented to reduce or eliminate sediment discharge to surface water from stormwater and non-stormwater discharges.	Project Applicant, Construction Contractors Project Applicant, Construction Contractors Project Applicant, Construction Contractors	Riverside County Building and Safety Department Riverside County Building and Safety Department Building and Safety Department, RWQCB	As specified by Ordinance Nos. 457 and 460 As specified by Rule 403 During construction and long-term operation
Threshold b.: Based on site observations and subsurface investigations conducted by GeoTek, liquefaction is not considered to be a hazard at the Project site due the lack of a true groundwater level within the site and presence of shallow bedrock. Also, the potential for	Less-than-Significant Impact	**MM 4.7-1** Prior to issuance of grading or building permits, the	Project	Riverside County	Prior to issuance of

Summary of Impacts	Significance Determination	Mitigation Measures (MM) and Regulatory Requirements (RR)	Responsible Parties	Monitoring Parties	Implementation Stage
seismically-induced settlement at the property is considered to be nil because of the minimal thickness of soil atop bedrock. Accordingly, the Project would not be subject to seismic-related ground failure, including liquefaction, and impacts would therefore be less than significant.		Riverside County Building and Safety Department shall verify that all of the recommendations given in the Project's September 21, 2021 Updated Geotechnical Evaluation, Proposed Single-Family Residential Development, APNs 245-300-001 and -004, Northwest of Iris Avenue and Chicago Avenue, Woodcrest Area of Riverside County, California," prepared by GeoTek, Inc. and included as *Technical Appendix F1* to the Project's EIR, are incorporated into the construction and grading plans. Alternatively, the Project shall comply with the findings and recommendations of any geotechnical studies that may be required in association with future grading and/or building permits.	Applicant, Construction Contractors	Building and Safety Department	grading or building permits
Threshold d.: The Project site is not susceptible to landslide or rockfall hazards, and impacts would be less than significant. Impacts due to lateral spreading and collapse hazards could occur if proposed grading and development is not conducted in accordance with the site-specific recommendations of the Project's Geotechnical Update (*Technical Appendix F1*). Implementation of MM 4.7-1 would ensure that appropriate measures are incorporated into future grading and/or building permit applications to address the potential for lateral spreading and collapse hazards. With implementation of the required mitigation, impacts due to lateral spreading and collapse would be reduced to less-than-significant levels.	Less-than-Significant with Mitigation Incorporated	**MM 4.7-2** Prior to issuance of building permits, the Project Applicant shall provide evidence to the Riverside County Department of Environmental Health (DEH) that the existing septic system presumed to be associated with the existing single-family home on the Project site has been removed in accordance with Section H1101.0 (Abandoned Sewers and Sewage Disposal Facilities) of the 2022 California Plumbing Code, as required pursuant to Section 5 of Riverside County Ordinance No. 592 (Sewer Use).	Project Applicant	Riverside County Department of Environmental Health	Prior to issuance of grading permits.
Threshold e.: The Project site is not "susceptible" to ground subsidence. The nearest lands subject to subsidence hazards occurs approximately 0.7-mile west of the Project site. Accordingly, the Project would not 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, and no impact would occur.	No Impact				
Threshold f.: The Project site is not subject to volcanic hazards or hazards associated with seiches. Although the Project site and surrounding areas exhibit undulating topography, due to the relatively shallow depth to bedrock that occurs across the Project site,	Less-than-Significant Impact				

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the risk of mudflow associated with these hill forms would be low. As such, impacts due to mudflow hazards would be less than significant.					
Threshold g.: The Project site would be graded in a manner that largely approximates the site's existing topographic conditions. The Project would require a total of approximately 520,000 cy of cut and fill. Earthwork activities are expected to balance on site and no import or export of soils would be required. Thus, the Project would not result in a substantial change in topography or ground surface relief features, and impacts would be less than significant.	Less-than-Significant Impact				
Threshold h: All proposed slopes on site would be constructed at a gradient of 2:1. Although proposed manufactured slopes would measure up to 72 feet in in height, site-specific recommendations are provided in the Project's Geotechnical Update (*Technical Appendix F1*) which would minimize impacts. However, a significant impact could occur if the Project did not comply with the site-specific recommendations of the Project's Geotechnical Update. Accordingly, prior to mitigation implementing the Geotechnical Update recommendations, the Project has the potential to cause significant impacts as a result of creating slopes higher than 10 feet. This is evaluated as a potentially significant impact. Implementation of MM 4.7-1 would ensure that appropriate measures are incorporated into future grading and/or building permit applications to ensure that any slopes higher than 10 feet would be grossly stable. With implementation of the required mitigation, impacts associated with unstable slopes would be reduced to less-than-significant levels.	Less than Significant with Mitigation Incorporated				
Threshold i.: It is likely that a septic system is	Less than Significant with Mitigation				

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present on site due to the age of the existing residence in the central portion of the Project site. If present, this septic system would need to be removed as part of Project site development. A potentially significant impact could occur if the presumed septic system on site is not removed in a manner consistent with applicable regulatory requirements. Implementation of MM 4.7-2 would ensure that the existing septic system presumed to be located on site in association with the existing single-family residence is removed in accordance with Section H1101.0 (Abandoned Sewers and Sewage Disposal Facilities) of the 2022 California Plumbing Code, as required pursuant to Section 5 of Riverside County Ordinance No. 592 (Sewer Use). Implementation of the required mitigation would reduce potential impacts associated with the removal of the existing septic system to below a level of significance.	Incorporated				
Thresholds j. and m.: 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 SWPPP as well as SCAQMD Rule 403 and Riverside County Ordinance Nos. 457 and 460. 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. 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.	Less-than-Significant Impact				
Threshold k.: Impacts due to expansive soils	Less than Significant				

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could occur if proposed grading activities are not conducted in accordance with the site-specific recommendations of the of the Project's Geotechnical Investigation (*Technical Appendix F1*). This is evaluated as a potentially significant impact for which mitigation would be required. Implementation of MM 4.7-1 would ensure that appropriate measures are incorporated into future grading and/or building permit applications to address expansive soils on site. Impacts would be reduced to less-than-significant levels. Threshold l.: Sewer service to the proposed Project would be provided by the WMWD, and no septic tanks or alternative wastewater disposal systems are proposed as part of the Project. Accordingly, no impact would occur.	with Mitigation Incorporated No Impact				
4.8 Greenhouse Gas Emissions					
Threshold a.: The annual GHG emissions associated with construction and long-term operation of the proposed Project are estimated to be approximately 4,146.60 MT CO_2e per year; therefore, the proposed Project would exceed the County's screening threshold of 3,000 MT CO_2e/yr. Although the Project would be required to achieve 100 points pursuant to the CAP Screening Tables, and in order to provide a conservative analysis of the Project's impacts due to GHGs, it is concluded that the Project's cumulatively-considerable impacts due to GHG emissions would be potentially significant prior to mitigation. The Riverside County CAP Update (November 2019) qualifies as a "Plan for the Reduction of Greenhouse Gas Emissions," pursuant to State CEQA Guidelines Section 15183.5(b). Pursuant to State CEQA Guidelines Sections 15064(h)(3) and 15130(d), a lead agency may determine that a project's incremental contribution to a cumulative effect is not	Less than Significant with Mitigation Incorporated	**RR 4.8-1:** Prior to issuance of building permits, and in accordance with measure R2-CE1 of the County's Climate Action Plan (CAP) Update, future implementing building permits that involve 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 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, meet or exceed 20% of energy demand for multi-family residential development, and meet or exceed 30% of energy demand for single-family residential development. **RR 4.8-2:** In addition, 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 (AB32). • Pavley Fuel Efficiency Standards (AB1493).	Project Applicant Project Applicant, Construction Contractors	Riverside County Planning Department Riverside County Planning Department, SCAQMD	Prior to issuance of grading permits Prior to issuance of building permits and throughout the life of the Project

Summary of Impacts	Significance Determination	Mitigation Measures (MM) and Regulatory Requirements (RR)	Responsible Parties	Monitoring Parties	Implementation Stage
cumulatively considerable if the project complies with the requirements in a previously-adopted plan or mitigation program. Additionally, 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 would not result in a significant impact due to GHG emissions. Implementation of MM 4.8-1 and Regulatory Requirement RR 4.8-1 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. 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. With implementation of MM 4.8-1 and Regulatory Requirement RR 4.8-1, the Project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment, and the Project's cumulatively-considerable impact due to GHG emissions would be reduced to less-than-significant levels. <u>Threshold b.:</u> The Project would be consistent with or otherwise would not conflict with the CARB 2017 Scoping Plan and the CARB 2022 Scoping Plan. However, the Project has the potential to conflict with the Riverside County CAP Update if the Project were unable to achieve 100 points pursuant to the CAP Screening Tables. This is evaluated as a cumulatively-considerable impact of the proposed Project. Projects that garner at least 100 points through application of the CAP	Less than Significant with Mitigation Incorporated	Establishes fuel efficiency ratings for new vehicles. • Title 17 California Code of Regulations (Low Carbon Fuel Standard). Requires carbon content of fuel sold in California to be 10% less by 2020. • Statewide Retail Provider Emissions Performance Standards (SB 1368). Requires energy generators to achieve performance standards for GHG emissions. • Renewable Portfolio Standards (SB 100). Requires electric corporations to increase the amount of energy obtained from eligible renewable energy resources to achieve a target of 50% renewable resources 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. • Senate Bill 32 (SB 32). Requires the state to reduce statewide greenhouse gas emissions to 40% below 1990 levels by 2030, a reduction target that was first introduced in Executive Order B-30-15. **MM 4.8-1** Prior to issuance of building permits for any of the Project's Plot Plans, 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 3.4 to the Project's Greenhouse Gas Analysis (GHGA) technical report (appended to the Project's EIR as *Technical Appendix G*). The conceptual measures may be replaced with other measures as listed in Appendix D to the 2019 Riverside County 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 2019 Riverside County CAP Update. The County shall verify implementation of the identified measures prior to final	Project Applicant	Riverside County Planning Department	Prior to issuance of building permits

Summary of Impacts	Significance Determination	Mitigation Measures (MM) and Regulatory Requirements (RR)	Responsible Parties	Monitoring Parties	Implementation Stage
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. Pursuant to MM 4.8-1 the Project Applicant would be required to implement Screening Table Measures that would provide a minimum of 100 points pursuant to the CAP Update Screening Tables (Appendix D to the CAP Update). With implementation of MM 4.8-1, the Project would be fully consistent with the 2019 CAP Update. The CAP Update evaluates and quantifies reductions out to Year 2030. The CAP Update states that "Through 2050, Riverside County would continue implementation of the Screening Tables. During this time, the reduction measures implemented through the Screening Tables would continue to reduce GHG missions from new development. Additionally, it is assumed that the State measures would keep being updated and reinforced to further reduce emissions. With these assumptions, Riverside County's emissions would decrease to a level below the reduction target by 2050." Thus, compliance with the CAP Update would serve to meet and support the reduction targets established Senate Bill 32, the CARB 2017 Scoping Plan, and the CARB 2022 Scoping Plan. 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.		building inspection.			
4.9 Hazards and Hazardous Materials					
Thresholds a. and b.: There are no indications of on-site or off-site RECs affecting the Project site under existing conditions. During demolition of the existing single-family	Less-than-Significant Impact	**RR 4.9-1:** Prior to the issuance of demolition permits for the existing on-site structures, the Project Applicant shall contract with a certified Asbestos Consultant to perform an asbestos survey for the existing structures on site. In the event asbestos	Project Applican	Riverside County Building and Safety Department	Prior to issuance of demolition permits

Summary of Impacts	Significance Determination	Mitigation Measures (MM) and Regulatory Requirements (RR)	Responsible Parties	Monitoring Parties	Implementation Stage
residence on site, the Project's construction contractors would be required to comply with SCAQMD Rule 1403 to address potential hazards associated with ACMs and with Title 17, CCR, Division 1, Chapter 8 to address potential hazards associated with LBPs. Thus, with mandatory compliance with applicable regulations, potential impacts associated with Project demolition activities would be less than significant. During Project construction and operation, mandatory compliance with federal, State, and local regulations would ensure that the Project as proposed would not create a significant hazard to the public or environment through the routine transport, use, or disposal of hazardous materials. Threshold c.: The Project would not impair or physically interfere with an adopted emergency response plan or emergency evacuation plan. No emergency facilities exist on the Project site, and the site does not serve as an emergency evacuation route. Thus, impacts would be less than significant. Threshold d.: The Goddard School of Riverside is located approximately 0.1-mile southeast of the Project site and provides daycare services. However, the Project does not contain any land uses associated with the emissions or handling of hazardous or acutely hazardous materials, substances, or waste. The use of 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. With mandatory regulatory compliance, the Project would not emit hazardous emissions, or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of	Less-than-Significant Impact Less-than-Significant Impact	containing materials (ACMs) are identified on site, the County of Riverside shall condition all demolition permits to comply with South Coast Air Quality Management District (SCAQMD) Rule 1403 with respect to asbestos-containing materials and the demolition contractor shall be required to comply with Rule 403. All asbestos-related work conducted during the demolition process shall be performed by a licensed Asbestos-abatement Contractor under the supervision of a certified Asbestos Consultant. Asbestos-containing construction materials (ACCMs) shall be removed and disposed of in compliance with notification and asbestos-removal procedures outlined in SCAQMD Rule 1403 to reduce asbestos-related health risks. During demolition, the demolition contractor shall maintain all records of compliance with Rule 1403, including, but not limited to, the following: evidence of notification of SCAQMD pursuant to Rule 1403; contact information for the Asbestos-abatement Contractor and Asbestos Consultant; and receipts (or other evidence) of off-site disposal of all ACCMs. These records shall be made available for County inspection upon request. **RR 4.9-2:** Prior to the issuance of demolition permits for the existing on-site structures, the Project Applicant shall retain the services of a California-certified Lead Inspector/Risk Assessor to collect lead paint, dust, and/or soil samples. The samples shall be tested at a qualified facility for the presence of lead based paint (LBP). In the event that LBPs are identified, the County of Riverside shall condition all demolition permits to comply with Title 17, California Code of Regulations (CCR), Division 1, Chapter 8 (LBP Regulations), which addresses requirements for the removal of components painted with LBPs during demolition of existing structures. The demolition contractor shall be required to comply with these provisions. Notification to the California Department of Public Health (CDPH) shall be conducted through completion of an Abatement of Lead Hazards Notification, CDPH Form 8551. The removal of all LBP materials shall be conducted: • By a Certified Lead Supervisor or Certified Lead Works, as defined by §§ 35008 and 35009 of the LBP Regulations, respectively;	Project Applicant, Lead Inspector	Riverside County Building and Safety Department, CDPH	Prior to issuance of demolition permits

Summary of Impacts	Significance Determination	Mitigation Measures (MM) and Regulatory Requirements (RR)	Responsible Parties	Monitoring Parties	Implementation Stage
an existing or proposed school, and impacts would be less than significant. Threshold e.: The Project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. As such, the Project would not create a significant hazard to the public or the environment due to the Project site's inclusion on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, and no impact would occur.	No Impact	• In accordance with the procedures specified in Chapter 12: Abatement, "Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing," U.S. Department of Housing and Urban Development, June 1995; • Using containment and in a manner which does not result in contamination of non-work areas with lead-contaminated dust, lead-contaminated soil, or lead-based paint debris; and • In accordance with an abatement plan prepared by a certified lead supervisor, certified lead project monitor, or certified lead project designer, which includes all of the requirements as specified in § 36100(4)(A) of the LBP Regulations The Certified Lead Supervisor conducting abatement shall retain records of the notification to the CDPH, and shall retain a copy of the abatement plan on-site at all times during demolition activities. The notification and abatement plan shall be made available to the County upon request for review. All demolition activities shall be subject to inspection by the CDPH and/or County officials to ensure compliance with the requirements of the LBP Regulations and abatement plan. Following completion of all abatement activities, a clearance inspection shall be conducted by a certified lead inspector/assessor or certified lead project monitor in accordance with §§ 36000(a) and 36000(c)(3) of Title 17, CCR, Division 1, Chapter 8. A copy of the results of the clearance inspection shall be provided to the County Planning Department upon completion of abatement and inspection activities.			
Thresholds f., g., and h.: The Project site is not located within two miles of a public airport or within an airport land use plan, and there are no components of the proposed Project that would affect airport operations. However, the Project site is located within the AIA for the MARB, the Project required review by the Riverside County ALUC, which determined that the Project would be fully consistent with the March ARB ALUCP, subject to certain ALUC standard conditions of approval. Therefore, the Project would not result in an inconsistency with an Airport Master Plan, would not require review by the Airport Land Use Commission, and would not result in a safety hazard for people residing or working in the Project area. Impacts would be less than significant.	Less-than-Significant Impact				
Threshold i.: The nearest active private airport is the Perris Valley Airport, located 10.9 miles southeast of the Project site. The Project site is not located within the AIA for this facility, and the Project would not be subject to substantial safety hazards due to aircraft operations at the Perris Valley Airport. As such, the Project would not result in a safety hazard for people residing or working in the Project area, and no impact would occur.	No Impact	**RR 4.9-3:** All future contracts with construction contractors shall comply with all applicable regulations and requirements promulgated by the federal Occupational Safety and Health Administration (OSHA). **RR 4.9-4:** 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	Construction Contractors Project Applicant, Construction Contractors, Future Occupants	Riverside County Building and Safety Department Building and Safety Department	Throughout the construction and long-term operation of the Project Throughout the construction and long-term operation of the Project

Summary of Impacts	Significance Determination	Mitigation Measures (MM) and Regulatory Requirements (RR)	Responsible Parties	Monitoring Parties	Implementation Stage
		Waste Collection Facility.			
4.10 Hydrology and Water Quality					
Thresholds a., b., and i.: The Project would be served potable water by the WMWD, and no groundwater wells are proposed on site; thus, Project direct impacts to groundwater supplies would be less than significant. Additionally, the total amount of runoff from the site would not change with Project development, and as such Project-related runoff would be conveyed to downstream facilities where groundwater recharge would continue to occur. Additionally, water quality impacts during construction, including potential impacts due to a conflict with the Santa Ana River Basin Plan and potential impacts to groundwater quality, 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 into the Santa Ana River watershed. Thus, the Project would not adversely affect surface or groundwater quality. Accordingly, the proposed Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality; would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge; and would not conflict with the Santa Ana River Basin Plan or result in adverse groundwater quality impacts. Impacts would be less than significant.	Less-than-Significant Impact	No mitigation is required.	N/A	N/A	N/A
Thresholds c. and f.: Grading proposed as part of the Project generally would maintain the site's existing drainage patterns, with runoff continuing to flow into Goldenstar Creek, which would continue to convey runoff in a northwesterly direction. In addition, the Project improvements would not result in an increase in	Less-than-Significant Impact				

Summary of Impacts	Significance Determination	Mitigation Measures (MM) and Regulatory Requirements (RR)	Responsible Parties	Monitoring Parties	Implementation Stage
the total peak flows from the Project site under post-development conditions; therefore, the Project would not result in the alteration of the existing alignment of any downstream receiving waters. Additionally, because existing drainage facilities downstream are adequately sized to accommodate peak runoff from the Project site and surrounding areas under existing conditions, and because peak runoff from the Project site would not increase with development of the Project site as proposed, the Project would not contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems. Impacts would be less than significant.					
Threshold d.: 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, portions of the Project site, including proposed roadways and residential building pads, would consist of impervious surfaces. Thus, the potential for erosion hazards on site would be substantially decreased as compared to existing conditions with buildout of the Project site. Additionally, implementation of the Project's proposed drainage system would not result in an increase in peak flows from the Project site, indicating that the Project would not result in increased erosion hazards in areas tributary to the Project site. As such, long-term erosion impacts would be less than significant.	Less-than-Significant Impact				
Thresholds e. and g.: The portions of the Project site proposed for residential development are located outside of mapped floodplains and are not subject to inundation due to flood hazards. The Project's proposed	Less-than-Significant Impact				

Summary of Impacts	Significance Determination	Mitigation Measures (MM) and Regulatory Requirements (RR)	Responsible Parties	Monitoring Parties	Implementation Stage
drainage system has been designed to preclude the potential for flooding hazards on site, in accordance with standard County requirements. With implementation of the Project's proposed drainage system, the peak runoff from the Project site would not increase as compared to existing conditions. As such, the Project would not substantially increase the rate of surface runoff in a manner which would result in flooding on-site or off-site and would not impede or redirect flood flows, and impacts would be less than significant. Threshold h.: The Project site is located approximately 35 miles northeast of the Pacific Ocean, and as such there is no potential for the Project site to be inundated with tsunamis. The Project site is not located within the dam inundation area for any bodies of water. As such, it can be concluded that the Project site also would not be subject to seiche hazards associated with nearby bodies of water, such as Lake Mathews. Additionally, areas planned for development on site are not located in areas subject to inundation during the 1% annual chance flood. Accordingly, the Project would not risk the release of pollutants due to inundation from floods, tsunamis, or seiches, and no impact would occur.	No Impact				
4.11 Land Use and Planning					
Threshold a.: The Project would not conflict with the General Plan, LMWAP, the SCAG 2024-2050 RTP/SCS, 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	Less-than-Significant Impact	**N/A**	N/A	N/A	N/A

Summary of Impacts	Significance Determination	Mitigation Measures (MM) and Regulatory Requirements (RR)	Responsible Parties	Monitoring Parties	Implementation Stage
than significant. Threshold b.: 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.	No Impact				
4.12 Mineral Resources					
Threshold a.: 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 b.: 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.: 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.: The Project would not expose people or property to hazards from proposed, existing, or abandoned quarries or mines, and no impact would occur.	No Impact No Impact No Impact No Impact	**N/A**	N/A	N/A	N/A
4.13 Noise					
Threshold a.: The Project site occurs approximately 4.5 miles west of the MARB/IPA, and is located within the AIA for this facility. According to the ALUCP prepared for the MARB/IPA, the Project site occurs within Compatibility Zone "D," which the ALUCP indicates is "mostly within the 55-CNEL contour." According to Table 2B of the Countywide ALUCP Policy Document, the Project's residential land uses are considered "clearly acceptable" with exterior noise levels	Less-than-Significant Impact	**MM 4.13-1** Prior to approval of any grading permits that require blasting activities and a blasting permit, the Project Applicant shall prepare and submit for County review and approval of a Blasting Noise and Vibration Monitoring and Abatement Plan ("Noise and Vibration Abatement Plan"). The required Noise and Vibration Abatement Plan shall include the name and qualifications of the person(s) responsible for monitoring and reporting blast vibrations. In addition, the Noise and Vibration Abatement Plan shall require a minimum of three seismographs for monitoring peak ground vibration and air-overpressure. The Noise and Vibration Abatement Plan also	Project Applicant, Construction Contractors	Riverside County Building and Safety Department	Prior to issuance of grading permits

Summary of Impacts	Significance Determination	Mitigation Measures (MM) and Regulatory Requirements (RR)	Responsible Parties	Monitoring Parties	Implementation Stage
below 55 dBA CNEL, and are considered "normally acceptable" with exterior noise levels up to 60 dBA CNEL. These noise compatibility levels also are consistent with Table N-1 of the General Plan Noise Element. Therefore, because the Project's proposed residential uses would not be exposed to airport-related noise levels exceeding 60 dBA CNEL, the Project would not expose people residing or working in the Project area to excessive airport-related noise levels, and impacts would be less than significant. Threshold b.: The nearest private airstrip to the Project site is the Perris Valley Airport, located approximately 10.9 miles southeast of the Project site. According to the ALUCP prepared for the Perris Valley Airport, the Project site is located well outside of the 55 dBA CNEL contour for this facility. As indicated under the analysis of Threshold a., the Project's residential land uses are considered "clearly acceptable" with exterior noise levels below 55 dBA CNEL. As such, the Project would not expose people residing or working in the Project area to excessive noise levels associated with private airstrips, and impacts would therefore be less than significant. Threshold c.: The maximum Project-related noise levels from typical construction activities would be 61.3 dBA Leq at the nearest sensitive receptor, which is well below the threshold of significance of 80 dBA Leq; thus, noise impacts during typical construction activities would be less than significant. During blasting activities, the nearest sensitive receptor would be exposed to blasting-related noise levels up to 70.2 dBA Lmax, which would not exceed the OSMRE and CFR lowest maximum Airblast Limit (30 CFR 816.67(b)) of 129 dBA Lmax; thus, noise from Project-related blasting activities would	Less-than-Significant Impact Less-than-Significant Impact	shall require that equipment and its use shall conform fully to the standards developed by the Vibration Section of the International Society of Explosive Engineers (ISEE). For all blasts, the Noise and Vibration Abatement Plan shall require monitoring of ground motion and air-overpressure at the nearest residential properties or other structure of concern. The Noise and Vibration Abatement Plan also shall specify a minimum trigger level for monitoring of 0.05 in/s for ground motion and 120 dB for air-overpressure. Additionally, the Noise and Vibration Abatement Plan shall require regular reporting of blasting and measurements to Riverside County, and shall include a copy of the instrument/software-generated blast monitoring report at each instrument location that includes measured peak particle velocity in inches per second, peak air-overpressure in linear-scale decibels, and vibration and air-overpressure event plots, with date and time of event recording. In addition, the Noise and Vibration Abatement Plan shall include the following requirements: • Prior to commencement of any blasting, a pre-blast survey of the conditions of all existing property and aboveground utilities located within 300 feet of any potential blasting areas shall be conducted. The pre-blast survey shall include a photographic record of all visible and accessible structures, facilities, utilities, or other improvements. The survey shall document the interior and exterior conditions of all residential property and associated structures located within 500 feet of blasting areas. If property owners refuse surveys, provide copies of certified-mail letters documenting attempts to provide the survey by a third-party professional survey company. The required surveys shall include a description of the interior and exterior condition of the various structures examined. Descriptions shall include the locations of any cracks, damage, or other existing defects and shall include information needed to identify and describe the defect, if any, and to evaluate the construction operations on the defect. Survey records shall include photos of all cracks and other damaged, weathered, or otherwise deteriorated structural conditions. If necessary, macro lenses and flash illumination shall be used to ensure defects are shown clearly in the photographs.			

Summary of Impacts	Significance Determination	Mitigation Measures (MM) and Regulatory Requirements (RR)	Responsible Parties	Monitoring Parties	Implementation Stage
be less than significant. Accordingly, Project construction-related noise impacts would be less than significant. Noise from long-term Project operations would not exceed the identified thresholds of significance at the nearest sensitive receptor of 55 dBA Leq during daytime hours and 45 dBA Leq during nighttime hours, and the Project-related noise level increase would not exceed the identified threshold of significance of 5.0 dBA Leq. Accordingly, noise from long-term Project operations would be less than significant at all sensitive receptor locations. With the addition of Project traffic, sensitive receptors along the roadway segment of Gamble Avenue south of Iris Avenue would be exposed to traffic-related noise of 52.6 dBA, while noise levels up to 60 dBA CNEL are considered "Normally Acceptable" for residential uses. Project off-site traffic noise level increases would range from -0.5 to 0.8 dBA CNEL under EAPC 2027 traffic conditions and from -0.5 to 6.1 dBA CNEL under Horizon Year 2045 conditions Project -related traffic noise increases under EAPC 2027 and Horizon Year 2045 would be less than significant. Analysis shows that future interior noise levels for homes along Chicago Avenue and Iris Avenue could exceed the County's interior noise standard of 45 dBA CNEL. The Project Applicant intends to provide each unit in the development with mechanical ventilation, thus the windows can be kept in a closed position. Based on standard construction techniques, interior noise standards can be satisfied using standard windows and construction techniques. Therefore, the Project would satisfy the County of Riverside 45 dBA CNEL interior noise level standards for residential development. <u>Threshold d.:</u> The residential uses proposed as part of the Project are not associated with	Less than Significant with Mitigation	Photos shall contain an accurate date stamp. No blasting shall occur prior to completion of surveys of surrounding residential properties. Surveys also shall be repeated at facilities or properties where damage concerns have been expressed by individual residents, property owners, or other concerned parties. Details of any observed changes to surveyed structures and documenting photos shall be reported and submitted to Riverside County. • Blasting only shall be allowed Monday through Friday only between the hours of 8:00 a.m. and 5:00 p.m. • No blasting shall occur closer than 100 feet from residential structures. In the event that non-rippable materials are encountered within 100 feet from any residential structure, alternative methods shall be employed to reduce blasting-related noise and vibration impacts. Alternative rock blasting within 100 feet of residential homes may include methods such as the drilling of holes in the largest area of rock, inserting expansive grout or small charges into each whole to fragment the rock into smaller pieces, and then crushing the pieces for transport or other use. • No more than a total of 2,000 pounds of explosive shall be detonated each day, excluding detonators. • All blasts located within 500 feet of any structures or above ground utilities shall be covered with woven steel cable or steel-cable and rubber-tire blasting mats with a minimum weight of 30 pounds per square foot. Woven polypropylene or similar weed-barrier fabric, covered with at least 6 inches of soil or sand shall be placed over blast areas to protect initiators before mats are placed. Mats shall be overlapped at least 3 feet and shall completely cover the blast area and extend at least three feet beyond the blast area in all directions. If any flyrock or blasted material is thrown more than 10 feet or half the distance to the nearest structure, whichever is less, blasting shall be suspended until the County's has approved a revised blasting plan showing revisions to assure adequate ground movement control. • Before blasts are covered, all loose soils above the blast shall be removed where feasible. Remaining ground located within 20 feet of the blast shall be			

Summary of Impacts	Significance Determination	Mitigation Measures (MM) and Regulatory Requirements (RR)	Responsible Parties	Monitoring Parties	Implementation Stage
excessive ground-borne vibration or ground-borne noise levels; thus, impacts due to excessive ground-borne vibration or ground-borne noise levels would be less than significant under long-term operating conditions. Construction vibration velocity levels are estimated to range from less than 0.01 to 0.01 in/sec PPV and would not exceed the County of Riverside threshold of 0.04 in/sec PPV at off-site receivers. In addition, vibration from rock crushing activities on site during Project construction at the nearest sensitive receptor would be below 0.01 PPV (in/sec) and would remain below the County of Riverside 0.04 in/sec PPV threshold for vibration; thus, vibration impacts from rock crushing activities would be less than significant. However, determining the vibration levels from the blasting operations at the Project site is difficult due to the variability of conditions at the site, and the precise amount of blasting that would be required won't be known until grading activities at the Project site commence. Without controls, vibration from blasting could exceed the identified threshold of significance of 0.04 in/sec PPV at any distance. This is conservatively evaluated as a potentially significant direct and cumulatively-considerable impact. Implementation of MM 4.13-1 would ensure that all future blasting activities occur on site in conformance with a County-approved blasting Noise and Vibration Abatement Plan. The mitigation would ensure that any potentially affected structures or utilities would be subject to inspections prior to commencement of any blasting activities, and additional surveys would be required where damage concerns have been expressed and would impose restrictions on blasting activities within 100 feet and within 500 feet of residential structures, and would require monitoring of vibration levels during	Incorporated	thoroughly wetted with water to suppress airborne dust. Sand or soils placed over weed-barrier fabric shall be similarly wetted before placing blast mats. • If specified vibration limits are exceeded, blasting operations shall cease immediately and a revised blasting plan shall be submitted to the County. Blasting shall not resume until a revised blasting plan has been reviewed and the Contractor has expressed in writing the conditions that will be applied to further blasting work. Project grading and blasting contractors shall be required to ensure compliance with the Noise and Vibration Abatement Plan requirements and shall permit periodic inspection of the construction site by County of Riverside staff or its designee to confirm compliance. The requirements of the Noise and Vibration Abatement Plan also shall be specified in bid documents issued to prospective construction contractors. Riverside County shall review all monitoring reports to ensure compliance with the Noise and Vibration Abatement Plan, and shall have the authority to stop all blasting activities on site if it is determined that blasting activities are not being conducted in conformance with Noise and Vibration Abatement Plan and/or the above-listed requirements.			

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blasting.MM 4.13-1 would ensure that vibration-related impacts during construction-related blasting activities do not adversely affect any existing structures, and would reduce blasting-related vibration impacts to less-than-significant levels.					
4.14 Paleontological Resources					
Threshold a.: The Project would not impact any known paleontological resources or unique geological features. However, there is a remote potential that fossils may be discovered during grading and earthmoving activities. This is considered a potentially significant impact on both a direct and cumulatively-considerable basis. Although not anticipated, in the remote event that paleontological resources are uncovered during grading and earthmoving activities, MM 4.14-1 would ensure that the area where the resource(s) was identified is subject to monitoring, and would further ensure that any uncovered fossils are appropriately treated. With implementation of MM 4.14-1, the Project's potential impacts to previously-undiscovered paleontological resources would be reduced to less-than-significant levels.	Less than Significant with Mitigation Incorporated	**MM 4.14-1** Prior to grading permit issuance, the Riverside County shall verify that the following applicable notes are included on the grading plans. Project contractors shall be required to ensure compliance with these notes and permit periodic inspection of the construction site by Riverside County staff or its designee to confirm compliance. These notes also shall be specified in bid documents issued to prospective construction contractors. These requirements only shall apply in the event that a paleontological resource(s) is uncovered during Project grading and earthmoving activities. 1. *If paleontological resources are discovered during earth disturbance activities, the discovery shall be cordoned off with a 100-foot radius buffer so as to protect the discovery from further potential damage, and a county-qualified paleontologist shall be consulted to assess the discovery. If the discovery is determined to be significant by the paleontologist, a Mitigation Monitoring and Reporting Program (MMRP) shall be initiated, which shall include notification of appropriate personnel involved and monitoring of earth disturbance activities:* a. *If a paleontological resource(s) are uncovered, monitoring of mass grading and excavation activities in areas identified as likely to contain paleontological resources shall be performed by a qualified paleontologist or paleontological monitor. Monitoring shall be conducted full-time in areas of grading or excavation in undisturbed sedimentary deposits.* b. *Paleontological monitors shall be equipped to salvage fossils as they are unearthed to avoid construction delays. The monitor must be empowered to temporarily halt or divert equipment to allow removal of abundant or*	Project Applicant, Construction Contractors	Riverside County Planning Department, Riverside County Building and Safety Department	Prior to issuance of grading permit

Summary of Impacts	Significance Determination	Mitigation Measures (MM) and Regulatory Requirements (RR)	Responsible Parties	Monitoring Parties	Implementation Stage
		large specimens in a timely manner. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface, or, if present, are determined on exposure and examination by qualified paleontological personnel to have low potential to contain fossil resources. The monitor shall notify the project paleontologist, who will then notify the concerned parties of the discovery. *c. Paleontological salvage during trenching and boring activities is typically from the generated spoils and does not delay the trenching or drilling activities. Fossils shall be collected and placed in cardboard flats or plastic buckets and identified by field number, collector, and date collected. Notes shall be taken on the map location and stratigraphy of the site, which is photographed before it is vacated, and the fossils are removed to a safe place. On mass grading projects, discovered fossil sites shall be protected by flagging to prevent them from being overrun by earthmovers (scrapers) before salvage begins. Fossils shall be collected in a similar manner, with notes and photographs being taken before removing the fossils. Precise location of the site shall be determined with the use of handheld GPS units. If the site involves remains from a large terrestrial vertebrate, such as large bone(s) or a mammoth tusk, that is/are too large to be easily removed by a single monitor, a fossil recovery crew shall excavate around the find, encase the find within a plaster and burlap jacket, and remove it after the plaster is set. For large fossils, use of the contractor's construction equipment may be solicited to help remove the jacket to a safe location.* *d. Isolated fossils shall be collected by hand, wrapped in paper, and placed in temporary collecting flats or five-gallon buckets. Notes shall be taken on the map location and stratigraphy of the site, which is photographed before it is vacated, and the fossils are removed to a safe place.* *e. Particularly small invertebrate fossils typically represent multiple specimens of a limited number of organisms, and a scientifically*			

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		suitable sample can be obtained from one to several five-gallon buckets of fossiliferous sediment. If it is possible to dry screen the sediment in the field, a concentrated sample may consist of one or two buckets of material. For vertebrate fossils, the test is usually the observed presence of small pieces of bones within the sediments. If present, as many as 20 to 40 five-gallon buckets of sediment can be collected and returned to a separate facility to wet-screen the sediment. *f. In accordance with the "Microfossil Salvage" section of the Society of Vertebrate Paleontology guidelines (2010:7), bulk sampling and screening of fine-grained sedimentary deposits (including carbonate-rich paleosols) must be performed if the deposits are identified to possess indications of producing fossil "microvertebrates" to test the feasibility of the deposit to yield fossil bones and teeth.* *g. In the laboratory, individual fossils shall be cleaned of extraneous matrix, any breaks shall be repaired, and the specimen, if needed, shall be stabilized by soaking in an archivally approved acrylic hardener (e.g., a solution of acetone and Paraloid B-72).* *h. Recovered specimens shall be prepared to a point of identification and permanent preservation (not display), including screen-washing sediments to recover small invertebrates and vertebrates. Preparation of individual vertebrate fossils is often more time-consuming than for accumulations of invertebrate fossils.* *i. Identification and curation of specimens into a professional, accredited public museum repository with a commitment to archival conservation and permanent retrievable storage (e.g., Western Science Center [WSC], Natural History Museum of Los Angeles County [LACM], San Diego Natural History Museum [SDNHM], San Bernardino County Museum [SBCM], or Riverside Municipal Museum [RMM]) shall be conducted. The paleontological program shall include a written repository agreement prior to the initiation of*			

Summary of Impacts	Significance Determination	Mitigation Measures (MM) and Regulatory Requirements (RR)	Responsible Parties	Monitoring Parties	Implementation Stage
		mitigation activities. Prior to curation, the lead agency (i.e., Riverside County) shall be consulted on the repository/museum to receive the fossil material. j. *A final report of findings and significance shall be prepared, including lists of all fossils recovered and necessary maps and graphics to accurately record their original location(s). The report, when submitted to, and accepted by, the appropriate lead agency, shall signify satisfactory completion of the Project program to mitigate impacts to any potential nonrenewable paleontological resources (i.e., fossils) that might have been lost or otherwise adversely affected without such a program in place.*			
4.15 Population and Housing					
Threshold a.: Implementation of the proposed Project would result in the demolition of this existing home. However, as part of the Project a total of 231 single-family homes would be constructed on site, which would more than offset the loss of one single-family residence. Additionally, because there is only one single-family home on site under existing conditions, the Project would not displace "substantial" numbers of existing people or housing. As such, the Project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere, and no impact would occur.	No Impact	**N/A**	N/A	N/A	N/A
Threshold b.: The Project would entail development of the 140.8-acre Project site with 231 single-family homes, thereby accommodating new housing opportunities within the County. The Project does not include any land uses, such as commercial retail or light industrial land uses, that would generate new employees or an increased demand for additional housing. Therefore, the Project would not create a demand for additional housing, particularly housing affordable to	No Impact				

Summary of Impacts	Significance Determination	Mitigation Measures (MM) and Regulatory Requirements (RR)	Responsible Parties	Monitoring Parties	Implementation Stage
households earning 80% or less of the County's median income, and no impact would occur. Threshold c.: Population growth on-site would not be substantial within the overall scale of unincorporated Riverside County or the various jurisdictions within the SCAG region. The increase in population associated with the proposed Project has been addressed under the relevant issue areas identified throughout this EIR. Under each of these topics, Project-related impacts are determined to be less than significant, or mitigation measures have been imposed to reduce impacts to the maximum feasible extent. There are no components of the proposed population increase that have not already been addressed and accounted for throughout this EIR for the Project site. Therefore, the proposed Project would not directly or indirectly induce substantial unplanned population growth in the area or otherwise result in growth that would result in significant adverse environmental effects not already addressed throughout this EIR. Additionally, the Project's proposed roadway and other infrastructure (e.g., water, sewer, etc.) improvements have been designed and sized to serve the proposed Project, and would not indirectly induce growth in the local area. Thus, a less-than-significant impact would occur.	Less-than-Significant Impact				
4.16 Public Services					
Threshold a.: With payment of mandatory DIF fees, the proposed Project's potential direct and cumulatively-considerable impacts to the Riverside County Fire Department would be reduced to less-than-significant levels, and the Project would not result in or require the construction of new fire protection facilities that could result in a significant impact to the environment.	Less-than-Significant Impact	**RR 4.16-1:** As a condition of Project approval, the proposed Project would be required to conform to all mandatory local, State, and federal laws, ordinances, and standards relating to fire safety. Among other items, these requirements include conformance with the Uniform Building Code Section 1503, which requires that all buildings be constructed with fire retardant roofing material, as well as standard Riverside County Fire Department conditions of approval (COAs) for specific plans, which prohibit flag lots and require alternative/secondary access routes to neighborhoods. The	N/A	N/A	N/A

Summary of Impacts	Significance Determination	Mitigation Measures (MM) and Regulatory Requirements (RR)	Responsible Parties	Monitoring Parties	Implementation Stage
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	alternative/secondary access routes would be required to be maintained throughout construction and buildout of the proposed Project. **RR 4.16-2:** The Project would be required to adhere to Riverside County Ordinance No. 659, which requires payment of a development impact fee (DIF) to assist the County in providing for fire protection facilities (including fire stations), sheriff protection facilities (including sheriff stations), library facilities, and health facilities.			
Threshold c.: The Project would generate approximately 124 students on an annual basis. Although the RUSD may need to construct new school facilities to meet the growing demand within this part of Riverside County, the payment of mandatory school impact fees would ensure that the Project would not result in significant direct or cumulatively-considerable impacts to the ability of the RUSD to provide for school services. As such, the Project impacts would be less than significant.	Less-than-Significant Impact	**RR 4.16-3:** The Project is required to comply with Riverside County Ordinance No. 575, which requires mandatory payment of school impact fees pursuant to Public Education Code § 17072.10-18.			
Threshold d.: 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 environment.	Less-than-Significant Impact				
4.17 Recreation					
Thresholds a. and d: The physical construction	Less-than-Significant	**RR 4.17-1:** Prior to the issuance of building permits,	N/A	N/A	N/A

Summary of Impacts	Significance Determination	Mitigation Measures (MM) and Regulatory Requirements (RR)	Responsible Parties	Monitoring Parties	Implementation Stage
of the on-site recreational facilities has been addressed under the relevant issue areas identified throughout this EIR. 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 planned recreational facilities on site that have not already been addressed and accounted for throughout this EIR. Accordingly, Project impacts due to parkland development on site would be less than significant, requiring no mitigation beyond that which is identified in other portions of this EIR.	Impact	Riverside County shall verify that the Project has met the requirements of Section 10.35 of Riverside County Ordinance No. 460, which specifies requirements related to parkland dedications and payment of fees in lieu of parkland dedication.			
Thresholds b. and c.: The Project Applicant would be required to pay fees pursuant to Section 10.35 of Ordinance No. 460, which would provide funding to allow Riverside County to acquire and/or improve new parkland within the County. Thus, impacts due to a conflict with Riverside County's parkland dedication requirements would be less than significant. Additionally, any increase in the use of existing recreational facilities within the County by future Project residents would be off-set by existing County residents utilizing the Project's proposed recreational amenities and/or the recreational amenities to be accommodated by the Project Applicant's payment of in-lieu fees pursuant to Ordinance No. 460. Thus, the Project would not include the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated, and impacts would be less than significant.	Less-than-Significant Impact				
4.18 Transportation					
Threshold a.: The proposed Project would be fully consistent with Connect SoCal, the Riverside County CMP, and the Riverside	Less-than-Significant Impact	**RR 4.18-1:** Prior to issuance of building permits, the Project Applicant shall pay appropriate Development Impact Fee Program (DIF) fees at the rates then in effect in accordance	As specified by Ordinance No. 659	As specified by Ordinance No. 659	As specified by Ordinance No. 659

Summary of Impacts	Significance Determination	Mitigation Measures (MM) and Regulatory Requirements (RR)	Responsible Parties	Monitoring Parties	Implementation Stage
County General Plan Circulation Element. 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.		with Riverside County Ordinance No. 659. **RR 4.18-2:** Prior to final building inspection, the Project Applicant shall pay appropriate Western Riverside County Transportation Uniform Mitigation Fee Program Ordinance (TUMF) fees at the rates then in effect in accordance with Riverside County Ordinance No. 824.	As specified by Ordinance No. 824	As specified by Ordinance No. 824	As specified by Ordinance No. 824
Threshold b.: Buildout of the residential uses proposed as part of the Project would result in a VMT per capita that is 30.8% above the County's VMT per capita threshold of significance. Therefore, the Project would conflict with or be inconsistent with CEQA Guidelines § 15064.3(b), which represents a significant of the proposed Project. TDM strategies have been evaluated for the purpose of reducing VMT impacts determined to be potentially significant through use of the CAPCOA 2021 Handbook. For residential land use projects, the 2021 Handbook provides a list of Neighborhood Design measures that reduce VMT. However, the maximum achievable reduction for these measures as noted in the 2021 handbook is limited to 10%. Therefore, even with implementation of all feasible trip reduction measures, including those listed in MM 4.18-2, the Project would be unable to reduce its VMT impact to below the impact threshold. It is also recognized that as the Project area and surrounding communities develop as envisioned under the County of Riverside's General Plan, new residential, retail, and other development would be implemented. These actions could collectively alter transportation patterns, improve the region's jobs/housing ratio, reduce VMT, and support implementation of new or alternative TDM measures. There are no means currently, however, to quantify any VMT reductions that could result from such future growth patterns. Project impacts would be significant and	Significant and Unavoidable Impact	**RR 4.18-3**: Prior to final building inspection for each phase of the proposed Project, the Project Applicant shall make fair-share contributions towards required transportation improvements, in accordance with Table 1-3 of the Project's Traffic Analysis (*Technical Appendix K2* to this EIR). **MM 4.18-1** Prior to the issuance of grading permits or improvement plans affecting Iris Avenue or Chicago Avenue, 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 (CMUTCD). 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** Prior to issuance of building permits for each phase of the proposed development, Riverside County shall review the building plans to ensure that the following measures have been accommodated by the Project: a) The Project shall provide pedestrian and bicycle network improvements within the development connecting to existing off-site facilities. b) The Project shall incorporate bicycle lanes, routes, and shared-use paths into street systems, new subdivisions, and large developments.	Project Applicant Project Applicant, Construction Contractors Project Applicant	Planning Department, Building and Safety Department Riverside County Building and Safety Department Riverside County Building and Safety	Prior to final building inspection Prior to issuance of grading permits or improvement plans Prior to issuance of building permits for each phase of the proposed development

Summary of Impacts	Significance Determination	Mitigation Measures (MM) and Regulatory Requirements (RR)	Responsible Parties	Monitoring Parties	Implementation Stage
unavoidable.					
Threshold c: All physical improvements planned as part of the Project would be in conformance with applicable Riverside County standards, and the Project's residential land uses are compatible with land uses in the surrounding area. The Project would not substantially increase hazards due to a geometric design feature or due to incompatible land uses. Impacts would be less than significant.	Less-than-Significant Impact				
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 use. 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				
Threshold e.: The Project has the potential to adversely impact circulation in the local area during the construction of frontage improvements along roads abutting the Project site (i.e., Iris Avenue and Chicago Avenue). The Project's potential impacts to circulation along abutting roads during construction is conservatively evaluated as a significant impact for which mitigation would be required. 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 public roadways (Iris Avenue and Chicago Avenue). Implementation of the	Less than Significant with Mitigation Incorporated				